



CITY OF NASHUA, NH
Consolidated Annual Performance
Evaluation Report
(CAPER)

for
Community Development Block Grant and
HOME Investment Partnership Program

July 1, 2019 – June 30, 2020 (FY20)

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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 fifth and final 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 coresponding Action Plan. Overall the City carried out many of the goals outlined in the Consolidated Plan. Resources were primarily directed 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 four facilities owned by non-profits; two public parks, five agencies received public service support; ten units received housing rehab assistance (six of which were rental rehab under the inaugural pilot program); 51 units under the Lead Paint & Healthy Homes grant were made lead-safe; and oversaw the newly revamped Citizens Advisory Commission, including the creation of an online application to move the process entirely electronic.

In early spring, the City (like many), directed our attention to the COVID-19 public health crisis. Revamping procedures to carry out services and most importantly rolling out the Round 1 CDBG-CV funds. The City launched a COVID-19 Impact fund, utilizing CARES Act, EN and Economic Development loan funds. Under this program a total of \$1.1M was made available to small businesses and non-profits. Under CDBG alone a total of 29 entites were assisted (about an even split between businesses and non-profits). Nearly every assited business received their funds before the end of the fiscal year.

At the start of the Consolidated Plan, the City cast a wide net of goals to achieve over the five year ConPlan period. However, limited funding and competing priorities slowed progress for some goals, including economic development (business assistance, façade treatments and LMJ jobs). In FY18 (PY19) the City approved idle revolving loan funds to provide technical assistance/training to individuals developing a micro-enterprise business. Unfortunately, the Subrecipient experienced challenges in obtaining matching funds needed to launch the program and the difficult decision was made to (again) reprogram these funds towad the COVID-19 Impact Fund Program. Ultimately, the overarching goal to assist microenterprises was still achieved and resulted in a similar number of beneficiaries.

Under the HOME program , seven units at the property known as Ledge McLaren were rehabilitated and preserved as affordable housing. The project was acquired and rehabbed through Neighborworks of Southern NH through our CHDO Reserve funds. 22 Marshall Street, which involved remediation of a known EPA brownfields site (EPA site #232101) was nearly completed, bringing 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 will be reported next program year. The City also approved a new HOME project at 10 Paxton Terrace: a new construction, two-unit, home owner project done by Greater Nashua Habitat for Humanity. As of this writing, the volunteer build at Paxton Terrace is temporarily suspended until next spring due to the pandemic. However, the site was cleared and the foundation was poured, clearing the way for construction to resume when safe.

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: \$110000	Facade treatment/business building rehabilitation	Business	3	0	0.00%			
Economic Development - general	Non-Housing Community Development	CDBG: \$110000	Jobs created/retained	Jobs	5	0	0.00%			
Economic Development - general	Non-Housing Community Development	CDBG: \$110000	Businesses assisted	Businesses Assisted	0	0		40	15	37.5%

Ensure safe sanitary housing	Affordable Housing	HUD: \$750000 / LBPHC: \$ / Match: \$75000	Rental units rehabilitated	Household Housing Unit	136	252	185.29%	60	51	85%
Ensure safe sanitary housing	Affordable Housing	HUD: \$750000 / LBPHC: \$ / Match: \$75000	Homeowner Housing Rehabilitated	Household Housing Unit	34	19	55.88%			
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	25	25	100.00%			
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	500	1182	236.40%	77	From outside entity; pending	
Homelessness	Homeless	CDBG: \$ / Competitive McKinney- Vento Homeless Assistance Act: \$ / Continuum of Care: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	100	10	10.00%			
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	15	13	86.67%			

Homeowner Rehab	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	50	42	84.00%	20	4	20.00%
Homeownership	Affordable Housing	HOME: \$	Homeowner Housing Added	Household Housing Unit	25	6	24.00%	2	0	0.00%
Improvements to facilities for special needs pop	Non-Homeless Special Needs	CDBG: \$93094	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	125	431	344.80%	221	309	139.8%
Improvements to facilities for youth	Non-Homeless Special Needs	CDBG: \$84024	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2500	9645	385.80%	304	126	41.45%
Improvements to facilities for youth	Non-Homeless Special Needs	CDBG: \$84024	Homeless Person Overnight Shelter	Persons Assisted	0	0		0	0	
Improvements to facilities for youth	Non-Homeless Special Needs	CDBG: \$84024	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0		0	0	

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	19035	380.70%	16250	1125	6.92%
Public facility improvements - general	Non-Housing Community Development		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	10000	8158	81.58%			
Public facility improvements - general	Non-Housing Community Development		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0				
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	12457	166.09%	822	740	90.02%
Public Services - General	Non-Housing Community Development	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0				
Public Services - Special Needs	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2500	3145	125.80%	0	17	Reported in wrong category- it is housing
Public Services - Special Needs	Non-Housing Community Development	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0		10	0	Reported above-Margs place
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	3401	56.68%	485	413	85%
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%	8	7 override Ledge McLaren	87.5%
Rental Housing	Affordable Housing	CDBG: \$ / HOME: \$	Rental units rehabilitated	Household Housing Unit	0	0				
Rental Rehab	Affordable Housing	CDBG: \$54894	Rental units rehabilitated	Household Housing Unit	50	6	12.00%	5	6	120%
Rental Rehab	Affordable Housing	CDBG: \$54894	Homeowner Housing Rehabilitated	Household Housing Unit	0	0		0	0	
Rental Rehab	Affordable Housing	CDBG: \$54894	Housing for Homeless added	Household Housing Unit	0	0		0	0	
Rental Rehab	Affordable Housing	CDBG: \$54894	Housing for People with HIV/AIDS added	Household Housing Unit	0	0		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:

Activity	Funded Amt	Balance	Notes
Public Services			
ALC public service	\$24,831.00	\$7,142.34	Balance due to COVID-19 closure of before/after school program. Avail to reprogram
Boys & Girls	\$7,000.00	\$0.00	
Greater Nashua Dental Connection	\$22,968.00	\$0.00	
Marguerites Place	\$11,000.00	\$0.00	
PAL	\$31,214.00	\$0.00	
UPD Project Delivery	\$115,000.00	\$2,710.43	Avail to reprogram
UPD, Administration (20% cap)	\$135,350.00	\$1,359.24	Avail to reprogram
E for All - microenterprise	\$40,000.00	\$40,000.00	Reprogrammed to COVID-19 Impact Fund Program
Children's Home - windows	\$39,024.00	\$14,574.00	Reprogrammed to COVID-19 Impact Fund Program
PAL - fire related impvts	\$20,000.00	\$20,000.00	Agency received another grant to cover the work; declined CDBG; funds avail to reprogram
Soup Kitchen – Redevelopment at Spring Street	\$75,000.00	\$75,000.00	Project pending; environmental clearance obtained; bids/work anticipated to begin winter 2020
Opportunity Networks - ADA bath	\$50,000.00	\$26,700.00	Project delayed due to COVID-19; finished early Oct.2020; bid less than funded amt. bal \$4,100 avail to reprogram
PLUS Company - HVAC units	\$43,094.00	\$0.00	
Youth Council - heat sys	\$25,000.00	\$6,125.00	Reprogrammed to COVID-19 Impact Fund Program
Owner Occ Housing Improvement	\$89,000.00	\$151,899.00	Balance increase from program income; funds spent on rolling basis in next fiscal year
Rental Rehab	\$54,894.00	\$0.00	
Contingency	\$8,049.34	\$8,049.30	Reprogrammed to COVID-19 Impact Fund Program

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	1,391	1
Black or African American	308	1
Asian	24	0
American Indian or American Native	6	0
Native Hawaiian or Other Pacific Islander	6	0
Other – multi-racial		5
Total	1,735	7
Hispanic	589	Unkown
Not Hispanic	1,146	Unkown

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

Narrative

The above chart does not contain accurate counts. Please refer to the table below for beneficiaries shown in the PR-23 Report (to be attached to final draft), which contains more detailed breakdown. The chart was also edited to include the seven HOME units from Ledge McLaren apartments.

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	1,071,577	\$614,909
HOME	public - federal	1,037,700	\$415,036
Continuum of Care	public - federal	1,936,674	Pending update
General Fund	public - local	512,000	\$512,000
Public Housing Capital Fund	public - federal	12,999,463	Pending update
		825,000	
Other	private	Populated incorrect, should be \$75,000	\$211,750
		825,000	
Other	public - federal	Populated incorrect, should be \$750,000	\$1,004,059

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 following was reported as leveraged funds for CDBG Subrecipient activities (note, due to COVID-19, close out reports contained limited information and not all Subrecipients were able to provide this data):

State	\$315,000
Local/Private	\$338,900
TOTAL	\$653,900

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. The project at 42 Chestnut Street leveraged non-HUD funding match in the amount of \$35,627.51 through a combination of Developer cash and value of in-kind/volunteer labor.

Lead-paint grant matching funds are derived from property owner contributions (cash match), CDBG loans and NH State loan funds. Owner contributions in the amount of \$211,750; CDBG loans \$45,192 and NH State loans \$122,458 were leveraged to the total \$1,004,059 expended under the HUD Lead Paint & Healthy Homes Grant during the fiscal year.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	1,499,317
2. Match contributed during current Federal fiscal year	156,002
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	1,655,319
4. Match liability for current Federal fiscal year	62,964.82
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	1,592,355

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
1877-42 Chestnut	6/13/2019	24,749				10,878		35,627
1932 Ledge McLaren	1/17/2020	120,375						120,375

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	326,150	0	0	0	29,600	0
Number	11	0	0	0	2	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	326,150	0	0			
	11	2	0			
Sub-Contracts						
Number	0	0	0			
Dollar Amount	0	0	0			

Table 8 - Minority Business and Women Business Enterprises

Note – contracts related to 42 Chestnut St (demo and foundation)

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	10	7
Number of Special-Needs households to be provided affordable housing units	0	0
Total	10	7

Table 11 – Number of Households

Completed = Ledge McLaren

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	8	0
Number of households supported through Rehab of Existing Units	2	7
Number of households supported through Acquisition of Existing Units	0	0
Total	10	7

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 projections included Neighborworks Southern NH (estimated 5 rehab), that resulted in seven (7); and completion of Marshall Street Apartments, which was delayed and completed in the next plan year. Overall we were close to our annual goal and did not face any significant challenges with current HOME Program activities.

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. Nashua also commonly partners on 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 several years ago, the City will assess how to best incentivize production of home owner units. The City was undertaking a Housing Study that we anticipate will provide new and creative suggestions of how best to meet homeowner and affordable housing needs (not solely relying on the HOME Program).

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	0	5
Low-income	6	1
Moderate-income	4	1
Total	10	7

Table 13 – Number of Households Served

*The numbers above reflect households served under housing programs. For CDBG, the Housing Improvement Program assisted 10 households; the HOME program reflects Ledge McLaren.

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

Toward the end of the program year, significant effort was focused toward the impact of COVID-19 to the homeless population. Educational efforts and temporary infrastructure was set up to slow the spread of the virus. Items such as portable bathrooms, hand-washing and hand sanitizing stations were set up in areas known to be frequented by homeless individuals. Certain non-profits opened their facilities to allow showers and proper cleansing; shelters sought to immediately modify their facility to implement social distancing.

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.

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 continued to implement 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 will also provide 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 was 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. As a member of the GNCOC, this agency offers a unique, holistic approach to care and prevention resulting in better outcomes for clients and community. 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 – New Hampshire.

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.

There are several agencies that assist victims of domestic violence, dating violence, sexual assault and stalking, with *Bridges Domestic and Sexual Violence Support* being the lead in the community. Bridges provides free and confidential services to victims and survivors of domestic violence, sexual assault, teen dating violence, child sexual abuse, elder abuse, stalking, and harassment. They provide crisis intervention, emergency shelter, court advocacy, support groups, and education and outreach to both women and men. In recent years they have seen an increase in the need for housing these victims. Last year alone they provided Crisis Intervention and Advocacy services to 2,337 individuals with 22,866 units of service (15-minute increments); Transitional Housing to 27 individuals for 8,663 bednights; Emergency Shelter to 44 individuals for 1,373 bednights; and educational presentations 6,675. Last year Bridges had to turn away 114 people due to our shelter being full.

Addressing the emergency shelter and transitional housing needs of homeless persons

The total CH in 2019 was 14 persons of which 10 were in ES, 3 in SH, and 1 unsheltered. 2018 had 10 CH of which 6 were in ES and 4 unsheltered. PIT workers also made a more conscious effort to locate families with children experiencing homelessness. They were provided with HUD's definition as opposed to other agencies' family homeless definition. During 2019 there was a total of 137 individuals in 44 families. Of these 137 individuals, 88 were below the age of 24, and 49 were above 24 years.

During 2018 there was a total of 117 homeless in 41 households with 77 below the age of 24 years. The GNCOC utilized the existing Veterans By Name List, which is updated biweekly, as a reference to locate homeless veterans in their known locations. The GNCOC partnered with SSVF service providers and 2 Veteran Administration Centers that serve NH to ensure all veterans that day were counted.

The number one goal is to refer a participant from a centralized entry location (CES). The GNCOC agencies regularly discuss what services they provide to ensure case managers understand which programs to refer clients. Weekly reports are based on need/vulnerability of the clients and provide referrals. CES is intended to increase and streamline access to housing and services for the homeless, match appropriate levels based on need, and prioritize persons with severe service needs for the most intensive interventions. VI-SPDATs (Vulnerability Index - Service Prioritization Decision Assistance Tool) are being performed, and contact is made with those in shelters who are chronic homeless to perform a VI-SPDAT on them to determine services needed.

The Greater Nashua Continuum of Care continues to work to improve and streamline their Coordinated Entry process. Currently a phone line offers 24-hour response. A caller leaves a message with pertinent information and the assigned provider returns the call with shelter availability information. Plans to improve and streamline the process are ongoing. Goals include refining the intake form, continued training for participating providers and better data collection.

There are three emergency shelters operating in Nashua, two receiving some Emergency Solutions Grant (ESG) funds as well as several agencies with transitional housing programs. The shelter programs have relationships with the two local hospitals to provide support for individuals seeking services from the Emergency Department for behavioral health issues, and provide emergency shelter once they are discharged from the hospital.

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 reported a reduction of 35% (1035 to 671 people) in the number of first-time homeless for persons with entries into ES, SH, TH or PH. 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 lowincome, stably-housed population to learn the tips and strategies in maintaining housing.

All GNCOC participating agencies have programs established for the purpose of providing emergency or transitional housing. Each of these programs offers supportive services tailored to the client's needs. Services provided will include case management covering education, daycare, budgeting, interviewing, resume writing, employment skills, legal aid and counseling to assist individuals and families.

Under the ESG program the GNCOC has a goal that 70% of participating households will achieve housing stability for six months following the end of rental assistance and that 50% of participants will maintain or have increased their income at program exit, demonstrating sufficient income to maintain housing.

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.

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

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 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.

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.

Harbor Homes Inc. will begin a 5 year \$400,000 grant from USDHHS (Substance Abuse and Mental Health Services Administration), to assist youth ages 18-24 with permanent housing. Approximately 150 individuals will be assisted. The funding will allow Harbor Homes to implement a comprehensive recovery and treatment program to individuals with a history of substance use disorders, and include permanent housing to further support a healthy transition to self-sufficiency and sustainability.

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

Actions taken to address the needs of public housing

Recently 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 access alternate funding sources to provide affordable housing opportunities in the City of Nashua and surrounding areas. This was a critical first step to pave the way for a major redevelopment that will have a significant (positive) impact on the number of affordable housing units, will greatly improve the layout of the area and living conditions of its current residents. The Bronstein Apartments (the "Property") is a 48-unit public housing development located on a 4.2-acre site at 41 Central Street, Nashua, NH and is owned and operated by the NHRA. The Property was built in 1971 and is in poor physical condition. NHRA has partnered with Boston Capital to redevelop Bronstein Apartments utilizing competitive 9% and 4% low-income housing tax credits, bond financing, and the HUD Section 18 Demolition/Disposition Program. The development team is proposing to replace the obsolete public housing with approximately 204 newly constructed units of mixed-income rental housing. Seventy (70) units will be affordable to extremely-low and low-income individuals and families.

The demolition and disposition of public housing is authorized under Section 18 of the Housing Act of 1937, as amended. NHRA will submit a Section 18 Demo/Dispo application to HUD in 2020. The application will meet all of the administrative steps and requirements of 24 CFR Part 970 and HUD Notice PIH 2018-04 including justification that the Property is obsolete as to physical condition, location, or other factors, making it unsuitable for housing purposes, and no reasonable program of modifications is cost-effective to return the public housing project or portion of the project to its useful life.

Once the Section 18 application is approved by HUD, the Declaration of Trust will be released from the Property and it will no longer operate under the public housing program, but under HUD's Project-Based Voucher Program. The Property will continue to operate with rental subsidy under Section 8 of the Housing Act of 1937.

The timeline for the redevelopment of Bronstein Apartments will be approximately 24-months.

-) NHRA was designated a Standard Performer in 2019 – NHRA will make every effort to increase its designation.
-) A High Performer Status was achieved under SEMAP during 2019
-) A full review of NHRA's five-year capital improvement plan was completed, and work is ongoing to address some of these needs. Recent work completed included roof, siding, window and door replacements at multiple developments. Upcoming work will continue to address the building envelopes at public housing developments.
-) Continued toward finalizing environmental site assessments (and any required mitigation) at all

housing sites.

As the Responsible Entity, the City conducts the environmental reviews for the NHRA. These are done according to the terms of a written Agreement. The City added the NHRA 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.

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

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. NHRA does not have a program in place to encourage home ownership.

Actions taken to provide assistance to troubled PHAs

N/A – NHRA is a High Performer.

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)

During the height of population growth many communities in NH established incentives for the development of housing for older persons. Given that the State has an aging population the development of age restricted housing was partially in response to meeting a growing demand. 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. This past year the City amended it's Senior Housing Ordinance to tighten the definitions and criteria to qualify as senior housing. The legislation better regulates where this housing can be developed and it's suitability within the proposed neighborhood.

Recent studies identified a serious mismatch between the existing housing stock in the state and the needs and desires of our changing population. NH's Accessory Dwelling Unit (ADU) law, which took effect on June 1, 2017 permits a residential living unit that is within or attached to a single-family dwelling on the same parcel of land as the principal dwelling unit it accompanies. ADU's increase the housing supply without further land development, are an affordable housing option for many low-moderate income residents, improves homeowner cash flow and are helpful to the elderly and/or disabled people who may want to live close to family members.

Regarding development, the City has a AAA bond rating and comparatively low building fees, which creates a positive lending environment. The result of which can be seen in a recent uptick in affordable housing development throughout the city.

The City has also adopted The Community Revitalization Tax Relief where property owners who intend to substantially rehabilitate a building located in downtown may apply to the City for a period of temporary, finite, tax relief during which the property tax on the structure would not increase as a result of its substantial rehabilitation (between 5 and 13 years). In exchange for the relief, the property owner grants a covenant ensuring there is a public benefit to the rehabilitation. Given that downtown Nashua contains mill building ripe for conversion this incentive may facilitate affordable housing development (as was the case for 30 Front Street/Cotton Mill). 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. In the past year, the city increased the elderly exemption amount and will continue to review credits to determine increases as necessary.

The Housing Appeals Board was signed into law in the summer of 2019 and will become effective January 1, 2021 providing an expedited route for appeals to land use board decisions. This law requires decisions be made in 90 days, instead of the current system which takes more than a year and many times several years for a decision.

Lastly, the City worked with the Governor's Office for the successful designation of two of our most distressed Census Tracts as Opportunity Zones to spur economic development. Opportunity Fund investors will receive a deferral of taxes owed on unrealized capital. Further after 10 years, the investor

will be eligible for an increase in the basis of their original investment, meaning significantly lower taxes at the end of the term.

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 44% resulting in 1,307 complaints (up from 908 the pervious 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. To that end, this past year the City implemented a pilot rental rehab program. The program offers deferred payment (0% interest) loans for essential repairs of residential rental properties containing 1-8 units. Properties must be occupied by income eligible tenants; rents charged must not exceed HUD published fair market rents; and owners must provide a 10% match based on total project cost. Each owner may receive only one loan per year capped at \$20,000 for one unit plus \$5,000 for each additional unit. Properties located in the City’s lowest income census tracts will receive priority (i.e. French Hill, Crown Hill and Tree Streets neighborhoods)

The full amount allocated (\$54,894) was expended, reflecting 7 units and leveraging \$70,078 of owner contribution, far exceeding the required 10% match. Other funds leveraged to these projects included city of Nashua Lead Paint & Healthy Homes grants totaling \$55,000; and \$33,000 of State of NH Lead Paint loan funds (though NHHFA). Due to the success of the pilot, the next Action Plan year included nearly double funding at \$150,000.

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. The City is carrying out its fourth grant for a total of \$11,780,000, and in the last fiscal year a total of 51 units were made lead safe through the grant program. As of this writing, the City was awarded a new grant in the amount of \$5.7M to address 250 units over 42 months.

The City addressed lead hazards through targeted grant funding, as well as through the Housing Rehab Programs. 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 Choise 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 witin the extremely quick timeline dictated by the LSHR.

The City also recently entered into a data sharing agreement with the state to obtain information directly regarding lead-poisoned children. This will help streamline and expedite our response and has been in discussion for several years.

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 47% (37% last year) while the income for adult leavers increased by 55% (slightly lower than last year's 63%).

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

The City has recently taken, or is planning to take the following actions:

- Community Resilience Strategy: 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 hosted a variety of opportunities, such as workshops, for stakeholders and the public to contribute to the Resilient Nashua Initiative. All community members were encouraged to take part. This Initiative has a direct connection to low-moderate income residents, as their resources are scarce to recover or absorb trauma.

The final report identified several goals: Identify acute shocks impacting the City of Nashua
Identify chronic stressors impacting the City of Nashua
Encourage diverse stakeholder dialogue through an inclusive environment
Identify opportunities to improve the City of Nashua's resilience

- Working 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).
- In response to the Community Health Assessment, the City creates the Community Health Improvement Plan (CHIP). This works on a three year cycle. The Public Health Advisory Council (PHAC) completed the process to develop the region's third plan, the 2018-2021 CHIP, that details the evidence and strategies that will be implemented to bring positive change in the prioritized areas. Priority areas

will include: Behavioral Health (suicide, mental health, and substance misuse), Chronic Disease, Maternal and Child Health, Weight Management/Physical Activity/Nutrition, and Public Health Emergency Preparedness.

- 2-1-1 is New Hampshire's statewide, comprehensive, information and referral service. Through a unique coalition of non-profit, government, corporate and volunteer partners, New Hampshire residents need only dial 2-1-1 to be connected, at no cost, with trained Information and Referral Specialists who can provide them with the health and human service information they need to get help, give help or discover options. 2-1-1 NH is an initiative of Granite United Way and relies on donors and partners like Eversource, the State of New Hampshire, Volunteer NH and local United Ways.

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 is being converted to an AI its general findings were used to develop the 2020 Consolidated Plan. Certain impediments are known to exist:

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

Actions:

-) See discussion in Lead Paint Section

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

The City recently drafted Uniform Grant Guidance Policies & Procedures, developed consistent with 2 CFR Part 200. Within that document Section VI. addresses Subrecipient Monitoring. In addition, the UPD will use *supplemental* Policies & Procedures specific to its CDBG Subrecipients (policies attached). The UPD is in the process of implementing the City-wide P&P. For this past program year under CDBG we conducted a risk assessment prior to award followed by ongoing monitoring. The up-front risk assessment helps identify any high risk activities that will require full scale on-site monitoring visits. 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 who previously struggled to meet schedules, submit performance reports, submit timely invoices. UPD did not conduct any full-scale on-site monitoring visits as no high risk entities were identified. However staff met with each CDBG Subrecipient to review their record-keeping and intake procedures prior to award and each Subrecipient completed the on-site monitoring form as a self-check (provided back to us). This initial meeting provided 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. The up-front meeting also included an evaluation of internal controls (i.e. separation of duties) as well as a review of the financial procedures/software.

Most of our Subrecipient activities fall into either Public Service or Public Facility activities, each with their own reporting requirements. Public Services are required to submit quarterly reports that document beneficiaries and contain supporting documentation for all reimbursement requests (i.e. invoices). Public Facility activities submit beneficiary data and progress reports. The financial portion is controlled within UPD not on a reimbursement basis. We oversee these physical projects and approve release of funds directly to the contractors on behalf of the Subrecipient.

Internal (i.e. Park and Rec.) 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 national objective compliance, verify expenditures, monitor progress and to identify high risk Subrecipients. Quarterly reports are comprehensive and reviewed in detail before any funds are reimburse to the Subrecipient.

CDBG Consultation/Technical Assistance: Staff offer workshops prior to application. Following that, staff visit each Subrecipient before the activity begins as described above. Throughout the year, UPD provides technical assistance to Subrecipients as needed or at staff turn-over. For those Subrecipients that cannot submit client records due to privacy or it may be impractical due to number served. In those cases, staff visit to review client files on-site. Please see our Supplemental Policy for additional detail on determining level of monitoring.

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. On-site and desk audits

were suspended due to COVID-19 and will resume when safe to do so. The City documented this in a Waiver request to the local field office. 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 October 26, 2020 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 pending.**

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 made a Significant Amendment to its PY2019 (FY20) Action Plan to accept CDBG-CV funds. These funds were related to the CARES Act of 2020 in response to the current health crisis. The City accepted \$390,913 and reprogrammed existing CDBG Entitlement funds in the amount of \$251,775 toward a COVID-19 Impact Fund Program. The program provided grants to low-moderate income micro-enterprise (small business) and non-profits to prevent, prepare for, and respond to coronavirus. In total 15 businesses and 14 non-profits were assisted. The breakdown of reprogrammed funds can be found in R-20-029.

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.

An intensive monitoring of all HOME assisted projects was conducted from approximately August 2018-August 2019. The details of that monitoring were included in last year's CAPER.

Two properties were due for a physical standards inspection visit in approximately June 2020: Cotton Mill and Salmon Brook. However, these inspections have been postponed due to COVID-19 as allowed by and documented through a waiver request to the local field office. Desk monitoring was also put on hold while staff focused their attention to the health crisis and rolling out the new CDBG-CV funds.

The City anticipates conducting desk monitoring in January to obtain calendar year 2020 tenant occupancy verifications.

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.

As part of the above portfolio-wide monitoring, we reviewed each project's Tenant Selection Plans, where affirmative marketing is generally contained. As a result, a few were revised/updated (especially to reflect the Violence Against Women Act) and one project needed to implement an entirely new document.

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 did not receive any HOME program income. The current balance of \$50,000 is derived from an old HODAH (HUD) project. These funds are awaiting local legislation to move to a separate fund, as they are not HOME and the City wishes to use them according to their original restrictions.

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)**