



CITY OF NASHUA, NH
Consolidated Annual Performance
Evaluation Report
(CAPER)
for
Community Development Block Grant and
HOME Investment Partnership Program

July 1, 2018 – June 30, 2019 (FY19)

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DRAFT

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.

NOTES TO DRAFT: Sections of this report are derived from outside sources. Updates where needed are noted in highlighted font. The final CAPER is subject to change and approval by HUD.

This CAPER represents completion of the fourth 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 CDBG/HOME accomplishments for the past fiscal year.

The City is generally on track in carrying out the goals identified in the Consolidated Plan. 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 five facilities owned by non-profits; six agencies received public service support; ten units received housing rehab assistance; 64 units under the Lead Paint & Healthy Homes grant were made lead-safe; Urban Programs continued to participate in the City's disaster resilience planning initiative; was selected to participate in a state-wide lead-paint initiative "Community of Action"; and oversaw the newly revamped Citizens Advisory Commission, including the creation of an online application to move the process entirely electronic.

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). To help remedy the lag under Economic Development, an Action Plan Amendment was approved to reprogram the idle revolving loan funds, to a new project. The new project is to provide technical assistance/training to individuals developing a micro-enterprise business. The entity, E for All (Entrepreneurship for All), will receive CDBG funds to replicate their very successful model here in Nashua. Although this initiative will not start until a future date, the decision to move in this direction was unanimous and a commitment to success under economic development.

Progress toward certain goals is being made under other funding sources and not reported in this plan. For example, two large-scale housing projects have been approved through the land use boards will convert Brownfields sites to housing; the Henry Hanger buildin (80 units) and the Temple St properties (168 units). These developments are occurring with private funding, but do enhance the ConPlan goals.

Under the HOME program, two new home-owner units were completed by Habitat for Humanity. The property is a two-family style home with an upper and lower unit. This project redeveloped the former Nashua Soup Kitchen and Shelter, helping to stabilize this block of primarily rental housing. This project also compliments the other HOME funded project, under the same partnership, completed recently across the street. Another HOME project, 22 Marshall Street, involved remediation of a known EPA brownfields site (EPA site #232101). This project was originally slated for completion in August 2019

and is now estimating November 2019, bringing 152 new units of affordable housing to the city (10 of which are HOME restricted), with a total development cost of nearly \$29M. One of the four buildings is completed and occupied, with the remaining three well underway. This project is funded through a combination of State HOME funds, NH Housing Finance Authority loans, LIHTC, private equity and City HOME funds. Lastly under the HOME program , the City considered several new proposals that fell through due to the quick real estate market. However , we were able to identify and fund a new project with Neighborworks of Southern NH to rehabilitate one of their newly acquired properties. A total of eight units will be rehabbed and preserved as affordable housing.

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%	0		
Business Assistance	Non-Housing Community Development	CDBG: \$	Jobs created/retained	Jobs	10	0	0.00%	0		
Business Assistance	Non-Housing Community Development	CDBG: \$	Businesses assisted	Businesses Assisted	5	0	0.00%	0		
Economic Development - general	Non-Housing Community Development	CDBG: \$46846.18	Facade treatment/business building rehabilitation	Business	3	0	0.00%	0		
Economic Development - general	Non-Housing Community Development	CDBG: \$46846.18	Jobs created/retained	Jobs	5	0	0.00%	0		
Economic Development - general	Non-Housing Community Development	CDBG: \$46846.18	Businesses assisted	Businesses Assisted	0	0		0		

Ensure safe sanitary housing	Affordable Housing	LBPHC: \$	Rental units rehabilitated	Household Housing Unit	136	192	141%	52	64	123%
Ensure safe sanitary housing	Affordable Housing	LBPHC: \$	Homeowner Housing Rehabilitated	Household Housing Unit	34	0		0		
Fair Housing	Fair Housing	CDBG: \$	Other	Other	1000	950	95%	0		
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	25		0		
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		0		

Homelessness	Homeless	CDBG: \$ / Competitive McKinney- Vento Homeless Assistance Act: \$ / Continuum of Care: \$	Homeless Person Overnight Shelter	Persons Assisted	60	971		250	211 NSKS	84.4%
Homelessness	Homeless	CDBG: \$ / Competitive McKinney- Vento Homeless Assistance Act: \$ / Continuum of Care: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	100	3	3%	5	7	140%
Homelessness	Homeless	CDBG: \$ / Competitive McKinney- Vento Homeless Assistance Act: \$ / Continuum of Care: \$	Homelessness Prevention	Persons Assisted	500	1000			Pending COC	
Homeowner Rehab	Affordable Housing	CDBG: \$	Rental units rehabilitated	Household Housing Unit	0	11	110%	2	2	100%

FY19/PY18

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Homeowner Rehab	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	50	30	60%	8	8	100%
Homeownership	Affordable Housing	HOME: \$	Homeowner Housing Added	Household Housing Unit	25	4	16%	1	2	200%
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	68	54.4%	50	54	108%
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	6770	271%	1961	2807	143%
Infrastructure improvements	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5000	0				
Parks/Trails/Green space	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5000	14,095	282%	16,250	3815 Crown Hill Pool	23%

Public facility improvements - general	Non-Housing Community Development		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	10000	8092	*Note, the goal defaults to ppl served.	325	1 facility Court Street Fire Station	*Court St was not LMA and does not line up well with the default goal outcome
Public facility improvements - general	Non-Housing Community Development		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	6		0		
Public facility improvements - general	Non-Housing Community Development		Homeless Person Overnight Shelter	Persons Assisted	0	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	5725	76%	3595	3320 ASCS	92%
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	2103	84%	0		
Public Services - Transportation	Non-Housing Community Development		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	500	0		0		
Public Services - Youth	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	6000	Pending		485	613	126%
Rental Assistance	Affordable Housing Homeless		Tenant-based rental assistance / Rapid Rehousing	Households Assisted	30	194			Pending COC	
Rental Housing	Affordable Housing	CDBG: \$ / HOME: \$	Rental units constructed	Household Housing Unit	40	8	20.00%	10	0	0%
Rental Rehab	Affordable Housing		Rental units rehabilitated	Household Housing Unit	50	0	0.00%	7	0	0%

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.

Following is a summary of the funds expended, all were ranked high or moderate priorities in the ConPlan:

FY2019 (PY2018) Activities				
	Amount	Status	Balance 6/30/19	Notes
Public Services				
Adult Learning Center - tuition stipends	\$25,177	Completed	\$0	
Nasha PAL - after school program	\$10,000	Completed	\$0	
Boys & Girls Club - membership scholarships	\$7,000	Completed	\$0	
Marguerite's Place - transitional housing operation	\$10,800	Completed	\$0	
Girls Inc - after school transportation	\$4,080	Completed	\$0	
Arlington Street Community Center - coordinator	\$60,000	Completed	\$20,333	Balance due to position not being hired at start of fiscal yr
Adult Learning Center - Window Replacement	\$30,000	Completed	\$0	
Boys & Girls Club - HVAC replacement	\$62,500	Completed	\$0	
Marguerite's Place - Exterior Siding	\$50,000	Completed	\$0	
Nashua Center - Lighting Improvements	\$11,682	Completed	\$0	
Nashua PAL - Exterior Lighting (sprinkler cost removed)	\$12,338	Completed	\$0	
DPW, Labine bathroom (FY17 & FY19; \$20k each)	\$40,000	Pending	\$40,000	DPW obtaining quotes
DPW, Splash pad @ Rotary Pool/Labine Park	\$70,000	Pending	\$70,000	DPW designing project, securing other funds to complete
UPD, Housing Improvement	\$75,000	Ongoing	\$60,153	Balance being drawn in FY20
Prior Year Projects Carried Forward				
Bridges - Kitchen (FY18; set up new in FY19)	\$13,863	Cancelled	\$0	Bal Reprogrammed to "E for All"
Soup Kitchen - shelter rehab (FY18; set up new in FY19)	\$50,000	Completed	\$0	
Court St Fire Station (FY18; set up new in FY19)	\$51,189	Completed	\$0	
Salem St Tot Lot - (FY18; set up new in FY19)	\$40,000	Pending	\$40,000	DPW will obtain quotes in FY20 (PY19)
Crown Hill Pool - lining (FY18; set up new in FY19)	\$100,000	Completed	\$0	
DPW, Vietnam Veteran's Park (FY17)	\$22,500	Ongoing	\$18,817	Work complete, awaiting invoices/confirmation of Davis Bacon
Salvation Army - bathroom (Carry Forward)	\$27,010	Completed	\$9,291	Bal Reprogrammed to "E for All"
HIP balance from FY18	\$93,565	Reprogrammed	\$61,785	Reallocated in next plan year to Rental Rehab
Economic Dev RLF	\$46,846	Reprogrammed	\$46,846	Reprogrammed to "E for All"
HOME Program				
21 Chautauqua Ave	\$292,000	Cancelled	N/A	Developer withdrew request Project completion estimated 11/2019
22 Marshall St (Carry Forward)	\$200,000	Ongoing	\$20,000	
42 Chestnut St (Carry Forward)	\$108,759	Completed	\$0	Two home owner units created Project completion estimated 12/2019
Neighborworks - Ledge/McLaren rehab (CHDO eligible)	\$330,000	Ongoing	\$160,804	

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)

Pending	CDBG	HOME
White		
Black or African American		
Asian		
American Indian or American Native		
Native Hawaiian or Other Pacific Islander		
Total		
Hispanic		
Not Hispanic		

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

Narrative

Chart is pending and will be updated in final CAPER version.

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	public - federal	1,197,620	876,882
HOME	public - federal	836,267	207,863
Competitive McKinney-Vento Homeless Assistance Act	public - federal	2,256,000	Pending update
Continuum of Care	public - federal	1,814,588	Pending update
General Fund	public - local	512,000	512,000
Public Housing Capital Fund	public - federal	11,829,239	Pending update
Other	private	90,000	141,190
Other	public - federal	825,000	1,247,704

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 (public-federal) and owner cash (private) contributions to that program.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
None			

Table 4 – Identify the geographic distribution and location of investments

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 FY2019 have leveraged a substantial amount of other public and private resources. Subrecipients reported the following leveraged funds to CDBG activities:

Federal	\$116,500
State	\$345,500
Local/Private	\$517,508
TOTAL	\$979,805

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.

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 \$141,190 were leveraged to the total \$1,247,704 expended under the HUD Lead Paint & Healthy Homes Grant.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	1,051,100
2. Match contributed during current Federal fiscal year	Calculation Pending from 42 Chestnut St.
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	1,051,100
4. Match liability for current Federal fiscal year	45,274
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	1,005,826

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	2	0
Number of Non-Homeless households to be provided affordable housing units	6	2
Number of Special-Needs households to be provided affordable housing units	0	0
Total	8	2

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	0	2
Number of households supported through Rehab of Existing Units	7	0
Number of households supported through Acquisition of Existing Units	1	0
Total	8	2

Table 12 – Number of Households Supported

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

The one-year goals listed reflected projects that were in the pipeline at the time the Action Plan was being developed. The units included Habitat for Humanity/Chatauqua Ave (1 acq.): Funding for this project and the environmental review were completed. However, the developer backed out of the deal and canceled the request; Neighborworks Southern NH (5 rehab): This project is underway but was not completed during the year and will be reported in the PY19 CAPER; Front Door Agency (2 rehab): Similar to above, the environmental review and underwriting was completed when the developer withdrew. The units reported above reflect the completion of a home owner project through Habitat for Humanity at 42 Chestnut Street.

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. With the uptick in the real estate market, it has been difficult for smaller non-profit entities to compete with cash buyers. Sellers do not want to hold the property for the amount of time the HOME process takes. Because Nashua's allocation is somewhat small, we have historically worked with these agencies to develop small-scale projects. As of late, the HOME funds have been used to provide gap funding in large scale projects that are receiving tax credits and/or state HOME funds. In those cases, the project is already "federalized" and adding Nashua HOME funds does not create a new or additional burden.

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	2
Low-income	8	0
Moderate-income	0	0
Total	10	2

Table 13 – Number of Households Served

*The numbers above reflect households served under housing programs. For CDBG, the Hoising Improvement Program assisted 10 households and under the HOME program the 42 Chestnut Street project created two new home owner units.

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. The Code Enforcement department refers "worst-case" housing on a frequent basis to our Housing Improvement Program. Persons with disabilities are also assisted through this 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 GNCOC 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.

Addressing the emergency shelter and transitional housing needs of homeless persons

Following sections are pending updates as COC final report is nearly complete: 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 approached 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 on 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. BOSCO programs provide assistance in accessing employment programs through their supportive services, which assists individuals with increasing their cash income. The COC Coordinator at Harbor Homes is responsible for overseeing the GNCOC's strategy to increase job and income growth from employment.

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

This section pending update from the Nashua Housing and Redevelopment Authority

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 2018.
-) A Standard Performer Status was achieved under PHAS during 2018.
-) 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.

NHRA 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 NHRA 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 in 2018 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. The City recently reassessed all housing, resulting in many seeing an increase in taxes. In addition to the existing exemptions, the City is taking on a complete valuation to ensure accuracy in its assessment process.

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 908 complaints (up from 811 the previous year, which also had a 12% increase). 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. As of this writing, the next year's Action Plan has allocated resources to rental rehab and the UPD will be launching that program. Furthermore, 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 64 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.

At the state level, recent changes to the law are phasing in lower blood lead levels as the trigger for investigation. As of July 1, 2019 the action level is 7.5 µg/dL and all children (not just high risk) shall be tested at age one and two. The City has also worked closely with the Nashua Housing and Redevelopment Authority when cases of EBLL are identified in their Housing Choice Voucher units. The action level under the federal Lead Safe Housing Rule is 5 µg/dL. Under our Lead Grant program we are able to assist these units within the extremely quick timeline dictated by the LSHR.

The City was one of seven communities selected to participate in the "Community of Action for Lead Safety" initiative, funded by the Endowment for Health and NH Listens at the Carsey School of Public Policy at the University of New Hampshire. The overall goal is to collaborate state-wide and implement local strategies to reduce lead poisoning. Local teams will convene with their project leads two to three times to: (1) begin the process of setting goals and direction and (2) to share progress, lessons learned, etc. Each team determines their criteria for success and measuring progress. NH Listens, Conservation Law Foundation, and NH Legal Assistance will provide technical support to each of the teams in their local efforts to prevent lead poisoning, including advice about implementation strategies. Communities may receive up to \$1000 for their local efforts. Cross-community learning exchanges: All teams will gather three times to learn more about the causes and impacts of childhood lead poisoning, applicable laws and regulations, potential local strategies, and resources for outreach or education. Community teams will have ample time to talk together, and share experiences and thinking about what it means to design frameworks for action. NH Listens will facilitate the process of building a framework for action based on local assets and solutions in the context of new laws.

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'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 GNCOC 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 GNCOC 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 GNCOC 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 in 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 hosted a variety of workshops for stakeholders and the public to contribute to the Resilient Nashua Initiative. The City is the first in the state to develop Hazard Mitigation and Resilience Plans.
- 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 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 oversees the City's 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.
- J The City's Division of Public Health and Community Services published the 2017 Greater Nashua

Community Health Assessment and the Community Health Improvement Plan. These documents focus on vulnerable populations, which often overlap with the target population under the Consolidated Plan. We are able to align goals and use this data when making funding decisions, especially as it relates to lead-paint, public service needs and park improvements. Data from the assessment is 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 prepare 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. The AFH will be converted to an AI and used as we develop the next Consolidated Plan in the months surrounding end of 2019. 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 64 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 the City's Housing Improvement Program, Code Enforcement Department, Division of Public Health and Community Services, home buyer counseling and general distribution of informational materials (using partners such as Neighborworks Southern NH, Marguerite's Place and Front Door Agency)

Impediment: The City's minority population is growing. Linguistic barriers may be present in the housing delivery system. The City's White Non-Hispanic population decreased from 74,906 persons in 2000 to 68,309 in 2010. This population loss was been offset by growth in minority populations that have been steadily growing since 1990, nearly tripling since that time. In Nashua, approximately 7.7 percent of individuals have limited English skills, of those, slightly more than half speak Spanish.

Actions:

-) 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 City routinely translates many of its standard documents, especially UPD, Transportation Department, DPHCS and Welfare.
-) Several city departments, including the UPD employ staff that can communicate in Spanish.

Impediment: Significant segments of the population are unaware of the requirements of the fair housing law. Despite the wealth of resources available to residents, there is generally a lack of knowledge about fair housing laws or how to file a complaint. Focus group participants combined with a third of resident survey takers reported a lack of knowledge and interest in learning more about their rights.

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.
-) Non-profit housing partners educate their clients regarding rights.

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. The UPD conducts desk-monitoring at the time of each reimbursement request.

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 quarterly 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: Desk audits of tenant occupancy and compliance with other regulatory terms is conducted annually as well as site visits to ensure compliance with property standards. This past year, the UPD conducted on-site monitoring of our entire portfolio to verify tenant information submitted by owners and determine compliance with the requirements of 24 CFR 92.252. The City was monitored by the Boston HUD field office in August 2018, which resulted in this wide-spread monitoring. As of this writing, we have completed project monitoring and are satisfied with the results. 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 ran in the Nashua Telegraph on September 10, 2019 announcing the CAPER would be available for a 15-day comment period, as well as posted on the City's Urban Programs Department webpage. **Comments received will be added to final version.**

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 FY2019 (PY18) Action Plan to modify certain activities and associated goals. The following project was cancelled and removed from the approved Plan as follows: Bridges kitchen renovation (\$13,863) – This project was originally carried forward from FY18 (PY17). The agency was in the process of trying to relocate and was unsure if/when that would occur. They withdrew the project since a timeline was unknown; Economic Development Revolving Loan Fund (\$46,846) - During the program year, the Board of Aldermen voted to reprogram the balance of the RLF to a new initiative of micro-enterprise development. Rather than loaning funds to individual businesses, the funds will be directed to a non-profit that provides technical assistance and education to entrepreneurs starting businesses. The new project will not begin until next program year. The goals and objectives were removed from the Action Plan, which originally contained 4 businesses to be assisted. The funds/goals will be reflected in next program year.

Otherwise we completed most projects within the year. A few park projects were carried forward to next plan year: Salem Street Tot Lot (\$40,000); Splash Pad @ Rotary Common park (\$70,000); and Labine Park restrooms (\$40,000). These projects are on the list for Parks and Recreation to put out for bid, with the exception of the bathrooms at Labine Park. They have been attempting to obtain bids, but having difficulty finding contractors willing to submit. The open activity Vietnam Veteran's Park basketball courts was nearly complete by the end of the program year, but had not paid out final invoices. This project (IDIS # 1954) will be reported in Plan Year 19 (FY20).

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.

Desk monitoring conducted in 2017 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 was in the process of conducting another remote monitoring when a HUD field office monitoring was scheduled/conducted in August 2018. This HUD monitoring highlighted the deficiency of not conducting site-visits to verify accuracy of owner-reported information.

To correct all deficiencies, our first step was to update our policies and procedures. Next, we hired a consultant (Monte Franke) to provide technical training to all owner/managers. We held this training in partnership with the NHHFA, who not only shared the cost but also handled the registrations and provided the facility. Representation for all but one of the City HOME projects attended the training. We, as PJ's also attended the training which included 1.5 additional days specific to our obligations.

Following the training, we conducted site visits to each HOME project. These visits included a review of client files to ensure proper documentation of rents, income and leases to verify compliance with the requirements listed at 24 CFR Part 92.252. Every HOME occupied unit was reviewed. We also worked with each owner/manager to rectify the specific items within the HUD monitoring report, as well as any other issues we discovered.

Although all the owners/managers were cooperative and eager to make things right, it took several weeks/months to obtain all the revised and required documentation. Below is a list of the site visit dates. Many projects needed to update leases, develop a tenant selection plan, update intake and file forms and correct the Tenant Occupancy Reports. This process took many months and a large amount of communication. The City is in the process of compiling all this information for submission to HUD.

IDIS #	Location	Site Visit Date
1615	126 Vine Street	05/30/19
1850	17 Lovell Street	05/23/19
1387	123 Amherst Street	05/25/19
1456	12-14 C Street	05/17/19
1384	119 Temple Street	06/06/19
1746	30 Front Street	06/08/19
1340	2 Shattuck Street	05/17/19
1592	59 Factory Street	05/10/19
1509	46 Spring Street	05/16/19
1523	681 West Hollis Street	05/11/19

Only two properties were also due for a physical inspection visits, 59 Factory Street and 123 Amherst Street. Staff observed the properties during the above documentation site-visits, but will be scheduling the properties for a full standards inspection by end of 2019.

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:

-) Use the Equal Housing Opportunity logo in all advertising;
-) Display a Fair Housing Poster in the rental and sales office;
-) 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;
-) 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

The City received \$25,000 from an old HUD-HODAG project. These funds were receipted into the HOME treasury account, as the "best fit" for the funds. The HODAG project restricts the funds toward low-income rental housing. Program income was not drawn during the program 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)