

FY22 (FFY21) ANNUAL ACTION PLAN

DRAFT

MARCH 24, 2021

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

JULY 1, 2021 – JUNE 30, 2022

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 the WestMetro HOME Consortium presents the FY22 (FFY21) Annual Action Plan, detailing the allocation of CDBG, HOME, and ESG funds for the period of July 1, 2021 through June 30, 2022.

FY22 (FFY21) FEDERAL FUNDING AMOUNTS

Community Development Block Grant (CDBG)	\$1,935,056.00
HOME Investment Partnerships Program (HOME)	\$1,491,865.00
Emergency Solutions Grant (ESG)	\$164,708.00
Total	\$3,591,629.00

COMMUNITY DEVELOPMENT BLOCK GRANT

Based on the priorities, needs and goals identified in the FY21-25 Consolidated Plan, the City of Newton has allocated FY22 (FFY21) CDBG funds into four general categories:

- **Affordable Housing** (\$1,162,800 or 60% of CDBG funding), for housing program delivery, housing rehabilitation, and site acquisition and improvements related to the construction of new affordable units for low- and moderate-income households.
- **Human Service** (\$290,258 or 15% of CDBG funding), to provide grants for a total of thirteen human service projects through 13 sub-grantee agencies during FY22.
- **Architectural Access** (\$95,000 or 5% of CDBG funding), to construct an accessible pathway along the perimeter of Richard McGrath Park.
- **Program Administration** (\$386,998 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 FY22, the Consortium will begin to implement the recommended actions in the recently updated [Analysis of Impediments to Fair Housing Choice report](#).

Affordable Housing

Approximately 60 percent of FY22 CDBG funding (\$1,162,800) plus \$42,250 in estimated FY22 (FFY21) program income, for a total of \$1,205,050, 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

Production of New Affordable Housing Units

In FY22 (FFY21), 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.

There are two projects receiving prior years CDBG and HOME funds from the City that will begin construction this spring, 2021. The first is the Newton Housing Authority's (NHA) Haywood House project. Haywood House received FY20 and FY21 CDBG funds to create 55 new affordable rental units for seniors. The income eligibility will range from 30% AMI and 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). Construction will begin Spring 2021.

The second project is the expansion of the Golda Meir House owned, developed, and managed by 2Life Communities. In FY21, the project was awarded FY18, FY20, and FY21 HOME funds to support the new construction of 68 affordable rental units for seniors with incomes ranging from 30% AMI and up to 99% AMI, including 9 units for chronically homeless adults with disabilities. 2Life Communities is a nonprofit, nonsectarian provider of senior supportive housing in the Greater Boston area. Since 1965, 2Life has created over 1,500 affordable homes for low-income older adults in Brighton, Newton and Framingham, all of which are owned, managed and serviced by 2Life. The project will close on its Low Income Tax Credit Award in late FY21 and construction will begin in Spring of 2021.

In FY22, 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. In FY20, the City Council began 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 hired an affordable housing development consultant team to conduct this detailed study. The consultant completed and submitted its study to the City in FY21. After reviewing the report, the City Council closed its Reuse Process and recommended to the Mayor that the City purchase the Armory from the Commonwealth for 100% affordable housing. The City is working with the housing consultant to release a Request for Proposals in late FY21 / early FY22 to identify an appropriate affordable housing developer to develop and manage the site.

Preservation of Affordable Units

In FY20 (FFY19), the Newton Housing Authority received funding approval from the City's Planning and 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 and Development Board voted to approve \$1,200,000 of CDBG funds (a combination of FY19, FY20 and FY21 funds) to support the acquisition and rehabilitation of the portfolio. The \$1,200,000 in CDBG funds will be used to reduce the portfolio's existing debt (\$648,648) and to fund capital needs improvements across the 12 sites (\$551,352). In FY21 (FFY20), the Newton Housing Authority officially closed on the acquisition of the portfolio. During the closing process, CAN-DO added an additional property, 236 Auburn Street, to the sites to be acquired by the NHA. This increased the acquisition to 36 units across 13 scattered sites, 33 units of which were financed by CDBG funds. The rehabilitation of the portfolio will begin in FY21 and continue into FY22. 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 the preservation of the CAN-DO portfolio, the City will also preserve affordable senior housing at 2Life Communities' Coleman House with FY21 CDBG funds (\$411,898) and FY22 HOME funds (\$119,155), which were pre-committed by the Planning & Development Board at their January 12, 2021 meeting. In addition, the WestMetro HOME Consortium awarded the project a total of \$418,519 of combined FY19, FY20, and FY21 Consolidated Pool funds. The funds will be used to conduct a comprehensive rehabilitation to building mechanical systems and infrastructure, as well as accessibility design upgrades to each of the 146 units. The improvements will make the project more efficient and environmentally sustainable for the next several decades, as well as improving the quality of life for senior residents. Construction is slated to commence at the end of FY21 and continue through FY23.

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 one income-eligible homebuyer will be assisted through the CDBG Downpayment/ Closing Cost Assistance program in FY22.

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. Through FY22 and prior year funding, it is anticipated that approximately three units of homeowner housing will be rehabilitated through CDBG assistance and 21 rental units, which are included in the acquisition of CAN-DO's portfolio of rental properties, as mentioned above.

In FY21 the City awarded the Newton Housing Authority (NHA) a total of \$1,200,000 in combined FY19, FY20, and FY21 CDBG funds to acquire and rehabilitate the 33-unit affordable housing portfolio of Citizens for Affordable Housing in Newton Development Organization (CAN-DO). These units were originally placed in jeopardy when CAN-DO disaffiliated from its management partner, Metro West Collaborative Development, in 2018. In FY21, the NHA acquired and preserved these 33 units with the support of \$648,648 in CDBG funds. This year (FY22), the City will complete work on 21 of these units through the Housing Rehabilitation program, utilizing \$551,352 in CDBG funds.

Human Services / Public Services

HUD caps the human service allocation at 15 percent of the City's total annual CDBG grant. As a result, \$290,258 plus \$6,492 in FY21 program income, for a total of \$296,750 will be made available for the FY22 Human Service program.

The FY22 (FFY21) Human Service Request for Proposals (RFP) was released on January 6, 2021, 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, as well as a representative from the Mayor’s Office. Subsequently, the review committee consulted with two representatives of the Planning and Development Board. Proposals were ranked on March 4, 2021 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 17 proposals, 13 of which will be awarded Human Service grants during the FY22 (FFY21) 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.

FY22 Human Service Program Allocations				
Agency	Program	FY22 Award	FY21 Awards	% Change
West Suburban YMCA	Childcare Financial Aid Program	\$50,000.00	\$0.00	n/a
Riverside Community Care	Mental Health Services Promoting Self-Sufficiency	\$40,000.00	\$50,000.00	-20%
Newton Community Development Foundation	Resident Services Program	\$25,000.00	\$31,000.00	-19%
Newton Housing Authority	Resident Services Program	\$25,000.00	\$33,410.00	-25%
The Second Step	Community Programs for Adult Survivors of Domestic Violence	\$25,000.00	\$35,000.00	-29%
Family ACCESS	Social Mobility for Young Families	\$24,000.00	\$48,000.00	-50%
2Life Communities (formerly JCHE)	CaringChoices and Wellness Nursing for Low-Income Seniors	\$20,000.00	\$15,000.00	33%

FY22 Human Service Program Allocations (continued)				
Agency	Program	FY22 Award	FY21 Awards	% Change
Newton Dept. of Parks, Recreation, and Culture	Financial Aid for Youth Summer Camp	\$18,850.00	\$0.00	n/a
John M. Barry Boys & Girls Club of Newton	Financial Aid for Teens and Families	\$17,000.00	\$17,000.00	0%
Horace Cousens Industrial Fund	Emergency Grants for Vulnerable Individuals and Families	\$15,000.00	\$12,000.00	25%
Jewish Family and Children's Services	Stabilization and Recovery Services	\$14,900.00	\$15,408.00	-3%
Plowshares Education Development Center	Tuition Assistance for Pre-School and School-Age Care	\$12,000.00	\$15,000.00	-20%
Barry L. Price Rehabilitation Center	Promoting Successful Life Transition for Adults with Intellectual and Developmental Disabilities	\$10,000.00	\$15,000.00	-33%
TOTAL		\$296,750.00	\$309,698.00	

Architectural Access

Approximately 5 percentage of CDBG funding (\$95,000) will be allocated toward the creation of an accessible pathway along the perimeter of Richard McGrath Park. In addition, other architectural access projects are underway, including an accessible path connecting Auburndale Cove and Lyons Field, referred to as Phase I of the Marty Sender Path. This project is expected to be bid out in the Spring of 2021 for summer construction. The FY21 Curb Cut project, which includes the upgrade and installation of four curb cuts at Watertown Street and Edinboro Street and Watertown Street and West Street, is expected to start construction this Spring 2021. Both projects were recommended by the Commission on Disability in FY21 (FFY20).

Program Administration

HUD caps the program administration allocation at 20 percent of the City's total annual CDBG grant. As a result, \$386,998 plus an estimated \$13,000 in program income, for a total of \$399,998, 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 \$1,491,865. 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 FY22:

- **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 49 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 rental housing units in Brookline. Additionally, as mentioned above, FY22 HOME funds will be used to support the preservation of 146 units at 2Life Communities' Coleman House in Newton. This project is expected to be complete in FY23.
- **Production of Affordable Units**
Construction of 12 HOME-assisted rental units will be complete in FY22. Eleven of these units are part of Brookline's 370 Harvard Street project and one unit will be created through Concord Housing Authority's Gerow 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 Brookline-Newton-Waltham-Watertown (BNWW) CoC. The BNWW CoC, previously led by the City of Newton, merged with the BoS CoC in December of 2016. On January 29, 2021, HUD awarded the BoS CoC a total of \$18,845,535 in FFY21 funds, a 5.5% increase from the prior year largely due to the increase in Fair Market Rents (FMR). From that

total, the BNWW region received \$2,105,894 for four projects across three sub-grantee agencies, including Advocates, Pine Street Inn, and The Second Step.

The City of Newton's 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 BNWW region. On December 8, 2020, prior to the release of the RFP, Division staff consulted with former BNWW CoC social service providers and representatives from the four municipalities and BoS CoC to determine FY22 (FFY21) ESG funding priorities across its eligible components, outlined below:

- **Emergency Shelter Services** (\$92,150 or 56%): 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** (\$40,950 or 25%): 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** (\$19,260 or 12%): funds support homeless individuals and families in moving them out of emergency shelters or places not meant for human habitation into permanent housing.

On January 6, 2021, the FY22 ESG RFP was released alongside the Human Service RFP and proposals were evaluated by a review committee comprised of representatives from the Newton Department of Planning and Development, Department of Health and Human Services, the 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 February 26, 2021 based on each project's past performance, staff capacity, target population, availability of other funding sources, and the most pressing needs in the region, which were identified in the FY21-25 Consolidated Plan. Furthermore, the review committee took into consideration the continued impacts of the coronavirus pandemic (COVID-19).

The City received six proposals from five nonprofit agencies, of which, four proposals will receive an ESG grant during the FY22 (FFY21) program year, following the recommendations of the ESG RFP Review Committee.

FY22 ESG Allocations				
Agency	Program	FY22 ESG Recommendations	FY21 ESG Awards	% Change
Emergency Shelter Services				
Community Day Center of Waltham	Day and Seasonal Night Wrap-Around Services	\$69,133.00	\$16,500.00	319%
REACH Beyond Domestic Violence	Emergency DV Shelter Operations	\$23,000.00	\$21,250.00	8%
The Second Step	Transitional Shelter Operations	\$0	\$21,250.00	-100%
Middlesex Human Service Agency	Bristol Lodge Men's and Women's Shelters	\$0	\$11,000.00	-100%
Homelessness Prevention				
Brookline Community Mental Health Center	Homelessness Prevention	\$40,936.00	\$49,670.78	-18%
Rapid Re-housing				
Brookline Community Mental Health Center	Homelessness Prevention	\$40,936.00	\$49,670.78	-18%
Program Administration				
City of Newton	Administration	\$12,375.00	\$12,580.05	-2%
TOTAL		\$164,708.00	\$167,734.00	-2%

**Brookline Community Mental Health Center was the only applicant that requested ESG funding for its Homelessness Prevention and Rapid Re-housing projects. The Second Step did not request funding for its Homelessness Prevention or Rapid Re-housing projects, as done in prior years.*

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 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 September 23, 2020. 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 FY20 (FFY19) CAPER, this hearing took place before the Planning and Development Board on October 5, 2020. 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 FY20 (FFY19) CAPER was submitted on November 2, 2020. 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 FY22 Annual Action Plan was available for public review on Wednesday 24, 2021, in advance of the virtual public hearing held by the Planning and Development Board on Monday, April 5, 2021. Detailed instructions for public participation in the meeting via ZOOM were included in the City's public hearing notice. The public comment period will begin April 5, 2021 and end Tuesday, May 4, 2020. The draft Plan will also be presented to the Zoning and Planning (ZAP) Committee of the Newton City Council on Monday, April 12, 2021.

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

To Be Completed

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

To Be Completed

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

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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 former BNWW CoC, previously led by the City of Newton, merged with the (BoS) CoC in December of 2016. The BoS CoC, under the supervision of the Massachusetts Department of Housing and Community Development, implements the continuum's homelessness strategy across 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.

In 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 FY22 (FFY21).

HUD awarded the BoS CoC a total of \$18,845,535 in FFY21 CoC funding, a 5.5% increase from the prior year largely due to the increase in Fair Market Rents (FMR). From that total, the BNWW region received \$2,105,894 for four 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 2021 Point-in-Time Count (PITC) on January 27, 2021. Data from the PITC is expected to be released as late as June of 2021.

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. On December 8, 2020, Division staff consulted with the former BNWW CoC local providers and representatives from the BoS CoC and four municipalities to finalize FY22 (FFY21) ESG funding priorities across ESG's eligible components, of which, funding was prioritized for emergency shelter, homelessness prevention, and rapid re-housing. ESG funds were not prioritized for street outreach or HMIS. The Division streamlined planning processes and released the ESG RFP alongside the Human Service RFP. This year's RFPs were available on January 6, 2021 and due February 3, 2021.

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 FY22 (FFY21) 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 FY22 Annual Action Plan.

The draft FY21 Annual Action Plan was available for public review on Wednesday 24, 2021, in advance of the virtual public hearing held by the Planning and Development Board on Monday, April 5, 2021. Detailed instructions for public participation in the meeting via ZOOM were included in the city's public hearing notice. The public is invited to submit comments on the FY22 Annual Action Plan through Wednesday, May 4, 2021. The draft Plan will also be presented to the Zoning and Planning (ZAP) Committee of the Newton City Council on Monday, April 12, 2021.

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 executive director was contacted directly to confirm ongoing programs and responses to Public Housing items.	Collaboratively develop community-wide housing goals based on community needs for inclusion in the Annual Action Plan.
Bedford Housing Partnership	Other government - Local		Housing Need Assessment	The BHT held a public meeting to review and provide input on the Annual Action Plan submission.	
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 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.
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.

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?
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 held a public meeting to review and provide input on the Annual Action Plan submission.	The anticipated outcomes of the consultation are improved coordination and the inclusion of the organization's input in the Action Plan.
Concord Housing Authority	Public Housing Authority	Public Housing Authority	Public Housing Needs	The CHA was consulted to confirm ongoing programs and responses to Public Housing items.	The anticipated outcomes of the consultation are improved coordination and the inclusion of the organization's input in the Action Plan.
FRAMINGHAM					
Framingham Housing Authority	Public Housing Authority	Housing	Public Housing Needs	Interviews	Improved coordination and the inclusion of the organization's input in the 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	

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?
MetroWest Center for Independent Living	Services- Persons with Disabilities	N/A	Housing Need Assessment	Interviews	Improved coordination and the inclusion of the organization's input in the Annual Action Plan.
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 held a public meeting to review and provide input on the Annual Action Plan submission.	The anticipated outcomes of the consultation are improved coordination and the inclusion of the organization's input in the Action Plan.
Lexington Housing Assistance Board (LexHAB)	Other government - Local		Housing Need Assessment	The LexHAB was consulted to discuss an upcoming project.	The anticipated outcomes of the consultation are improved coordination and the inclusion of the organization's input in the Action Plan.
Lexington Housing Authority	Public Housing Authority	Public Housing Authority	Public Housing Needs	The LHA was consulted to confirm ongoing programs and responses to public housing items.	The anticipated outcomes of the consultation are improved coordination and the inclusion of the organization's input in the Action Plan.
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 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		

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?
Natick Police Department	Other government - Local		Homeless Needs - Chronically homeless	Interviews and focus groups	Improved coordination and the inclusion of the organization's input in the Annual Action Plan.
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, Small Repair Grant Program and Emergency Rental Assistance Program through greater coordination among 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.
SUDBURY					
Sudbury Housing Trust	Other government - Local		Housing Need Assessment	The SHT held a public meeting to review and provide input on the Annual Action Plan submission.	The anticipated outcomes of the consultation are improved coordination and the inclusion of the organization's input in the Action Plan.
Sudbury Housing Authority	Public Housing Authority	Public Housing Authority	Public Housing Needs	The SHA was consulted to confirm ongoing programs and responses to Public Housing items.	
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.
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.
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.

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 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.
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.
Waltham Ad Hoc Committee	Other Government - Local	Other Government Agency	Housing Needs Assessment	Scheduled Public Meetings to discuss housing problems in Waltham	Acknowledging actions taken in the city to address affordable housing. Identifying needs/challenges, identifying possible solutions. To accomplish these goals, the committee cataloged relevant reports, data and documentation; reviewed the City's existing policies, engaged with housing advocates, City and state officials and subject matter experts; and researched potential improvements to the City's existing policies.
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	

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?
WAYLAND					
Wayland Housing Trust	Other government - Local		Housing Need Assessment	The WHT will consulted and provide input when new projects are identified and considering applying for HOME funds.	The anticipated outcomes of the consultation are improved coordination and inclusion of the organization's input in the Action Plan
Wayland Housing Partnership	Other government - Local		Housing Need Assessment	The WHP will consulted and provide input when new projects are identified and considering applying for HOME funds.	
Wayland Housing Authority	Public Housing Authority	Public Housing Authority	Public Housing Needs	The SHA was consulted to confirm ongoing programs and responses to Public Housing items.	Collaboratively develop community-wide housing goals based on community needs for inclusion in the 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 of the FY21-25 Consolidated Plan, in addition to the FY22 Annual Action 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	
Town-prepared Demographic, Economic and Housing Profiles	Town of Needham	
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 of the FY21-25 Consolidated Plan, in addition to the FY22 Annual Action 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 Rercreation 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 2019	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	
Watertown Housing Plan, 2020 (adopted by WHP)	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 from December through February, including the following: the Fair Housing Committee; Newton Housing Partnership; Newton Commission on Disability; 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 5, 2021. A virtual public hearing will be conducted in place of an in-person meeting due to the Coronavirus (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 22, 2021. 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 monthly.

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 2022 Annual Action 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. In addition, Brookline is poised to update the 2016 Housing Production Plan (HPP). The HPP is a robust community input exercise to identify needs, strengths, opportunities and challenges to the production and preservation of affordable housing.

On January 1, 2021, Framingham began its third year as a City. In FY20, the City established new protocols for accepting HUD funds that will continue in FY22. 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 December of 2020, the Town of Natick completed the Natick 2020 Housing Production Plan, outlining the Town's strategy for preserving and increasing the Town's affordable housing stock. In multiple public engagement events held in 2019, 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 inhabitants in various life stages. The Natick Affordable Housing Trust is reviewing the final draft and is will submit it to the Commonwealth in the Spring of 2021.

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 27, 2021 to gather input on the FY22 (FFY21) 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 FY22 (FFY21) 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	Summary of comments not accepted	Other from Mode
BEDFORD					
Public Meeting	Non-targeted/broad community	Housing Trust held a public meeting and reviewed and provided input for the AAP	None Received	N/A	N/A
BROOKLINE					
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	N/A
Public Hearing	Non-targeted broad community	Second public hearing to be at a Select Board meeting to approve Draft FY21-25 Consolidated Plan and FY22 Annual Action Plan	Meeting not held yet	N/A	N/A
CONCORD					
Public Meeting	Non-targeted/broad community	CHDC held a public meeting and reviewed and provided input for the AAP	None Received	N/A	N/A
FRAMINGHAM					
Public Hearing	Non-targeted/broad community	City Council meeting to review and approve the AAP.	Meeting not held yet	N/A	N/A
LEXINGTON					
Public Meeting	Non-targeted/broad community	Lexington Housing Partnership held a public meeting and reviewed and provided input for the AAP	None Received	N/A	N/A
NATICK					
Public Meeting	Non-targeted/broad community	20+	Preserve existing affordable housing; increase affordable homeownership & help needy elderly with affordable housing options and supportive services	N/A	NA
Public Meeting	Non-targeted/broad community	20+	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		
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	NA
NEEDHAM					
Public Meeting	Residents of Public and Assisted Housing	Meeting to be held with elected and appointed official and tenants regarding tenant needs.	Meeting not held yet	N/A	NA
NEWTON					
Public Meeting	General	8 attendees	On February 3, 2021 the Fair Housing Committee discussed FY22 AAP process, housing production and fair housing goals. Housing production included a review of a project receiving prior year federal funds and projects receiving FY22 funds. In addition, a summary of strategies that will be implemented in Year 1 of the Analysis of Impediments was discussed.	N/A	Fair Housing Committee
Public Meeting	General	13 attendees	The BNWW CoC discussed funding priorities for FY22 ESG and in a special meeting the non-recipients voted on funding priorities (December 8, 2020)	N/A	Homelessness; Brookline-Newton-Waltham-Watertown Continuum of Care
Committee Meeting	General	8 attendees	Representatives from the Housing and Community Development Division, Dept. of Health and Human Services, and the Planning and Development Board met relative to the FY22 Human Service program awards (February 23, 2021 and March 4, 2021). Discussion focused on FY22 applications, past performances, funding priorities and allocation recommendations.	N/A	Human Services RFP Review Committee
Committee Meeting	General	8 attendees	Representatives from the Housing and Community Development Division, Dept. of Health and Human Services, MA BoS CoC, and the former BNWW CoC met relative to the FY22 ESG awards (February 16, 2021 and February 26, 2021). Discussion focused on FY22 applications, past performances, funding priorities and allocation recommendations.	N/A	ESG RFP Review Committee
Committee Meeting	General	8 attendees	On January 19, 2021 the Newton Housing Partnership discussed FY22 housing projects, including funding of 2Life Communities's Coleman House Preservation Project. Fair Housing and Human Service goals were also presented to the Partnership.	N/A	Newton Housing Partnership
Public Meeting	General	12 attendees	The COD discussed the FY22 AAP process and made a recommendation for FY22 CDBG architectural access project on January 11, 2021.	N/A	Commission on Disability
Public Hearing	General		Presentation of draft FY22 Annual Action Plan and summary of activities to be undertaken during FY22/FY21 on April 5, 2021.		P&D Review
Public Hearing	General		Presentation of draft FY22 Annual Action Plan and summary of activities to be undertaken during FY22/FY21 on April 12, 2021.		Zoning and Planning Committee
SUDBURY					
Public Meeting	Non-targeted/broad community	Sudbury Housing Trust held a public meeting and reviewed and provided input for the AAP	None Received	N/A	N/A
WALTHAM					
Public Meeting	Non Targeted Outreach	Meeting to discuss the Draft Annual Action Plan and seeking comments from community members.	Presentation of draft FY22 Annual Action Plan and summary of activities to be undertaken during FY22/FY21 on January 27, 2021.	N/A	N/A
WATERTOWN					
Public Meeting	Non-targeted/broad community	N/A	Meeting of the Watertown Housing Partnership.	N/A	N/A
WAYLAND					
Public Meeting	Non-targeted/broad community	Wayland Housing Partnership will host a public meeting to solicit feedback when new HOME projects/programs are identified	None Received	N/A	N/A

Expected Resources

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

1. Introduction

The City of Newton anticipates receiving \$3,591,629 in CDBG, HOME and ESG funds, plus an additional \$365,000 in program income, during the July 1, 2021- June 30, 2022 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 program, respondents to the City's Request for Proposals (RFP) must detail complete program costs and resources to be utilized in conjunction with the CDBG and ESG 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 grant allocations. In FY20 (FFY19), the ESG program exceeded its requirement and leveraged approximately \$1.3 million in matching funds with a combination of state and private funds. While the human services program does not have a matching requirement, in FY20 (FFY19), the program leveraged approximately \$2.9 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 agreed to use HOME funds to put together a state housing grant application to explore redevelopment possibilities at a Belmont Housing Authority state aided elderly/disabled development. However, it was determined that further analysis would be required prior to submitting an application. Unfortunately, this coincided with the pandemic outbreak and effectively halted these efforts. The Town awarded another CPA grant to the Belmont Housing Authority in the Fall 2020 which will be used to explore redevelopment opportunities at Belmont's state-aided family development. The Housing Authority will continue to pursue planning strategies using CPA funds previously awarded for the elderly/disabled development.

In FY22, the Town of Brookline will continue working on conceptual planning for two anticipated age-restricted housing development projects: the Hebrew Senior Life expansion at 108 Centre Street and the development of an affordable rental senior housing project (62+) at the Kent/Station Street Town-owned parking lot. Both projects entail the production of new affordable rental housing units targeted to very low income and low income populations. Once those projects are in the permitting stage, the Town anticipates setting aside HOME funds in order to match any municipal, state or federal funding needed, or any private investment in the form of sponsor loans, bonds or low income housing tax credit equity.

In FY22, Concord anticipates the Christopher Heights (aka Junction Village) project to be underway. The project leveraged HOME funds with extensive local, state and federal funding. These funds will exceed the HOME match requirements. Additionally, the Town of Concord will consider committing HOME funds to the Concord Housing Authority (CHA) Gerow project, the construction of one rental unit. The CHA expects to fund the project with a combination Community Preservation Act funds, CHA funds and HOME funds.

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 order to stem the housing crisis for many low and moderate income families, the City of Framingham will assist eligible households with TBRA funds to secure affordable housing. The City expects clients to use other funds to assist with moving.

The Lexington Housing Authority renovated the Pine Grove project with local support of both HOME funds and CPA funds. LexHAB is continuing to plan for a six-unit development project. This project will also primarily be funded with CPA and HOME funds.

In 2021, 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 \$320,000 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.

Needham continues to support the Needham Housing Authority efforts to modernize and redevelop existing federally-sponsored projects to address antiquated and inaccessible design issues and potential construction deficiencies. The Town committed additional CPA funding to enable the NHA to hire a development consultant to assist them in applying for necessary financing, including the RAD Program.

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. These sources provided ample HOME match funding.

Watertown will open its initial Community Preservation Act (CPA) funding round this year. The Town enacted a two percent surcharge, and has created the property assessment and taxation infrastructure to collect and sequester these funds. It presently has over \$7 million in the CPA reserve and the expected annual revenue stream is \$2 million. The CPA funds can be used in the future to leverage federal HOME funds. In addition, the Town has approximately \$269,000 in its Affordable Housing Trust Fund generated by cash-in-lieu payments for affordable Inclusionary Zoning 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 spring of 2021.

In addition, the City of Newton will support 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. Construction will commence in the Spring 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 in CDBG funds to reduce the portfolio's existing debt (\$648,648) and to fund capital needs improvements across the 12 sites (\$551,352). 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. In FY21 (FFY20), the Newton Housing Authority officially closed on the acquisition of the portfolio. During the closing process, CAN-DO added an additional property, 236 Auburn Street, to the sites to be acquired by the NHA. This increased the acquisition to 36 units across 13 scattered sites, 33 units of which were financed by CDBG funds. Although awarded prior year CDBG funds, the rehabilitation of the portfolio began in FY21 and continues into FY22. 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. In FY20, the City Council began its Real Property Reuse Process to determine the ultimate use of the site, should the city purchase the property from the Commonwealth. 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 hired an affordable housing development consultant team to conduct this detailed study. The consultant completed and submitted its study to the City in FY21. After reviewing the report, the City Council closed its Reuse Process and recommended to the Mayor that the city purchase the Armory from the Commonwealth for 100% affordable housing. The City will now work with the housing consultant to release a Request for Proposals in FY22 to identify an appropriate affordable housing developer to develop and manage the site.

The Town of Bedford conveyed a five acre property to a private developer to construct homeownership units, four of which were sold in FY20 to income eligible first time buyers.

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

The Town of Brookline owns and plans to utilize a municipal parking located at the Kent/Station Street intersection for affordable housing. The parcel is intended to be developed as a senior affordable housing development project (age-restricted), and the project was identified in the 2016 Town's Housing Production Plan as an appropriate match.

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.

The Gerow project in Concord is located on a parcel that was purchased by the Town for recreational purposes, but then later voted at town meeting to transfer a small parcel to the Concord Housing Authority for purposes of affordable housing. It is anticipated that this project will be funded in part by local HOME funds.

Needham is supporting Needham Housing Authority plans to modernize its federally-sponsored developments at Seabeds Way and Captain Robert Cook Drive.

In 2020 Waltham became the recipient of a HUD Section 108 Loan to test, cap and revitalize The City's former Woerd Avenue municipal landfill. The former landfill site is non-operational and occupies critical land in one of Waltham's lowest income neighborhoods, which is commonly referred to as the "Southern Neighborhood District" by community members.

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 FY22

Program	Source	Use of Funds	Expected Amount Available FY22 (FFY21)		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 (\$)	\$1,935,056.00	\$5,805,168.00	Please see word document for narrative.
			Program Income (\$)	\$65,000.00	\$225,000.00	
			Prior Year Resource(s)	\$6,492.00		
			Total(\$)	\$2,006,548.00	\$5,805,168.00	
HOME	public - federal	Homebuyer Assistance, and Creation and Rehabilitation of Rental Units. CHDO Operating and Administrative Funds.	Annual Allocation (\$)	\$1,491,865.00	\$4,439,145.00	Unexpended HOME PI is \$9,528.52 and HP is \$32,208.27
			Program Income (\$)	\$300,000.00	\$900,000.00	
			Prior Year Resource(s)	\$3,364,189.61		
			Total(\$)	\$5,156,054.61	\$5,339,145.00	
ESG	public - federal	Financial Assistance, Overnight Shelter, Rapid Re-housing, Rental Assistance, Homelessness Prevention Services, Transitional Housing, Street Outreach	Annual Allocation (\$)	\$164,708.00	\$494,124.00	Please see word document for narrative.
			Program Income (\$)			
			Prior Year Resource(s)			
			Total(\$)	\$164,708.00	\$494,124.00	

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 FY22 (FFY21) 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 FY22 (FFY21), 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.

There are two projects receiving prior years CDBG and HOME funds from the City that will begin construction this spring, 2021. The first is the Newton Housing Authority's (NHA) Haywood House project. Haywood House received FY20 and FY21 CDBG funds to create 55 new affordable rental units for seniors. The income eligibility will range from 30% AMI and 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). Construction will begin Spring 2021.

The second project is the expansion of the Golda Meir House owned, developed, and managed by 2Life Communities. In FY21, the project was awarded FY18, FY20, and FY21 HOME funds to support the new construction of 68 affordable rental units for seniors ranging from 30% AMI and up to 99% AMI, including 9 units for chronically homeless adults with disabilities. 2Life Communities is a nonprofit, nonsectarian provider of senior supportive housing in the Greater Boston area. Since 1965, 2Life has created over 1,500 affordable homes for low-income older adults in Brighton, Newton and Framingham, all of which are owned, managed and serviced by 2Life. The project will close on its Low Income Tax Credit Award in late FY21 and construction will begin in Spring of 2021.

In FY22, 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. In FY20, the City Council began 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 hired an affordable housing development consultant team to conduct this detailed study. The consultant completed and submitted its study to the City in FY21. After reviewing the report, the City Council closed its Reuse Process and recommended to the Mayor that the City purchase the Armory from the Commonwealth for 100% affordable housing. The City is working with the housing consultant to release a Request for Proposals 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 and 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 and Development Board voted to approve \$1,200,000 of CDBG funds (a combination of FY19, FY20 and FY21 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. In FY21 (FFY20), the Newton Housing Authority officially closed on the acquisition of the portfolio. During the closing process, CAN-DO added an additional property, 236 Auburn Street, to the sites to be acquired by the NHA. This increased the acquisition to 36 units across 13 scattered sites, 33 units of which were financed by CDBG funds. The rehabilitation of the portfolio will begin in FY21 and continue into FY22. 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 the preservation of the CAN-DO portfolio, the City will also preserve affordable senior housing at 2Life Communities' Coleman House with FY21 CDBG funds and a pre-commitment of FY22 HOME funds. The funds will be used to conduct a comprehensive rehabilitation to building mechanical systems and infrastructure, as well as accessibility design upgrades to each of the 146 units. The improvements will make the project more efficient and environmentally sustainable for the next several decades, as well as improving the quality of life for senior residents. Construction is slated to commence at the end of FY21 and continue through FY23.

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 one income-eligible homebuyer will be assisted through the CDBG Downpayment/ Closing Cost Assistance program in FY22.

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 FY22 and prior year funding, it is anticipated that approximately three units of homeowner housing will be rehabilitated through CDBG assistance and 21 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 ESG program, \$152,625 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 the Brookline-Newton-Waltham-Watertown region. The City of Newton, BoS CoC, and the BNWW representatives balanced consideration of the population's greatest needs in the immediate region, continued impacts of the coronavirus pandemic, and HUD's increased emphasis on funding for homelessness prevention and rapid re-housing assistance. During FY22 (FFY21), ESG funding will support 4 projects across 3 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 FY22 and will in turn support a number of programs designed to educate elected officials, decision makers, and the general public about these obligations.

In FY22, the City will work with the WestMetro HOME Consortium to implement the strategies of the WestMetro HOME Consortium Analysis of Impediments to Fair Housing Choice. A consultant was brought on in FY20 to assist the City and Consortium in this effort and the plan was submitted to HUD for its review in March 2021.

Goal: Provision of human services

Human service grants will support 13 public service agencies and organizations during FY22 (FFY21). A total of \$296,750 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 FY22 (FFY21) CDBG allocation, \$95,000, will be allocated toward the creation of an accessible pathway along the perimeter of Richard McGrath Park. In addition, other architectural access projects are underway, including an accessible path connecting Auburndale Cove and Lyons Field, referred to as Phase I of the Marty Sender Path. This project is expected to be bid out in the Spring of 2021 for summer construction. The FY21 Curb Cut project, which includes the upgrade and installation of four curb cuts at Watertown Street and Edinboro Street and Watertown Street and West Street, is expected to start construction this Spring 2021. Both projects were recommended by the Commission on Disability in FY21 (FFY20).

HOME Consortium Goals

Goal: Tenant Based Assistance for Rental Housing

In FY22, it is anticipated that 49 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 households into public housing.

Goal: Rehabilitation of Existing Units

In FY22, HOME funds will be used to rehabilitate three rental housing units at the Brookline Housing Authority's Morse Apartments, a 100-unit elderly, high-rise building owned by the Brookline Housing Authority. The rehabilitation of the HOME units is part of a larger effort to address all repair needs for the long-term and residents' ability to age in place as part of the HUD Rental Assistance Demonstration Program. 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 to modernize and expand a 60-unit obsolete housing development into a new 139 unit project. The Town will also support the Housing Authority as it utilizes the HUD Rental Assistance Demonstration program to preserve and modernize its federal public housing portfolio ensuring they continue to serve low-income residents into the future.

In FY22, the Natick Affordable Housing Trust will explore partnering with a nonprofit to use HOME funds to start a critical Housing Rehabilitation program for income-eligible households.

Needham continues to work with the Needham Housing Authority on potential modernization and/or redevelopment efforts to improve and expand the supply of affordable units in the community. In the coming fiscal years, Needham expects to allocate CPA and HOME funds to support these efforts.

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 12 HOME-assisted rental units will be complete in FY22. Eleven of these units will be located in Brookline and the additional unit will be part of the Concord Housing Authority's portfolio.

Brookline's 370 Harvard Street project, developed by 2LifeCommunities, is a 6-story newly constructed building with 62 units of affordable rental housing for low and moderate-income seniors. Eleven HOME-assisted units with supportive services were constructed and funded with a combination of private equity, local, state and federal funds. This project will be complete and at full occupancy in FY22.

The Concord Housing Authority (CHA) is proposing the Gerow project, which includes the construction a two-bedroom single family home next to an existing CHA single-family house on a site currently owned by the CHA. This new HOME-assisted unit will provide an opportunity for families of low to moderate income to live in Concord.

Ongoing progress

In FY22, the Town of Brookline will continue to support several important affordable senior housing projects that are underway, including a 62-unit project to be developed on a municipal parking lot in Brookline Village and the rezoning of several parcels owned by Hebrew Senior Life. This effort will support the expansion of affordable and market-rate senior housing in the Coolidge Corner neighborhood.

Concord plans to continue supporting the Junction Village affordable assisted living facility by committing \$442,943.40 in FY19, FY20 and consolidated pool HOME funds to the Junction

Village development. This project leverages \$2,000,000 in local funds and additional state and federal funding for the construction of 83 new income-restricted units of assisted living.

Lexington continues to work with the Lexington Housing Assistance Board (LexHAB) and the Lexington Housing Authority to identify potential projects. LexHAB is working on developing affordable housing on a property located at 116 Vine Street (Leary Farm). The current proposal for the project is for six units with construction anticipated to begin in 2022 and continue through 2023. The Town will work to determine the project's eligibility for HOME funds with an anticipated commitment for FY22.

The Town of Wayland will continue to make progress on efforts to developing 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.

Watertown does not have any pending HOME supported projects that will be completed in FY22 (FFY21) and expects to rely on its Inclusionary Zoning, the Affordable Housing Development Fund and Community Preservation Act funds to create additional affordable units. The Town may seek to use HOME funds in FY22 to identify and evaluate potential affordable housing sites. In addition, it is likely that an existing HOME-assisted development may apply in FY22 to use HOME funds for necessary capital improvements.

AP-20 FY22 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: \$399,998	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: \$928,560.00	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: \$276,490.00	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; acquisition of existing units	Affordable housing	2021	2025	Sustainability	Create suitable living environments	8-Rental units rehabilitated	21	8-Household housing unit
									10-Homeowner housing rehabilitated	3	10-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	23-Other - please specify	0	23-Other - please specify
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	1	23-Other - please specify
Supportive Services for Homeless and At-Risk of Homelessness	ESG: \$164,708	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	390	23-Other - please specify
Human Services	CDBG: \$296,750	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	3-Public service activities other than Low/Moderate Income Housing benefit	2,187	3-Persons assisted
Architectural Access	CDBG: \$95,000	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	1-Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	1,360	1-Persons Assisted
HOME CONSORTIUM											
Administration	HOME: \$149,186.50	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: \$1,578,583.94	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	49	12-Households Assisted
Rehabilitation of Existing Units	HOME: \$439,325.00	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	3	8-Household housing unit
									10-Homeowner housing rehabilitated	0	8-Household housing unit
Production of Affordable Units	HOME: \$539,398.40	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	12	12-Households Assisted
									9-Homeowner housing added	0	12-Households Assisted
CHDO-Set Aside	HOME: \$516,145.26	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: \$124,593.25	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 second 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, \$1,162,800 combined with \$42,250 in estimated FY22 (FFY21) program income, for a total of \$1,205,050, will be allocated to affordable housing projects to be identified during the FY22 (FFY21) 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 FY22 (FFY21). 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 \$290,258, the maximum allowed by regulation. These funds will be combined with \$6,492 in prior year program income for a total of \$296,750 to be made available for the FY22 Human Service program.

Architectural Access

Five percent of the FY22 (FFY21) CDBG allocation, \$95,000 will be allocated to the creation of an accessible pathway along the perimeter of the Richard McGarth Park.

Program Administration

Staff intends to allocate the maximum allowable amount of 20 percent for program administration, or \$386,998 combined with \$13,000 in anticipated FY22 (FFY21) program

income, for a total of \$339,998.

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 FY22

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.	\$1,205,050.00	6/30/2022	24	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 FY22 CDBG Entitlement funds (\$290,258) plus 15% of FY21 program income (\$6,492) and FY22 estimated program income (9,750).	\$296,750.00	6/30/2022	715	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 a park pathway in West Newton.	\$95,000.00	6/30/2022	444	Accessible 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.	\$399,998.00	6/30/2022	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.	\$174,986.50	6/30/2022	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.	\$1,578,583.94	6/30/2022	49	TBD
HOME Rehabilitation	N/A	Housing Rehabilitation	Funds for the rehabilitation of affordable rental units and income-eligible homeowner units.	\$439,325.00	6/30/2022	3	TBD
HOME Production of Affordable Housing		Production of Rental Units	Funds to be used for the construction of affordable housing in the Consortium	\$539,398.40	6/30/2022	11	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.	\$124,593.25	6/30/2022	1	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.	\$516,145.26	26/30/2021	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.	\$164,708.00	6/30/2022	127	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 \$1,205,050 will be available to allocate on a rolling basis toward FY22 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, 2021 - June 30, 2022 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 FY22 (FFY21), 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 were recently awarded 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 Spring of 2021.

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 late 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 (\$648,648) and to fund capital needs improvements across the 12 sites (\$551,352). The City committed CDBG funding from FY19, FY20, and FY21 allocations. In FY21 (FFY20), the Newton Housing Authority officially closed on the acquisition of the portfolio. During the closing process, CAN-DO added an additional property, 236 Auburn Street, to the sites to be acquired by the NHA. This increased the acquisition to 36 units across 13 scattered sites. Newton CDBG funds supported the original 12 properties, which did not include Auburn Street. The rehabilitation of the 33 units will begin in FY21 and continue into FY22. 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 the preservation of the CAN-DO portfolio, the City will also preserve affordable senior housing at 2Life Communities' Coleman House with FY21 CDBG funds and a pre-commitment of FY22 HOME funds. The funds will be used to conduct a comprehensive rehabilitation to building mechanical systems and infrastructure, as well as accessibility design upgrades to each of the 146 units. The improvements will make the project more efficient and environmentally sustainable for the next several decades, as well as improving the quality of life for senior residents. Construction is slated to commence at the end of FY21 and continue through FY22.

Lastly, in FY22, 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. In FY20, the City Council began its Real Property Reuse Process to determine the ultimate use of the property, should the City purchase it 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 hired an affordable housing development consultant team to conduct this detailed study. The consultant completed and submitted its study to the City in FY21. After reviewing the report, the City Council closed its Reuse Process and recommended to the Mayor that the city purchase the Armory from the Commonwealth for 100% affordable housing. The City will now work with the housing consultant to release a Request for Proposals in FY21 to identify an appropriate affordable housing developer to develop and manage the site.

In FY22 (FFY21), the City will administer programs that were successful in FY21 (FFY20) 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 FY22 will be assisting the NHA rehabilitate 21-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 24 units will be rehabilitated in FY22 (FFY21). Over the past years, 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 FY22, the City will work with the WestMetro HOME Consortium to implement the strategies of the WestMetro HOME Consortium Analysis of Impediments to Fair Housing Choice. A consultant was brought on in FY20 to assist the City and Consortium in this effort and the plan was submitted to HUD for its review in March 2021.

Consortium Communities

The Town of Bedford plans to assist at least two households with HOME funded rental assistance in FY22. Bedford has several new housing development projects in the pipeline that will include affordable units. The Village at Bedford Woods a new homeownership project will have 6 affordable units. The Town has 977 affordable units, with 18.36% of its housing included in the Commonwealth's Subsidized Housing Inventory (SHI).

Belmont's Bradford project is complete. This mixed-use project includes 112 units, 12 of these are affordable. The regulatory agreement was signed by the Select Board in December 2020.

The Town of Brookline actively supports the production and preservation of affordable housing projects through the Housing Advisory Board and Community Planning staff. 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. 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 eight 40B projects containing a total of 648 rental units, of which 135 will be affordable to households earning 80% of AMI or less. Six potential 40Bs projects are still under review. If approved, an estimate

of 466 units will be built, 199 of them will be affordable. 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 four or more newly constructed dwelling units, as recently amended. Currently sixteen dwelling units in six projects have been approved which are subject to this bylaw, while many other will provide cash payments towards the Brookline Housing Trust.

The Town of Concord has a history of supporting efforts to establish and maintain affordable housing. In FY22, the Concord Housing Authority (CHA) is proposing the construction of a two-bedroom single family home next to an existing CHA single-family house, on a site currently owned by the CHA. Both units will be affordable and provide an opportunity for families of low- to moderate-income to live in Concord. Concord anticipates committing both FY21 and FY22 HOME funds to the project. In FY21, Concord committed \$442,943.40 in FY19, FY20 and consolidated pool HOME funds to the Junction Village development. This project leverages \$2,000,000 in local funds and additional state and federal funding for the construction of 83 new deed-restricted units of assisted living. Construction is anticipated to be underway in FY22.

In FY22, 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 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 committed FY18, FY19 and FY20 HOME funds towards the renovation of five units owned by the Lexington Housing Authority at Pine Grove Village. The project was completed in August 2020. While no projects or programs are identified in this year's Annual Action Plan, the Town continues to work with the Lexington Housing Assistance Board (LexHAB) and the Lexington Housing Authority to identify potential projects. LexHAB is currently working on developing affordable housing on a property located at 116 Vine Street (Leary Farm). The current proposal for the project is for six units with construction anticipated for 2022 to 2023. The Town will work to determine the project's eligibility for HOME funds with an anticipated commitment of FY22 HOME dollars.

The Lexington Housing Authority (LHA) continues to plan for capital improvement projects that ensure the preservation and long term viability of their affordable housing portfolio. The LHA accesses both federal funds and state formula funding to supplement their own funds for these projects.

In FY22, the Natick Affordable Housing Trust will continue to fund a new Tenant Based Rental Assistance service offered by the Natick Service Council (NSC), continuing the pilot program started in FY21. Town staff is working with NSC to reorient the program to prevent homelessness, rather than helping homeless families with security deposits. 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. Unfortunately, an abutter has appealed the ZBA approval and the project is still in litigation. More recently, the Town approved new zoning for The Residences at Carter Mill that involved the redevelopment of the Avery Crossings assisted living units with 72 Independent Apartments (nine of which will be affordable), 55 Assisted Living Apartments, and 28 Memory Care Apartments.

Needham also approved a bylaw 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, they address local housing needs of providing smaller rentals to help owners age in place, keep extended families together, and support those with special 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 launched a Small Repair Grant program that provides 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 which has been totally committed. The Trust has requested another \$50,000 to continue the program.

In FY21, Needham introduced the Emergency Rental Assistance Program to provide financial assistance to help renters who have lost income due to COVID-19. With an allocation of \$120,000 in Community Preservation funding and another \$50,000 from the Massachusetts COVID-19 Relief Fund, the program covers 50% of rent up to \$1,500 per month for up to three months. To qualify, applicants must reside in a private rental unit, including affordable Chapter 40B units, and have incomes no more than 80% AMI. The Town selected Metro West CD to administer 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.

Waltham has approved the following two Inclusionary Zoning Special Permit projects and three Chapter 40 developments in the last year. Two units affordable to households earning 80% of the Area Median Income (AMI) were generated from Inclusionary Zoning projects. A total of 181 affordable units were created through Chapter 40B. Approximately 36 units were designated for households earning 60% of the AMI and 145 units were set aside for households earning 80% AMI.

The Watertown Housing Partnership approved a new five-year housing plan in December 2020, with review by the Town Council expected early in 2021. The plan contains goals and strategies to create and preserve affordable housing for various income levels (below 80% area median income and below 60% area median income) and for seniors and individuals with a disability. One of the plan's themes is creating a pipeline of 100% affordable or mixed-income projects since virtually all of the Town's new affordable units have been generated by its robust Inclusionary Zoning requirements and production of substantial amounts of multifamily housing.

The Town of Wayland will continue to make progress on efforts to develop 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):	14
Non-Homeless (for all units NOT reserved for homeless individuals and/or households):	58
Special-Needs (units reserved for households that are not homeless but require specialized housing or supportive services)	0
Total (Consortium-wide) >>>>	89

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):	49
The Production of New Units (construction of new units, including conversion of non-residential properties):	12
Rehab of Existing Units (including reconstruction):	27
Acquisition of Existing Units (for programs such as downpayment assistance):	1
Total (Consortium-wide) >>>>	89

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

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

In FY21, the Newton Housing Authority (NHA) acquired 36 additional units of affordable housing. The NHA is focused on providing robust resident services to the existing residents of these properties. CDBG funds will be utilized by the Housing Authority for improvements to these units following a capital needs assessment. The assessment and the rehabilitation projections will be done in partnership with the City of Newton.

In FY21, the Newton Housing Authority will complete the closing and begin construction on Haywood House, a new 55-unit senior affordable housing development. This project has been in the pipeline for several years and has received significant funding awards through the LIHTC program, other state affordable housing funds, and CPA and CDBG funds from the City of Newton. Construction is anticipated to be completed in 2022. Upon occupancy, Haywood House staff will provide services for seniors who live at Haywood House as well as residents of NHA's other properties.

Consortium Communities

In FY22 (FFY21), 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.

In Fall 2021, the Belmont Housing Authority was awarded a CPA grant to explore redevelopment opportunities at its state-aided family development. The Belmont Housing Authority will contract with the Cambridge Housing Authority and their highly successful Planning and Development Department to develop a master plan for that site. Additionally the Cambridge Housing Authority will assume the remaining planning responsibilities on assessing redevelopment opportunities at the state-aided elderly/disabled development using previously awarded CPA funds.

In FY22, 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 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 FY22, the Town will work with the Housing Authority to permit and fund a third project located at 32 Marion Street. This project will completely modernize and expand an

obsolete 60-unit development into a 139-unit project that will be built over two phases. This final project, which will utilize both town-controlled and state subsidies is expected to begin construction in 2022.

In FY22 (FFY21) 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.

In FY20, 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 FY22 (FFY21) 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 in FY20. The Authority is developing comprehensive renovation and development plans 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 FY22 (FFY21), the Town of Needham continues to work with the Needham Housing Authority (NHA) on plans to potentially modernize or 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 and apply for funding. Needham is holding Community Preservation funds in reserve for the support of such a project.

Beginning in Spring 2021, Waltham CDBG program will fund road and ADA sidewalk improvements to the WHA Chesterbrook Family Housing Development. The Housing Division will continue to address improvements that need to be made at Beaverbrook Elderly Housing site with additional HOME underwriting. The 1.3 million dollar Community Preservation Committee funded roof project is now complete at the Beaverbrook complex.

The Watertown Housing Authority is working with HUD to “reposition” its 50 federal public housing units using Section 18 of the Federal Housing Act of 1937 (42 U.S.C. § 1437p). The WHA proposes to convert these units into 50 Section 8 vouchers. Repositioning would provide long-

term sustainability for this wing of the E. Joyce Munger Apartments and therefore benefit its tenants. During FY22, the WHA will continue the process of obtaining local and federal approval for this repositioning.

In FY22, 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 has recently expanded the Resident Advisory Board to include residents from across NHA's programs. These residents meet monthly to discuss the resident experience and to provide feedback to NHA. In addition, the Resident Services Department is conducting a resident survey in 2021. This survey is designed to get feedback from tenants about their experiences with NHA and at their homes and to solicit ideas for programming that tenants would be interested in.

The Newton 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

The Belmont Housing Authority entered into a management contract with the Cambridge Housing Authority in the summer of 2020. Under this new administration, the Housing Authority is working closely with the newly formed Tenant Association regarding joint efforts to expand tenant opportunities which will include offering information on local home-ownership programs.

In Brookline, as affordable homeownership unit becomes available through turnover, the Housing Division administers the resale process through lotteries and engages underserved communities, minorities, and residents of the housing authority in extensive outreach for participation and inclusion. 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 Housing Authority 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. Recently the Town passed a bylaw to include the addition of two low-income tenants, including those who live in BHA properties, as members of the Housing Advisory Board. One current BHA resident already sits on this policy board as a tenant representative.

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 discuss such issues as BHA plans and policies, major repair projects, or other resident concerns. In FY21, The BHA hired a new executive director with deep experience in affordable housing development and management.

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.

Tenants of the Natick Housing Authority have many opportunities to help govern the agency. Currently the Authority is holding elections for the Cedar Gardens Tenants Organization in March of 2021, and includes a tenant representative on its Board of Directors.

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 representatives of the former BNWW CoC, including local providers and municipal staff, 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 8, 2020, the cohort finalized FY22 (FFY2021) ESG funding priorities across the five eligible components, including street outreach, emergency shelter, homelessness prevention, rapid re-housing, and HMIS.

Consistent with existing needs and the impacts of the coronavirus pandemic, HUD priorities, evaluation of ongoing programming, and recommendations from the CoC and local providers, Division staff allocated 16.5% and 16% of FY22 ESG funds towards homelessness prevention and rapid re-housing activities respectively. Homelessness prevention activities 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. Furthermore, rapid re-housing activities provide the much-needed assistance to close the gap and break down barriers that prevent homeless individuals and families from moving into permanent housing. The City's ESG funds will be supplemented with other state and federal resources, including the Residential Assistance for Families in Transition (RAFT) and Emergency Rental and Mortgage Assistance (ERMA) programs. Brookline Community Mental Health Center will implement homelessness prevention and rapid re-housing activities for FY22.

Furthermore, while Division staff did not allocate FY22 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 FY22 ESG funds to continue the operation of its day center and winter warming center, which provide 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 Department, 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. In FY21 (FFY20), as a direct response to the coronavirus pandemic, the Community Day Center of Waltham acquired the building adjacent to its day center and with the City of Newton's ESG-CV funds, is renovating the building to serve as a winter warming center and an extension of the day center. Renovation is currently underway. In addition, the shelters administered by Middlesex Human Service Agency, located in Waltham, provides overnight shelter, meals and bathroom/shower facilities, while engaging homeless persons in case management to work towards permanent housing.

Needham recently introduced the Emergency Rental Assistance Program to help stabilize tenants who have experienced income loss during the pandemic and are struggling to pay their rent, many likely facing potential eviction. The Town's community housing specialist provides additional support in answering inquiries and supplying important information and referrals. Homeless individuals and families, as well as those at risk of homelessness are assisted by the Needham Housing Authority (NHA) in their search for affordable housing opportunities and support service. These households can be prioritized for occupancy in NHA 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 Waltham, Community Day Center of Waltham. As previously mentioned, the Community Day Center of Waltham 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. As a result, In FY21 (FFY20), as a direct response to the coronavirus pandemic, the Community Day Center of Waltham acquired the building adjacent to its day center and with the City of Newton's ESG-CV funds, is renovating the building to serve as a winter warming center and an extension of the day center. Due to the coronavirus pandemic, the emergency shelters in the region reduced capacity to 50% to adhere to social distancing guidelines. However, many more homeless individuals were then left unsheltered. The Community Day Center of Waltham's winter warming center will add much-needed beds in the region. Finally, 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 27, 2021, the BoC CoC, in coordination with several agencies from the former BNWW CoC, completed the 2021 Point-in Time Count (PITC). Although there is a clear need and benefit of providing shelter services, particularly in the midst of the coronavirus pandemic, 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

In 2014 the Natick Affordable Housing Trust established an Emergency Homeless Voucher program for homeless individuals on the streets during inclement weather and in need of 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 (NSC). The recipients of the voucher are usually picked up and assisted first by the Natick Police, who gather information, run a background check, notify the Council, and provide a ride and the voucher to a local motel. The NSC will pick up the voucher recipient the next day for further assistance. This program successfully assisted several homeless households in FY21, and the Trust will continue its operations in FY22.

The City of Waltham focuses resources on providing rapid rehousing services 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 with 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. Current efforts being made with CARES Act, Community Preservation Act, and general municipal funding for rental assistance helped maintain housing for low to moderate income renters during COVID thereby reducing homelessness.

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 offering 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 collaborates with Family Promise, a regional transitional housing organization, to provide two dwellings for homeless clients in need of transitional housing, at 299 Bacon Street. The Trust is also reviewing the possibility of using HOME funds for Tenant Based Rental Assistance in FY22 that could be provided to several income levels, including those families transitioning from homeless assistance to more independent living. In addition to providing emergency rental assistance during COVID-19, Needham will promote mixed-income housing development within the parameters of local housing guidelines 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. Current CDBG and Municipal Housing Trust Emergency Assistance programs funds can provide financial support for those who may be facing eviction due to non-payment of rent and or rent arrears. Programs that remove the barrier of the upfront costs needed to obtain permanent housing is 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.**

The City of Newton's ESG homeless prevention program 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 through eviction prevention services, emergency utility assistance, and financial assistance for school, camp, and other childrens' programs.

In FY22, the City of Framingham will use CARES Act funds to assist eligible residents with two months of emergency rental assistance. HOME Tenant Based Rental Assistance full rental assistance will also be provided to eligible homeless families referred from Family Promise Metrowest. Additionally, the City will assist households facing eviction who are able to pay rent moving forward, but need assistance with rent arrears. 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 City of Framingham CARES Act funds.

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

The Watertown Housing Partnership (WHP) launched an emergency rental assistance program in September. The program seeks to avoid evictions and prevent homelessness. The WHP initially committed \$175,000 to assist Watertown residents struggling to pay rent because of economic loss related to COVID-19. Eligible households were required to have incomes below 80% of area median income and were not eligible if they had another form of public rental assistance. Households could receive assistance for up to 3 months, with the amount of money varying by bedroom configuration. The WHP voted in December 15 to commit a further \$100,000 to this program and amended program guidelines to include recipients of other forms of public rental assistance and allow tenants to renew for a further three months. HOME resources were not used for this program.

In FY22 the City will support several affordable housing projects that target the special needs population. Construction has recently began on the CDBG-funded Newton Housing Authority's Haywood House. Haywood House 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. In FY22 the City will continue to support 2LifeCommunities' expansion of the Golda Meir House. This new community will add approximately 68 one- and two bedroom units through two additions. About 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.

Across the Consortium, Tenant-Based Rental assistance and housing rehabilitation programs will target non-homeless special needs households. It is anticipated that 49 households will be assisted through Tenant Based Rental Assistance programs in Bedford, Framingham, Natick, Waltham and Wayland. In FY22, HOME funds will be used to rehabilitate three rental housing units at the Brookline Housing Authority's Morse Apartments, a 100-unit elderly, high-rise, building owned by the Brookline Housing Authority. Eleven HOME-assisted units will be included in the 62 units of affordable rental housing for low and moderate-income seniors constructed at 370 Harvard Street by 2LifeCommunities. Finally, deferred payment loans offered by the Housing Rehabilitation program in Newton 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 controversial and add time and cost to developments that could otherwise more easily create affordable housing units.
- 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

The City will continue to seek additional regulatory changes in FY22 (FFY21) 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 seeks to 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.

In FY21 (FFY20), the City extensively reviewed possible updates to its zoning ordinance in order to increase permitting flexibility and development incentives for affordable housing. Potential zoning revisions included: 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.”

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.

After extensive City Council discussions and public listening events attended by hundreds of City residents, the City will use FY22 to delve deeper into critical challenges that an updated zoning ordinance could address, including how village centers and mixed use areas can better accommodate housing that is affordable at a range of price points, support of local businesses, protection of the environment, and creation of more vibrant community life.

Expansion of the Homeowner Rehabilitation Program

Over the past few years, 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 the Program allows 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 the AI 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.

- As the City continues to examine the redesign of its current zoning ordinance, 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.
- 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 U.S. 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 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 Spring of 2021.
- In FY22, the City will work with the WestMetro HOME Consortium to implement the strategies of the 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 the middle of FY21. The implementation of the Plan will increase awareness of Fair Housing policies and practices and offer more protections for protected classes.

Consortium Communities

In FY20, Belmont amended its Inclusionary Housing bylaw by lowering the threshold requirement for affordable units and eliminating exemptions for mixed-use developments. 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.

In 2019, the Town of Bedford developed a housing study to provide a strategic direction for housing in Bedford. Several of the goals and strategies identified in the study are aimed at promoting housing diversity, ensuring housing opportunities for households of all ages and backgrounds. Strategies that promote affordable housing include easing zoning restrictions on two-family dwellings and accessory dwelling units, amend zoning to explicitly permit congregate and co-living, and to seek opportunities for locally-initiated development of

affordable housing. Bedford continues to work on these efforts to promote diverse housing opportunities in the Town.

In 2020, Lexington has approved local special legislation to allow for a development surcharge where funding would support the creation of community housing. Additionally, Lexington is working on amending the Special Permit Residential Development Zoning Bylaw to provide for the creation of more affordable and diverse residential dwelling units.

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

- **Regulatory:** The Brookline Zoning Bylaw includes provisions to increase affordable housing through the 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 provides fiscal resources and technical assistance to facilitate new affordable housing development. The Town will continue to use its own Housing Trust to help write down high property and land costs associated with affordable housing development.
- **Education, Consultation and Advocacy:** The Brookline Housing Advisory Board (HAB) is fundamental in promoting the preservation and creation of affordable housing. The HAB will continue studying and providing 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, major construction and renovation efforts as well as smaller repairs and replacements. 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 2021, the Natick Town Meeting approved revisions to 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 allowed accessory dwelling units, previously not permitted.

Although Needham is over the 10% state affordability goal under Chapter 40B (at 12.8%) the Town has continued to approve affordable housing developments, including a 16-unit rental redevelopment project 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).

Waltham's affordable housing strategy must address the current housing crisis caused by both the general shortage of affordable housing and the eviction risks that are a byproduct of the COVID-19 pandemic. Several actions have been identified by City staff with the goal of creating new affordable housing and preventing evictions. These steps include: appropriating another \$300,000 in CPA funds to the Emergency Assistance Program for renters facing eviction due to COVID-19; allocating 5% of annual building permit fees to increase the annual Municipal Housing Trust Fund dedication to \$340,000; and adopting accessory zoning ordinances to remove apartment restrictions (i.e.: in-law apartment limitations) to legalize currently illegal apartments within residences and bring them up to building and safety code requirements.

The five-year housing plan approved by the Watertown Housing Partnership in December 2020 recommends that the Town continue to consider changing zoning that might serve as a barrier to affordable housing. In the last five years, Watertown has created new opportunities for mixed use development (including multifamily housing) along two major corridors (Pleasant Street and Arsenal Street) and substantially reduced parking requirements for multifamily projects. The new plan suggests that Watertown consider developer incentives to create units with lower rents, encourage more development in close proximity to high-frequency bus lines and local retail employment, and further infill development.

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 started using town funds in the summer of 2021 to augment federal HOME monies to assist the Natick Service Council's new COVID 19 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 FY22 (FFY21), 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- to moderate-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 nonprofit housing developers.

Consortium Communities

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.

In FY22 Bedford and Sudbury will administer an Emergency Rental Assistance program to assist many low-income households enabling families to maintain housing through economically uncertain times.

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. 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 started annually appropriating \$80,000 in local revenues to the Natick Affordable Housing Trust for developing and preserving affordable housing for needy households in the Town. The Trust is also considering proposing new real estate transfer taxes to Town Meeting in 2021 to help fund affordable housing development.

Needham continues to support efforts of the Needham Housing Authority to address problems associated with its existing developments due to antiquated and inaccessible design issues and potential construction deficiencies. It is expected that with Town CPA funding, the NHA will hire a development consultant to prepare financing applications over the next year.

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. Waltham will continue to award federal funds to social service agencies that are providing ESOL classes, and job training to low income non-English speaking households; assistance to very low income families, services to at risk youth; and emergency utility assistance to income eligible families in financial stress.

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 FY22 (FFY21).

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 a violation of the Massachusetts Sanitary Code, and the Health Department is the agency tasked with the enforcement of regulations and requirements for lead removal, abatement and containment. Contractors are required to comply with the State's requirements of safe practices for renovation and lead abatement. The City refers constituents in need of lead abatement to many 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, are required by law to assess environmental impacts through an environmental review. Projects are responsible to disclose the presence of toxic substances such as lead and/or asbestos, and in many cases, it is required to release a mitigation plan if the proposed activity requires it.

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.

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 2015-2019 ACS, the City of Newton had 4.3% of its population living below the poverty level, representing 3,522 individuals. Compared to the 2010-2014 American Community Survey (ACS) 5-Year Estimates, 5.6% of individuals in Newton are living below the poverty level, representing 4,463 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 2019 and 2020 poverty guideline.

Newton Population by Age Group	2010-2014 ACS Estimate Below Poverty Level	2015-2019 ACS Estimate Below Poverty Level
Under 18 years	1,244	542
18 to 64 years	2,344	2,115
65 years and over	875	865
Total	4,463	3,522

Source: American Census Survey, 5-Year Estimate

Household Size	Poverty Guideline (for 48 Continuous States and the District of Columbia)	
	2019	2020
1	\$12,490	\$12,760
2	\$16,910	\$17,240
3	\$21,330	\$21,720
4	\$25,750	\$26,200
5	\$30,170	\$30,680
6	\$34,590	\$35,160
7	\$39,010	\$39,640
8	\$43,430	\$44,120
For each additional person, add	\$4,420	\$4,480

*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 30,659 individuals living below the poverty level (2019 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.

In FY21 Bedford, Natick, Needham, Newton, Sudbury, Waltham, and Watertown administered an Emergency Rental Assistance program that assisted many low-income households enabling families to maintain housing through economically uncertain times.

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.

The Town of Natick started annually appropriating \$80,000 in local revenues to the Natick Affordable Housing Trust for developing and preserving affordable housing for needy households in the Town. Part of this funding was dedicated to monitoring Natick's HOME and Trust operations, as well as affordable owner-occupied housing developed under MGL c. 40B.

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 nonprofit sectors. It generates networks, coalitions, and

partnerships that serve as platforms for continued dialogue on community improvements.

Waltham Housing Division has increased staff and 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.

Watertown's proposed Housing Plan includes creation of a municipal affordable housing trust as a "near-term" strategy. The Town Council is likely to consider such a trust in FY21. Creating a trust will increase the Town's capacity to create and preserve affordable housing by adding an entity with the authority to engage in real estate activities.

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 FY22 (FFY21)

**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 ESG funds to sub-recipients is determined through a competitive, annual RFP process. Division staff also consults with sub-recipients regarding their projects 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 projects will help clients achieve housing stability.

In advance of the release of the FY22 (FFY21) RFP, the representatives of the BNWW CoC, including local providers and municipal staff, and BoS CoC met to prioritize funding 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, given the impacts of the coronavirus pandemic, the cohort recommended striking a balance between funding shelter service activities and focusing resources on HUD's long-term priorities of homelessness prevention and rapid re-housing. These principles align with the BoS CoC' and United States Interagency Council on Homelessness' Strategic Plans to End Homelessness.

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 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 social service 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 a long track record 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 FY22 RFP review process, the review committee members, consisting of

representatives from the City of Newton Planning and Development Department, Newton Health and Human Service Department, BoS CoC, City of Waltham, and Pine Street Inn, a local provider, evaluate the uses and outcomes of existing ESG-funded projects from FY20 and FY21 should the providers choose to re-apply for funds for the upcoming fiscal year. This is accomplished through the analysis of reports of monitored projects, as well as a review of quarterly performance reports that are submitted during the program 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 in prior years, is no longer used for this process. In addition, the BoS CoC continues to offer on-going technical assistance and trainings for providers to enhance their knowledge and understanding of the HMIS system.

APPENDIX

CITIZEN PARTICIPATION PLAN
CITY OF NEWTON HOUSING AND COMMUNITY DEVELOPMENT PROGRAM
REVISED MAY 4, 2020, Approved at P&D 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.

Following the public comment period, staff must submit a formal notification of the substantial amendment to the Mayor for approval. Once the Mayor certifies the notification, it is submitted to HUD.

3. Modified Citizen Participation Process for Substantial Amendments Related to Emergency or Disaster Response

As specified above, the City may amend the approved Annual Action Plan and Consolidated Plan, in accordance to 24 CFR 91.505. Substantial amendments to these plans will be subject to the citizen participation process, and the City must provide citizens with 30 days to comment on the substantial amendments.

- **Comment Period:** In the event there is an emergency or disaster, in which a state of emergency is declared either at the federal, state, or local level, the City will allowed to engage in a modified citizen participation process in which a public hearing will be conducted with a shortened comment period of 5 days. The shortened comment period will allow the City to respond to an emergency or disaster in a timely manner
- **Virtual Public Hearing and Public Meetings:** In the event there is an emergency or disaster, in which a state of emergency is declared either at the federal, state, or local level, the City will conduct public meetings and public hearings virtually to ensure public safety. Virtual public hearings and public meetings will allow for questions in real time, with answers coming directly from the elected representatives to all “attendees”, via a virtual hearing method or platform that provides for accessibility for persons with disabilities and LEP to participate.

4. 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.

5. 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.

6. 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.

7. 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

8. 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.

9. 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.

10. 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.

11. 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.

12. HUD Waivers Related to CARES Act

On March 27, 2020, President Trump signed the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136. As authorized by the CARES Act, the City will receive FY20 Community Development Block Grant Coronavirus (CDBG-CV) funds and Emergency Solutions Grant Coronavirus (ESG-CV) funds to prevent, prepare for, and respond to the coronavirus (COVID-19). In addition, the CARES Act adds additional flexibility for the use of FY20 CDBG-CV funds and as it relates to the annual FY21 (FFY20) CDBG funds during these unprecedented times.

Waivers provided by HUD related to the Citizen Participation Plan and the Consolidated Plan are detailed below. Newton submitted a formal request to HUD on April 9, 2020 for the use of these two waivers:

a. Citizen Participation Public Comment Period for Consolidated Plan and Annual Action Plan Amendments

A HUD CPD grantee may amend an approved consolidated and annual action plan in accordance with 24 CFR 91.505. Substantial amendments to these plans are subject to the citizen participation process in the grantee's citizen participation plan (CPP). The citizen participation plan must provide citizens with 30 days to comment on substantial amendments.

Given the need to expedite actions to respond to COVID-19, HUD has waived this requirement in order to balance the need to respond quickly to the growing spread and effects of COVID-19 with the statutory requirements to provide reasonable notice and opportunity for citizens to comment on substantial amendments concerning the proposed uses of CDBG, HOME or ESG funds.

Waiver: This 30-day minimum for the required public comment period is waived for substantial amendments, provided that no less than 5 days are provided for public comments on each substantial amendment.

Timeframe: This waiver is available from April 13, 2020 through the end of the recipient's 2020 program year (June 30, 2021).

b. Citizen Participation Reasonable Notice and Opportunity to Comment

For substantial amendments to the consolidated and annual action plan, HUD's regulations require the recipient to follow its citizen participation plan (CPP) to provide citizens with reasonable notice and opportunity to comment, and must also state how reasonable notice and opportunity to comment will be given.

Given governmental orders to limit public gatherings, HUD has provided waivers to allow grantees to determine what constitutes reasonable notice and opportunity to comment given their circumstances.

Waiver: This waiver provides that grantees may amend citizen participation plans to establish expedited procedures to draft, propose, or amend consolidated plans. Expedited procedures must include notice and reasonable opportunity to comment of no less than 5 days. The 5-day period can run concurrently for comments on the consolidated plan and annual action plan amendment and amended citizen participation plans.

In-person public hearings are not required. Grantees may meet public hearing requirements with virtual public hearings if: 1) national/local health authorities recommend social distancing and limiting public gatherings for public health reasons; and 2) virtual hearings provide reasonable notification and access for citizens in accordance with the grantee's certifications, timely responses from local officials to all citizen questions and issues, and public access to all questions and responses.

Timeframe: This waiver is in effect from April 13, 2020 through the end of the recipient's 2020 program year (June 30, 2021).

Given governmental orders to limit public gatherings and the need for expedited decision making related to the use of CDBG-CV funds, the following paragraph describes the efforts to notify the public of the public meetings and public hearings during this time:

- 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 to Board members.
- Notice will be posted on the Electronic Posting Board.
- Notice will be provided on the City’s website in the City Calendar
- Notice will be listed in the Planning and Development Department’s weekly “Friday Report” which is e-mailed to City officials, agency/organization representatives and residents.

During this time, public meetings and public hearings shall be conducted virtually to ensure public safety. Public hearings will allow for questions in real time, with answers coming directly from the elected representatives to all “attendees”, via a virtual hearing method or platform that provides for accessibility for persons with disabilities and LEP to participate.

Copies of the proposed Consolidated Plan, Analysis of Impediments to Fair Housing, CAPER, Annual Action Plan will only be made available on the City’s website, www.newton.com/CDBG.

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.

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 operating costs, such 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** as necessary to prevent an individual or family from moving into an emergency shelter or meeting 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 ESG must become thoroughly familiar with all regulations promulgated by the United States Department of Housing and Urban Development (HUD) governing the ESG 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.

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

The Massachusetts [Balance of State Continuum of Care](#) (BoS 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 support 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 Massachusetts Department of Housing and Community Development (DHCD) at 617-573-1100 or downloading 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 the CoC-funded Permanent Supportive Housing projects are made in order of vulnerability as vacancies occur.

Completed packets are then sent to the Federal Grants Unit, Division of Housing and Stabilization, DHCD, 100 Cambridge Street, Suite 300, Boston, MA 02114, or scanned and emailed to DHCDcocapplications.mass.gov. 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. If agencies have any questions or concerns related to the Coordinated Entry system, they may call the Federal Grants Unit at (617) 573-1390.

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 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). Furthermore, applicants must have an annual income at or below 30% of Area Median Income (AMI).

FY 2020 Income Limits	
Household Size	30% Extremely-Low Income Limits
1	\$26,850
2	\$30,700
3	\$34,550
4	\$38,350
5	\$41,450
6	\$44,500
7	\$47,600
8 or more	\$50,650

Effective April 1, 2020

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.

1d. *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's 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, childcare 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, Supplemental Nutrition Assistance Program (SNAP), Supplemental Security Income (SSI) or Social Security Disability Insurance (SSDI), Transitional Aid to Families with Dependent Children (TAFDC), Medicaid [*MassHealth in Massachusetts*], Women, Infants, and Children (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 ESG 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, such as the Massachusetts Department of Mental Health (DMH), Department of Developmental Services (DDS), Department of Children and Families (DCF), Department of Public Health (DPH), 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, WIC, 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 Homeless Management Information System (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 ESG must be entered into the applicable community-wide HMIS in accordance with the data and technical standards established by HUD. 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 HMIS Comparable Database. All data reported to HUD is to be compiled from HMIS or the comparable 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, childcare, 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 twenty-one (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 assistance 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 re-housing 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 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 [FY2021 HUD Boston-Cambridge-Quincy Metro Fair Market Rents](#) were revised and will become effective as of April 1, 2021. The revised Fair Market Rents are listed below. Once HUD releases the FY2022 Fair Market Rents, City staff will send the information along to ESG agencies.

Final FY 2021 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 2021 FMR	\$1,742	\$1,924	\$2,336	\$2,906	\$3,168

Eligible financial assistance may include housing search, rent application, security deposit, utility deposits, moving costs, and 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, 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, if 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 annually from the initial evaluation. At any point during the provision of financial assistance, the program participant exceeds 30% of the AMI, as determined by HUD, or if the program participant has other resources or support networks that would allow him/her to retain housing without ESG assistance, the program participant must be declared ineligible for further assistance.

Other than the possible exception of payment of first month's rent and the 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 applying to the program. The participants' 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 (9) 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 six years old 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 inspection must be completed by a certified inspector. A certified inspector is one who has successfully completed [HUD's Visual Assessment Training](#). The inspection must ensure the unit complies 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-leaded 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.

Additional information about HUD's Visual Assessment Training can be found at:

<https://apps.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 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 and how to obtain access to facilities and services. Additional outreach measures must be taken to ensure that program outreach will reach those who would not 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/or 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.

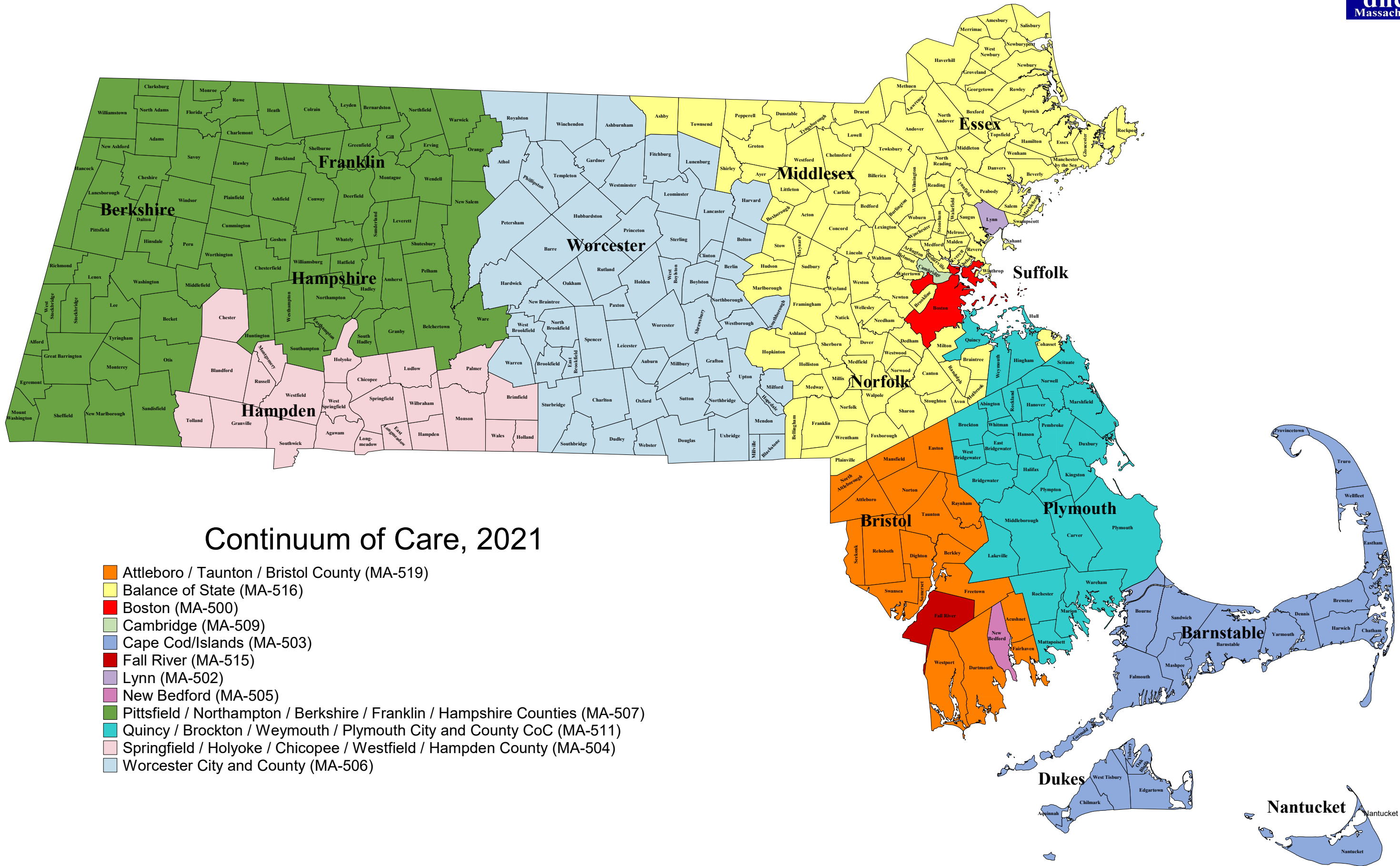
Participants who are terminated cannot re-apply for services until all outstanding issues are cleared to the satisfaction of the City of Newton.

XII. CARES Act

The Coronavirus Act, Relief, and Economic Security Act, also known as the CARES Act, is a \$2.2 trillion economic stimulus bill which was signed into law on March 27, 2020. The bill was in response to the economic fallout of the coronavirus (COVID-19) pandemic in the United States. As a result, the City of Newton received Emergency Solutions Grant Coronavirus (ESG-CV) funds to prepare, prevent for, and respond to COVID-19 among individuals and families who are homeless or receiving homeless assistance and to support additional homeless assistance and homelessness prevention activities to mitigate the impacts created by coronavirus. Requirements at 24 CFR Part 576 will apply to the use of these funds, unless otherwise provided by the alternative requirements and flexibilities established under the CARES Act, Notice CPD 20-08, or subsequent waivers, amendments, or replacements to the Notice. HUD's Notice CPD 20-08 became effective on September 1, 2020 and can be viewed on: <https://www.hud.gov/sites/dfiles/OCHCO/documents/20-08cpdn.pdf>.

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



Continuum of Care, 2021

- Attleboro / Taunton / Bristol County (MA-519)
- Balance of State (MA-516)
- Boston (MA-500)
- Cambridge (MA-509)
- Cape Cod/Islands (MA-503)
- Fall River (MA-515)
- Lynn (MA-502)
- New Bedford (MA-505)
- Pittsfield / Northampton / Berkshire / Franklin / Hampshire Counties (MA-507)
- Quincy / Brockton / Weymouth / Plymouth City and County CoC (MA-511)
- Springfield / Holyoke / Chicopee / Westfield / Hampden County (MA-504)
- Worcester City and County (MA-506)

Newton Community Development Block Grant Program - FY22 Budget DRAFT

PROJECT #	IDIS #	Env. Review	Key Org	Obj Code	Projects	Letter-of-Credit (LOC) Budget	FY22 Program Income (Estimated)	Prior Year(s) Program Income (FY21)	Prior Year(s) Entitlement Funds	Total Budget
HOUSING PROGRAM										
CD22-01A		Exempt	15002022	Various	Housing Program Delivery	\$292,800.00				\$292,800.00
CD22-01B		project by project	15002022	5796	Housing Rehabilitation and Development Program Fund	\$870,000.00				\$870,000.00
CD22-01C		project by project	15002022	5796C	Housing Program Income Pool (estimated rehab loan repayments)		\$42,250.00			\$42,250.00
HOUSING PROGRAM TOTAL						\$1,162,800.00	\$42,250.00	\$0.00	\$0.00	\$1,205,050.00
ARCHITECTURAL ACCESS										
CD22-03A		project by project	15002022	586001	McGrath Park Accessible Path	\$95,000.00				\$95,000.00
ARCHITECTURAL ACCESS TOTAL						\$95,000.00	\$0.00	\$0.00	\$0.00	\$95,000.00
HUMAN SERVICES										
CD22-05A		Exempt	15002022	579700	Barry Price Rehabilitation Center / Building Independence and Self-Esteem Through Employment	\$10,000.00				\$10,000.00
CD22-05B		Exempt	15002022	579700	Boys and Girls Club /Financial Aid for Teens and Families	\$17,000.00				\$17,000.00
CD22-05C		Exempt	15002022	579700	West Suburban YMCA / Childcare Financial Aid Program	\$50,000.00				\$50,000.00
CD22-05D		Exempt	15002022	579700	Family ACCESS of Newton / Social Mobility for Young Families	\$24,000.00				\$24,000.00
CD22-05E		Exempt	15002022	579700	Horace Cousens Industrial Fund / Emergency Payment for Families in Financial Crisis	\$15,000.00				\$15,000.00
CD22-05F		Exempt	15002022	579700	2Life Communities / Caring Choices and Wellness Nursing for Low-Income Seniors	\$20,000.00				\$20,000.00
CD22-05G		Exempt	15002022	579700	Jewish Family & Children's Service/ Stabilization & Recovery Services for People with Mental Illness & Autism	\$8,408.00		\$6,492		\$14,900.00
CD22-05H		Exempt	15002022	579700	Newton Community Development Foundation / Resident Services Program	\$25,000.00				\$25,000.00
CD22-05I		Exempt	15002022	579700	Newton Housing Authority / Resident Services Program	\$25,000.00				\$25,000.00
CD22-05J		Exempt	15002022	579700	Plowshares Education Development Center / Tuition Assistance for Preschool and After School	\$12,000.00				\$12,000.00
CD22-05L		Exempt	15002022	579700	Riverside Community Care / Mental Health Services Promoting Economic Mobility	\$40,000.00				\$40,000.00
CD22-05M		Exempt	15002022	579700	The Second Step / Residential and Community Programs for Survivors of Domestic Violence	\$25,000.00				\$25,000.00
CD22-05N		Exempt	15002022	579700	Dept. of Parks & Rec. / Financial Aid for Youth Summer Camp	\$18,850.00				\$18,850.00
CD22-98D		Exempt	15002022	579700	Human Service Program Income Reserve**** (for FY23 projects- do not include in FY22 budget totals)		\$9,750			
HUMAN SERVICES TOTAL (Cannot exceed 15% of current year LOC + 15% of prior year program income)						\$290,258.00	\$9,750.00	\$6,492.00	\$0.00	\$296,750.00
PROGRAM ADMINISTRATION										
CD22-09A		Exempt	15002022	Various	Program Administration	\$385,998.00	\$13,000.00			\$398,998.00
CD22-09B		Exempt	15002022	Various	Citizen Participation	\$1,000.00				\$1,000.00
CD22-99		Exempt	15002022	579700	Contingencies					\$0.00
ADMINISTRATION TOTAL (Cannot exceed 20% of current year LOC + 20% of current year program income- must also include Planning activities)						\$386,998.00	\$13,000.00	\$0.00	\$0.00	\$399,998.00
GRAND TOTAL ALL PROGRAM AREAS						\$1,935,056.00	\$65,000.00	\$6,492.00	\$0.00	\$1,996,798.00
FY21 CDBG Letter of Credit Funds from HUD B-20-MC-25-0019						\$1,935,056.00				

* FY22 CDBG is a .21% increase from FY21 (\$1,931,019)

**** FY22 Program Income for Human Services is not included in total as it is reserved for FY23 programs

Newton Emergency Solutions Grants Program - FY22 Budget- DRAFT

Program Funding Vote Per Continuum of Care- unanimous vote on 12/8/20

ESG Review Committee Recommendations made on 2/16/21 and 2/26/21 (P&D Board subcommittee - Jennifer M. and Sudha M.)

P&D Board Approval

Mayoral Approval

Project Number	Env. Review	IDIS #	ESG PROJECTS	KEY ORG	OBJ CODE	ACCOUNT TITLE	ESG Funds
HES22-01C	Exempt		Day and Seasonal Night Wrap-Around Services -- Community Day Center of Waltham	21012021	579700	Grants	\$ 69,150.00
HES22-01D	Exempt		Emergency Shelter Operations -- REACH	21012021	579700	Grants	\$ 23,000.00
HES22-02A	Exempt		Homelessness Prevention -- Brookline Community Mental Health Center	21012021	579700	Grants	\$ 40,950.00
HES22-03A	Exempt		Rapid Re-housing -- Brookline Community Mental Health Center	21012021	579700	Grants	\$ 19,260.00
HES22-05A	Exempt		ESG Administration	21012021	579700	Grants	\$ 12,348.00
							\$ 164,708.00
FY22 ESG Letter of Credit Funds E-21-MC-25-0019							\$ 164,708.00

FY22 ESG is a 1.8% decrease from FY21 (167,734)

WestMetro HOME Partnerships Program FY22 Projects- **DRAFT**

Project #	Key Org	Obj Code	IDIS #	Env. Review	PROJECT NAME/TYPE	FY22 Budget
BEDFORD						
HM22-01A	16002022	571500		Exempt	Bedford HOME Administration	\$ 1,550.00
HM22-01B	16002022	579700		Project by Project	Bedford TBRA	\$ 15,650.00
TOTAL						\$ 17,200.00
BELMONT						
HM22-02A	16002022	571500		Exempt	Belmont HOME Administration	\$ 4,900.00
HM22-02B	16002022	579700		Project by Project	Belmont Projects / Programs	\$ 48,975.00
TOTAL						\$ 53,875.00
BROOKLINE						
HM22-03A	16002022	571500		Exempt	Brookline HOME Administration	\$ 21,200.00
HM22-03B	16002022	579700		Project by Project	Housing Dev. - BHA Strategic Preservation Initiative	\$ 211,900.00
HM22-03P	16002022	579700			Brookline Program Income	\$ -
TOTAL						\$ 233,100.00
CONCORD						
HM22-13A	16002022	571500		Exempt	Concord HOME Administration	\$ 2,800.00
HM22-13B	16002022	579700		Project by Project	CHA's Gerow Project -367 Commonwealth Ave	\$ 28,000.00
TOTAL						\$ 30,800.00
FRAMINGHAM						
HM22-09A	16002022	571500		Exempt	Framingham HOME Administration	\$ 23,350.00
HM22-09C	16002022	579700		Program Review	Framingham TBRA Program	\$ 233,400.00
HM22-09P	16002022	579700			Framingham Program Income	\$ -
TOTAL						\$ 256,750.00
LEXINGTON						
HM22-12A	16002022	571500		Exempt	Lexington HOME Administration	\$ 2,975.00
HM22-12B	16002022	579700		Project by Project	Lexington Projects / Programs	\$ 29,650.00
TOTAL						\$ 32,625.00
NATICK						
HM22-11A	16002022	571500		Exempt	Natick HOME Administration	\$ 4,400.00
HM22-11B	16002022	579700		Program Review	Natick TBRA Program	\$ 44,075.00
HM22-11B	16002022	579700			Loan Repayment from Sudbury- FINAL PAYMENT	\$ 7,014.00
TOTAL						\$ 55,489.00
NEEDHAM						
HM22-05A	16002022	571500		Exempt	Needham HOME Administration	\$ 2,775.00
HM22-05B	16002022	579700		Project by Project	Needham Projects / Programs	\$ 27,775.00
TOTAL						\$ 30,550.00
NEWTON						
HM22-06A	16002022	571500		Exempt	Newton HOME Administration	\$ 11,905.55
HM22-06B	16002022	579700		Project by Project	2Life- Coleman House	\$ 119,155.50
TOTAL						\$ 131,061.05
SUDBURY						
HM22-10A	16002022	571500		Exempt	Sudbury HOME Administration	\$ 750.00
HM22-10B	16002022	579700		Project by Project	Sudbury Projects / Programs	\$ 7,525.00
HM22-10B	16002022	579700			Loan Repayment to Natick- FINAL PAYMENT	\$ (7,014.00)
TOTAL						\$ 1,261.00
WALTHAM						
HM22-07A	16002022	571500		Exempt	Waltham HOME Administration	\$ 17,725.00
HM22-07B	16002022	579700		Program Review	Waltham TBRA Program	\$ 177,325.00
HM22-07P	16002022	579700			Waltham Program Income	\$ -
TOTAL						\$ 195,050.00
WATERTOWN						
HM22-08A	16002022	571500		Exempt	Watertown HOME Administration	\$ 9,250.00
HM22-08B	16002022	579700		Project by Project	Watertown Projects / Programs	\$ 92,425.00
HM22-08P	16002022	579700			Watertown Program Income	\$ -
TOTAL						\$ 101,675.00
WAYLAND						
HM22-14A	16002022	571500		Exempt	Wayland HOME Administration	\$ 850.00
HM22-14B	16002022	579700		Program Review	Wayland TBRA Program	\$ 8,450.00
TOTAL						\$ 9,300.00
CONSORTIUM ADMINISTRATION						
HM22-99	16002022	571500		Exempt	Consortium HOME Administration	\$ 44,755.95
HM22-15A	16002022	579700		Project by Project	Competitive Funding Pool	\$ -
HM22-15B	16002022	579700		Exempt	CHDO Operating Expenses Funding Pool	\$ 74,593.25
HM22-15C	16002022	579700		Project by Project	CHDO Set Aside Funding Pool	\$ 223,779.75
TOTAL						\$ 343,128.95

TOTAL FY22 HOME CONSORTIUM BUDGET \$ 1,491,865.00

HOME Consortium Letter of Credit Funds M21-DC25-0213 \$ 1,491,865.00

FY22 HOME is a .82% increase from the FY21 Allocation of \$1,479,715