



# Second Program Year Action Plan

The CPMP Second Annual Action Plan includes the [SF 424](#) and Narrative Responses to Action Plan questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. The Executive Summary narratives are optional.

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GENERAL

Executive Summary

*The Executive Summary is required. Include the objectives and outcomes identified in the plan as well as an evaluation of past performance, a summary of the citizen participation and consultation process (including efforts to broaden public participation) (24 CFR 91.200 (b)), a summary of comments or views, and a summary of comments or views not accepted and the reasons therefore (24 CFR 91.105 (b)(5)).*

**Executive Summary Response: Include the objectives and outcomes identified in the plan**

Based on the budget enacted by Congress for the prior fiscal year, the NSC anticipates receiving \$2,502,404 in HOME entitlement funds. This represents a 12.2% cut from the amount of funds allocated in the continuing resolution from the prior year. These funds are distributed by the North Suburban Consortium’s Board which is composed of representatives from its eight communities (Arlington, Chelsea, Everett, Malden, Medford, Melrose, Revere and Winthrop). The Consortium has chosen to distribute funds based solely on needs that have been prioritized by the Board. Thus there is no geographical based allocation to any of the communities.

The objectives that the NSC has established for the second year (2011-2012) of the five year period are:

**First Objective – Preservation**

The priority is to preserve what affordable housing there is, whether it is already subsidized by the government with expiring use restrictions, or whether it is unrestricted private market units occupied by and affordable to households with low incomes.

Strategies: The strategies to be used are:

- Funding for projects that will extend the affordability of expiring use properties in the NSC, and maintain or upgrade those properties.

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- Affordable housing rehab loan programs that enable low/mod homeowners to bring their properties up to code;
- Support programs that enable people to lower their cost of housing through energy conservation and efficiency;

### **Second Objective – Production**

This priority is to produce affordably restricted housing units that will be available to low income families for a period of time that meets or exceeds the HOME affordability periods based on the amount of HOME investment in the properties.

Strategies: The strategies to be used are:

- 0% interest, net cash flow loans to fund non-profit developments for extremely low and low income households.
- Low Interest loans to private developers of mixed income rental developments that includes a percentage of affordably restricted units for low and moderate income households.
- Buy Down Subsidies of condo units in order to create mixed income homeownership developments with affordable homeownership units in perpetuity.
- Housing Rehab loan programs that place affordable restrictions on rental units in owner-occupied multi-family properties throughout the consortium.
- Support organizations and communities using other strategies and sources of funds to create new affordable units.

### **Third Objective – Increase access to homeownership for very low, low and moderate income households**

Strategies: The strategies to be used are:

- Down Payment and Closing Cost Assistance to assist low and moderate income first time home buyers who are looking to enter the housing market and purchase their first real estate in the NSC jurisdiction.
- Partnership of the NSC First Time Home Buyer Program to very low income households utilizing Housing Choice Voucher Programs through local housing authorities to purchase their first property.
- Support low and moderate income households who invest in older, more affordable housing stock in the NSC jurisdiction through a purchase and rehab program.
- Housing counseling courses for low and moderate income households who are considering purchasing a property.

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- Increase and expand current fair housing activities, including affirmative fair marketing, outreach efforts, and translation of vital docs.
- Provide Fair housing activities that promote affirmative fair marketing and broader outreach efforts.
- Focus on efforts to streamline and simplify access to affordable housing where possible.

### **Fourth Objective - Stabilization and improvement of neighborhoods experiencing high foreclosure rates**

Strategies: The strategies to be used are:

- Support projects that stabilize foreclosed properties (or properties at risk of foreclosure) or low income households at risk because of foreclosure.

### **Executive Summary Response: Evaluation of Past Performance**

The North Suburban Consortium closed out 546 HOME units in the prior 5 year period (FFY2005-FFY2009). The major accomplishments in the HOME targeted priority areas were as follows:

#### a) Preservation

The NSC rehabbed 95 owner occupied and 24 rental units in owner occupied multi-family properties with HOME funds. It also loaned HOME funds to rehabilitate and improve privately owned apartment buildings. These loans to private developers (non-profits and for-profit developers) preserved and improved 82 existing rental units as affordable in the NSC jurisdiction.

#### b) New construction and reconstruction

NSC HOME loans for projects to create new affordable rental and homeownership units resulted in the creation of 55 additional HOME restricted rental units being created, and 16 HOME restricted homeownership units. In some cases, primarily when the projects were CHDO projects, the number of HOME restricted units underestimated the total affordable units created by the project, but the NSC only takes credit for units created which have a HOME affordability restriction.

#### c) Access to Homeownership

The NSC assisted 221 first time home buyers with down payment and closing cost assistance to purchase property in the NSC jurisdiction. It

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also funded 53 buy down subsidies to create affordably restricted homeownership units.

d) Stabilization and Improvement of “at risk” neighborhoods  
This is a new priority for the NSC. It has funded numerous projects in neighborhoods targeted for revitalization efforts, leading to increased investment in the neighborhood, specifically in low income neighborhoods in Chelsea and Revere. It will report its first progress towards this goal in its Year End Report for the federal fiscal year 2010.

### **Executive Summary Response: Summary of Citizen Participation and Consultation Process (including efforts to broaden public participation) (24 CFR 91.200 (b))**

Groups with programs which use or could use resources outlined in the The NSC’s approach to Citizen Participation was to build upon the extensive process used to create the Five Year Plan and First Annual Action Plan. The NSC has always involved local organizations which have specific ties to or whose members comprise minority, non-English speaking or disabled persons. Additionally, accommodations for those with limited English proficiency are available upon request.

The NSC held two jurisdiction-wide public hearings on the Year 2 Action Plan were advertised throughout the NSC in local papers, and held in Malden, the representative community. The public input hearing held on February 8<sup>th</sup>, 2011, at 6:30 PM at the fully accessible Malden Government Center solicited input into the Year 2 Action Plan, which was incorporated into the draft plan. The draft plan was made available to the public at the MRA offices, as well as local community development offices on April 12, 2011. During the 30 day public comment period, another advertised jurisdiction-wide public hearing was held at Malden Government Center on April 26, 2011 to receive any comments about the draft ConPlan and to again advise people that written comments could also be submitted to any one of the NSC member communities.

In addition to the comments received at these jurisdiction-wide public hearings, input on affordable housing needs and strategies discussed at local public meetings held by member communities were also incorporated into the development of this plan.

There were no comments submitted on the Draft Year 2 Action Plan to the MRA, or any of the NSC member communities.

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**Executive Summary Response: A Summary of Comments or Views and a Summary of Comments or Views not Accepted and the Reasons therefore (24 CFR 91.105 (B)(5)).**

A summary of opinions received and expressed and Agency responses can be found in Attachment A.

**General Questions**

1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.

The NSC strives for proportional distribution of HOME funds across the communities. The NSC funds communities with high poverty and minority concentrations for revitalization projects and seeks to de-concentrate poverty by funding affordable housing projects in more affluent communities, as well. Overall, the NSC strives for every member community to utilize HOME funds in a manner that furthers affordable housing and fair housing goals in their community. However, the NSC does not divide HOME funds strictly on a geographical basis. In order to maximize the amount of affordable housing created across the NSC the Consortium accepts applications for funds on a rolling basis.

The following is a summary of the Consortium’s income and racial geography by census tracts.

**Table 1: Poverty Concentrations<sup>1</sup>**

<b>Community</b>	<b>% Poverty Families Census 2000</b>	<b>% Poverty Families ACS 2008</b>
Arlington	4.06%	5.07%
Chelsea	23.30%	19.98%
Everett	11.82%	9.95%
Malden	9.17%	11.80%
Medford	6.38%	8.55%
Melrose	3.35%	3.98%

<sup>1</sup> 2000 Census, 2008 ACS

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Community	% Poverty Families Census 2000	% Poverty Families ACS 2008
Revere	14.64%	12.41%
Winthrop	5.50%	9.61%

**Table 2: Minority Concentrations<sup>2</sup>**

City/Town	2000 Total	2010 Total	% Change	% African-American	% Asian	% Hispanic
ARLINGTON	42,389	42,844	1.07%	2.43%	8.29%	3.26%
CHELSEA	35,080	35,177	0.28%	8.49%	3.11%	62.13%
EVERETT	38,037	41,667	9.54%	14.31%	4.81%	21.10%
MALDEN	56,450	59,450	5.52%	14.80%	20.14%	8.40%
MEDFORD	55,765	56,173	0.73%	8.79%	6.88%	4.36%
MELROSE	27,134	26,983	-0.56%	2.43%	3.79%	2.46%
REVERE	47,283	51,755	9.46%	4.87%	5.58%	24.38%
WINTHROP	18,303	17,497	-4.40%	2.01%	1.21%	6.09%

As can be seen from the Table 1 above, in 2008, three of the 8 communities had poverty rates in excess of 10%. Table 2 shows the population growth in each of the NSC cities and towns. It breaks these numbers down by race. Those communities that saw the largest growth in population, saw that growth in population come from minority and immigrant groups. These communities continue to see a strong demand for affordable housing.

In addition to what we learn from this city/town level data, it is possible that within each community, there may be census tracts in which there are census blocks which have different concentrations even though the tract did not. The census tract and block detail is not available from ACS or ESRI subsequent to the 2000 census. So looking back to the 2000 Census, we had the following picture of poverty and racial concentration by census tracts.

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<sup>2</sup> Census 2000 & Census 2010.

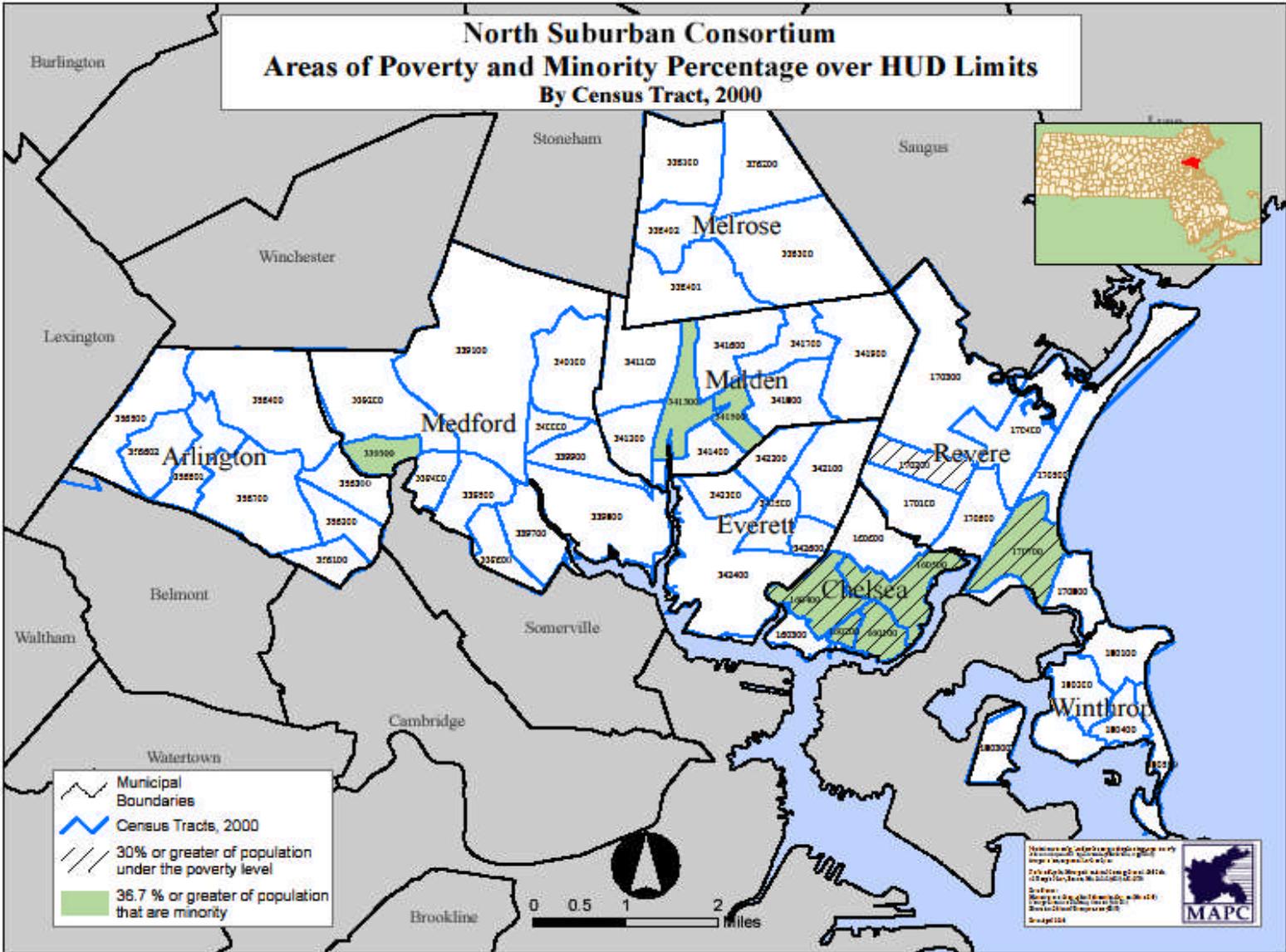


Chart 1: Map of Low-Mod Census Tracts (2000 Census)

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As can be seen from the table and the map, there are six tracts in which there is an excessive concentration of poverty (based on the HUD definition of greater than 30%) and there are eight tracts which have an excessive minority concentration (based on the HUD definition of the market area % plus 20%).

HUD and the State have identified communities with significant foreclosure rates and within those communities, the neighborhoods hardest hit. Within the Consortium, high foreclosure rates continue to persist in the NSC communities of Chelsea, Revere, and Everett. (See Table 1, Executive Summary). Neighborhoods impacted by the foreclosure crisis will be considered in the allocation of HOME resources.

For those NSC communities that have seen significant foreclosures in a specific neighborhood, or who have targeted high minority/poverty neighborhoods for revitalization efforts, the NSC works to provide funding to promote development of safe, decent affordable housing in those neighborhoods and spur, or leverage, increased private investment in the area. Often this takes the form of funding for non-profit development in those neighborhoods.

*2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.*

Unlike CDBG, the HOME program does not allocate by means of target areas. The NSC, first and foremost, primarily strives to ensure HOME funds are being utilized by all 8 of the NSC communities, to create affordable housing opportunities across the NSC.

In NSC communities where the cost of housing is extremely high compared to median family income for the greater Boston area, the NSC supports funds in order to subsidize deeper affordability at mixed-income developments throughout the City or Town, as well as affordable housing developments throughout the City or Town. In the NSC member communities where the high cost of housing is not the most pressing issue, but rather housing strategies focus on improving the safety and quality of housing in low-income areas, the member community may prioritize HOME funds for projects which are within the geographic target areas identified by the city or town for revitalization.

*3. Describe actions that will take place during the next year to address obstacles to meeting underserved needs.*

The primary obstacle to meeting the underserved housing needs of low-income and moderate-income populations continues to be the availability of funds. Except for special populations unable to work (some elderly, most extra elderly, some disabled and those institutionalized), the critical need is jobs. Organizations serving these populations continue to experience significant reductions in funding from both governmental and private sources. Additionally, reductions in state aid to local budgets have increased the funding shortfall, leaving many worthy and valuable programs unfunded or underfunded.

While this may be beyond the capacity of the local jurisdiction to address satisfactorily, the NSC is committed to continuing to work with and support non-profit Community Housing Development Organizations (CHDOs), homeless providers, and other special needs providers in their mission to serve low income and special needs populations in the NSC.

The NSC will continue to communicate with these groups as their needs change or the demand dramatically increases over the next year. Wherever possible, the NSC will provide technical assistance and support to providers in their pursuit of federal, state and other funding sources.

Moreover, the NSC actively educates communities about ways to remove barriers to the development of affordable housing and promotes proven programs. It will continue these efforts in the future.

The only disproportionate housing need identified in the preparation of the NSC's Five Year Plan were Hispanic renters with moderate cost burden (housing costs between 30%-50% of income). The NSC will continue outreach to minority populations and consider this population when targeting HOME funds.

*4. Identify the federal, state, and local resources expected to be made available to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.*

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Based on the prior year's resources available, the Consortium anticipates the following sources of funds for the year 2011-2012:

**Table 3: Resources Identified for Year 2010-2011**

	FEDERAL SOURCES			STATE SOURCES		
	HCV (Section 8)	PUBLIC HOUSING OPERATING	PUBLIC HOUSING CAPITAL FUNDS	MRVP	PUBLIC HOUSING OPERATING	PUBLIC HOUSING CAPITAL FUNDS
Arlington	4,652,837			21,876		
Chelsea	4,936,980	1,609,704	689,469			
Everett	4,286,772			248,500	298,407	
Malden	7,367,060	3,635,962	1,397,907	137,520	295,000	386,000
Medford	9,151,040	1,603,000	634,905	106,537	549,081	236,055
Melrose				13,464		
Revere	5,493,996	1,875,030	203,061	236,946	682,378	
Winthrop						
Totals	35,888,685	8,723,696	2,925,342	764,843	1,824,866	622,055

In addition to these resources, which have been allocated (primarily on a formula basis) at the time this plan is published, there are also State and Federal Resources available for affordable housing, and many NSC programs and development projects also rely on securing these resources.

State funding from the Massachusetts Department of Housing and Community Development is allocated to NSC HOME funded projects on a rolling basis, or via the state's one stop application funding rounds. The NSC encourages and supports its developers in applying for Housing Stabilization Funds, Housing Innovation Funds, Low Income Housing Tax Credits, Historic Tax Credits, Community Based Housing Funds, Affordable Housing Trust Funds, State HOME funds, and other state funding programs as they are available. Typically, NSC HOME funded projects leverage around \$6,000,000 of state community development funding from Massachusetts Department of Housing and Community Development per year.

NSC HOME funded development projects also rely on private financing, as HOME funds are typically used as a gap financing source, even when they are layered with other public subsidy. Based on the last 5 years performance, NSC HOME funded development projects typically leverage as much as \$27,000,000 in private financing per year.

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The NSC's Continuum of Care agencies apply for HUD McKinney Vento funds annually, as well. McKinney Vento funds are available for affordable housing development projects that include units for homeless households. The Tri-City Continuum of Care and Somerville/Arlington CoC are typically awarded \$ 1.45 million dollars and \$2.25 million dollars, respectively, on an annual basis.

NSC HOME programs such as the NSC's First Time Home Buyer Program, partner HOME funding with subsidized mortgage products such as Mass Housing Partnership's Soft Second Mortgage Program, which includes subsidy for low income first time home buyers. The NSC's First Time Home Buyer Program typically leverages around \$200,000 of state subsidy through Mass Housing Partnership, and as much as \$8,000,000 year in private mortgage funds.

Finally, some of the NSC communities have local funds available for affordable development. For example, the City of Chelsea has Affordable Housing Trust Funds available in a limited amount, on a rolling application basis, for projects in Chelsea. The City of Chelsea and the City of Melrose have both been able to make contributions of locally leveraged funds for HOME funded projects in their communities. These funds are scarce, but have been awarded in amounts of around \$100,000/year in those communities.

### Managing the Process

*1. Identify the lead agency or entity for overseeing the development of the plan and the major public and private agencies responsible for administering programs covered by the consolidated plan.*

The lead agency for overseeing the development of the North Suburban Consortium (NSC) Consolidated Plan is the Malden Redevelopment Authority, as designated by the City of Malden. The major public agencies responsible for administering the programs covered by the Plan include the Housing/Community Development Departments of the member communities (or other City departments as applicable), and various private non-profit organizations involved in housing development, services for homeless, elderly, disabled, substance abuse and victims of domestic violence.

The key public agencies typically responsible for the segments of the HOME program are:

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**Table 4a: Public Delivery Organizations for HOME**

<b>Public Organizations</b>
City of Malden Redevelopment Authority
City of Medford Department of Planning and Community Development
Town of Arlington Department of Planning and Community Development
Town of Melrose Office of Planning and Community Development
Town of Winthrop Financial Director
City of Everett Office of Community Development
City of Revere Department of Planning and Community Development
City of Chelsea Community Development Office

These public agencies are responsible for participating in the NSC Board meetings, reviewing development projects for funding decisions, compliance reporting and monitoring of HOME funded activities in their jurisdictions, and making decisions regarding the provision of HOME funded programs in their jurisdiction. In many cases, the public agency also runs HOME funded programs, such as Housing Rehab Programs or First Time Home Buyer Programs out of its office.

**Table 4b: Private Delivery Organizations for HOME**

<b><u>Private Nonprofit Community Development Housing Organizations (CHDOs)</u></b>
Chelsea Restoration Corporation (First Time Home Buyer Intake and Outreach, Affordable Homeownership and Rental Development, Foreclosure Prevention)
Housing Corporation of Arlington (Affordable Rental Development, Homeless Prevention Program)
Housing Families Inc (Affordable Rental Development for very low income, formerly homeless families, Housing and Stabilization Service Provider, Homeless Prevention and Rapid Rehousing Programs)
Tri-CAP (Affordable Rental Development for very low income, formerly homeless individuals, Fuel Assistance, Weatherization Programs, Asset Development, Housing and Stabilization Service Provider, Homeless Prevention and Rapid Rehousing Programs)
Chelsea Neighborhood Developers (also Revere Neighborhood Developers LLC) (Affordable Rental and Homeownership Development of family sized units, Asset Building)
Medford Community Housing (Non-Profit Affordable Housing Rental Development)

As developers whose mission it is to create affordable housing, these CHDOs are the primary recipients of NSC HOME funds for development. In some cases, they also assist with outreach and

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intake for HOME funded programs. Many of the CHDOs also participate in Continuum of Care organizations, and fulfill their mission of serving low/mod households by offering asset development, homelessness prevention, neighborhood organizing and planning, and other activities that provide both representation and benefits for low and moderate income communities in the NSC's jurisdiction.

Additionally, the members of the NSC belong to three different Continuum of Care organizations.

1. Malden, Medford and Everett are members of the Malden/Medford CoC. The lead organization which manages its overall planning and submissions to HUD is The Homeless and Housing Task Force of Medford, Malden and Everett.
2. Arlington belongs to the Somerville CoC. The lead organization which manages its overall planning and submissions to HUD is Somerville Homeless Coalition.
3. Chelsea, Everett, Melrose, Revere and Winthrop belong to the Balance of State CoC. The lead organization which manages its overall planning and submissions to HUD is the Department of Housing and Community Development (DHCD) of the State.

*2. Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations and others who participated in the process.*

The NSC Board authorizes the planning and management process and delegates its implementation to the City of Malden Redevelopment Authority.

As described more fully in the Citizen Participation section, NSC built upon its extensive process used to create prior Plans. The NSC's approach for research and analysis of needs for the Five Year Strategic Plan, of which this represents the Second Year's Action Plan, was to hire a consultant to assist the MRA in the assembly and analysis of data from databases, from agencies in the area, from surveys and from meetings. Groups active in areas which use or could use resources were made aware of the Plan being developed by advertisements and public notices and were invited to submit suggestions, ideas and requests for support. In addition many of these same groups responded to a survey mailed to all potential groups and attended a series of public hearings which were conducted for public input.

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These surveys, input meetings, and other forms of data analysis were compiled by the consultant and the MRA HOME staff. From these, the Five Year Plan was created, from which this plan is primarily developed.

A jurisdiction-wide public input hearing was held in Malden, and the draft Year 2 Action Plan also incorporated participation on the subject of affordable housing and homelessness from public meetings held throughout the year in various member communities to develop their local community development plans.

*3. Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies.*

The Consortium will continue to work closely with its non-profit partners to both monitor the success of existing programs and generate ideas for new programs to serve the changing needs of the Consortium's low income population. NSC Board members, HOME staff, and CHDOs interact with health and social service agencies both at their local Continuum of Care meetings, as well as at regional networking meetings such as the Metro Boston Network convened by the United Way. It is primarily through these venues, as well as in planning and preparing community development plans and that the NSC board members maintain contact with health and social service agencies, and work with the NSC public and private developers to ensure that they are working together with these agencies when clients and needs overlap.

### Citizen Participation

*1. Provide a summary of the citizen participation process.*

#### *Statement of Policy*

The NSC has adopted a Citizen Participation Plan which establishes the process by which the 5 Year and Annual Action Plans are designed and developed in consultation with the general public. The NSC also encourages citizens to participate in the development of any substantial amendments to the Consolidated Plan and required Consolidated Annual Performance and Evaluation Report (CAPER).

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### *Public Meetings in Development of the Year 2 Annual Action Plan (FFY2011)*

The NSC's approach to Citizen Participation was to build upon the extensive process used last year for the Five Year Plan and the Year 1 Annual Action Plan.

An advertised jurisdiction-wide public hearing for public input was conducted at Malden Government Center on Tuesday, February 8 at 6:30 PM. HOME input public hearing minutes are available upon request and comments received are included in the plan. In addition to these broader public forums, it should be noted that the NSC provides additional technical assistance to assist individuals or groups with the preparation of proposals for HOME funding and, if requested, the formation, or continued compliance, of a CHDO.

The draft plan was made available on April 12, 2011 at the offices of the Malden Redevelopment Authority located in Room 621 of the Malden Government Center and at the Planning and Community Development departments of NSC member municipal offices. The draft plan was also available online at the Malden Redevelopment Authority's website: [www.maldenredevelopment.com](http://www.maldenredevelopment.com), at the North Suburban Consortium's website: [www.northsuburbanconstorium.org](http://www.northsuburbanconstorium.org), and by request during the 30 day public comment period.

During the 30 day public comment period, another advertised jurisdiction-wide public hearing was held at Room 421 of the Malden Government Center on April 26, 2011, at 6:30 PM, to receive any comments about the draft plan and to again advise the public that written comments could also be submitted to any one of the NSC member communities.

No comments were received by any of the member communities, or the representative member, on the draft consolidated plan.

It should also be noted that the member communities of Arlington, Medford and Revere also held public hearings for input on their consolidated plans and draft plans. Chelsea and Everett also hold meetings to develop their community development plans for state Small Cities funds. The representative members from these cities and towns provided information on the citizen participation and input from those meetings in order to inform the goals and strategies developed in this plan.

### *2. Provide a summary of citizen comments or views on the plan.*

During the public hearings and planning process prior to the draft being issued, the Consortium received many comments, which were used to shape the priorities of this Plan. Amongst the comments received at the input hearing held in Malden Government Center were requests for affordable housing for very low income households, especially in conjunction with continued coordination with the local Continuum of Care organizations. The need for continued fair housing activities, as well as attention to affordable housing for very low income individuals, such as SRO's or studio units was raised by the Executive Director of Tri-CAP, an active CHDO and member of the Malden-Medford-Everett Continuum of Care as an agency that specializes in serving low income households.

After the draft was issued and advertised, comments were received at the public hearing or at the MRA offices, prior to the completion of the final Plan. A public hearing to consider comments to the Consolidated Plan was conducted at Malden Government Center, Room 421, on Tuesday, April 26 at 6:30 PM. No comments were received at that meeting, or submitted in writing during the 30 day public comment period.

### *3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.*

In a continuing effort to broaden public participation, especially to minorities, non -English speaking persons and persons with disabilities, NSC has worked with and will continue to work closely with the Human Services Departments, Housing Authorities and social service agencies and CHDOs in the HOME Consortium communities. These agencies serve as the NSC's communication conduit to many of these populations due to their established relationships with their clients and other agencies which serve minority, disabled and non-English speaking persons.

The NSC has always involved local organizations which have specific ties to or whose members comprise minority, non-English speaking or disabled persons. Sources utilized for this plan which fall into these categories are as follows:

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- all jurisdiction-based non-profit and CHDO organizations.
- most jurisdiction-based public service agencies.
- housing authorities.
- faith-based organizations.
- municipal websites.
- posted public notices in city and town halls.

*4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.*

The NSC has made a good faith effort to incorporate the comments received during the preparation and submission of the plan. Financial resources are limited, therefore not all needs identified are able to be addressed. The citizen participation process including the schedule of meetings, consultations throughout the year, and public hearings were conducted and publicized to maximize participation. All comments were considered in the preparation of these plans.

As noted above, the public hearing and meeting comments received were addressed and/or incorporated into the Plan.

### Institutional Structure

*1. Describe actions that will take place during the next year to develop institutional structure.*

The NSC is working to increase collaboration and information sharing with other agencies in the region. Regional capacity continues to grow as NSC representatives, as well as homelessness agencies, public health providers, and public service providers collaborate on various funding applications to administer programs in the NSC jurisdiction. Collaborating now includes participation in the Metro Boston Network created by MBHP, and now managed by United Way, as well as CoCs that collaborate to apply for McKinney Vento funding. Some of the NSC's CHDOs are expanding within the NSC's jurisdiction, creating more of a regional network of non-profit development. Local CHDOs are looking to expand in an attempt to increase their development opportunities as staff capacity grows, and regionalization is one strategy for financial viability.

Collaboration on homeless issues has been strengthened recently as non-profits work to prevent homelessness and rapidly re-house

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households with ARRA funds under the Homeless Prevention and Rapid Re-Housing Program. Monthly meetings of regional providers to discuss these programs are well attended by both municipal representatives and non-profits. The Metro Boston Network also brings together non-profits and municipal representatives from various CoCs in the region, and the Metro Boston Network has a subcommittee that meets regularly on affordable housing development.

Furthermore, there has been increased collaboration across sectors as private developers are partnering with local non-profits and CHDOs to work towards mixed-income housing developments, as well as the preservation of expiring use properties.

The NSC sees very little need for large-scale modifications because the overall interaction among the communities and the various institutions within the communities continues to function well.

The NSC continues to focus on strengthening the linkages between sectors and ensuring that they complement, rather than duplicate efforts to create affordable housing in the jurisdiction. It is also looking to build on the cross-collaboration between local non-profits in order to further affirmative marketing and fair housing goals.

### Monitoring

*1. Describe actions that will take place during the next year to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.*

There are two aspects to ensuring long-term compliance with program requirements and comprehensive planning requirements. One is the monitoring of sub-recipients, the other is monitoring specific completed HOME-funded projects in compliance with the HOME Program-required inspections schedule, as well as recertification for income and rent compliance.

#### Monitoring Sub-recipients:

As the monitoring agent and representative agent for the NSC, the MRA provides annual monitoring for each of the community sub-recipients.

The purpose of the monitoring process is to evaluate performance with

regard to:

- Compliance with HOME program rules and administrative requirements;
- Meeting production goals;
- Prevention of fraud and abuse of funds;
- Need for technical assistance;
- Evidence of innovative or outstanding performance.

Each community is notified when it will be monitored. After the monitoring visit, the MRA prepares a written report within 30 days of the visit. Specific deadlines are set for any necessary responses. The NSC conducts all monitoring site visits in accordance with its Annual Monitoring Plan, which outlines the process for completing an annual performance assessment based upon review of recent HOME funded projects in the community, administrative documentation such as timesheets, fair housing and marketing activities, and compliance with program guidelines across all HOME funded activities.

The Monitoring visit is also an opportunity to provide technical assistance to sub recipients and to look for programs or practices that are examples of innovative or outstanding performance, deserving of recognition. The MRA will share both positive and negative results of its monitoring activities with all member communities as part of its follow-up procedure.

In addition to the performance assessment review undertaken annually, the MRA holds monthly Board meetings regularly attended by all member communities. These monthly meetings provide ongoing contact with each community throughout the year.

### Monitoring of Completed HOME Program-funded Projects:

In order to verify compliance with state health and safety standards in affordable rental housing, NSC is required to conduct on-site inspections of HOME-assisted rental housing during a HOME-assisted project's period of affordability. According to the numbers of HOME units in a project, a schedule is prepared by the NSC representative member and assigned to each NSC community on an annual basis. Each NSC community is then responsible for their assigned on-site inspections to be completed within the calendar year. These inspection reports are held on file at the NSC representative member's office.

Recertification notices for HOME rental units are sent out annually to both the tenants and property owners of HOME funded affordable units. These annual re-certifications serve to monitor ongoing compliance with HOME rent limits and tenant income limits. These "recerts" are kept on file at the offices of the Malden Redevelopment Authority.

### Lead-based Paint

*1. Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.*

NSC is committed to providing loans to homeowners to correct code violations. Included as an eligible activity, and often a required element of these housing rehabilitation loans is de-leading. This is a serious issue for 1-4 family homeowners renting to families with children. Many homeowners do not have the financial capacity or knowledge to de-lead without some assistance and are very concerned about the liability associated with the presence of lead paint in their property. Therefore, it is necessary that funds be provided for abatement and subsequent consequences of this issue.

Housing rehabilitation program staff in participating member communities ensure that de-leading is completed in compliance with the Lead Safe Housing Rule (24 CFR Part 35) and the new EPA standards. De-leading funds are made available as part of the housing rehab low interest or deferred loans to homeowners. Investor owners are also eligible for low interest loans to abate their units. The NSC currently has active rehab programs in Revere, Malden, and Everett. Other MRA is available for technical assistance for any NSC communities considering creating rehab programs that utilize HOME or CDBG funds.

The NSC is also continuing to develop its purchase and rehab program, where HOME funds for de-leading can be paired with private mortgage products available to home buyers who are purchasing and rehabbing their first home. Making de-leading attractive to first time buyers by pairing it with down payment assistance is one strategy towards

ensuring that older, more affordable housing stock is being brought up to code and de-leaded.

## HOUSING

### Specific Housing Objectives

\*Please also refer to the Housing Needs Table in the Needs.xls workbook.

1. *Describe the priorities and specific objectives the jurisdiction hopes to achieve over the next year.*

The priorities and specific objectives for the second year (2011-2012) of the five year plan are as follows.

#### Priorities and Needs Analysis

1. **Preservation:** Preserve current housing being occupied by low and moderate income households and which is not currently being assisted with governmental subsidies, and work to extend the affordability periods at expiring use properties. Focus resources on rental units affordable to households who are otherwise at high risk of paying more than 50% of their income for housing;
2. **Production:** Increase the production of affordably restricted housing. Focus on affordable rental development that is appropriate for the population most at risk of paying more than 50% of the income for housing – extremely low income individuals, special needs populations, and single parent households.
3. **Increase Access to Homeownership Opportunities:** Increase access to market rate and affordably restricted homeownership units throughout the NSC jurisdiction. Focus on sustainability and housing counseling to prevent risk of foreclosure, also partner with Local PHA's to assist households who working towards homeownership using Housing Choice Voucher Programs and family self sufficiency programs.
4. **Stabilization and improvement of neighborhoods experiencing high foreclosure rates:** Neighborhoods with low and moderate income homeowners and renters have been especially hard hit by the recent economic recession. The NSC will prioritize programs and projects that aim at stabilizing and improving those neighborhoods within the NSC jurisdiction that

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have been identified as “at risk” or priority neighborhoods impacting a disproportionate number of low and moderate income households.

The NSC is committed to production of both rental and home ownership units, but currently prioritization is high for affordable rental units. The NSC also recognizes the need to bring existing, substandard units occupied by low/mod households up-to-code using local housing rehab programs funded from both HOME and other funds, and utilize these rehab programs to preserve longer term affordability of scattered site affordable rental units with HOME rental restrictions in exchange for rehab funding. There is no one, single program the NSC has aimed at preserving expiring use properties. Instead, the NSC will prioritize development projects that seek NSC funding when they involve extending the period of affordability at a property where the affordable restriction is expiring. Finally, the NSC continues to operate successful programs aimed at promoting sustainable homeownership opportunities for low and moderate income households.

The estimated housing preservation and production goals for FFY11 and estimated costs as listed in the CPMP *Goals.xls* are summarized as follows.

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**Table 5: Priority Objectives and Estimated Beneficiaries**

<b>Priority Objectives:</b>		
<b>Program: Homeowner Rehabilitation Program</b>		
<b>Objectives:</b>	<b>Estimated Funding</b>	<b>Estimated Beneficiaries</b>
1. Bring substandard housing occupied by low or moderate income homeowners up to code with financing terms that will allow them to afford the residence as their primary residence.	\$275,000	4
2. Bring rental units in owner occupied, multi-family properties up to code using financing that allows, and requires the owner-occupant to continue to charge affordable rents for the rental unit.	\$75,000	3
<b>Program: Development Projects – Homeownership and Rental</b>		
<b>Objectives:</b>	<b>Estimated Funding</b>	<b>Estimated Beneficiaries</b>
1. Low interest loans for development projects that allow affordability of expiring use properties to be extended and prevent displacement of low/mod renters.	Included below	Included below
2. Low-interest loans for developers of affordable rental housing.	\$1,432,043	95
3. Low interest or forgivable loans for developers of affordable homeownership units.	\$0	0
<b>Program: First-Time Home Buyer Program</b>		
<b>Objectives:</b>	<b>Estimated Funding</b>	<b>Estimated Beneficiaries</b>
1. HOME funds for down payment and closing cost assistance for first time home buyers purchasing in the NSC jurisdiction.	\$340,000	32
2. Homebuyer Counseling	included	150
<b>Program: Buy Down Subsidies</b>		
<b>Objectives:</b>	<b>Estimated Funding</b>	<b>Estimated Beneficiaries</b>
1. HOME funds used to buy down the purchase price of market rate homeownership units to make the units affordable to households at or below 80% MFI for at least the HOME affordability period, if not in perpetuity.	\$200,000	3
<b>Program: Acquisition &amp; Rehab</b>		
<b>Objectives:</b>	<b>Estimated Funding</b>	<b>Estimated Beneficiaries</b>
1. Partner with local banks offering purchase and rehab financing in order to provide down payment and closing cost assistance, as well as de-leading funds for low/mod first time home buyers.	\$75,000	3

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The Non-Homeless special needs will be addressed within the priorities above.

The NSC Board continues to consider the strategy of HOME TBRA. Depending on funding availability, a subcommittee may be designated to investigate the logistics of this program, and provide information to the Board. Currently, however, with lower grant allocations overall, the NSC pipeline is prioritizing the continued funding of existing rehab and first time home buyer programs, as well as all of the affordable housing development projects taking place across the NSC.

The NSC is fortunate to have the following Community Housing Development Organizations active within their jurisdiction: Chelsea Neighborhood Developers (CND), Chelsea Restoration Corp. (CRC), Housing Corp. of Arlington (HCA), Housing Families Inc. (HFI), Tri-City Community Action Program, Inc.(Tri-CAP), and Medford Community Housing (MCH). The NSC has historically funded a number of CHDO activities and expects to continue this pattern during this five year period. Local CHDOs continue to work to create units for extremely low income households, and the NSC prioritizes funding for units that are designated for formerly homeless households as separate projects (mostly SRO projects), or as part of larger, affordable housing projects. With the regionalization of CHDOs and increased partnership between non-profits, there are opportunities for CHDOs to partner with homeless service providers and work together on development activities, especially in order to develop affordable housing with supportive service components.

*2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.*

**Table 6: Resources Expected for Area of Need 2010-2011**

For the period July 1, 2011 through June 30, 2012, the North Suburban HOME Consortium will have the following funds available to enable the various programs and activities to meet their goals and objectives.

FY 2011/2012 Entitlement Grant	\$ 2,502,404
Program Income	\$ 300,000

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This represents a 12.2% cut in the entitlement funds from the prior year's continuing resolution, and a \$150,000 reduction in the amount of Program Income, as Program Income has continued to decline annually.

The Consortium makes special efforts to identify federal and state programs that can be used in conjunction with HOME funds. It anticipates that Federal Low Income Housing Tax Credits, HOME funds from the State of Massachusetts, Affordable Housing Trust Funds, Housing Stabilization Funds, and other state bond funded programs, as well as MHP's Soft Second financing will continue to be resources that are available for affordable housing development projects and HOME Programs.

As noted above, however, there has been a significant reduction in state and local revenues and programs which in turn has led to a reduction or elimination of funding. Moreover the decline of capital and consequently loans from financial institutions, especially for low and moderate income households and developers, makes the next year uncertain and difficult for leveraging resources, and many projects are experiencing delays in development due to longer waiting periods for public funds.

### Needs of Public Housing

*1. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.*

The NSC has extremely limited resources to assist the needs of PHAs and their clients, especially when compared with the needs of those who do not have access to affordable housing. It continues to support the PHAs which have residents who apply for homeownership assistance, focusing on those in Family Self Sufficiency programs. In addition it works closely with the efforts of the 7 PHAs which have HCV vouchers to establish and/or use HCV Homeownership programs. While none of the 4 PHAs with federal public housing have adopted a Section 32 homeownership program, the NSC would encourage them should they choose to do so, as a recent HUD study indicated that homeownership production collaborations has been between PHAs and HOME PJs have been highly successful.

The NSC will also work with the 7 PHAs which have HCV allocations and MBHP which manages the State DHCD allocation, to advocate for project based Section 8 allocations for affordable housing developments – especially those with supportive service components. There has been significant progress in fostering partnerships between non-profit owners of affordable housing and PHAs through the use of project-based section 8 vouchers to date. As the HUD regulations permit only a percentage of the PHA’s vouchers to be allocation for this purpose, the NSC is mindful of the limited availability of these project based vouchers, but promotes their use to assist development of affordable housing units for very low income individuals.

*2. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.*

No housing authorities in any of the NSC 8 communities have been designated as troubled. The assessment scores of both federal and state agencies indicate that none are performing poorly.

### Barriers to Affordable Housing

*1. Describe the actions that will take place during the next year to remove barriers to affordable housing.*

There is a state law [Chapter 40B] in Massachusetts that requires local governments to have at least 10% of its housing stock affordable to households below 80% of median in order, to retain full control over the zoning permit process when affordable units are proposed. The nature of that affordability is defined by the state and generally must be for at least 15 years for homeownership and 30 years for rental units. The law gives the state the power to override local decisions regarding affordable housing projects, whether those decisions are based on zoning by-laws, or other arguments such as impact on schools, environmental issues, infrastructure limitations etc. A local community can amend its by-laws and procedures for a specific project and gain exemption from this law under what is known as and what is controlled by state regulations – Local Initiative Plan or LIP.

This law continues to function as a way for affordable housing developments to bypass restrictive zoning, or local ordinances which could reasonably be considered regulatory barriers to affordable housing in communities which do not currently have a representative supply of affordable housing (at least 10%).

The Consortium continues to promote policies and practices that would promote safe, quality, affordable housing development in their communities. The NSC has worked with consultants to identify the major types of barriers for affordable housing development, as well as possible policies and practices that could be implemented to minimize or eliminate these barriers.

### **Land Availability and Development Costs**

#### **Zoning Relief and Other Bonuses**

State and case law permits local jurisdictions to provide a variety of benefits to a development, such as a density bonus in exchange for reserving a percentage of housing units for low and moderate income or senior households for specified periods of time.

#### **Inclusionary Housing**

Inclusionary Zoning has become a more common tool for communities and is usually linked to the bonuses mentioned above. Two towns in the NSC have this provision. In strong housing markets, it is feasible for developers to meet the inclusionary zoning requirements without other subsidies.

#### **Commercial/Industrial Linkage Fee**

The concept is that most commercial and industrial development relies on a number of employees who are paid less than 80% of median. So by requiring some effort to provide funds to enable these employees to live as well as work in the community by putting the money towards affordable housing development in the community, the linkage fee is a benefit to all.

#### **Availability of Financing**

Some communities have developed task forces which work with lenders operating in the community to develop agreements in conjunction with the federal Community Reinvestment Act, which will provide lower mortgage rates and other financial benefits for providers and consumers of affordable housing.

### **Accessory Apartments**

Many communities have developed accessory apartment provisions in the zoning code, which in effect permit homeowners, especially single family homeowners, to provide an additional housing unit either within the existing house or as an addition, provided that one of the households meets the eligible income limit. This code provision has the added benefits of legalizing a number of illegal uses and also of developing housing in communities with little or no land availability. Three Cities and Towns in the NSC have such a by-law.

### **Gap Financing and Fee Reductions**

Some communities use HOME funds, redevelopment set-aside funds, and Housing Trust Funds (set up under inclusionary zoning and linkage programs) to provide 'gap-financing' for affordable housing projects in order to mitigate the impacts of market factors (such as land costs and construction costs), planning and development fees, on- and off-site improvements, infrastructure and utility connection and other costs associated with residential development.

Some communities provide permitting fee reductions for projects which provide affordable housing.

### **Administrative Constraints**

#### **Permit Processing**

A community can set up an expedited processing system for any project which is providing affordable housing. This program establishes an aggressive processing timeline to cut the cost and time constraints associated with building affordable housing by:

1. Providing mandatory preliminary review meetings for early staff feedback;
2. Significantly reducing project review cycles;
3. Funding environmental, traffic impact and other studies after preliminary reviews.

#### **Infrastructure Constraints**

The State has launched Chapter 40R which provides support for transit adjacent and oriented developments. This can result in lower development costs in conjunction with creating affordable housing. It can provide flexibility for local street and sidewalk standards and parking requirements. Three NSC members have adopted this zoning.

HOME/ American Dream Down payment Initiative (ADDI)

1. *Describe other forms of investment not described in § 92.205(b).*

There are no other sources of down payment and closing cost assistance funds, as the ADDI funds have been discontinued.

2. *If the participating jurisdiction (PJ) will use HOME or ADDI funds for homebuyers, it must state the guidelines for resale or recapture, as required in § 92.254 of the HOME rule.*

The purpose of the resale and recapture provisions is to ensure that the housing purchased with HOME assistance remains affordable to low income buyers in accordance with 24 CFR 92.254 and to provide the initial home buyer with a fair return on investment. The NSC acknowledges the potential conflict that can arise in meeting these two purposes and attempts to balance them.

For the NSC First Time Homebuyer Program which uses HOME funds to provide down payment and closing cost assistance for homebuyers wishing to purchase market rate units in the jurisdiction who are at or below 80% of median family income, the NSC has adopted the following provisions concerning recapture of subsidy:

a) HOME funding will be used for down payment and closing cost assistance (\$7,500 single family, \$8,500 2 family, \$9,000 3 family).

b) These funds will be recaptured upon sale or transfer of the property out of net resale proceeds, with the recapture amount declining by 10% of the amount of the down payment and closing cost assistance every year that the homeowner has occupied the residence.

c) Recapture may occur not only when the premises are sold or transferred, but also if the premises cease to be the borrower's primary residence, the death of the borrower occurs or there is a change in the title (other than removal of husband or wife or addition of husband or wife).

d) All recaptured funds will be used to assist other first time home buyers in accordance with 24 CFR 92.254 (a)(4)(ii)(C).

The NSC also uses HOME funds to assist homebuyers through buy-down subsidies. In these cases, the units are deed restricted with covenants which ensure affordability at least for the minimum affordability period under Section 92.254a.(4). In most cases, the NSC member community elects to place a covenant which restricts the unit for longer than the minimum affordability period. NSC has adopted the following provisions concerning resale restrictions:

- a) These affordable units must be owner-occupied for the entire term of the affordability period.
- b) Resale of an affordable unit must be to a household at or below 80% of MFI for the jurisdiction.
- c) Maximum resale price of the unit is the price paid by the seller increased in proportion to the increase (but not decrease) in the Boston Area Median Income plus the value of any approved capital improvements made to the property by the seller. In this way, the NSC is able to maintain the affordability of the property to future, income eligible buyers, but it does not compromise the owner's incentive to maintain the property, and provides a reasonable return on all improvements and investments in the property. At no time, will the seller be required to sell the property for less than what they paid, protecting the seller from market downturns to the greatest extent feasible.
- d) Should the value of capital improvements result in a maximum resale price that is unaffordable to a reasonable range of low to moderate income buyers, the NSC will ensure continued compliance with the affordable housing restriction by investing additional HOME funds at the closing to buy down the price to an affordable level.
- e) For the NSC First Time Homebuyers who utilize HOME funds to assist with down payment and closing costs to purchase units already subject to a resale restriction will be bound by the resale restriction. In addition, a separate financing instrument in the form of a deferred payment, forgivable mortgage for the amount of the down payment assistance may be required, as well.

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3. *If the PJ will use HOME funds to refinance existing debt secured by multifamily housing that is that is being rehabilitated with HOME funds, it must state its refinancing guidelines required under § 92.206(b). The guidelines shall describe the conditions under which the PJ will refinance existing debt. At a minimum these guidelines must:*
- a. Demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing.*
  - b. Require a review of management practices to demonstrate that disinvestments in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated.*
  - c. State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.*
  - d. Specify the required period of affordability, whether it is the minimum 15 years or longer.*
  - e. Specify whether the investment of HOME funds may be jurisdiction-wide or limited to a specific geographic area, such as a neighborhood identified in a neighborhood revitalization strategy under 24 CFR 91.215(e)(2) or a Federally designated Empowerment Zone or Enterprise Community.*

*State that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.*

In accordance with 91.220(g)(2)(iii), the NSC has adopted the following policy with regard to refinancing existing debt on multi-family housing projects:

- a) The North Suburban Consortium recognizes that housing rehabilitation and the creation of new housing is the primary eligible activity.
- b) The North Suburban Consortium believes that the primary eligible activity can be accomplished without the use of HOME funds to refinance existing debt.

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- c) However, due to current economic circumstances, the North Suburban Consortium would consider the use of HOME funds in limited circumstances to refinance a portion of existing debt in owner-occupied, multi-family projects eligible under 24 CFR 92.206 (b). This activity must primarily be rehabilitation and the refinancing must be necessary to reduce the overall monthly housing cost of the owner.
  - d) The required period of affordability is 15 years, should the NSC use HOME funds to refinance existing debt in conjunction with rehabilitation work at a property.
  - e) The HOME funds may be invested jurisdiction-wide.
  - f) NSC HOME funds will not be used to refinance existing debt that is made or insured by any federal program, including the CDBG program.
4. *If the PJ is going to receive American Dream Down payment Initiative (ADDI) funds, please complete the following narratives:*
- a. *Describe the planned use of the ADDI funds.*
  - b. *Describe the PJ's plan for conducting targeted outreach to residents and tenants of public housing and manufactured housing and to other families assisted by public housing agencies, for the purposes of ensuring that the ADDI funds are used to provide down payment assistance for such residents, tenants, and families.*
  - c. *Describe the actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership, such as provision of housing counseling to homebuyers.*

No ADDI funds were received for this fiscal year.

HOMELESS

Specific Homeless Prevention Elements

\*Please also refer to the Homeless Needs Table in the Needs.xls workbook.

*1. Sources of Funds—Identify the private and public resources that the jurisdiction expects to receive during the next year to address homeless needs and to prevent homelessness. These include the McKinney-Vento Homeless Assistance Act programs, other special federal, state and local and private funds targeted to homeless individuals and families with children, especially the chronically homeless, the HUD formula programs, and any publicly-owned land or property. Please describe, briefly, the jurisdiction’s plan for the investment and use of funds directed toward homelessness.*

The Malden/Medford Continuum of Care (COC) is the COC responsible for addressing Homeless issues for the communities of Malden, Medford and Everett. The lead organization which manages the overall planning and submissions to HUD is the Tri-City Housing and Homeless Task Force. Projects located in Medford, Malden and Everett that serve individuals in all three communities utilize McKinney-Vento funds to address the needs of the homeless. Projects and programming include emergency shelters and supported transitional and permanent housing. At the state level, assistance is provided through DTA (Department of Transitional Assistance) and the Division of Housing Stabilization with the Department of Housing and Community Development. Services may be provided through the Executive Office of Health and Human Services. Non-profit agencies also look to private grants and foundations to fill financing gaps.

The Somerville Continuum of Care (CoC) is responsible for addressing Homeless issues for the community of Arlington, as of 2008. The Somerville Homeless Providers group is the decision-making body. Information regarding homelessness in the communities of Chelsea, Melrose, Revere and Winthrop have been generated from information from local, regional and state providers of homeless services. These remaining communities may receive McKinney-Vento Funds under the Balance of State Continuum Care.

Additional funding under the ARRA Homeless Prevention and Rapid Re-Housing Program is available in the entitlement communities of Arlington, Medford and Malden. Non-profit organizations who

developed programs to serve households at or below 50% MFI who are homeless or at imminent risk of homelessness are funded as sub-grantees of the entitlement cities/town. The State has also funded non-profits, such as Heading Home and MBHP, to use HPRP funds in non-entitlement jurisdictions. These agencies are active in the non-entitlement NSC communities. It should be noted, however, the majority, if not the entirety of HPRP funding for financial assistance available through the state-funded agencies and the Malden HPRP sub-recipients has been committed over the past two fiscal years, and so very little remaining financial assistance is expected to be made available under these HPRP funded programs during FFY2011.

*2. Homelessness—In a narrative, describe how the action plan will address the specific objectives of the Strategic Plan and, ultimately, the priority needs identified. Please also identify potential obstacles to completing these action steps.*

The ultimate goal in providing shelter for homeless households is to maximize those who are able to secure and maintain themselves in permanent housing. This, together with a new emphasis on “Housing First” strategies for ending homelessness has made the production of new affordable housing units a strong priority for the NSC.

For those households who are in transitional housing, the CoC will work to increase access to affordable permanent housing by working with PHAs and private owners of affordable housing to identify supply and to adopt waiting list preferences. Secondly, the CoC will work to expand community-based services, and encourage partnerships between non-profit service providers and affordable housing developers so that supportive services can be included as part of the housing developments the NSC funds. This is an important step in ensuring households feel comfortable making the change to permanent housing, knowing that there will be necessary supports available, should they need them.

To ensure long term stability for those who are placed in permanent housing, the CoC will continue to closely track this group, addressing challenges as soon as they identified ranging from transportation to access to mainstream services and crisis response services. These strategies are based on need determined through data analysis and related information provided by organizations servicing these populations. They are applicable throughout the Consortium area.

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The communities not covered by the Malden/Medford and Somerville CoCs are also committed to an objective to provide permanent housing with supportive services and wherever possible, in conjunction with other efforts to address the homeless population by the Balance of State CoC. For example, HarborCov, in the City of Chelsea is supporting a strategy to deal with Victims of Domestic Violence which includes provision of services and a long-range plan to develop 50 permanent supportive housing units. It currently has 26 units in service. HarborCov also leads a grant-funded Homelessness Prevention Initiative for families which provides cash and supportive services. HarborCov includes Winthrop and Revere in its service area. Revere has 52 shelter units for individuals and working with Housing Families, Inc. currently has 28 scattered housing units for families that also include services and case management. Winthrop and Melrose have all indicated instances of homeless and at risk households. These conditions are typically handled on a case by case basis either through referrals for services or by providing emergency cash assistance.

The ultimate goal in providing shelter for homeless households is to maximize those who are able to secure and maintain themselves in permanent housing. In order to achieve this objective, the CoCs have concentrated efforts on providing transitional supported housing which will then lead to permanent supported housing, as well as permanent housing solutions for extremely low income households. The CoCs will also work to expand community-based services, although funding for these types of services is increasingly difficult to secure, making partnerships with housing developers and PHA's increasingly important and strategic. Local CHDOs who participate in the CoCs continue to work towards fostering their development activities in order to create more housing for formerly homeless clients.

To ensure long term stability for those who are placed in permanent housing, the CoCs will continue to monitor its providers to ensure that the homeless in need of housing and services, have their challenges addressed, ranging from transportation, to access to mainstream services and to crisis response services.

The NSC member communities who have received Homeless Prevention and Rapid Rehousing funds to address homelessness have also met on a regular basis since the awarding of HPRP funds in order to monitor, track, and discuss progress towards prevention and rapid re-housing goals. These HPRP grantee meetings assist municipal representatives with their understanding of how programs are working

at the local level, and improve coordination with local service providers.

*3. Chronic homelessness—The jurisdiction must describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2012. Again, please identify barriers to achieving this.*

The strategies identified are central to the focus of addressing chronic homelessness. Chronically homeless individuals may also suffer from the effects of substance abuse and/or mental illness. A national homeless study conducted by the National Coalition for the Homeless indicated that 25 percent of the homeless suffer from mental illness and that 60 percent of homeless individuals are drug dependent. The CoC continues to involve mental health and public health service agencies such as Elliot Human Services and Cambridge Health Alliance in order to facilitate coordination with social workers and health care providers for the homeless or formerly homeless who experience mental illness, drug dependencies, or have experienced physical or emotional trauma contributing to disabling conditions.

The CoC planning process includes outreach to the local governments of the cities that are part of the Continuums of Care. The Commonwealth of Massachusetts has been funding regional networks of homeless providers. United Way (replacing MBHP) is now the co-convenor of the network for the Metro Boston Network, which is the network for the Consortium area. This has as one of its primary tasks, addressing the problems of chronic homelessness. Regional information, cooperation and new innovative strategies are expected to be particularly effective in impacting this problem. Improved data collection procedures will ensure that this population is correctly counted so that planning can be optimized. Appropriate discharge planning by mental health facilities, medical hospitals, substance abuse treatment centers and prisons are all key in assisting chronically homeless. Additionally, as a member of the Massachusetts Housing and Shelter Alliance (MHSA), the CoCs participate in advocacy at the state level to insure that monitoring and discharge protocols are given ongoing priority. In conjunction with this outreach, every effort will be made to connect the chronically homeless with benefits and resources with the goal of achieving economic self-sufficiency.

A cornerstone in the eradication of chronic homelessness is the provision of permanent supportive housing. Services required may include personal case management, job training, and life skills

preparation. For long term success, the CoC realizes that it must increase the capacity of current homeless housing providers to create and operate housing for this population. The second way to achieve success is to engage the larger affordable housing community to incorporate chronically homeless housing in their own housing plans. In addition to regular HCV's, there are a number of vouchers limited to special populations. In 2008, HUD provided funding to assist chronically homeless veterans through VASH Vouchers. The funding continues in place. These vouchers combine Section 8 rental assistance for homeless veterans, with case management and clinical services provided through the Veteran's administration. Veterans must already be homeless in accord with HUD's definition of homelessness. MBHP administers the VASH vouchers in the NSC area. According to MBHP, as of April 1, 2010, 11 VASH vouchers for formerly homeless veterans are currently active in the area. A representative from the Veterans Administration has begun attending the local CoC meetings in an effort to coordinate more closely at the local level to provide services and housing solutions to homeless veterans.

*4. Homelessness Prevention—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.*

The CoC Task Force will continue to work together to develop a fully elaborated continuum of care for local residents. The Task Force will: continue outreach and assessment, continue to provide transitional housing and supportive services for families and individuals, and continue to offer intensive case management to the homeless providing enough stability to move to more permanent housing. Permanent housing placement, rather than emergency shelter creation, has become the focus for the Continuum of Care.

Preventing further homelessness is a priority for the Consortium. The breadth of the population dealing with the potential of homelessness has grown dramatically due to the high unemployment rate during the current economic recession. Agencies throughout the area have seen a dramatic increase in those with long-term work histories at significant risk of losing their housing, due to unemployment and underemployment. Households have been at risk of foreclosure, either as part of the sub-prime loan crisis or due to economic hardship.

Homelessness Prevention Pilot Programs have been made possible recently in Malden, Medford, and Arlington, who received Homelessness Prevention and Rapid Re-Housing Program funding

through the ARRA grant. The Metro Boston Network has also funded Pilot Programs aimed at Prevention. These HPRP and MBN pilot programs have served to fund agencies and create programs aimed at preventing eviction and imminent homelessness. The funds have assisted in paying arrearages in instances where tenancy can be preserved, providing credit counseling and financial planning services for those households who have chronic budgeting problems leading to housing instability, short-term or medium term rental assistance, and legal services and landlord mediation and outreach to eligible households hoping to preserve at-risk tenancies. Some of the successful prevention programs funded by the Interagency Council on Housing and Homelessness Metro Boston Network as pilot programs have received continued funding from the ICHH. The HEARTH Act may contain new regulations that would allow for prevention programs to continue in the NSC.

The CoCs continue to look towards developing housing projects for homeless households, or at least including housing units designated for formerly homeless households in other affordable developments. They seek to supplement this use of HOME and McKinney funding with prevention programs under the Hearth Act, if this is an eligible use under the new regulations.

*5. Discharge Coordination Policy—Explain planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how, in the coming year, the community will move toward such a policy.*

The Continuum of Care which serves the homeless in the area, has adopted formal discharge protocols for facilities discharging people from foster care, health care, mental health care and correctional facilities.

### **Foster Care Discharge**

The Department of Social Services (DSS) Standards for Independent Living Services requires a written 'Notice of Intent to Discharge' be prepared for DSS foster care clients with a Permanency Planning Goal of Independent Living. The notice must be prepared within 90 days of discharge from substitute care and/or DSS case closing, and sent to the youth and any substitute care provider. It includes an Independent Living Discharge/Case Closing Plan that describes the discharge resources for the youth, specifies the steps to meet needs and targeted goals, and the indicates the person responsible to assist.

It must also detail the appropriate housing arrangements, which can include: apartments, boarding homes, room and board, and housing with family, friends, and former foster parents. It may not include the street, shelter, hotel/motels, or dwellings that fail to meet health and building codes. Youth are routinely discharged to reunify with their families (or to another housing option, if the youth's age permits or reunification is not possible).

If appropriate housing is not available, then to the extent that the State may retain custody, the youth must not be discharged from the State's system of care. The State's protocol must be adhered to by all DSS providers in the Malden Medford CoC. It is understood and agreed to by this CoC whose representatives work with State agencies, through the Interagency Council and related groups, to enhance implementation.

### **Health Care Discharge:**

The Executive Office of Health & Human Services (EOHHS) has established Discharge Planning Standards included in all Requests for Proposal (RFP). Monitoring includes: site visits, annual reports, review of Bureau of Substance Abuse Services (BSAS) data on discharges and admissions, analysis of billing data and Risk Management. These data must be submitted by BSAS-funded programs on all clients, not just those funded by BSAS. The RFP Template states:

"Transition/Discharge: The Commonwealth has determined that the discharging of consumers into homeless shelters is not an appropriate discharge plan. It is the Commonwealth's goal, through the implementation of aggressive and comprehensive discharge planning efforts, to reduce the number of inmates/clients who go into shelters after having been in residential programs. Bidders in their response to this RFP will be required to provide a plan of action which will become a contract performance goal that will enable the Commonwealth to achieve this goal." DPH-funded detoxification programs routinely discharge clients from their programs to State-funded residential recovery programs or to State-funded transitional support services. The State's protocol must be adhered to by all Bureau of Substance Abuse Services providers in the Malden Medford CoC. It is understood and agreed to by this CoC whose representatives work with State agencies, through the Interagency Council and related groups, to enhance implementation.

### **Mental Health Discharge**

Regulation 104 CMR 27.09 requires that all mental health facilities arrange for the necessary post-discharge support and clinical services

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needed to facilitate a smooth reentry to the community. Such measures must be documented in the client's medical record. All mental health facilities are required to make every effort to avoid discharge to the streets or shelters. All facilities are required to take steps to identify and offer alternative options to patients and must document such measures, including all competent refusals of alternative options by a patient, in the medical record. In the case of such a discharge the mental health facility must arrange for or, in the case of a competent refusal, identify post-discharge support and clinical services. The facility shall keep a record of all discharges to a shelter or the street in the approved form and submit such information to the Department of Mental Health on a quarterly basis. The Department of Mental Health funds and routinely discharges clients to their State-funded system of group homes. The State's protocol must be adhered to by all DMH providers in the Malden Medford CoC. It is understood and agreed to by this CoC whose representatives work with State agencies, through the Interagency Council and related groups, to enhance implementation.

### **Corrections Discharge**

Department of Corrections policy relative to release preparation of inmates includes:

1. An individualized risk reduction plan, including applications for specialized housing, if there are recidivism risks (sex offender, drug or alcohol abuse, etc.).
2. Inmate's participation in at least five transition workshops prior to release, to develop comprehensive treatment and transition plans that address housing, employment, substance abuse and mental health, and basic life skills. The plan's implementation is monitored by the DOC Re-Entry Unit's Transition Planning Coordinator, through monthly meetings, in coordination with relevant parties (Parole Officer, the Dept. of Mental Health Forensic Transition Team, Mental Health Team Leader, and others).
3. The transition plan to promote continuity with community services, in which the inmates specify their housing reentry plan. The DOC has targeted resources for specialized housing with services to prevent inmates from reentering the corrections system and/or becoming homeless again. The DOC routinely discharges inmates to traditional residential placements, including family reunification, rental housing, or State-funded halfway houses. The State's protocol must be adhered to by all DOC correctional service providers in the Malden Medford

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CoC. It is understood and agreed to by this CoC whose representatives work with State agencies, through the Interagency Council and related groups, to enhance implementation.

### Emergency Shelter Grants (ESG)

*(States only) Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.*

**N/A**

## COMMUNITY DEVELOPMENT

### Community Development

\*Please also refer to the Community Development Table in the Needs.xls workbook.

- 1. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), public facilities, public improvements, public services and economic development.*
- 2. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.*

\*Note: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

As the Consortium is a HOME Participating Jurisdiction, it does not conduct specific economic development programs. However the Consortium does support each City and Town's efforts which provide housing improvements in quality and affordability and thus enable low-mod households to set aside more resources for education and training.

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In addition the Consortium makes itself available to support its member communities when preparing applications for economic development funding.

### Antipoverty Strategy

- 1. Describe the actions that will take place during the next year to reduce the number of poverty level families.*

As the Consortium is a HOME Participating Jurisdiction, it does not conduct specific economic development programs. However the Consortium does support any municipal efforts which provide housing improvements and preserve or promote affordability and thus enable low-mod households to set aside more resources for education and training.

In addition the Consortium makes itself available to support its member communities when preparing applications for economic development funding, especially from the state CDBG program.

In so far as most households being provided housing assistance end up with a reduced level of cost, they are more able to allocate their scarce resources to other needs such as nutrition, education and other activities which can help lead them out of poverty.

### NON-HOMELESS SPECIAL NEEDS HOUSING

#### Non-homeless Special Needs (91.220 (c) and (e))

\*Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.

- 1. Describe the priorities and specific objectives the jurisdiction hopes to achieve for the period covered by the Action Plan.*

Throughout the Consortium, there are households in various subpopulations who are not homeless but have specific housing needs and may also require special attention due to their current or prospective service needs. These subpopulations include: elderly, frail elderly, persons with severe mental illness, developmentally disabled, physically disabled, substance abusers, victims of domestic

violence, persons with HIV/AIDS and veterans, which is an expanding group in need of services and housing.

The NSC is aware of the needs of special populations and is committed to supporting initiatives which target these populations. NSC has determined that one of the most effective strategies in assisting these populations is the provision of transitional and permanent affordable housing. It also continues to provide assistance to non-profit organizations serving these populations by assisting in providing funds for acquisition, development and rehabilitation of structures designed to house victims of domestic violence, developmentally disabled, persons with mental illness and former substance abusers. One of the most effective strategies is the use of Project Based Section 8 [PBA], which is made available through PHAs and through DHCD, as these households often have limited ability to increase their income, and thus rental vouchers are the most sustainable, long term solution to housing costs. The NSC will continue to assist any developments proposed, when HOME funds are determined to be an effective source to meet special needs, and encourage supportive service provision as part of the project.

The Consortium is also especially mindful of the aging population in Massachusetts<sup>3</sup>, and has funded several elderly housing development projects recently. It has funded a Preservation Project in Malden, Salem Towers, which will allow 80 units of affordable elderly housing that were set to expire in Malden to continue as affordable in perpetuity. It is also assisting the revitalization and adaptive reuse of a former fire station in Revere, to be used as 7 rental units for low income elderly households. Finally, two applications, including a HUD 202 development project, are planned in Winthrop. The NSC has supported both these developments with commitments of HOME funds in hopes that other funding sources in amounts sufficient to complete the projects will be committed in the upcoming year. In all of these developments, the NSC promotes more than the minimum number of accessible units, as well as the use of universal design elements to the maximum amount feasible.

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<sup>3</sup> See the map created by MAPC outlining the aging population in the Metro Boston Region: [www.metrobostondatacommon.org/pdf/Preparing%20for%20an%20Aging%20Population.pdf](http://www.metrobostondatacommon.org/pdf/Preparing%20for%20an%20Aging%20Population.pdf). MAPC in their population projection released in 2005 state, "Between 2000 and 2030, the senior population in the MAPC region is projected to increase by 79%, while the total population will increase by only 9%. Over this time period, the proportion of seniors will increase from 10% to 22%. By 2030, the over-65 group will constitute more than 25% of the population in 37 out of MAPC's 101 communities."

*2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.*

In addition to the availability of federal public housing and other federally assisted housing programs for the elderly (primarily Section 202) and for the disabled (primarily Section 811 and PBA), Massachusetts is one of the few states which provides state-aided public housing for the elderly, for the frail elderly and for the non-elderly disabled through DHCD. DHCD also funds development costs from the Facilities Consolidation Fund (FCF). The housing is limited to clients of DMH or DDS. Other state agencies serving the elderly within the Consortium include EOEA and the EOHHS. Massachusetts also has a variety of community-based programs serving the elderly. There are local Councils on Aging (COA) within the Consortium which provide elders and families with direct care services. The eight communities are also serviced by Area Agencies on Aging, which are designated as 'Aging Services Access Points'. Programs implemented to meet the needs of elderly residents include subsidized housing; protective services (intervention in cases where there is evidence that an elder has been neglected, abused or financially exploited by someone in a domestic setting); home care; congregate housing; nutrition; guardianship; legal services; transportation; assistance with health care administration; and coordination services for the disabled elderly.

In addition to affordability, a key issue for the physically disabled has been the inaccessibility of housing units. Rehab funds available from the HOME Consortium have been used to create accessibility, and the NSC encourages accessible design features to the maximum extent feasible in all of its HOME funded projects, while also ensuring compliance with Section 504 and the American with Disabilities Act for all new construction or substantial rehab projects. In the Consortium communities that have entitlement or state CDBG funds available, physical rehabilitation programs are also available and are utilized for adapting housing to meet the needs of the physically disabled, as well as meeting ADA and Section 504 requirements.

The number of adults with mental illness or developmental disabilities who are treated in institutions has continued its dramatic decline. Correspondingly, the number receiving community-based services has significantly increased. DMH and DDS, are the primary service systems for providing services and housing (through the use of state and private housing providers), to these populations.

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At the level of local government, communities have Public Housing Authorities, local Human Services departments, Veteran's Agents and local Councils on Aging, as mentioned above, all of which concentrate at least some of their services on these populations. Communities receiving CDBG funds allocate some of their resources for services and facilities which serve these populations. HOME funds from the Consortium are also available for providing assistance in the acquisition, development and rehabilitation of supported housing. In addition, non-profit organizations, including CHDOs servicing communities within the Consortium typically administer programs targeted to these populations, some of which are funded through the state agencies listed above and others which are funded with federal resources or through public and private grants or a combination of these sources. Finally, several of the Consortium communities have received Neighborhood Stabilization Program (NSP) funds designed to assist communities impacted by the current economic conditions and/or Homeless Prevention Rapid-Reoccupancy Program funds (HPRP) designed to work with those at risk of homelessness.

### Housing Opportunities for People with AIDS

\*Please also refer to the HOPWA Table in the Needs.xls workbook.

- 1. Provide a Brief description of the organization, the area of service, the name of the program contacts, and a broad overview of the range/ type of housing activities to be done during the next year.*
- 2. Report on the actions taken during the year that addressed the special needs of persons who are not homeless but require supportive housing, and assistance for persons who are homeless.*
- 3. Evaluate the progress in meeting its specific objective of providing affordable housing, including a comparison of actual outputs and outcomes to proposed goals and progress made on the other planned actions indicated in the strategic and action plans. The evaluation can address any related program adjustments or future plans.*
- 4. Report on annual HOPWA output goals for the number of*

*households assisted during the year in: (1) short-term rent, mortgage and utility payments to avoid homelessness; (2) rental assistance programs; and (3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. Include any assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.*

5. *Report on the use of committed leveraging from other public and private resources that helped to address needs identified in the plan.*
6. *Provide an analysis of the extent to which HOPWA funds were distributed among different categories of housing needs consistent with the geographic distribution plans identified in its approved Consolidated Plan.*
7. *Describe any barriers (including non-regulatory) encountered, actions in response to barriers, and recommendations for program improvement.*
8. *Please describe the expected trends facing the community in meeting the needs of persons living with HIV/AIDS and provide additional information regarding the administration of services to people with HIV/AIDS.*
9. *Please note any evaluations, studies or other assessments that will be conducted on the local HOPWA program during the next year.*

**N/A. The Consortium does not receive HOPWA funds.**

#### Specific HOPWA Objectives

Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the Action Plan.

**N/A. The Consortium does not receive HOPWA funds.**

Other Narrative

*Include any Action Plan information that was not covered by a narrative in any other section.*

**The projected NSC HOME Budget for the period July 1, 2011 – June 30, 2012 is outlined below:**

**Table 7: NSC HOME Budget**

NSC Budget - Year 2	
<b>Total NSC HOME Allocation FFY11/FY12:</b>	<b>\$2,502,404</b>
<b>Program Income:</b>	<b>\$300,000</b>
First Time Home Buyer Program	\$340,000
FTHB Acquisition & Rehab Program	\$75,000
Homeowner Rehab Program	\$350,000
Buy-Down Subsidy Program	\$200,000
Development Project - Homeowner	0
Development Project- Rental	\$1,432,043
<i>(includes 15% set aside for CHDOs)</i>	<i>\$375,361</i>
Admin	\$280,240
CHDO Operating	\$125,120
<b>Total Budget:</b>	<b>\$2,802,404</b>

The NSC anticipates meeting the 15% CHDO set aside requirement in Year 2 by funding Rental Development Projects where the owner/sponsor is an NSC certified CHDO.

**NSC Policy and Procedures for Affirmative Fair Marketing**

1. Each NSC financed development with 5 or more HOME-assisted units shall be required to prepare an Affirmative Marketing Plan (the “Plan”), which shall be subject to the review and approval of the member community and the MRA as Representative Member. Guidance for the preparation of their Affirmative Fair Marketing Plan is provided in the NSC HOME Memorandum of Understanding, which outlines the NSC’s expectations in greater specifics;
2. Each Plan shall be monitored and reviewed for the specific steps to be taken by the developer/owner to meet the goals identified in the Plan.
3. The Loan Agreement or similar document associated with each Development containing 5 or more HOME units shall provide for the submission to the member community and/or the MRA as Representative Member by the developer evidence of:
  - a. the implementation of the Plan; and
  - b. the demographic composition of the resulting occupancy.

The NSC has an Affirmative Marketing subcommittee which reviews the NSC’s affirmative marketing guidance for HOME funded developments in the NSC. It has recently updated this guidance, and created a consolidated list of agencies recommended and required for outreach. This subcommittee may also review affirmative marketing plans, as well as tenant selection procedures on an as needed basis for HOME funded developments.

**Plans to Update the NSC Analysis of Impediments to Fair Housing**

In response to a Request for Proposals issued by the Consortium, the NSC has received proposals from consultants to provide services related to the preparation of an updated Analysis of Impediments to Fair Housing. The MRA anticipates entering into a contract for these services to be completed over the course of the upcoming fiscal year.

**ATTACHMENT A: COMMENTS AND RESPONSES RECEIVED ON  
DRAFT CONSOLIDATED PLANS**

Comments at the public hearing of April 26, 2011 were as follows:

There were no comments received at on the Year 2 Draft Consolidated Plan.