



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

for  
Community Development Block Grant and  
HOME Investment Partnership Program

July 1, 2014 – June 30, 2015 (FY15)

Prepared by the Urban Programs Department  
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DRAFT September 24, 2015

## 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.

NOTE: This CAPER represents the fifth and final year of the 2000-2015 Consolidated Plan. It is the first CAPER to be produced using HUD's eCon Planning Suite, resulting in a different format than in previous years. The eCon Planning Suite is designed to start with entry of a full 5-year Consolidated Plan allowing users to generate Action Plans and end of year reports with greater automation and ease. The City of Nashua opted to enter our FY15 Action Plan, as a stand-alone Plan, in the system in order to become familiar with the process prior to entering our 2015-2020 Consolidated Plan. As such, we must use the system to generate the FY15 CAPER. Some accomplishment data has been converted from our previous formats to fit into this new format. However, all data from past CAPERs has been carried over to present an as accurate assessment as possible.

During the program year, measurable progress was made on the majority of the five-year goals established in the 2010-2015 Consolidated Plan, as outlined in this report. Some goals, however, did fall short or were unable to be addressed. This was due primarily to reduced funding over the five-year period. When the 2010-2015 Consolidated Plan was drafted, we based our plans on level funding. Unfortunately total funding to the CDBG program was approximately 20% less and HOME was 32% less than the previous five-year period. Despite funding cuts, the City and its partners addressed priority needs through meaningful projects and leveraging private resources.

### **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.

This chart was modified to include accomplishments to date under the "Actual Strategic Plan" column. Since this was the first Plan to be entered in eCon Planning Suite, the system did not have historical data of accomplishments to date. It was also modified for Public Facility related projects. In past Plans, the unit of measure for public facilities was number of facilities improved. In the new system, the unit of measure is number of persons assisted. We have manually altered the table to be consistent with past Plans. Also, it should be noted that the Source/Amount column only reflects funds allocated for FY15, whether carried out or not. Rental Units constructed includes Cotton Mill Square;

of the 109 total units, 51% are restricted for households earning less than 80% AMI through a Section 108 Loan provided by the City. This accomplishment data is not reflected in IDIS. Another 14 were reported under the HOME program.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Affordable Housing	Affordable Housing	HOME: \$194876	Rental units constructed	Household Housing Unit	50	91	182%	50	55	110%
Affordable Housing	Affordable Housing	HOME: \$194876	Homeowner Housing Added	Household Housing Unit	2	0	0.00%	2	0	0.00%
Business Development	Non-Housing Community Development		Businesses assisted	Businesses Assisted	5	34	680%			
Business district enhancement	Non-Housing Community Development		Facade treatment/business building rehabilitation	Business	5	0	0.00%			
Home Ownership Assistance	Affordable Housing		Homeowner Housing Added	Household Housing Unit	50	0	0.00%			
Housing Discrimination	Affordable Housing		Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	75	232	309%	60	46	76%
Improve Housing Quality	Affordable Housing	CDBG: \$238917	Rental units rehabilitated	Household Housing Unit	50	40	80%	4	4	100%

Improve Housing Quality	Affordable Housing	CDBG: \$238917	Homeowner Housing Rehabilitated	Household Housing Unit	50	65	130%	8	9	112%
Improve Housing Quality	Affordable Housing	CDBG: \$238917	Housing for Homeless added	Household Housing Unit	0	0		0	0	
Improve Housing Quality	Affordable Housing	CDBG: \$238917	Housing for People with HIV/AIDS added	Household Housing Unit	0	0		0	0	
Infrastructure	Non-Housing Community Development	CDBG: \$120000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted* (formerly # of projects)	ConPlan goal: 5 projects	3 Projects	60%	1 project 3,846 ppl	0	0.00%
Job Creation	Non-Housing Community Development		Jobs created/retained	Jobs	60	22	37%			
Job Skills	Non-Housing Community Development		Other	Other	150	0	0.00%			
Neighborhood projects	Non-Housing Community Development		Other	Other	3	2	67%			
Park Projects	Non-Housing Community Development	CDBG: \$70000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted* (formerly # of projects)	(10)	(5)	(50%)	(2)	0	0.00%

Public Facility Improvement	Non-Housing Community Development	CDBG: \$55127	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted* (formerly # of projects)	(30)	(18)	(60%)	(3)	(1)	33%
Public Service Homeless Assistance	Homeless		Homeless Person Overnight Shelter	Persons Assisted	127	0	0.00%			
Public Services - General	Non-Housing Community Development	CDBG: \$53600	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	25,000	23,322	93%	1,400	1,398	99.86%
Public Services - Youth	Non-Housing Community Development	CDBG: \$22500	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	10,000	3,609	36%	370	285	77.03%
Sidewalk/Trail Projects	Non-Housing Community Development		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted* (formerly # of projects)	(5)	(2)	(40%)			
Slum Blight	Non-Housing Community Development		Other	Other	3	2	66%			
Youth Facility Improvement	Non-Housing Community Development	CDBG: \$18500	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted* (formerly # of projects)	(20)	(8)	(40%)	(1)	(2)	(200%)

**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.**

The table below shows the highest priority goals and objectives from the 2010-2015 Consolidated Plan. Activities conducted during FY15 are highlighted below.

<b>GOAL A: STRENGTHENING NEIGHBORHOODS</b>		<b>PRIORITY</b>
<u>Objectives</u>		
➤ Increase home ownership in areas of low-moderate income (LMI) concentrations to increase income diversity		HIGH
➤ Increase the supply of rental housing to meet needs of all income groups		HIGH
➤ Enhance the character of existing neighborhoods and revitalize older ones		HIGH
➤ Ensure safe, sanitary housing and prevent housing discrimination		MEDIUM
➤ Improve the quality of existing housing stock		MEDIUM
➤ Improve quality of life issues contributing to neighborhood blight		MEDIUM
<b>GOAL B: IMPROVE ECONOMIC OPPORTUNITIES</b>		
<u>Objectives</u>		
➤ Improve the economic well being of Nashua’s LMI individuals through job creation or retention		HIGH
➤ Stimulate the growth of new enterprises, including micro enterprises		HIGH
➤ Enhance the vitality of neighborhood business districts and Downtown Nashua		HIGH
➤ Reclaim Brownfields and other abandoned and underutilized sites		MEDIUM
➤ Enhance the job skills of Nashua’s workforce, particularly LMI individuals		MEDIUM
<b>GOAL C: IMPROVE THE QUALITY OF LOCAL INFRASTRUCTURE</b>		
<u>Objectives</u>		
➤ Improve the quality/increase the quantity of public improvements that benefit low-moderate income individuals		HIGH
➤ Provide low-moderate income residents with accessible open space, from neighborhood playgrounds to large scale regional parks		HIGH
➤ Ensure neighborhoods have access to schools, community centers, and open space via sidewalks or trails		MEDIUM
<b>GOAL D: IMPROVE THE QUALITY OF COMMUNITY FACILITIES</b>		
<u>Objectives</u>		
➤ Improve the quality/increase the quantity of facilities serving LMI individuals		HIGH
➤ Improve the quality/increase the quantity of facilities that benefit LMI teens and youth		HIGH
<b>GOAL E: IMPROVE THE QUALITY OF PUBLIC SERVICES</b>		
<u>Objectives</u>		
➤ Improve services for all LMI individuals		HIGH
➤ Improve services for LMI youth and teens		HIGH

## 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	12,943	0
Black or African American	268	0
Asian	377	0
American Indian or American Native	26	0
Native Hawaiian or Other Pacific Islander	13	0
<b>Total</b>	<b>13,627</b>	<b>0</b>
Hispanic	1,206	0
Not Hispanic	12,421	0

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

### Narrative

The following table derived from IDIS reports, shows greater detail than the default table above.

#### CDBG Beneficiaries by Racial / Ethnic Category

Housing- Non Housing	Race	Total Persons	Total Hispanic Persons	Total Households	Total Hispanic Households
Housing	White	0	0	20	5
	Total Housing	0	0	20	5
Non Housing	White	14,100	1,423	0	0
	Black/African American	385	50	0	0
	Asian	391	0	0	0
	American Indian/Alaskan Native	34	3	0	0
	Native Hawaiian/Other Pacific Islander	34	0	0	0
	American Indian/Alaskan Native & White	11	0	0	0
	Black/African American & White	22	3	0	0
	Amer. Indian/Alaskan Native & Black/African Amer.	14	1	0	0
	Other multi-racial	2,156	223	0	0
	Total Non Housing	17,147	1,703	0	0
Grand Total	White	14,100	1,423	20	5
	Black/African American	385	50	0	0
	Asian	391	0	0	0
	American Indian/Alaskan Native	34	3	0	0
	Native Hawaiian/Other Pacific Islander	34	0	0	0
	American Indian/Alaskan Native & White	11	0	0	0
	Black/African American & White	22	3	0	0
	Amer. Indian/Alaskan Native & Black/African Amer.	14	1	0	0
	Other multi-racial	2,156	223	0	0
	Total Grand Total	17,147	1,703	20	5



## 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		\$760,904	\$368,562
HOME		\$1,006,353	\$73,423.27
Other	HOME Match	\$110,000	
Other	HOPWA - HUD	\$1,430,000	
Other	In-kind match to LHC grant	\$125,117	\$84,145
Other	Lead Hazard Control Grant (LHC)	\$826,000	\$915,981
Other	Local	\$30,000	\$0
Other	Match to LHC Grant	\$125,000	\$77,500

**Table 3 - Resources Made Available**

### Narrative

This table 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 is generated by the system based on information entered in the Strategic Plan and Annual Action Plan. The expenditure data is generated by the system based on drawdowns completed during the program year. Users may update the values in both columns. The narrative should be used to explain any adjustments made to the default values:

- HOME funds available include the FY15 annual allocation, balance available from the active project at 45-47 Chestnut Street; CHDO Operating, CHDO Reserve, Homebuyer program funds and uncommitted prior year affordable housing development funds.
- HOME "Amount Expended During Program Year" was adjusted to reflect total drawn as shown in IDIS report PR05.
- HOME Match "Amount Expended During Program Year": A dollar amount was added to the table to reflect match documented during the program year.
- HOPWA funds are administered by the Greater Nashua Continuim of Care. The information in the table was provided by the GNCOC, as they reported it to HUD.
- In-kind match to LHC grant was adjusted down from \$375,353. That figure represented the total match expected over a three year grant.
- Local amount of \$30,000 is City funds toward Centennial Pool. Project not executed in FY15.

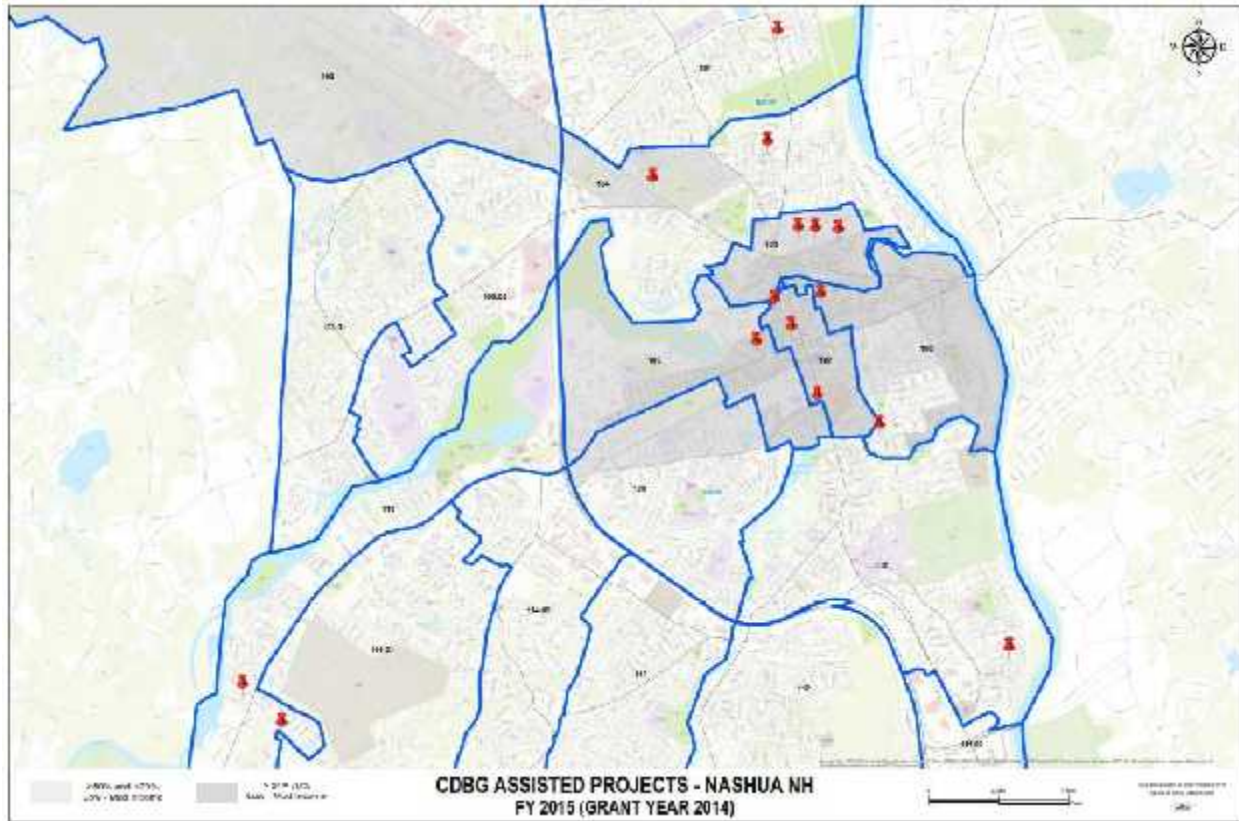
**Identify the geographic distribution and location of investments**

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

**Table 4 – Identify the geographic distribution and location of investments**

**Narrative**

The map below shows the geographic distribution of activities completed in the Plan year. No target areas were defined under the 2010-2015 Consolidated Plan.



## 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 FY2015 have leveraged a substantial amount of other public and private resources despite difficult economic circumstances. Subrecipients reported the following leveraged funds to CDBG activities: (amts. subject to change, pending final reporting)

Federal	\$132,801
State	\$64,379
Other	\$ tbd
<u>Local/Private</u>	<u>\$196,838</u>
TOTAL	\$394,018

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.

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. The local/private amount listed above includes the Lead Grant owner contributions and amounts reported by CDBG Subrecipients.

<b>Fiscal Year Summary – HOME Match</b>	
1. Excess match from prior Federal fiscal year	
2. Match contributed during current Federal fiscal year	
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	
4. Match liability for current Federal fiscal year	
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	

**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 \$

Table 7 – Program Income

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

**Table 8 – Minority Business and Women Business Enterprises**

<b>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</b>						
	<b>Total</b>	<b>Minority Property Owners</b>				<b>White Non-Hispanic</b>
		<b>Alaskan Native or American Indian</b>	<b>Asian or Pacific Islander</b>	<b>Black Non-Hispanic</b>	<b>Hispanic</b>	
Number						
Dollar Amount						

**Table 9 – Minority Owners of Rental Property**

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

**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	129	
Number of non-homeless households to be provided affordable housing units	146	
Number of special-needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>275</b>	

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	50	55
Number of households supported through the rehab of existing units	10	13
Number of households supported through the acquisition of existing units	0	0
<b>Total</b>	<b>60</b>	<b>68</b>

Table 12 – Number of Households Supported

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

Discuss how these outcomes will impact future annual action plans.

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 Persons Served	CDBG Actual	HOME Actual
Extremely Low-income	4	0
Low-income	2	11
Moderate-income	7	3
<b>Total</b>	<b>13</b>	<b>14</b>

Table 13 – Number of Persons Served

**Narrative Information** HOME Actual was added to the default system output to include Cotton Mill.

## **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 Continuim of Care (GNCO) administers the HOPWA and ESG funds in the City. They take the primary lead in addressing homelessness in Greater Nashua. They held two annual events for the homeless and at-risk community members. Project Homeless Connect was a one day event held in December and follows a national model to provide a one-stop shopping experience for those in need of connecting to a variety of services. From housing to healthcare, local agencies provide information to individuals and families about programs for which they may be eligible, as well as receive haircuts, food, coats and other items of clothing, benefit assistance, job search, etc. Every September the GNCO holds Project Employment Connect, a job fair for homeless and at-risk individuals, including a "Dress for Success" event coordinated by a local hospital.

The GNCO funds an outreach worker, PATH worker, and Healthcare for the Homeless outreach worker. These positions are tasked with seeking out homeless individuals and families in the community to engage them in care and services.

As of 2014 , Harbor Homes, the GNCO and its affiliate agencies have provided permanent housing to more than 10,000 non- veteran and veteran NH residents through an array of 80 programs.

### **Addressing the emergency shelter and transitional housing needs of homeless persons:**

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. Unfortunately, the need always far outweighs the capacity and programs often turn away those in need. One of the shelter programs has developed a new relationship with the two local hospitals to provide support for individuals seeking services from the Emergency Department for behavioral health issues, and provides 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:**

**recently homeless from becoming homeless again.**

As mentioned previously, rapid re-housing funds are being utilized in this way. Additionally, one GNCO agency has a generous Supportive Services for Veteran Families program that has done a tremendous



job of preventing veteran homelessness. Also, the City of Nashua and one GNCOC agency made good use of Neighborhood Stabilization Program funds to purchase and renovate several foreclosed homes in Nashua , turning them around to low-income families.

**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:**

Per HUD’s mandate, the GNCOC has an ad-hoc committee working within the Continuum as well as individuals participating on a statewide committee to implement a coordinated intake assessment program. This helps streamline referrals and make it easier for those seeking services to meet their needs. More coordinated utilization of the Homeless Management Information System (HMIS) is also strengthening COC's ability to track individuals served.

Rapid re-housing funds were utilized in our community to assist families in moving out of shelters more quickly, but there still are not enough resources to easily free up shelter space. There has also been an increase in utilization of the COC's wrap around services, to shorten shelter stays.

Regarding chronically homeless Veteran’s outreach efforts were conducted weekly throughout the GNCOC service area by local service providers and VA staff in-person and by phone at local homeless shelters, soup kitchens, health centers, rooming houses, veteran service organizations, city/town welfare, known camps/parks where homeless individuals tend to frequent, and homeless service providers. There is a “One-Stop Veteran Access Center” located in Nashua at local services provider Harbor Homes(HH). HH uses a Coordinated Access model along with community partners and representatives from the VA, SAMHSA, SSVF, GPD, The Bridge program and shelters to expeditiously and efficiently serve our homeless veterans and those at risk of homelessness. Through comprehensive outreach to the public via local media to contact HH if they know of any homeless Veterans.

Presently there are no unsheltered homeless Veterans in NH-502. Through a set of counting and tracking tools: Coordinated Access Line and Log, annual Point in Time HUD/COC count, weekly outreach activities, and the veteran referral log. The veteran registry will reflect unsheltered veterans that enter the Greater Nashua Continuum of Care homeless service system. Over the past 10 years, the GNCOC has been keenly focused on the issue of Veteran homelessness. Out of this effort, 6 different programs have been developed that assist homeless veterans. The implementation and success of these programs was achieved, in part, by more than 20 million dollars in community investments directed toward the infrastructure that supports homeless veterans and their families. For 8 of the last 10 years, HH has operated the HVRP program and through September 2015, this program will have successfully obtained nearly 750 jobs.

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

### **Actions taken to address the needs of public housing**

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

- Utilized Project Based Vouchers to provide more low income housing choices to the community. Currently working with Southern NH Services to provide thirty-one (31) Section 8, Project Based Vouchers (PBV) to their Salmon Brook Senior housing development. NHA will utilize their existing Section 8 waiting list to fill the units.
- NHA changed some internal management roles at the NHA to provide more efficient oversight of its Maintenance program in order to maintain high performer status under the existing Section Eight Management Assessment Program (SEMAP) standards. A High Performer Status was achieved under SEMAP during 2013; as well as worked toward increasing its Public Housing Assessment (PHAS) score. A substandard physical score was attained in 2013 and a Troubled designation in 2014.
- Established more effective processes departmentally to support improved operations. Additional oversight within property inspections and processes to issue work orders, close work orders, and inspect work completed is being done. A Facilities Manager was put in place to provide direct oversight.
- Assessed its public housing stock in order to improve the sustainability of its properties. A full review of NHA's five-year capital improvement plan was completed, and work is ongoing to address some of the capital improvements needs. Additional work to elevators, installation of CO detectors, etc. is planned in the near future.

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

The following initiatives were conducted to involve residents:

- Met with residents to encourage and promote the start-up of Resident Associations to promote socialization and special community activities run by the resident leadership of the Association.
- Met with residents to encourage and assist in starting Crime Watch groups at developments showing a need or desire to have one.
- NHA had representation at all Resident Association meetings with management acting as a liaison between residents and NHA.
- Involved the Resident Advisory Board (group of individuals from public housing and Section 8 selected to serve on this board) in the planning and development of NHAs required Annual and Five Year Plan.
- Educational sessions were provided to residents on site on important health and safety topics (bed bug awareness, fire prevention, etc.) through a partnership with Nashua's Lead Paint and Healthy Homes Program.
- Management worked closely with local and state agencies such as the Welfare Dept., Health

Dept., mental health providers, and family services providers to determine assistance needed for NHA families.

- Management collaborated with local community agencies to provide services and programs for residents.
- Monthly review of all criminal activity reports supplied by the local police department to coordinate efforts to resolve and/or prevent further problems.
- Management developed and conducted efforts to involve families in community activities such as development beautification events.
- NHA representation at a multitude of community networking and service provider meetings.

### **Actions taken to provide assistance to troubled PHAs**

Following a *Substandard Physical* designation in 2013, the Nashua Housing Authority (NHA) submitted a corrective action plan to HUD, which was subsequently approved. The actions described were generally changes to management to ensure work orders and other necessary repairs were fully carried out. The Plan did not include any items that would require City assistance or Consolidated Plan resources.

The recent *Troubled* designation's financial score of zero was based on a failure to make required financial indicator submissions. The NHA prepared a corrective action plan, that included changes to the contract and/or procurement of their independent auditor to ensure timely submission of financial documents. The NHA will try to increase revenues while decreasing expenses. The actions HUD suggest to include in the Recovery Plan will not require City assistance or Consolidated Plan resources.

## **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)**

Property costs in Nashua, although increasing rapidly with the overall market, remain lower than those of all of its neighboring towns and most communities in the region. Property taxes are comparatively low and the City has historically encouraged diverse uses of land.

Nevertheless, the cost of affordable housing production remains high in the Nashua market. As a result, the City continues to work to eliminate barriers that may limit the production or feasibility of affordable housing construction that are within the capacity of local government to address. In 2006 the City adopted a new land use code that includes inclusionary zoning, which provides density incentives for projects where the applicant consents to designate some number of units as affordable.

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

The greatest obstacle to meeting underserved needs is the limited availability of funding. Federal and local budget cuts, economic downturn, subprime mortgage crisis, foreclosure spikes, the housing market and political climate have resulted in the increased need for services, economic opportunities and affordable housing. However, the changes have also resulted in reduced funding, causing fewer services, program elimination, staffing cuts and the loss of other essential resources.

The City's CDBG award has seen a reduction of 30% since FY2011. The HOME program has suffered even greater reductions with a total loss of 50% since FY2011. Furthermore, CDBG and HOME funds alone are not enough to address all needs.

The City of Nashua actively addressed this obstacle by pursuing other grant opportunities to meet needs, such as the Lead Paint & Healthy Homes Program; operating as collaboratively and efficiently as possible; collaborating with neighboring communities to share "lessons learned"; using best practice guidelines, systems, and previously created documents. Despite these efforts, the City, like all communities, continues to be faced with increased reporting requirements and compliance issues. Maintaining transparency and a high level of conduct requires extensive staff time.

### **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 \$8.8M through three separate grants.

The City addresses 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. In all other projects, the City requires contractors to use lead safe work practices and EPA's Renovate, Repair and Paint protocols.

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

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

There are a variety of actions the City undertakes throughout the 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, budgeting and other life skills, child care 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.

Additionally, the City's Economic Development Department works diligently to grow the City's economy, specifically by working to redevelop vacant or underperforming commercial corridors. Developing a variety of businesses in Nashua is critical to providing living-wage jobs for a diverse population with multiple jobs skills and experiences. Economic Development is accomplished by utilizing many different funding sources including, but not limited to, the CDBG Economic Development Fund, tax-increment financing (TIF) and local funds.

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

The central responsibility for the administration of the Annual Action 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. The UPD accessed, facilitated, and coordinated resources and draws from the immediate sources of expertise in the community to strengthen existing partnerships and develop new collaborative relationships.

The City's emerging healthy housing network will link residents to critical services, which when utilized has the potential to reduce health costs, emergency room visits, missed school and work days. The City has recently taken other actions related to economic resilience. These include:

- Has engaged potential public and private partners through the Nashua Local Emergency Planning Committee (LEPC) and the Nashua Voluntary Organizations active in Disaster (VOAD).
- Is 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).

- Has applied innovative approaches to address unmet disaster needs that deliver resilience to future disasters and multiple benefits (e.g., economic revitalization, job creation, community amenities). Specific examples include:
- Jackson Falls Dam Crest Gate: This project reduced the flood risk for approximately 70 properties along the Nashua River by putting adjustable crest gates atop a lowered hydroelectric dam that can be lowered in times of high river flows. This innovative project has contributed to downtown revitalization while making existing properties less prone to flooding. Modification of the crest gates was spurred by tax credit and HOME funding to the project (since it was originally in a floodplain).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 NGV America and Harvard University for its efforts. CNG is clean, domestic produced fuel with a very stable price. Diversity in fuels ensures that we can maintain operations during shortages and supply chain failures while also helping to reduce our emissions.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. Traffic management was identified as a need in the Hazard Mitigation Plan due to the need for efficient evacuation routes and emergency vehicle routes during a disaster.Community Health Improvement Plan (CHIP): The City has worked with community partners to develop a CHIP that will improve the health and wellness of Nashua residents. Together, they have worked to implement a measurable plan of action. The three top health priorities that will be addressed are: obesity, mental health and access to care. Connecting to building resilience, prioritizing access to health care now ensures critical medical resources are allocated to only the most pressing issues after disaster.

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

Same as 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. With the recent publication of the Affirmatively Furthering Fair Housing Final Rule, the City anticipates updating its analysis in the coming fiscal year. However, based on the City's Analysis of Impediments (AI) to Fair Housing Choice, prepared in October 2010, identified several impediments for Nashua, consistent with trends across the country. 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:

- ✓ Urban Programs staff strictly enforces HUD's Lead Safe Housing Rule and the EPA's Renovate Repair and Painting rule in all housing projects.
- ✓ Under the City's \$2.48M lead hazard control and healthy homes grant (effective June 1, 2012 – May 31, 2015), approximately 46 units were made lead-safe in FY15.
- ✓ A new \$3.4M Lead Hazard and Healthy Homes grant was obtained.
- ✓ 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.
- ✓ Continue landlord and tenant education through our partnership with NH Legal Assistance, the City's Housing Improvement Program, Code Enforcement Department, home buyer counseling and general distribution of informational materials.

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

Actions:

- ✓ Nashua has a contract with an outside agency to provide limited language services. The *Language Line* is available to all departments who engage a customer that is non-English speaking. Over 184 languages can be translated and is updated as needed.
- ✓ Outreach and education through local, faith-based, church and other relevant groups.
- ✓ The Urban Programs Department has translated many of its standard documents, especially those intended for tenants. We will continue to translate other written documents on an ongoing basis.
- ✓ Several city departments, including the UPD employ staff that can interpret Spanish.

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

Actions:

- ✓ The City contracts with NH Legal Assistance to conduct outreach and education to tenants and landlords regarding fair housing. NHLA conducted a community conference entitled "A Place to Call Home: Housing persons with Mental Illness in Our Community". A total of 28 people attended the conference. In total NHLA provided counselign to 46 individuals.

## **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 FY15, staff met with each CDBG Subrecipient to review their record-keeping and intake procedures. Throughout the year the Urban Programs Department performed desk audits on a rolling basis as CDBG Subrecipients submitted requests for payments. Reports are required quarterly, enabling staff to identify any potential performance issues in a timely manner. The reports, which include beneficiary details, were reviewed for consistency with National Objective compliance. Internal (city implemented) activities were monitored through ongoing internal communications. Only the Urban Programs Department can encumber and authorize payment of CDBG funds. Therefore no internal projects are conducted without oversight of the UPD.

CDBG Desk Audits are performed to confirm compliance with HUD regulations and to identify high risk Subrecipients. High risk factors might include:

- Subrecipients who are new to the HUD programs implemented
- Subrecipients who have experienced high turnover in key staff positions
- Subrecipients struggling to meet schedules, submit performance reports, submit timely invoices

➔ No high-risk CDBG Subrecipients were identified in FY14

CDBG On-Site Visits are conducted annually to Subrecipients based on the high risk factors above and whether the UPD has had difficulty obtaining data from them. UPD provided technical assistance to several Subrecipients through onsite visits during the year.

The UPD is comprised of a small staff responsible for HUD program oversight, which over the past few years has lost positions due to budget reductions. In the past, obtaining accurate client counts from CDBG Subrecipients was a struggle. UPD worked closely with Subrecipients to ensure only new clients are reported throughout the year, rather than looking at each quarter independently. We found that face-to face meeting to explain counting beneficiaries to be a successful method of compliance.

HOME: Monitoring of HOME projects underway included desk audits and spot checking on financial management practices, visits to the construction site and staff corespondance.

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

The City's adopted Citizen Participation Plan is posted to our website at:

<http://www.gonashua.com/CityGovernment/Departments/CommunityDevelopment/UrbanPrograms/tabid/457/Default.aspx>



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

The City placed a public notice, giving the general public a 15-day opportunity to comment on this CAPER. The draft report was made available at the Public Library, the Community Development Division and on our website.

**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.**

No changes to the Consolidated Plan Program objectives were made during this reporting period. However, the Urban Programs Department evaluates program design and efficiency on an ongoing basis. Data reporting remains an ongoing issue for many of the non-profits who receive CDBG support. UPD works closely with each entity to ensure they understand the requirements and also considers capacity of the entity before awarding funds. The UPD continues to survey Subrecipients and stakeholders, both formally and informally, to determine where other improvements can be made.

Although there were no changes to objectives, all grantees have experienced changes to regulations and reporting. Examples include the HOME Final Rule, the Affirmatively Futhering Fair Housing Final Rule, new "grant-based accounting" requirements and updates/revisions to IDIS. Each of these major changes affect the way the City manages its HUD programs. Staff are continually adjusting policies and procedures to keep up with the changing environment.

## **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.

On-site monitoring of all HOME-assisted properties was conducted in June 2014. Each unit in small projects was inspected, while a sampling of units in large scale projects was inspected. The inspections were conducted by the City's Housing Code Officers, on behalf of the Urban Programs Department. No violations of the City's Housing Code or the federal Housing Quality Standards were identified. No on-site monitoring was required this program year.

**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**

**Describe other actions taken to foster and maintain affordable housing. 91.220(k)**

The City actively markets its federal funds available to assist in the financing of affordable housing. The Mayor, Community Development Director, Economic Development Director, Planning Manager and Urban Programs staff all help to connect developers (both not-for profit and for-profit) to our federal funds. Staff meet with, provide technical assistance and advice to developers on how best to package their proposals to take advantage of all potential public funds. Our strong partnerships with the Nashua

Housing Authority and NH Housing Finance Authority, stewards of Project Based Vouchers and LIHTC respectively, enables us to coordinate all available resources.

Due to the downturn in housing development over the past five years, it became increasingly critical to preserve and maintain affordable housing. The City works closely with the managers/owners of our existing affordable housing portfolio to ensure lasting viability of these projects. There are many instances of CDBG funds allocated to HOME assisted projects in need of rehabilitation. Furthermore over the term of the 2010-2015 Consolidated Plan, significant efforts were spent to preserve the HOME/CDBG assisted projects owned by Neighborhood Housing Services of Greater Nashua as this agency ceased its operations. A total of 120 units (7 properties) were transferred to other non-profit entities.