



CITY OF NASHUA, NH

Consolidated Annual Performance Evaluation Report (CAPER)

for

Community Development Block Grant and
HOME Investment Partnership Program

July 1, 2017 – June 30, 2018 (FY18)

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CR-05 - Goals and Outcomes

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

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

This CAPER represents completion of the third year of the 2016-2020 Consolidated Plan and was produced using HUD's eCon Planning Suite. The eCon Planning Suite is the online entry system that is tied to the 5-year Consolidated Plan and corresponding Action Plan. Many of the charts are automatically generated and require reconciliation. We have indicated these situations throughout the report and included self-generated charts to assist the public in understanding the City's accomplishments over the past program year.

The City is generally on track in carrying out the goals identified in the Consolidated Plan, however faced delays with several projects originally listed in the Annual Action Plan (discussed in CR-45 below). Focus continues on directing resources to facilities and programs that serve low-moderate income individuals, improving City-owned facilities, such as parks, and housing rehabilitation. During the program year improvements were made to three facilities owned by non-profits; five agencies received public service support; three units received housing rehab assistance; launched a new Lead Paint & Healthy Homes grant, participated in a disaster resilience planning initiative and oversaw the newly revamped Citizens Advisory Commission.

At the start of the Consolidated Plan, the City cast a wide net of goals we hoped to achieve over the five year period. However, limited funding and competing priorities have slowed progress for some goals, including economic development (business assistance, façade treatments and LMJ jobs). Progress toward certain goals is being made under other funding sources and not reported in this plan. For example, a new senior housing development of 39 units was recently approved by the Planning board, with another senior housing development of 16 townhouse-style units about to be approved; and a redevelopment of an existing brownfields site (The Picker Building) is under a proposed redevelopment inclusive of a new building, with an estimated 120 units.

Under the HOME program, reconstruction of the former Nashua Soup Kitchen on Chestnut Street continued. Funds were provided to Habitat for Humanity to create two new home-owner units. The property will be a two-family style home with an upper and lower unit. Replacing the soup kitchen with owner-occupied housing will help to further stabilize this block of primarily rental housing. This project will compliment the other HOME funded project, under the same partnership, completed recently across the street. Although initially this project planned completion in summer 2018, they are now estimating fall 2018 and is nearly complete as of this writing. Another HOME project, 22 Marshall Street, involved remediation of a known EPA brownfields site (EPA site #232101). This project is on schedule and well underway to bring 152 new units of affordable housing to the city (10 of which are HOME restricted), with a total development cost of nearly \$29M. This project is funded through a combination of State HOME funds, NH Housing Finance Authority loans, LIHTC, private equity and City HOME funds.

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

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

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Brownfields Redevelopment	Non-Housing Community Development		Brownfield acres remediated	Acre	5	0	0.00%			
Business Assistance	Non-Housing Community Development	CDBG: \$	Jobs created/retained	Jobs	10	0	0.00%			
Business Assistance	Non-Housing Community Development	CDBG: \$	Businesses assisted	Businesses Assisted	5	0	0.00%			
Economic Development - general	Non-Housing Community Development	CDBG: \$46846.18	Facade treatment/business building rehabilitation	Business	3	0	0.00%			
Economic Development - general	Non-Housing Community Development	CDBG: \$46846.18	Jobs created/retained	Jobs	5	0	0.00%	2	0	0.00%
Economic Development - general	Non-Housing Community Development	CDBG: \$46846.18	Businesses assisted	Businesses Assisted	0	0		2	0	0.00%

Ensure safe sanitary housing	Affordable Housing	LBPHC: \$	Rental units rehabilitated	Household Housing Unit	136	128	94.12%	5	66	1,320.00%
Ensure safe sanitary housing	Affordable Housing	LBPHC: \$	Homeowner Housing Rehabilitated	Household Housing Unit	34	15	44.12%			
Fair Housing	Fair Housing	CDBG: \$	Other	Other	1000	950	95.00%			
Homelessness	Homeless	CDBG: \$ / Competitive McKinney-Vento Homeless Assistance Act: \$ / Continuum of Care: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	14				
Homelessness	Homeless	CDBG: \$ / Competitive McKinney-Vento Homeless Assistance Act: \$ / Continuum of Care: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0				

Homelessness	Homeless	CDBG: \$ / Competitive McKinney- Vento Homeless Assistance Act: \$ / Continuum of Care: \$	Homeless Person Overnight Shelter	Persons Assisted	60	721	1,201.67%			
Homelessness	Homeless	CDBG: \$ / Competitive McKinney- Vento Homeless Assistance Act: \$ / Continuum of Care: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	100	0	0.00%			
Homelessness	Homeless	CDBG: \$ / Competitive McKinney- Vento Homeless Assistance Act: \$ / Continuum of Care: \$	Homelessness Prevention	Persons Assisted	500	1000	200.00%			
Homeowner Rehab	Affordable Housing	CDBG: \$	Rental units rehabilitated	Household Housing Unit	0	9				

Homeowner Rehab	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	50	20	40.00%	4	3	75.00%
Homeownership	Affordable Housing	HOME: \$	Homeowner Housing Added	Household Housing Unit	25	0	0.00%			
Improvements to facilities for special needs pop	Non-Homeless Special Needs		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	125	14	11.20%			
Improvements to facilities for youth	Non-Homeless Special Needs	CDBG: \$45000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2500	3963	158.52%	1136	1090	95.95%
Infrastructure improvements	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5000	0	0.00%			
Parks/Trails/Green space	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5000	10280	205.60%			

Public facility improvements - general	Non-Housing Community Development		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	10000	8092	80.92%			
Public facility improvements - general	Non-Housing Community Development		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	6				
Public facility improvements - general	Non-Housing Community Development		Homeless Person Overnight Shelter	Persons Assisted	0	0				
Public facility improvements - general	Non-Housing Community Development		Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0				
Public Services - General	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	7500	1380	18.40%	1283	1025	79.89%
Public Services - General	Non-Housing Community Development	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0		0	0	

Public Services - Special Needs	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2500	1089	43.56%			
Public Services - Transportation	Non-Housing Community Development		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	500	0	0.00%			
Public Services - Youth	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	6000	1629	27.15%	650	579	89.08%
Rental Assistance	Affordable Housing Homeless		Tenant-based rental assistance / Rapid Rehousing	Households Assisted	30	194	646.67%			
Rental Housing	Affordable Housing	CDBG: \$ / HOME: \$	Rental units constructed	Household Housing Unit	40	8	20.00%	5	0	0.00%
Rental Rehab	Affordable Housing		Rental units rehabilitated	Household Housing Unit	50	0	0.00%			

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

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

CDBG funds were expended on the following high priority categories: Rehab of Residential housing units; Public Facility Improvements; and Public Services. HOME funds were expended on homeownership development (42 Chestnut Street) and rental development (22 Marshall Street) Progress photos attached. Homelessness is primarily addressed through the GNCOC agencies. Goals listed above regarding homeless accomplishments were extracted from the GNCOC's annual reports. Funds through the GNCOC are tied to accomplishments reported in the HHMIS, however these efforts do affect priorities listed in the Consolidated Plan. The City's Lead Hazard Control/Healthy Homes grant also works toward improving the condition of both owner and rental units (listed under Safe & Sanitary Housing).



Activity Summary Table



42 Chestnut Street in progress



22 Marshall St in progress

CR-10 - Racial and Ethnic composition of families assisted

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

91.520(a)

	CDBG	HOME
White	1,339	0
Black or African American	535	0
Asian	94	0
American Indian or American Native	8	0
Native Hawaiian or Other Pacific Islander	4	0
Total	1,980	0
Hispanic	697	0
Not Hispanic	1,283	0

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

Narrative

The chart above was modified from the IDIS populated date, by removing HOME families assisted. IDIS appears to have pulled data from Salmon Brook Senior Housing (IDIS activity # 1850), which was previously reported in last year's CAPER.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	CDBG	755,725	417,045
HOME	HOME	830,833	207,863
HOPWA	HOPWA		
ESG	ESG		
Competitive McKinney-Vento Homeless Assistance Act	Competitive McKinney-Vento Homeless Assistance Act	2,256,000	0
Continuum of Care	Continuum of Care	1,814,588	1,991,140
General Fund	General Fund	511,999	512,000
Public Housing Capital Fund	Public Housing Capital Fund	10,740,439	11,431,956
Other	Other	1,464,219	1,370,237

Table 3 - Resources Made Available

Narrative

The table above provides a comparison between the expected amount of funds available from each resource to the amount actually expended in the program year. The resources made available are generated by the system based on information entered in the Consolidated Plan and Annual Action Plan. The CDBG & HOME expenditure data is generated by the system based on drawdowns completed during the program year. Outside entities report the amount of Public Housing, COC and McKinney/Vento. General Fund represents the amount allocated to public-service type activities. Funds in the "Other" column reflect the HUD Lead Based Paint Hazard Control Grant and owner cash contributions to that program.

Identify the geographic distribution and location of investments

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

Table 4 – Identify the geographic distribution and location of investments

Narrative

No additional narrative

Leveraging

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

The funds provided through the Consolidated Plan programs during FY2018 have leveraged a substantial amount of other public and private resources. Subrecipients reported the following leveraged funds to CDBG activities:

Federal	\$154,772
State	\$336,076
Local/Private	\$578,670
TOTAL	\$1,069,518

HOME matching funds are derived from non-federal sources contributed to individual HOME projects. Eligible match is calculated and documented at the start of each project to ensure the requirements will be met. Sources may include private contributions, donated materials/labor, forgone taxes, infrastructure improvements needed to complete the project and other eligible sources. Match is identified in the development proposal and supported after the fact with commitment letters, disbursement documents, reports, copies of checks, etc. HOME match is tracked using an Excel spreadsheet updated at least annually. At this time the City has a match credit (balance) of \$1,051,100.

Lead-paint grant matching funds are derived from property owner contributions (cash match), CDBG loans and in-kind value of staff time, overhead and other services provided under the City's general fund. Owner contributions in the amount of \$104,870 were leveraged to the total \$1,370,237 expended under the HUD Lead Paint & Healthy Homes Grant.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	1,078,145
2. Match contributed during current Federal fiscal year	0
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	1,078,145
4. Match liability for current Federal fiscal year	27,045
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	1,051,100

Table 5 – Fiscal Year Summary - HOME Match Report

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match

Table 6 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at beginning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
0	0	0	0	0

Table 7 – Program Income

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

Table 8 - Minority Business and Women Business Enterprises

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

Table 9 – Minority Owners of Rental Property

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

Table 10 – Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	7	0
Number of Special-Needs households to be provided affordable housing units	0	0
Total	7	0

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	5	0
Number of households supported through Rehab of Existing Units	0	0
Number of households supported through Acquisition of Existing Units	2	0
Total	7	0

Table 12 – Number of Households Supported

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

The one-year goals reflected in the chart above were estimates at the time of the Action Plan. Two “households supported through Acquisition of Existing Units” was based on the anticipated completion of 42 Chestnut Street (HOME project). This project is being done through Habitat for Humanity who uses primarily volunteer labor to complete the work. The project is off track by only a few months, yet resulted in the City not being able to count the units in this CAPER.

The HOME program in general faces difficulty in identifying viable projects. The funds are used to fill gaps in affordable housing development. By nature, the projects take significant time to underwrite, secure funding, conduct environmental review and line up all required pieces to set up a new project in IDIS. Adding to the difficulty factor was the 24-month commitment deadline. Since Nashua’s HOME allocation is not large, it was difficult to “bank” enough HOME funds to make a significant impact in a development budget. Since the 24-month rule has been suspended, Nashua has been able to accrue a decent amount and is working on several potential HOME projects as of this writing.

Further, the City has officially started to reprogram (following our Citizen Participation Plan) HOME funds that were slated for a home buyer program. After years of attempting to make the program work, the City has abandoned this use of funds for the time being. Although still a high priority, we must expend the funds in a timely manner.

HOME funds from the FY18 (PY17) Action Plan and prior years have been rolled forward to the next fiscal year.

Discuss how these outcomes will impact future annual action plans.

Using lessons learned from the failed home-buyer program, the City will assess how to best incentivize production of home owner units. As we are nearing the end of our current Consolidate Plan, we will use that planning opportunity to seek public input and research options.

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

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	2	0
Low-income	0	0
Moderate-income	1	0
Total	3	0

Table 13 – Number of Households Served

Narrative Information

Summary of the efforts to address “worst case needs”, and progress in meeting the needs of persons with disabilities? *Worst-case housing needs are defined as low-income renter households who pay more than half of their income for rent, live in seriously substandard housing, which includes homeless people, or have been involuntarily displaced. The needs of persons with disability do not include beds in nursing homes or other service-centered facilities.*

The Urban Programs Department directly addresses low-income renters and those living in substandard housing through the lead paint & healthy homes grant. Code Enforcement refers "worst-case" housing on a frequent basis. Persons with disabilities are assisted through our Housing Rehab program to implement accessibility modifications. We do not have a direct program to assist involuntary displacements, however the City's Welfare department is able to coordinate housing for households displaced, as well as the GNCO coordinated entry system.

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

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

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

The Greater Nashua (GNCOC) is the primary decision making group that manages the overall planning effort for the entire COC. The communities served include Nashua, Brookline, Amherst, Hollis, Merrimack, Milford, Mont Vernon, Hudson, Litchfield and Mason. The GNCOC utilizes federal, state and private funds to address the needs of homeless, including competitive HOPWA grants.

The City is represented at the GNCOC by the Manager of the Welfare Department, a department within the City of Nashua's Division of Public Health & Community Services (DPHCS). The Welfare Officer is a member of the GNCOC Executive Board and also chairs the GNCOC Ending Homelessness sub-committee. The Ending Homelessness sub-committee was very active in the creation and implementation of the Coordinated Entry process for the Greater Nashua community, working with partner agencies to provide clients access to necessary homeless prevention and shelter services, including chronically homeless individuals and families and veteran populations. The City's DPHCS also provides outreach to homeless and at-risk members of the community through health activities on the Outreach Van.

Information relating to the GNCOC's achievements was obtained from their annual HUD reports. Street outreach covers 100% of the COC geographic area & is provided 5 days per week. Every inhabited area of the COC is visited at least once per calendar month. Places where those who are unsheltered are known to reside are visited more frequently. Outreach workers also respond to requests from the public, police and emergency responders, and requests directly from the unsheltered individuals. Three barriers identified by the COC for those who are unsheltered are: reluctance to go to shelter, lack of transportation, and lack of ID. To address these barriers, outreach providers can house individuals directly from unsheltered situations, provide transportation and bus tickets to services, and purchase birth certificates and ID cards.

The GNCOC has implemented several strategies which include: providing clients with documents needed for employment (identification cards and birth certificate), refer to job employment programs which help clients to obtain their GED-TASC and assist with resume writing, allow the homeless to use their address of job applications, SOAR Team Members assist by walking people through the process of signing up for benefits. GNCOC also provides clients with a list of agencies that will hire sex offenders and those with a criminal background.

Specific outreach to the LGBT population and training to providers is also a priority. Southern NH HIV/AIDS Task Force is a non-profit AIDS Service Organization providing affordable housing, case management, and supportive services including access to medical care and medications to individuals and families living with HIV/AIDS and offers HIV testing and counseling to those at risk of HIV infection. While this Task Force is the lead agency, no GNCOC agency discriminates with regards to LGBT, and these agencies are trained on a regular basis on providing equal access to HUD Programs. Agencies also receive a list of resources to refer LGBT individuals to depending upon their need. Any client or community member with a discrimination claim due to HIV status or LGBTQIA identity are referred to GLAD, Gay and Lesbian Advocates and Defenders NH.

Reaching out to homeless...cont'd

In order to better identify and assess the needs of homeless youth, the GNCOC has partnered with the Balance of State COC (BOSCO) where COC leadership engaged the statewide Youth Subcommittee, which includes COC funded programs, child protection and juvenile justice staff, NH's Runaway and Homeless Youth programs (administered by Child and Family Services (CFS), and members of the former NH Homeless Teen Task Force, State Representatives, the Department of Education, and school district McKinney Vento homeless liaisons to increase PIT count participation by youth centered providers. The BOSCO staff provided training and solicited feedback from members on the chosen process and tools during in-person meetings and phone outreach. The Youth Subcommittee and Data subcommittee strategized how to enhance street outreach efforts to find youth. Providers were notified in person and via email, Facebook and the BHS website on the PIT instructions, and the Youth Count Survey. During the BOSCO meetings on 12/17/17 and 1/18/18, staff met with the Youth Subcommittee to discuss PIT planning, community youth engagement and where to find youth experiencing homelessness. The Youth Subcommittee recommended conducting the counts in the schools with McKinney Vento homeless liaisons and School Resource Officers, at Child Protection district offices, and with the RHY street outreach teams. Students were asked to participate in the count, and to provide feedback on locations that youth experiencing homelessness could be found. The GNCOC partnered with the local schools to solicit feedback from current and formerly homeless youth. The GNCOC has a youth homelessness liaison, which was given the opportunity to engage in the planning of the 2018 PIT. For the 2018 PIT, the GNCOC in collaboration with all other State of NH COC's started planning on 8/5/17 by engaging the data teams to review and approve the current methodologies, training needs, and data sharing in order to fulfill PIT requirements. On 11/17/17 and 1/9/18 there were PIT trainings held during full BOSCO meetings, where time was dedicated to educating participants on the Chronic Homelessness definition. Trainings were also provided to shelter directors and street outreach teams on the Chronic Homelessness definition. The GNCOC also used HMIS to cross reference data to verify self reported Chronic Homelessness with the use of HMIS algorithms and reports. The HMIS data team presented to the youth subcommittee to provide education on the definition of homeless that is used for the PIT, and to clarify any confusion between the definition of homelessness used for CoC Program NOFA versus the definition of homelessness used within the school districts. The GNCOC increased coordination with the Division for Children, Youth & Families to capture data on youth that have aged out of foster care and juvenile justice into homelessness. The GNCOC utilized the existing Veterans By Name List, which is updated bi-weekly, as a reference to locate homeless veterans in their known locations. The GNCOC partnered with SSVF providers and the 2 Veteran Administration (VA) centers that serve NH to ensure that all veterans contacted that day were counted. Throughout the year, the Veteran subcommittee has presented to all COC's within the State of NH, the Governor's Interagency Council on Homelessness, local Veterans of Foreign Wars (VFWs) and American Legions, and DHHS groups to provide education on the definition of Veteran per the VA, SSVF, and other veteran service groups to ensure that all who served are counted.

Addressing the emergency shelter and transitional housing needs of homeless persons

The GNCOC is part of the state's Homeless Youth Subcommittee, which provides overarching strategy and TA to end youth homelessness. Additionally, GNCOC is working with the neighboring COC, Manchester COC, and the consultant they hired to set benchmarks and receive TA around ending youth homelessness that is more specific to the region. The model closely follows GNCOC's efforts around ending veteran homelessness, achieved in 2017. Of note, there is significant underfunding to address youth homelessness in NH, partly because the state lacks data to demonstrate the need for federal funding.

The GNCOC has established a practice of using the "no-wrong" door approach for families entering the systems. Clients are addressed in the Coordinated Entry System to identify a person's barriers to achieve stable housing. Families are prioritized based upon their complex, co-occurring issues that are likely to impact housing stability. This approach involves quickly connecting homeless families within 30 days to permanent housing without preconditions and barriers to entry by performing intake, assessment, prioritization, housing location, move-in, case management, and on-going follow-up. Supportive services help to maximize housing stability and work to prevent the return to homelessness. Coordinated entry/shelters work with families on reunification with friends and/or family that may help while connecting them to resources to improve their situation to assist with housing stability on their own.

Diversion is stressed with families in particular, as there are limited shelter resources for this subpopulation. However, many GNCOC member agencies prioritize families in their programming, such as The Front Door Agency and Marguerite's Place. The Front Door Agency, in particular, is heavily involved in the Coordinated Entry system, and is one of the GNCOC's largest provider's of ESG RRH vouchers, with a focus on families. RRH is a key tool that GNCOC uses to ensure families not only are rapidly rehoused within 30 days of homelessness, but also maintain their housing post-assistance. The GNCOC's Coordinator, employed by Harbor Homes, is the person/agency responsible for overseeing the strategy.

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

During the past year, GNCOC experienced an almost 2 percent reduction (1.88% or 11 people) in the number of first-time homeless from 584 to 573 persons. This reduction can be attributed to the GNCOC's Coordinated Entry Team which has placed diversion as its top priority when meeting with homeless individuals. Through diversion the Team is able to determine if an individual is truly homeless, has no other place to go, and needs to be in a homeless facility. Some are more on the "risk of becoming homeless" due to payments owed on utility bills, rent, etc. In these cases the Team works to find resources to address this issue so the individual can remain housed. The CoC continues to educate providers throughout the CoC in order to identify risk factors for homelessness through a diversion process. These risks include safety, employment/income status, family dynamics, mental and physical health, substance use, and history of housing and homelessness. The CoC is currently educating providers on strategies, include viewing and executing diversion as a service in and of itself and inquiring amongst the very low-income, stably-housed population to learn the tips and strategies in maintaining housing.

Diversion is attempted before entering an emergency shelter and several diversion attempts may occur before the client is fully assessed. All these diversion attempts are documented in HMIS, and clients are not engaged for permanent housing placement until all diversion options have been exhausted. Diversion also helps to determine if there are other locations such as a relative or friend's house where

they can stay. When prevention funds are available, they are used to respond to service issues. Harbor Homes Inc. a funded agency, with the GNCOC Board is responsible for overseeing this Assessment Team and its strategy.

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

The average length of time a client remained homeless in the GNCOC System was 168 bed nights which was a slight increase from the previous year's number of 166. The Coordinated Entry Team has developed a prioritized list by name that compiles the clients by vulnerability, needs and if it is a family. Previously the only information obtained was the date they became homeless. With this new prioritization tool, the CoC Coordinated Entry staff can quickly and efficiently place individuals and families in PH interventions based of client acuity of need. During weekly meetings all the Team Case Managers discuss each client and work quickly to help provide services and take them through the system as well as to provide housing through the Housing First Model which has been adopted by most of the GNCOC agencies.

Through this diversion as well as prioritization need, the GNCOC has been able to not have a substantial increase in the number of bed nights. Harbor Homes Inc. is responsible for overseeing this measurement. The GNCOC is able to track its recidivism through HMIS as well as the coming together of COC Case Managers during their meetings which identify and discuss recidivists. In order to reduce returns to homelessness there will be an increased emphasis among all COC providers on wrapping supportive services and case management around individuals in the community when housed through a clearly defined process of referrals to appropriate programs. Weekly monitoring of COC Programs, through the By Name List, will be conducted to ensure the needs of those vulnerable to recidivism are being met to remain stable and to retain their housing. If a person returns to homelessness, they must go back through the process where they will be referred to shelters and programs which meet their needs from diversion to wrap around case management services. While Harbor Homes Inc. is the agency responsible for this oversight, the work is done by each of the GNCOC member agencies.

The GNCOC hosts a Project Employment Connect annually, which connects homeless individuals with employers, in addition to other resources. Led by Chair of the Employment Subcommittee, which meets monthly, strategies around increasing access to employment includes providing clients with documents needed for employment, referring to job employment programs and assist with resume writing. GNCOC also provides clients with a list of agencies that will hire sex offenders and those with a criminal background along with a list of WorkForce jobs as well as having this posted at many of the agencies. In addition to providing transportation and bus passes to the job interviews and work sites, these agencies also have clothes and tools to assist with their new jobs. Employment programs are invited to COC mtgs to educate projects on their resources and 211 staff are trained to assess and refer to resources to increase income. All GNCOC Programs help participants apply and maintain benefits through NH's single benefit application for cash assistance, medical, SNAP, childcare, medical beneficiary, and long term supports and services, that is accessible in paper and electronically. Staff are required to assist w/appeals if initial apps are denied. The COC System Administrator is SOAR trained, and all GNCOC funded projects have at least one SOAR trained staff person that assists clients with their SSI

applications. BOSCOG programs provide assistance in accessing employment programs through their supportive services, which assists individuals with increasing their cash income. The COG Coordinator at Harbor Homes is responsible for overseeing the GNCOC’s strategy to increase job and income growth from employment.

	Percentage
Report the percentage of individuals and persons in families in emergency shelter, safe havens, transitional housing, and rapid re-housing that exit to permanent housing destinations as reported in HDX.	51%
Report the percentage of individuals and persons in families in permanent housing projects, other than rapid re-housing, that retain their permanent housing or exit to permanent housing destinations as reported in HDX.	96%

Permanent Housing Stats

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

Actions taken to address the needs of public housing

In the past year, the Nashua Housing Authority officially became the The Nashua Housing and Redevelopment Authority (NHRA) and established the Nashua Affordable Housing Corporation, a 501c3 entity. These two major changes will allow them to begin working with alternate funding sources to provide affordable housing opportunities in the City of Nashua and surrounding areas. The City itself has limited resources to assist the needs of the Nashua Housing Authority (NHA) and its clients, especially when compared with the needs of those who do not have access to affordable housing. However, as the quality of the living environment for residents is critical to the neighborhoods where public housing is placed, the City supports the NHRA through technical assistance (development) and partners on HUD related endeavors.

As the Responsible Entity, the City conducts the environmental reviews for the NHA. These are done according to the terms of a written Agreement. The City added the NHA to our Programmatic Agreement with NH SHPO to streamline historic review. The City dedicates significant time to preparing these reviews and considers this support critical to the NHA's operations and ability to maintain its housing stock.

The Nashua Housing and Redevelopment Authority took the following actions during FY18 to address public housing needs and Section 8 Housing Choice Voucher Program:

-) The Nashua Housing Authority officially changed its name to Nashua Housing and Redevelopment Authority (NHRA). As indicated in their Annual Plan, NHA is interested in expanding its focus to provide additional affordable housing opportunities within the community through the use of its non-profit, Nashua Affordable Housing Corporation (NAHC).
-) A High Performer Status was achieved under SEMAP during 2017.
-) A Standard Performer Status was achieved under PHAS during 2017.
-) Conducted oversight and incorporation of bi-annual development and unit inspections to ensure properties met or exceeded HUD standards.
-) A full review of its five-year capital improvement plan was completed, and work is ongoing to address some of these needs. Recent work completed includes roof, window and door replacements, along with exterior painting and siding replacement at multiple housing properties. Combination smoke/CO detectors have been installed at properties.

NHA will continue to operate as a housing authority, providing both public housing and Section 8 Housing Choice Vouchers. Becoming a Housing and Redevelopment Authority will allow this agency to work within its non-profit (NAHC) to provide alternative affordable housing opportunities to low-income families.

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

The Nashua Housing Authority has a formal Resident Advisory Board (RAB) consisting of three residents of public housing, and three participants in its Section 8 Housing Choice Voucher Program. The Executive Director meets with the RAB annually to discuss any programmatic opportunities and plans for new initiatives. The Housing Authority does not have a program in place to encourage home ownership, however has indicated that they will act on any opportunities that present themselves in the future.

Actions taken to provide assistance to troubled PHAs

Nashua's PHA is not designated troubled.

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

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

Many communities in New Hampshire during the height of population growth established incentives for the development of housing for older persons as permitted under state and federal law. Given that the State has an aging population the development of age restricted housing was partially in response to meeting a growing demand. Additionally, senior housing theoretically had lower tax implications to municipalities than housing with children, making it more desirable. While such developments are exempt from familial status and age discrimination complaints, their proliferation came at the detriment of meeting housing demands for families with children. The City amended its Senior Housing Ordinance last year to tighten the definitions and criteria to qualify as senior housing. The legislation better regulates where this housing can be developed and its suitability within the proposed neighborhood. After a year in place, the City is taking a comprehensive look at this and our other housing related land use regulations to understand how we can better meet the community's needs.

The City is in the process of rezoning a large area of land from AI to PI/Mixed Use between the southern side of Amherst St and the railroad tracks, north of the airport. It is 0-18-026 and 0-18-027. Under mixed use this would allow for housing which was not allowed before.

The City also offers tax exemptions for many segments of the community reducing the assessed value of the property as follows: blind exemption \$75,000; disabled exemption \$155,000; elderly exemption ranges from \$155,000-\$225,000.

Regarding development, the City has a AAA bond rating and comparatively low building fees (which although recently increased, are still lower than surrounding communities), creating a positive lending environment. The result of which can be seen in a recent uptick of housing development throughout the city. Although Nashua is mostly built-out, developers are looking to convert commercial to residential as well as eyeing contaminated sites to determine if they are ripe for development.

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

The City, like all entities, is subject to limited budgets and increasing needs. The needs identified in the Consolidated Plan cannot be met by CDBG, HOME or the City alone. The City of Nashua addresses this obstacle by pursuing other grant opportunities, such as the Lead Paint & Healthy Homes Program; collaborating with neighboring communities to share "lessons learned"; using best practice guidelines, systems, and previously created documents. We partner and work collaboratively with other entities working toward similar goals.

Addressing substandard rental housing continues to be a high need. In the past year, new cases to the Code Enforcement Department increased by 12% resulting in 811 complaints (up from 724 the previous year). The majority of the housing complaints are located in the City's Census Tracts with the highest concentrations of low-income, rental occupied units. This demonstrates the need to allocate our federal resources to rental housing issues as well. Unfortunately, at this time there are not enough

CDBG/HOME resources to create a rental rehab program. However under the City's HUD Lead-paint & Healthy Homes grant we are able to assist rental properties address lead hazards and minor rehab using Healthy Homes Initiative funds.

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

Since 2007, the City, through the Urban Programs Department, has been successful in securing grant funding from HUD's Office of Healthy Homes and Lead Hazard Control to address lead paint and other health hazards in units occupied by low-moderate income households. As of this writing the City has been awarded a total of \$11,780,000 through four separate grants. In the last fiscal year a total of 68 units were made lead safe through the grant program.

The City addressed lead hazards through targeted grant funding, as well as through the Housing Improvement Program. Complying with HUD's Lead Safe Housing Rule, certain work will trigger the need to address lead paint (interim controls or abatement). In all other projects, the City requires contractors to use lead safe work practices and EPA's Renovate, Repair and Paint protocols.

The City of Nashua's Division of Public Health and Community Services provided free blood lead screenings, education and home visits with a specialist from the Environmental Health Department. Nurses offered one-on-one education with parents of children with elevated blood lead levels. The City is working toward reaching a "One Touch" approach in dealing with the multiple health hazards in homes. A one touch approach takes advantage of the fact that many different agencies may be visiting a home. Whichever is the first to get their foot in the door should identify the potential hazards, correct the problems, refer occupants to services or educate, thus reducing the number of visits/agencies to one home. Keeping this goal in mind, the City's Code Enforcement Department has been trained to recognize potential lead hazards, especially in homes where young children reside, and make referrals to the Urban Programs Department.

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

Under the 5-year Consolidated Plan, there are a variety of actions the City undertakes each year in an effort to reduce the number of poverty-level families and increase self-sufficiency. Most of the public service activities assist agencies who are providing services to break the cycle of poverty. Whether by providing job training, counseling, child care, budgeting, life skills and more. CDBG programs that may indirectly influence the impact of household living by those at or below the poverty level, by reducing other costs include, affordable housing, energy efficiency, public transportation and health care assistance.

Increasing income levels for those experiencing homelessness is also a high priority. The GNCO reports an increase in total income for both the adult stayers as well as the adult leavers. The adult stayers increased their income by 37% (30% last year) while the income for adult leavers increased by 63% (27% last year).

This increase is the result of several GNCO programs: an employment committee which explores available opportunities and hosts an Annual Employment Connect Event; Ticket To Work helps individuals work with employment specialists for resume writing, job search, and job retention; Veterans FIRST HVRP helps homeless veterans obtain and maintain employment; Harbor Homes Employment Services Program offers clients the ability to earn income while learning new skills and gaining job confidence; and GNCO agencies (Harbor Homes Employment Services Program, GN Mental Health Center, HIV/AIDS Task Force, GN Council on Alcoholism and others) connect clients to SSI/SSDI and other mainstream resources.

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

- J The City of Nashua began working with community stakeholders throughout 2018 to develop a comprehensive resilience initiative. The Resilient Nashua Initiative's main purpose is to identify acute shocks and chronic stressors impacting the City of Nashua, now and in the future, and collaboratively find solutions to address these complex issues. The first task was to update the City's Hazard Mitigation Plan as well as develop a Resilience Strategy Plan to improve overall resilience for the community as a whole. Throughout 2018 and 2019 the City will host a variety of opportunities, such as workshops, for stakeholders and the public to contribute to the Resilient Nashua Initiative. All community members are encouraged to take part.
- J Continued to implement actions that permanently increase community resilience (e.g., building code updates, integration of low-cost hazard mitigation into HUD-funded owner rehab and lead paint activities and integrating disaster/hazard mitigation and planning into CDBG public facility activities).
- J Engaged potential public and private partners through the Nashua Local Emergency Planning Committee (LEPC) and the Nashua Voluntary Organizations active in Disaster (VOAD). These meetings provide an opportunity on a routine basis to promote increased awareness about economic & community resilience. Topics range from Business Continuity planning to Personal Preparedness efforts.
- J The City offers the Community Emergency Response Team (CERT) Program, an all-risk, all-hazard training. This valuable course is designed to help you protect yourself, your family, your neighbors and your neighborhood in an emergency situation. The "Until Help Arrives" training is offered through this program.
- J Compressed Natural Gas (CNG) Fueling: The City has one of the largest public CNG fueling facilities in New England. Nashua was recognized as the first community in New England to aggressively replace its city vehicles with more energy efficient trucks, receiving accolades from NGVAmerica and Harvard University for its efforts.
- J Congestion Mitigation and Air Quality Improvement (CMAQ): Nashua participates in the CMAQ program to help improve air quality, lower emissions, and improve transportation infrastructure effectiveness through projects expanding transit services and improvements to traffic management systems. The City actively pursues grant funding under this program.
- J The Division of Community Development provides the staff liaison/Vice Chair to the Environment and Energy Committee. Its purpose is to further sustainability and livability in Nashua by promoting environmental stewardship and renewable energy, encouraging energy conservation and energy efficiency, reducing environmental impacts and encouraging green initiatives both within the municipality and beyond to reach businesses and residents. The Committee is encouraged to recommend municipal energy and energy efficiency projects that would result in cost savings for the City. The Committee will advise the Mayor and Board of Aldermen on environmental and energy issues.
- J The 2017 Greater Nashua Community Health Assessment is the third comprehensive Community Health Assessment conducted by the Division of Public Health and Community Services and their Public Health Advisory Council partners. It is a product of the collaboration of over 33 organizations, programs and City departments serving the Greater Nashua Community. Like the previous CHAs, data from the assessment will be used to prioritize health issues, develop goals and strategies to improve health outcomes, and implement evidence-informed

initiatives to make our community a healthier place to live, work, and thrive.

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

Central responsibility for the administration of the Consolidated Plan is assigned to the Urban Programs Department (UPD). This department coordinated activities among the public and private organizations' efforts to realize the prioritized goals of the Annual Action Plan. Extensive public-private partnerships have been established and organized to address the City's housing and community development needs. On a larger scale, the Community Development Division interact with a variety of partners, including other city divisions, financial & higher educational institutions, developers, the business community, non-profits and citizens.

Examples of coordination are described throughout this plan, especially in this CR-35 sections above.

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

Federal funds have been and will continue to be used to address, to the extent feasible, fair housing impediments. The City amended its Citizen Participation Plan to reflect the new Affirmatively Furthering Fair Housing Final Rule. We partnerd with the Nashua Regional Planning Commission to begin an Assessment of Fair Housing. A draft of the assessment was submitted by the NRPC in early 2018. The intent was to ensure a a timeline to allow us to integrate outcomes into our next Consolidated Plan. However around this same time, HUD rolled back its new requirement to conduct an AFH. The City is now in a position where our previous AI is out of date, yet the AFH was not adopted to replace the AI. In the upcoming year, we plan to use the data from the AFH to develop an AI, consistent with the former HUD guidelines. In the meantime, we continue to work toward our known impediments. The City cannot address all impediments, but strives to achieve some progress each year:

Impediment: Due to an older housing stock, the presence of lead based paint is an impediment to households with children.

Actions:

- J Urban Programs staff strictly enforces HUD's Lead Safe Housing Rule and the EPA's Renovate Repair and Painting rule in all housing projects.
- J Under the City's \$3.4M lead hazard control and healthy homes grant approximately 68 units were made lead-safe in FY18.
- J Continue to seek funding from other sources to assist property owners address lead hazards in order to reduce owner resistance to renting to families with small children.
- J Continue landlord and tenant education through NH Legal Assistance, the City's Housing Improvement Program, Code Enforcement Department, home buyer counseling and general distribution of informational materials.

Impediment: The City's minority population is growing. Linguistic barriers may be present in the housing delivery system.

Actions:

- J Nashua has a contract with an outside agency to provide limited language services. The *Language Line* is available to all departments who engage a customer that is non-English speaking. Over 184 languages can be translated and is updated as needed.

-) Outreach and education through local, faith-based, church and other relevant groups.
-) The Urban Programs Department has translated many of its standard documents, especially those intended for tenants. We will continue to translate other written documents on an ongoing basis.
-) Several city departments, including the UPD employ staff that can interpret Spanish.

Impediment: Significant segments of the population are unaware of the requirements of the fair housing law.

Actions:

-) The City displays posters throughout City building and the public transit system to inform residents of their rights.
-) NH Legal Assistance has conducted discrimination testing through its fair housing programs supported by the City.

CR-40 - Monitoring 91.220 and 91.230

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

At the start of every fiscal year, staff meet with each CDBG Subrecipient to review their record-keeping and intake procedures. This initial meeting provides an opportunity for the City to ensure the Subrecipient will collect the correct information to document compliance with national objective eligibility and accurate accounting procedures. They are provided a monitoring form up front to ensure they are aware of the minimum standards. Further, Subrecipients are required to attach backup documentation to every reimbursement request throughout the program year, including income verifications for each client served.

For those Subrecipients who are serving large numbers of clients, it is not practical for the City to collect income verification from the Subrecipient for each client. Also, some Subrecipients have confidential/protected clients and provide the City with a client number to protect confidential services. In these cases, the Program Coordinator conducted additional site visits to verify the accuracy of client information provided to the City, by reviewing a random sampling of files to verify proper documentation and income calculations. On-site monitoring was conducted at least once to all Subrecipients, with some having more than one.

Financial management is verified through submission of annual audits, reviewed by staff to ensure compliance with 2 CFR 200. For those Subrecipients not subject to audit, we request CPA reviewed statements and review the accounting practices at the site visit. Any Subrecipients who split time between CDBG and other sources must keep/submit detailed time records. Results of site monitoring are summarized and kept on file.

Internal (city implemented) activities were monitored through ongoing internal communications. Only the Urban Programs Department can encumber and authorize payment of CDBG funds. Therefore no internal projects are conducted without oversight of the UPD.

CDBG Desk Audits are performed to confirm compliance with HUD regulations and to identify high risk Subrecipients. High risk factors might include: Subrecipients who are new to the HUD programs implemented; Subrecipients who have experienced high turnover in key staff positions; Subrecipients struggling to meet schedules, submit performance reports, submit timely invoices. No high-risk CDBG Subrecipients were identified in FY18.

CDBG On-Site Visits are conducted annually to Subrecipients at the start of each program year to review the Subrecipient Agreement, record keeping requirements and client tracking to ensure the Subrecipients understand the CDBG requirements. Throughout the year, UPD provides technical assistance to Subrecipients as needed or at staff turn-over. Starting spring 2019, we will be conducting mid-year site visits to all Subrecipients. If a repeat Subrecipient has no issues, they will be monitored on-site every two years, unless they experience changes that raise their risk level. See attached monitoring form used to monitor Subrecipient compliance.

HOME: A desk-audit of all HOME assisted properties was conducted to verify rents and occupancy, in accordance with the requirements of §92.252. We conduct annual monitoring of our HOME portfolio in

approximately August each year. Issues with documentation, especially related to calculating/documenting income and rent/utility determinations were noted. The City is actively in the process to work with HOME project managers to correct deficiencies. Further the City intends to hire a consultant to offer technical training to all HOME project managers regarding rental compliance. Property standards inspections occurred in late summer with no major deficiencies noted. Additional details are listed in CR-50.

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

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

A public notice in will run in the Nashua Telegraph on 11-22-2018 announcing the CAPER would be available for a 15-day comment period. Comments will be updated following completion of the comment period.

CR-45 - CDBG 91.520(c)

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

The City amended its FY2018 Action Plan to remove certain activities. The following projects have been cancelled and were removed from the approved Plan as follows: Bridges kitchen renovation (\$13,863) - during the program year the organization informed the City they intend to purchase a new facility and cancelled the project; Greater Nashua Mental Health Center parking lot (\$40,000) - Urban Programs requested a full engineering report to determine the extent of repair needed, especially underground failures. Organization withdrew citing lack of funding to cover the engineer and project. Their request was originally funded at 50% to begin with and they did not have any additional funds to put toward the project.

Given the national delay in receiving Action Plan approvals/HUD Grant Agreements, the amount of time to complete projects within the program year is greatly reduced. The following projects were removed to carry forward to PY18 (FY19) Action Plan as follows: Nashua Soup Kitchen & Shelter (\$50,000) - following award of these funds the organization decided not to rehab the facility citing difficulties with the site/zoning approvals for the type of new facility they desired. The organization received approval from the Board of Aldermen to change the use of funds which will be implemented in the FY19 Action Plan; Salvation Army bathroom rehab (\$39,958) - project faced delays in obtaining signatures for agreements/contract from national headquarters as well as producing organization's required financial contribution. Project is planned to begin end of September 2018; Salem Street Tot Lot (\$40,000) & Crown Hill Pool (\$100,000) - due to the delay in receiving grant award/funds from HUD these projects were not able to be completed before inclement weather; Court Street Fire Station (\$47,463) - project faced delays in finalizing scope of work, obtaining bids, and Finance Committee approval. It is on track to be completed by mid-October.

The City does not have an existing Section 108 Loan.

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

No

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

CR-50 - HOME 91.520(d)

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

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

The City's on-site inspection policy is as follows: Properties must be maintained to meet all applicable State and local codes. Housing must be free of all health and safety defects. Any life-threatening deficiencies identified by the City must be corrected by the owner immediately. All other violations must be corrected within 12 months. Housing must meet the lead-based paint requirements in 24 CFR part 35.

-) The City will utilize existing Code Enforcement measures to ensure that the property owner addresses deficiencies in a timely manner.
-) The City will conduct periodic property inspections within 12 months after project completion and at least once every 3 years thereafter during the period of affordability.

The City conducted desk monitoring of all HOME assisted projects to ensure compliance with occupancy, long term affordability, lease requirements and the other requirements listed at 24 CFR Part 92.252. Results of that monitoring showed inconsistent calculation of income/documentation required and rent & utility calculation concerns. There were no instances of ineligible tenants residing in HOME assisted units, however, through the process of monitoring it became clear that many of the individuals responsible for compliance, at the property level, are unaware of some HOME rules.

The City has not conducted onsite inspections to verify information submitted by owners and was in the process of collecting this data for a remote (desk) monitoring in August 2018. As of this writing, a HUD monitoring of the City's HOME program was also conducted in August. This HUD monitoring highlighted the deficiency of not conducting site-visits to verify accuracy of owner-reported information. We will be providing technical training to all HOME-assisted projects, followed by on-site visits to ensure record keeping, income and rent calculations are accurate and correct issues discovered during the August monitoring.

Six (6) properties were due for and received property standards inspections during the program year to assess property standards. There were no major issues noted and property managers were informed of minor issues. Examples of minor issues included small holes in walls (i.e. doors handles bumping), cracked windows, light bulbs out, doors needing adjusting, water stains on flooring, bath fan repairs, etc.. The inspections occurred in late summer and the City is in the process of verifying the issues were corrected. (see attached listing)

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

The City's Affirmative Marketing policy for HOME assisted units is as follows: For projects with five or more HOME-assisted, units, the Project Sponsor/Owner will be required through legally binding written agreements, to affirmatively market any unit available for rent or purchase in a manner to attract tenants or homebuyers, as applicable, without regard to race, color, national origin, sex, religion, familial status or disability. The Project Sponsor/Owner must agree, in soliciting tenants/buyers, to do the

following:

- J Use the Equal Housing Opportunity logo in all advertising;
- J Display a Fair Housing Poster in the rental and sales office;
- J When appropriate, advertise and use various media sources, such as local public access channel, social media, postings within neighborhoods (local markets, community centers, etc) and minority outlets to reach persons least likely to apply for the housing;
- J Maintain files of Project Sponsor's affirmative marketing activities for five (5) years after project completion and provide access thereto to the City staff.

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

N/A - No HOME program income was received or used this year.

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

The City actively markets its federal funds available to assist in the financing of affordable housing. The Mayor, Community Development Director, Economic Development Director, Planning Manager and Urban Programs staff all help to connect developers (both for-profit and non-profit) to our federal funds. Staff meet with and provide technical assistance and advice to developers on how best to package their proposals to take advantage of all potential public funds. Our strong partnerships with the Nashua Housing Authority and NH Housing Finance Authority, stewards of Project Based Vouchers and LIHTC respectively, enables us to coordinate all available resources.

The City works closely with the managers/owners of our existing affordable housing portfolio to ensure lasting viability of these projects. There are many instances of CDBG funds allocated to HOME assisted projects in need of rehabilitation.



Office of Community Planning and Development
 U.S. Department of Housing and Urban Development
 Integrated Disbursement and Information System
 PR26 - CDBG Financial Summary Report
 Program Year 2017
 NASHUA , NH

DATE: 11-19-18
 TIME: 11:48
 PAGE: 1

PART I: SUMMARY OF CDBG RESOURCES	
01 UNEXPENDED CDBG FUNDS AT END OF PREVIOUS PROGRAM YEAR	251,063.55
02 ENTITLEMENT GRANT	596,876.00
03 SURPLUS URBAN RENEWAL	0.00
04 SECTION 108 GUARANTEED LOAN FUNDS	0.00
05 CURRENT YEAR PROGRAM INCOME	147,976.00
05a CURRENT YEAR SECTION 108 PROGRAM INCOME (FOR SI TYPE)	0.00
06 FUNDS RETURNED TO THE LINE-OF-CREDIT	0.00
06a FUNDS RETURNED TO THE LOCAL CDBG ACCOUNT	0.00
07 ADJUSTMENT TO COMPUTE TOTAL AVAILABLE	0.00
08 TOTAL AVAILABLE (SUM, LINES 01-07)	995,915.55
PART II: SUMMARY OF CDBG EXPENDITURES	
09 DISBURSEMENTS OTHER THAN SECTION 108 REPAYMENTS AND PLANNING/ADMINISTRATION	283,895.85
10 ADJUSTMENT TO COMPUTE TOTAL AMOUNT SUBJECT TO LOW/MOD BENEFIT	0.00
11 AMOUNT SUBJECT TO LOW/MOD BENEFIT (LINE 09 + LINE 10)	283,895.85
12 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	133,149.51
13 DISBURSED IN IDIS FOR SECTION 108 REPAYMENTS	0.00
14 ADJUSTMENT TO COMPUTE TOTAL EXPENDITURES	0.00
15 TOTAL EXPENDITURES (SUM, LINES 11-14)	417,045.36
16 UNEXPENDED BALANCE (LINE 08 - LINE 15)	578,870.19
PART III: LOWMOD BENEFIT THIS REPORTING PERIOD	
17 EXPENDED FOR LOW/MOD HOUSING IN SPECIAL AREAS	0.00
18 EXPENDED FOR LOW/MOD MULTI-UNIT HOUSING	4,850.00
19 DISBURSED FOR OTHER LOW/MOD ACTIVITIES	279,045.85
20 ADJUSTMENT TO COMPUTE TOTAL LOW/MOD CREDIT	0.00
21 TOTAL LOW/MOD CREDIT (SUM, LINES 17-20)	283,895.85
22 PERCENT LOW/MOD CREDIT (LINE 21/LINE 11)	100.00%
LOW/MOD BENEFIT FOR MULTI-YEAR CERTIFICATIONS	
23 PROGRAM YEARS(PY) COVERED IN CERTIFICATION	PY: 2015 PY: 2016 PY: 2017
24 CUMULATIVE NET EXPENDITURES SUBJECT TO LOW/MOD BENEFIT CALCULATION	1,596,920.04
25 CUMULATIVE EXPENDITURES BENEFITING LOW/MOD PERSONS	1,596,920.04
26 PERCENT BENEFIT TO LOW/MOD PERSONS (LINE 25/LINE 24)	100.00%
PART IV: PUBLIC SERVICE (PS) CAP CALCULATIONS	
27 DISBURSED IN IDIS FOR PUBLIC SERVICES	89,531.00
28 PS UNLIQUIDATED OBLIGATIONS AT END OF CURRENT PROGRAM YEAR	0.00
29 PS UNLIQUIDATED OBLIGATIONS AT END OF PREVIOUS PROGRAM YEAR	0.00
30 ADJUSTMENT TO COMPUTE TOTAL PS OBLIGATIONS	0.00
31 TOTAL PS OBLIGATIONS (LINE 27 + LINE 28 - LINE 29 + LINE 30)	89,531.00
32 ENTITLEMENT GRANT	596,876.00
33 PRIOR YEAR PROGRAM INCOME	46,293.17
34 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PS CAP	0.00
35 TOTAL SUBJECT TO PS CAP (SUM, LINES 32-34)	643,169.17
36 PERCENT FUNDS OBLIGATED FOR PS ACTIVITIES (LINE 31/LINE 35)	13.92%
PART V: PLANNING AND ADMINISTRATION (PA) CAP	
37 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	133,149.51
38 PA UNLIQUIDATED OBLIGATIONS AT END OF CURRENT PROGRAM YEAR	0.00
39 PA UNLIQUIDATED OBLIGATIONS AT END OF PREVIOUS PROGRAM YEAR	1,607.50
40 ADJUSTMENT TO COMPUTE TOTAL PA OBLIGATIONS	0.00
41 TOTAL PA OBLIGATIONS (LINE 37 + LINE 38 - LINE 39 +LINE 40)	131,542.01
42 ENTITLEMENT GRANT	596,876.00
43 CURRENT YEAR PROGRAM INCOME	147,976.00
44 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PA CAP	0.00
45 TOTAL SUBJECT TO PA CAP (SUM, LINES 42-44)	744,852.00
46 PERCENT FUNDS OBLIGATED FOR PA ACTIVITIES (LINE 41/LINE 45)	17.66%



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LINE 17 DETAIL: ACTIVITIES TO CONSIDER IN DETERMINING THE AMOUNT TO ENTER ON LINE 17

Report returned no data.

LINE 18 DETAIL: ACTIVITIES TO CONSIDER IN DETERMINING THE AMOUNT TO ENTER ON LINE 18

Plan Year	IDIS Project	IDIS Activity	Activity Name	Matrix Code	National Objective	Drawn Amount
2016	15	1886	10 Scarborough Drive	14B	LMH	\$4,850.00
				14B	Matrix Code	\$4,850.00
Total						\$4,850.00

LINE 19 DETAIL: ACTIVITIES INCLUDED IN THE COMPUTATION OF LINE 19

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2017	7	1926	6176732	Boys & Girls Club - Playground Structures	03D	LMC	\$15,000.00
2017	10	1912	6139932	Nashua Children's Home (Painting Dormitory)	03D	LMC	\$4,000.00
2017	10	1912	6152024	Nashua Children's Home (Painting Dormitory)	03D	LMC	\$6,000.00
2017	11	1911	6170183	Police Athletic League (PAL) - Granite Stairs & Columns	03D	LMC	\$18,000.00
2017	11	1911	6176732	Police Athletic League (PAL) - Granite Stairs & Columns	03D	LMC	\$2,000.00
2017	13	1915	6139932	Salvation Army	03D	LMC	\$40.00
					03D	Matrix Code	\$45,040.00
2017	4	1910	6121343	Police Athletic League (PAL) - OP	05D	LMC	\$12,514.24
2017	4	1910	6160770	Police Athletic League (PAL) - OP	05D	LMC	\$6,838.52
2017	4	1910	6170183	Police Athletic League (PAL) - OP	05D	LMC	\$5,647.24
2017	5	1907	6139932	Boys & Girls Club (Membership Scholarships)	05D	LMC	\$4,060.00
2017	5	1907	6160770	Boys & Girls Club (Membership Scholarships)	05D	LMC	\$805.00
2017	5	1907	6176732	Boys & Girls Club (Membership Scholarships)	05D	LMC	\$2,135.00
2017	6	1913	6170183	The Salvation Army - OP	05D	LMC	\$4,277.11
2017	6	1913	6176732	The Salvation Army - OP	05D	LMC	\$253.89
					05D	Matrix Code	\$36,531.00
2017	1	1908	6121343	Bridges - Shelter OP	05G	LMC	\$6,875.11
2017	1	1908	6139932	Bridges - Shelter OP	05G	LMC	\$3,622.18
2017	1	1908	6170183	Bridges - Shelter OP	05G	LMC	\$4,087.71
2017	1	1908	6176732	Bridges - Shelter OP	05G	LMC	\$3,415.00
2017	2	1909	6121343	Bridges - Crisis Intervention OP	05G	LMC	\$7,225.47
2017	2	1909	6139932	Bridges - Crisis Intervention OP	05G	LMC	\$4,336.02
2017	2	1909	6170183	Bridges - Crisis Intervention OP	05G	LMC	\$3,438.51
					05G	Matrix Code	\$33,000.00
2017	3	1906	6121343	Adult Learning Center (Tuition Subsidy)	05L	LMC	\$11,858.00
2017	3	1906	6152024	Adult Learning Center (Tuition Subsidy)	05L	LMC	\$5,929.00
2017	3	1906	6170183	Adult Learning Center (Tuition Subsidy)	05L	LMC	\$2,213.00
					05L	Matrix Code	\$20,000.00
2016	15	1902	6084996	92 Pine Street	14A	LMH	\$3,500.00
2017	17	1916	6139932	21 Marina Drive	14A	LMH	\$1,100.00
2017	17	1917	6152024	12 Verona St.	14A	LMH	\$55.00
2017	17	1917	6170183	12 Verona St.	14A	LMH	\$10,400.00
2017	17	1925	6170183	160 Chestnut St.	14A	LMH	\$13,400.00
2017	17	1925	6176732	160 Chestnut St.	14A	LMH	\$100.00
					14A	Matrix Code	\$28,555.00
2017	18	1905	6103368	Project Delivery	14H	LMH	\$48,238.72
2017	18	1905	6112666	Project Delivery	14H	LMH	\$8,828.44
2017	18	1905	6121343	Project Delivery	14H	LMH	\$9,091.08
2017	18	1905	6139932	Project Delivery	14H	LMH	\$20,350.35
2017	18	1905	6152024	Project Delivery	14H	LMH	\$9,118.98
2017	18	1905	6160770	Project Delivery	14H	LMH	\$13,180.97
2017	18	1905	6170183	Project Delivery	14H	LMH	\$7,111.31



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Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
					14H	Matrix Code	\$115,919.85
Total							\$279,045.85

LINE 27 DETAIL: ACTIVITIES INCLUDED IN THE COMPUTATION OF LINE 27

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2017	4	1910	6121343	Police Athletic League (PAL) - OP	05D	LMC	\$12,514.24
2017	4	1910	6160770	Police Athletic League (PAL) - OP	05D	LMC	\$6,838.52
2017	4	1910	6170183	Police Athletic League (PAL) - OP	05D	LMC	\$5,647.24
2017	5	1907	6139932	Boys & Girls Club (Membership Scholarships)	05D	LMC	\$4,060.00
2017	5	1907	6160770	Boys & Girls Club (Membership Scholarships)	05D	LMC	\$805.00
2017	5	1907	6176732	Boys & Girls Club (Membership Scholarships)	05D	LMC	\$2,135.00
2017	6	1913	6170183	The Salvation Army - OP	05D	LMC	\$4,277.11
2017	6	1913	6176732	The Salvation Army - OP	05D	LMC	\$253.89
					05D	Matrix Code	\$36,531.00
2017	1	1908	6121343	Bridges - Shelter OP	05G	LMC	\$6,875.11
2017	1	1908	6139932	Bridges - Shelter OP	05G	LMC	\$3,622.18
2017	1	1908	6170183	Bridges - Shelter OP	05G	LMC	\$4,087.71
2017	1	1908	6176732	Bridges - Shelter OP	05G	LMC	\$3,415.00
2017	2	1909	6121343	Bridges - Crisis Intervention OP	05G	LMC	\$7,225.47
2017	2	1909	6139932	Bridges - Crisis Intervention OP	05G	LMC	\$4,336.02
2017	2	1909	6170183	Bridges - Crisis Intervention OP	05G	LMC	\$3,438.51
					05G	Matrix Code	\$33,000.00
2017	3	1906	6121343	Adult Learning Center (Tuition Subsidy)	05L	LMC	\$11,858.00
2017	3	1906	6152024	Adult Learning Center (Tuition Subsidy)	05L	LMC	\$5,929.00
2017	3	1906	6170183	Adult Learning Center (Tuition Subsidy)	05L	LMC	\$2,213.00
					05L	Matrix Code	\$20,000.00
Total							\$89,531.00

LINE 37 DETAIL: ACTIVITIES INCLUDED IN THE COMPUTATION OF LINE 37

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2015	13	1852	6071861	CDBG Administration	21A		\$1,607.50
2017	19	1903	6084996	CDBG Administration	21A		\$30,170.24
2017	19	1903	6103368	CDBG Administration	21A		\$21,595.94
2017	19	1903	6112666	CDBG Administration	21A		\$7,724.00
2017	19	1903	6121343	CDBG Administration	21A		\$8,978.32
2017	19	1903	6139932	CDBG Administration	21A		\$8,669.76
2017	19	1903	6152024	CDBG Administration	21A		\$4,566.77
2017	19	1903	6160770	CDBG Administration	21A		\$6,283.92
2017	19	1903	6170183	CDBG Administration	21A		\$43,370.43
2017	19	1903	6176732	CDBG Administration	21A		\$182.63
					21A	Matrix Code	\$133,149.51
Total							\$133,149.51



City of Nashua
Community Development Division
 City Hall, 229 Main Street, PO Box 2019
 Nashua, New Hampshire 03061-2019

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Satisfactory Review
 ___ Yes ___ No
Follow-Up Visit Needed
 ___ Yes ___ No
Follow-Up Reports Needed
 ___ Yes ___ No

SUBRECIPIENT MONITORING CHECKLIST

GENERAL INFORMATION

Date: _____ Project ID#/IDIS#: _____ P.O. #: _____

Project/Program Manager: _____ Title: _____

Sponsoring Organization: _____

Program Name/Location: _____

Contact Person: _____ r _____

Address: _____ City/State/Zip Code: _____

Phone: _____ Fax: _____ E-mail: _____

Contract/Grant Amount: _____ Contract/Grant Period: _____

Funding Source: CDBG HOME Other _____

Amendment/s: _____ New Amount Funded: _____ New Contract Date: _____

Comments: _____

PERFORMANCE EVALUATION REVIEW

[Required by 24 CFR 570.501(b) and 2 CFR 200.331(d)]

1. **National Objectives Compliance:** [24 CFR 570.208] Yes No N/A

Please check all that apply:

- Low/mod benefit (Area)
- Low/mod benefit (Direct)
- Low/mod limited clientele benefit
- Presumption of low/mod benefit for special needs groups; documentation required
- Slums & blight (Area)
- Slums & blight (Spot)
- Urgent needs

2. **Eligible/Ineligible Activities Compliance:** [24 CFR 570.201-7] Yes No N/A

Type of eligible activity: _____

3. **Contract Objectives (in agreement):** Yes No N/A

Compare current vs. original in agreement: _____

3a) **Definition of Units of Service in Scope of Service:** [24 CFR 570.503(b)(1)] _____ LMC

4. **Contract Statement of Work:** Yes No N/A

Compare actual work performed vs. planned: _____

5. **Contract Schedule:** Yes No N/A

Compare actual progress vs. planned: _____

6. **Contract Budget:** Yes No N/A

Compare actual expenditure vs. planned: _____

7. **Summary of Achievements:** Yes No N/A

Acknowledge major accomplishments: _____

RECORD-KEEPING SYSTEMS

[Required by 24 CFR 570.506]

1. **Filing System:** Yes No N/A

Orderly, comprehensive and up-to-date

List of records/files reviewed: _____

2. **Equipment purchased with CDBG:** [24 CFR 570.502 & 2 CFR 200.313] Yes No N/A

Any equipment purchased with CDBG funds must be properly recorded and maintained. Records must include description of equipment, date of purchase, cost, source of funds, title, serial number, and use of property.

3. **Location and Accessibility:** [24 CFR 570.508] Yes No N/A

Are records reasonably accessible to the public for review?

4. **Documentation:** [24 CFR 570.506] Yes No N/A
Monthly reporting requirements and Self-Declaration of Income (if applicable).
Do all participants meet eligibility requirement?
Is there a copy of income verification on file for each participant?
Document Presumed Benefit – nature of facility or program, or location (area) of program.
-
-
-
-
-

5. **Three-year Retention of Records:** [24 CFR 570.502(a)(7)(ii); 2 CFR 200.333] Yes No

Notes: _____

FINANCIAL MANAGEMENT SYSTEMS

1. **Systems for Internal Control:** [2 CFR 200.303] Yes No N/A
Accounting policies and procedures and staffing in place.
Are effective controls in place to safeguard all property (cash, real estate, assets and personal property) and to assure that the property is being solely used for authorized purpose?
2. **Components of Financial Management System:** Yes No N/A
Chart of accounts, journals, ledgers, reconciliation, data processing, reporting system, and software utilized.
3. **Accounting records:** Yes No N/A
Accurate, current, and complete disclosure of financial results – Compare latest GPR, drawdown requests, bank records, payroll records, receipts, disbursements, timesheets, cost allocation plan, & expense tracking.
4. **Eligible, allocable and reasonable costs:** Yes No N/A
Are costs eligible and reasonable?
5. **Management of Program Income (when applicable):** [24 CFR 570.504] Yes No N/A
Describe type and amount of program income or registration/client fees: _____
-
-

- 6. **Single Audit Report/Follow-up:** [2 CFR 200, Subpart F] Yes No N/A
*Collect copy of subrecipient's most current IPA Audit Report.
Records must adequately identify source of funds and use.*

- 7. **Maintenance of Source Documentation:** [2 CFR 200.302] Yes No N/A
*Accounting records must be supported by source documentation such as
cancelled checks, paid bills, payroll, time and attendance records, contracts,
and sub-grant award documents, etc.*

- 8. **Budget Control:** [2 CFR 2 CFR 200.302] Yes No N/A
Actual expenditures must match budget.

- 9. **Revision to Financial Plans & Close-out (when applicable):** Yes No N/A

Notes: _____

PERFORMANCE EVALUATION REVIEW - CONCLUSION

- 1. **Summary of Corrective Actions/Deadlines:** Yes No N/A
Schedule for corrective actions or improvements (if any): _____

- 2. **Technical Assistance and Training needed:** Yes No N/A
Schedule for technical assistance or improvements: _____

- 3. **Comments/Suggestions from the Subrecipient:** _____

- 4. **Best Practices:** _____

- 5. **How Would You Like to Change or Improve the Program?** _____

To the best of my knowledge, the information supplied for the completion of this form is true and accurate.

Monitor's Signature

Date

Subrecipient Representative's Signature

Date

HOME MONITORING

IDIS #	Owner	Address	LIHTC	IDIS Compl't'n Date	Afford. Period	Total # of units	HOME # units	Most recent desk monitoring (rent & occupancy)	Previous property standards inspection	Current property standards inspection	Comments This year's monitoring has just occurred and the City is actively in the process of compiling the results. Below are high level summaries.
1523	AHEPA 35	681 West Hollis St		11/17/08	40	38	8	8/2018	12/2015	7/18/2018	Minor physical (light bulb out in vent hood) - maintenance corrected on the spot; Documentation concerns - in the process of compiling report to entity; no instance of ineligible occupants
1615	3D Realty	126 Vine St		5/4/10	20	17	4	8/2018	6/2014	7/16/2018	No physical condition concerns; Documentation concerns - in the process of compiling report to entity; no instance of ineligible occupants
1746	Cotton Mill Square	30 Front St	✓	4/29/15	15	109	14	8/2018	10/2017	Not due	Not due for physical inspection; Documentation concerns - in the process of compiling report to entity; no instance of ineligible occupants
1456	Front Door Agency	12-14 C St		1/2/07	20	4	4	8/2018	6/23/2014	8/14/2018	Minor physical (door adjustments, knobs, stricker plates) - will accept certification from property manager; Documentation concerns - in the process of compiling report to entity; no instance of ineligible occupants
1340	Front Door Agency	2 Shattuck St		10/28/08	15	6	6	8/2018	6/23/2014	7/19/2018	Minor physical (door adjustments, vct tile needs adhesive) - will accept certification from property manager; Documentation concerns - in the process of compiling report to entity; no instance of ineligible occupants
1592	Harbor Homes	59 Factory St		11/10/10	20	40	8	8/2018	1/13/2016	Not due	Not due for physical inspection; Documentation concerns - in the process of compiling report to entity; no instance of ineligible occupants
1409	Harbor Homes	46 Spring St		9/8/05	20	20	5	8/2018	6/24/2014	7/23/2018	Minor physical (door adjustments, stirker plates, bulb in fridge) - will accept certification from property manager; Documentation concerns - in the process of compiling report to entity; no instance of ineligible occupants
1387	Nashua Children's Home	123 Amherst St		11/14/07	20	6	5	8/2018	6/25/2016	Not due	Not due for physical inspection; Documentation concerns - in the process of compiling report to entity; no instance of ineligible occupants

HOME MONITORING

IDIS #	Owner	Address	LIHTC	IDIS Compl't'n Date	Afford. Period	Total # of units	HOME # units	Most recent desk monitoring (rent & occupancy)	Previous property standards inspection	Current property standards inspection	Comments
1384	NeighborWorks of Southern NH	119 Temple St	✓	11/17/08	20	28	4	8/2018	12/21/2015	7/19/2018	Minor physical (faucet loose, striker plate adjustments, loose doorknobs). will accept certification from property manager. Documentation concerns - in the process of compiling report to entity; no instance of ineligible occupants.
1850	Salmon Brook, LLC (SNHS)	17 Lovell St	✓	5/12/17	15	31	8	8/2018	6/2017	Not due	Not due for physical inspection; Documentation concerns - in the process of compiling report to entity; no instance of ineligible occupants

**PUBLIC NOTICE
CITY OF NASHUA**

**Draft FY18 Consolidated Annual Performance Evaluation Report (CAPER)
for the City of Nashua's HUD Entitlement Programs
Available for Public Comment**

The City of Nashua has prepared an annual performance report on the Community Development Block Grant; HOME Investment Partnership Program; and other actions described in the current Consolidated Plan for the period July 1, 2017 to June 30, 2018 (FY18) as required by the U. S. Department of Housing and Urban Development.

The draft report will be available for a 15-day public comment period beginning November 22, 2018. The CAPER may be viewed/download from the City's website, www.nashuanh.gov, Urban Programs Department page. A printed copy is available for review at the Community Development Division, City Hall, 229 Main Street, Nashua, NH. The Draft Plan is subject to change and final HUD approval.

Please address public comments to: CAPER Comments; Urban Programs Department; ATTN: Carrie Schena, Urban Programs Manager; City Hall; Nashua, NH 03061. All comments must be received by 4:00pm on December 7, 2018 to be included.