



City of Lowell Massachusetts

ANNUAL ACTION PLAN Program Year 2022-2023

For
CDBG, ESG, HOME Programs

Office of the City Manager
Department of Planning and Development
JFK Civic Center, 50 Arcand Drive
Lowell, MA 01852
978-674-4252

July 2022

Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The Annual Action Plan outline the activities which will be undertaken during the program year beginning July 1, 2022 and ending June 30, 2023 using Federal funds granted to the City of Lowell by the US Department of Housing and Urban Development (HUD) under the Community Development Block Grant (CDBG), Home Investment Partnership (HOME), Emergency Solutions Grant (ESG) programs.

Projects and activities described in this plan are intended to primarily benefit low-income and moderate-income residents of the City of Lowell, neighborhoods with high concentrations of low- or moderate-income residents, and the City as a whole. This plan is the product of extensive public outreach, consistent with the city of Lowell's Five-Year Consolidated Plan. This public participation included multiple public hearings, and consultation with agencies, groups, and organizations involved in the development of affordable housing, creation of job opportunities for low- and moderate-income residents, and/or the provision of services to children, elderly persons, and persons with disabilities, their families, and homeless individuals. A complete draft of this plan was made available for public review and comment for a 30-day period beginning **July**, 2022. The availability of the plan is advertised in the local newspaper and the complete documents are available for review on the City's website (www.lowellma.gov) and in print form at the Department of Planning and Development located at 50 Arcand Drive.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

This Action Plan outlines a set of objectives and strategies that the City will pursue through the application of its Community Development Block Grant (CDBG), HOME Investment Partnerships program, Emergency Solutions Grant (ESG), as well as through participation with local providers in the network that coordinates the community's system of program and service delivery efforts. The statutes of HUD's formula grant program set forth three basic goals against which the City will focus its resources:

1. Decent affordable Housing
2. Suitable Living Environment
3. Economic Opportunities

In compliance with the above directives, this plan sets forth the following priority needs and goals:

Priority Needs

1. Decent Affordable Housing
2. Suitable Living Environment
3. Economic Opportunities
4. Infrastructure Improvements
5. Public Services
6. Public Facilities
7. Affordable Housing
8. Sheltering those that are Homeless
9. Provide outreach services to those individuals that are unsheltered
10. Assist with getting homeless service providers access to HMIS
11. Provide homeownership down payment assistance
12. Domestic violence related services
13. Advocacy services for the blind.
14. Improve Neighborhood Environments
15. Services related to youth programming and supportive services
16. Services related to elderly services
17. Provide education and access food and nutrition services
18. Provide Childcare options
19. Provide job training and employment resources
20. Assist local and small businesses
21. Address code compliance related issues

Goals:

1. Increase the Number of Affordable units
2. Sustain quality standards of affordable housing
3. Improve affordability of homeownership
4. Increase food security
5. Improve the affordability of housing through rehab services
6. Increase opportunities for LMI youth through educational, recreational and leadership development services
7. Provide services and address issues related to homelessness
8. Maintain / increase childcare services
9. Increase employment opportunities to Lowell residents
10. Improve the City's public infrastructure and public parks
11. Support new and small businesses through technical and financial assistance.
12. Support programs that provide food to homeless and at risk individuals

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

In October 2021 the City completed the Consolidated Annual Performance and Evaluation Report for the program year. The goals and objectives for the reporting period were based on priority needs identified in the 2020-2025 Five Year Consolidated Plan. The Five-Year Plan also recognized four thematic funding areas that correspond to the vision of the City of Lowell's Comprehensive Master Plan.

Almost 55 activities were funded during the 2021-2022 program year. The specific outputs of these activities are included in the table below. In addition to these outputs, collective impact of these activities resulted in substantial improvements to the lives and neighborhoods of Lowell's low- and moderate-income residents and persons living throughout the City of Lowell.

During the 2021-2022 program year, measurable progress was made in the five-year goals established in the 2020-2025 Consolidated Plan and due to the Coronavirus pandemic there have been some supply chain issues in which delays have been encountered making it difficult to complete the activity.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The citizen participation program is instrumental in obtaining input from the community and organizations in designing programs that will best meet the needs of the low- and moderate-income populations.

As required by HUD rules and regulations, the City of Lowell complies with regulation 24 CFR 91.105, Citizen Participation Plan for local governments. Further discussion about the Citizen Participation process including efforts to broaden participation, for the creation of the 2022-2023 Action Plan, along with public comments and the City's responses is included in the Citizen Participation and Consultation sections of this Plan.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

The Draft Annual Action Plan was available for review and public comment.

6. Summary of comments or views not accepted and the reasons for not accepting them

The Draft Annual Action Plan is available for review and public comment. Comments will be presented at the conclusion of the 30 day comment period

7. Summary

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PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

| Agency Role | | Name | Department/Agency |
|-----------------------|--------|------|--|
| CDBG Administrator | LOWELL | | City of Lowell Dept. of Planning & Development |
| HOPWA Administrator | LOWELL | | City of Cambridge MA |
| HOME Administrator | | | City of Lowell Dept. of Planning & Development |
| ESG Administrator | LOWELL | | City of Lowell Dept. of Planning & Development |
| HOPWA-C Administrator | | | City of Lowell Dept. of Planning & Development |

Table 1 – Responsible Agencies

Narrative (optional)

AGENCIES ADMINISTERING PROGRAMS AND ACTIVITIES:

As the entitlement grantee for the CDBG, HOME, and ESG programs, the City of Lowell Department of Planning and Development (DPD) is the lead agency for the development of this Annual Action Plan. The DPD will also act as one of several public and private agencies that will administer programs and activities under the plan. The DPD oversees Planning, Economic Development, Community Development, Housing, Historic Board, and Urban Renewal Programs. To meet the administrative responsibility for grants management, and address community needs and sentiment, DPD staff also reviews program data quarterly throughout the program year to ensure that activities are effectively meeting community needs. Other agencies and organizations that will aid in the administration of activities under this plan are listed in the consultation section of this Action Plan.

Lowell's Plan to address Broadband resiliency as addressed in the City's recently FEMA Approved Hazard Mitigation Plan:

- Critical Facilities and Vulnerable Populations (section 3.8): The plan identifies critical facilities related to communication and emergency response. These facilities are considered critical in the case of various hazard types.
- Existing Mitigation Measures (Section 5):
- References CodeRED system which allows for delivery of messages to targeted areas or the entire City.
- Hazard Mitigation and Climate Adaptation Strategy (Section 7):

Specific Action identified in Table 7-1: Expand outreach to vulnerable populations; increase use of CodeRED. Continue use of social media, partner with local organizations with existing communications to their members (leverage existing networks); assess alternative methods for residents without landlines or access to the internet

Consolidated Plan Public Contact Information

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AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

The Annual Action Plan encompasses an application process whereby organizations, such as City departments, nonprofit social service agencies, and private for-profit businesses have the opportunity to submit proposals to fund projects that will eventually define the City of Lowell's Annual Action Plan. The primary objective of the CDBG, HOME, and ESG, programs is to provide decent housing and a suitable living environment with expanding economic opportunities principally for low-income and moderate-income persons.

The initial step of the Plan development process began in October with the advertisement of the planning process, availability of funds, and the Request for Proposal (RFP). On October 21, 2021, the schedule of the Annual Action Plan process and RFP were made available to all interested parties through an advertisement in the Lowell Sun and on the City's website. The notice of RFP availability was also e-mailed to all current sub-recipients and parties that have shown interest in anticipation of the RFP. Those without email access were informed by telephone. Due to the Coronavirus pandemic applications were on-line via the City of Lowell's website at www.lowellma.gov. The application deadline was at 5:00 pm on December 1, 2021. All applications were to be submitted electronically.

As part of the development of 2020-2025 Five-Year Consolidated Plan, the City continues its process for selecting recipients and the dispersing of CDBG and ESG funds. The City will continue a rolling HOME application process for the FY 2022-2023 allocations. Given the uncertainty of the HOME program funding and the number of multi-year commitments made to local projects, an RFP for HOME funds was again not released as part of this annual action plan. This allows the City to consider qualified proposals that are presented throughout the year, depending on availability of funds.

In an effort to support as many eligible programs as possible amid continuous cuts to the CDBG program at the national level, the City is making awards for projects under the public service cap at a minimum of \$15,000 and a maximum of \$20,000. As reporting requirements for CDBG funded programs increase, administering an award for less than \$15,000 proves challenging for both the sub-recipient of the grant and the City staff responsible for grant oversight. Therefore there will also be a maximum of 2 applications per organization. There may be an award of up to \$50,000 under limited absolute need, after review by the Department of Planning and Development staff.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

Public and assisted housing providers, private and governmental health, mental health, and service agencies are participants in the network described in this document. They are also the organizations with which the City worked to develop the Annual Action Plan, and they are expected to continue active participation in the upcoming years. The City maintains a Hunger Homeless Commission that is comprised of homeless shelter and service providers. The City strongly encourages and examines collaboration activity as criteria in its RFPs for Consolidated Plan funds. A collaborative not only enhances the coordination of services among agencies but also helps consolidate the reporting requirements of Community Development Block Grant programs.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The City of Lowell has merged the COC with the balance of state. City staff participates in the monthly Continuum of Care meetings to address the needs of various homeless populations in the City.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The City of Lowell has merged the COC with the balance of state. City staff participates in the monthly Continuum of Care meetings to address the needs of various homeless populations in the City.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

| | | |
|---|--|--|
| 1 | Agency/Group/Organization | MERRIMACK VALLEY HOUSING PARTNERSHIP |
| | Agency/Group/Organization Type | Services-Education |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Classes are conducted for First Time Home buyer training |

Identify any Agency Types not consulted and provide rationale for not consulting

Other local/regional/state/federal planning efforts considered when preparing the Plan

| Name of Plan | Lead Organization | How do the goals of your Strategic Plan overlap with the goals of each plan? |
|-------------------|-------------------|--|
| Continuum of Care | | |

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

AP-12 Participation – 91.105, 91.200(c)

**1. Summary of citizen participation process/Efforts made to broaden citizen participation
Summarize citizen participation process and how it impacted goal-setting**

Due to the Coronavirus Pandemic the City utilized Zoom in order to socially distance safely. The notices were put up on the City website, also an ad was placed in the local newspaper (The SUN).

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Citizen Participation Outreach

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| Sort Order | Mode of Outreach | Target of Outreach | Summary of response/attendance | Summary of comments received | Summary of comments not accepted and reasons | URL (if applicable) |
|------------|------------------|--------------------|--------------------------------|------------------------------|--|---------------------|
|------------|------------------|--------------------|--------------------------------|------------------------------|--|---------------------|

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| | | | | | | |
|---|----------------|---|--|---|---|--|
| 1 | Public Hearing | <p>Minorities</p> <p>Non-English Speaking - Specify other language: Any and all</p> <p>Persons with disabilities</p> <p>Non-targeted/ broad community</p> <p>Residents of Public and Assisted Housing</p> | <p>There was a total of 20 Participants. There were 17 participants from local non profits and 3 city employees. Although invited there were no participants logged in from the public</p> | <p>The City presented a power point presentation to explain the grants and the processes. There were no comments received other than thank you.</p> | <p>All comments received. Hearing was held November 2, 2021</p> | |
| 2 | Public Hearing | Minorities | There was a total of | There were lots of questions from members of the CAC all but 2 were answered that evening. Responses to CAC questions for CTI and CBA | All comments | |

| | | | | |
|--|--|--|--|--|
| | <p>Non-English Speaking - Specify other language: Any and all</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p> | <p>36 Participants at this hearing. There were 32 representatives from local non-profits and 4 City employees. Each participant was allowed 2 minutes to speak on behalf of the non-profit they represented.</p> | <p>02/02/2022 This is the response from CTI regarding how much of the \$11 million dollar fuel assistance allocation actually gets dispersed to Lowell residents: The total that was dispersed last year to Lowell clients. \$2,955,419.15 This is the explanation I received from Coalition for a Better Acre on the Sewing Project at the Walk In Center: I really appreciated the deep questions the CAC members had about CBA's Walk-In Center. I wanted to follow-up with a brief update after having the opportunity to check in with our Director of Programs, Cecilia Gutierrez Yapur, this morning. Cecilia oversees all of the operations and programs at the Walk-In Center and works closely with CBA's clients and partners. Regarding the Sewing Skills Program at the Walk-In Center. After completing the program, three of the six women are continuing their journey to employment working with a local fashion designer under the guidance of Diana Coluntino. One participant has elected to complete piece work at home. The other two participants have elected to use their new-found sewing skills as a hobby. All of the participants are still connected with CBA through case management, and some have elected to support the next session of the Sewing Skills Program as assistants. Others continue in the 9-month long English classes they began in September. While CBA is able to place participants in a textile manufacturing job, it is certainly not the singular option. CBA staff value our ability to help participants find</p> | <p>received. Hearing was held February 1, 2022</p> |
|--|--|--|--|--|

| Sort Order | Mode of Outreach | Target of Outreach | Summary of response/attendance | Summary of comments received | Summary of comments not accepted and reasons | URL (if applicable) |
|------------|------------------|--------------------|--------------------------------|--|--|---------------------|
| | | | | work that fits with their schedule and personal goals. We believe this flexibility is what makes this program unique. All answers were accepted without further comment. | | |

Table 4 – Citizen Participation Outreach

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Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

The City’s 2022-23 Entitlement Grant Awards and estimated program income amounts are listed below:

Anticipated Resources

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Remainder of ConPlan \$ | Narrative Description |
|---------|------------------|--|----------------------------------|--------------------|--------------------------|-----------|---|---|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | | |
| CDBG | public - federal | Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services | 2,129,223 | 232,000 | 195,125 | 2,556,348 | 4,258,446 | CDBG Funds will be used to support a variety of social service programs economic development activities as well as public facility and infrastructure improvements. |

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Remainder of ConPlan \$ | Narrative Description |
|---------|------------------|---|----------------------------------|--------------------|--------------------------|-----------|---|--|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | | |
| HOME | public - federal | Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA | 949,668 | 50,000 | 426,222 | 1,425,890 | 1,899,336 | HOME Funds will be used to provide down payment assistance to first time homebuyers support homeowner rehab activities and support development projects. |
| HOPWA | public - federal | Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA | 0 | 0 | 0 | 0 | 0 | HOPWA funds are now administered through the City of Cambridge for Middlesex County as Cambridge is the largest Community in the County. |

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Remainder of ConPlan \$ | Narrative Description |
|---------|------------------|--|----------------------------------|--------------------|--------------------------|-----------|---|---|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | | |
| ESG | public - federal | Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing | 188,858 | 0 | 45,000 | 233,858 | 377,716 | ESG funds will support operating costs and essential services at homeless shelters. Funds will also support homeless prevention and rapid rehousing |

Table 5 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

Federal funds will be used to leverage other public and private resources in the housing, public facilities, public services, and economic development areas. Matching fund requirements, along with the needed documentation, are specified in the subrecipient agreements. Matching funds include non-federal cash sources, infrastructure, appraised land/real property, and site preparation, construction materials, and donated labor

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

During the duration of the 2020- 2025 Consolidated Plan CDBG funds are expected to be used to support economic development the development of green space on city-owned property and make improvements to city-owned outdoor and recreation space. These projects are targeted in neighborhoods with high concentrations of low- and moderate-income households

Discussion

The City of Lowell will continue to utilize a competitive application process and diversification of funds across multiple activities to ensure the best projects serving the lowest income and most in need are funded. Local funding and minimum matching requirements will continue to be required to ensure funding is diversified across multiple agencies. The City of Lowell will continue to review the needs of the residents and adjust funding where needed and adjust if funding is increased or reduced.

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Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

| Sort Order | Goal Name | Start Year | End Year | Category | Geographic Area | Needs Addressed | Funding | Goal Outcome Indicator |
|------------|-----------|------------|----------|----------|-----------------|-----------------|---------|------------------------|
| | | | | | | | | |

Table 6 – Goals Summary

Goal Descriptions

| | | |
|----------|-------------------------|---|
| 1 | Goal Name | DH-1.3 |
| | Goal Description | Sustain Quality standards affordable Housing this goal will primarily be supported with CDBG funds |
| 2 | Goal Name | DH-1.4 |
| | Goal Description | Support homebuyers with pre purchasing counseling services This goal will primarily be supported with CDBG Funds |
| 3 | Goal Name | DH-2.1 |
| | Goal Description | Improve the affordability of homeownership this goal will primariliy be supported with HOME funds |

| | | |
|---|-------------------------|---|
| 4 | Goal Name | DH-2.2 |
| | Goal Description | Improve affordability of housing through rehabilitation assistance |
| 5 | Goal Name | DH-2.3 |
| | Goal Description | Improve the affordability of housing through increased fuel efficiency This goal will be primarily supported with CDBG funds |
| 6 | Goal Name | SL-1.1 |
| | Goal Description | Increase the opportunities for LMI youth through educational recreational leadership development programs This goal will primarily be supported with CDBG funds |
| 7 | Goal Name | SL-1.2 |
| | Goal Description | Improve availability and accesibility of programs that maintain and enhance the quality of life for the elderly and special needs populations This goal will be primarily supported with CDBG funds |
| 8 | Goal Name | SL-1.3 |
| | Goal Description | Support programs that provide emergency food and shelter to homeless and at risk households This goal will be primarily supported with CDBG funds |
| 9 | Goal Name | SL-1.4 |
| | Goal Description | Increase the availibility and accessibility of public facilities for LMI youth elderly and special needs populations via creation and renovation This goal will be primarily supported with CDBG funds |

| | | |
|----|-------------------------|---|
| 10 | Goal Name | SL-3.1 |
| | Goal Description | Improve the citys public infrasttucture and public parks This goal will be primarily supported with CDBG funds |
| 11 | Goal Name | SL-3.2 |
| | Goal Description | Sustain the City neighborhoods through activities to improve the physical environment This goal will be primarily supported with CDBG funds |
| 12 | Goal Name | EO-1.1 |
| | Goal Description | Support programs that provide LMI residents with training and technical support to optain employment This goal will be primarily supported with CDBG funds |
| 13 | Goal Name | EO-1.2 |
| | Goal Description | Support new businesses with small business loans and technical assistance This goal will be primarily supported with CDBG funds |
| 14 | Goal Name | EO-1.3 |
| | Goal Description | Sign and facade assistance This goal will be primarily supported with CDBG funds |
| 15 | Goal Name | SL-2.1 |
| | Goal Description | Homeless assistance This goal will be primarily supported with ESG funds |
| 16 | Goal Name | SL-3.3 |
| | Goal Description | Direct Shelter Assistance |

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Projects

AP-35 Projects – 91.220(d)

Introduction

The following tables list the activities and programs that will be supported using HUD program funds during the 2017-2018 program year.

The Objectives of these funds are to:

1. Creating Suitable Living Environments
2. Providing Decent Affordable Housing
3. Creating Economic Opportunities

Projects

| # | Project Name |
|---|--------------|
| | |

Table 7 - Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The City of Lowell will continue to support non-profit agencies, the local housing authority, homeless providers, and special needs groups in their goal to meet the underserved persons of the community. The City will continue to communicate with these groups as their needs change or the demand dramatically increases over the next year. The City will provide technical assistance to providers in the pursuit of Federal, State, and other funding sources. The primary obstacle to meeting underserved needs of low-income and moderate income populations continues to be the availability of funds. Organizations serving these populations continue to experience significant reductions in funding from both governmental and private sources. Reductions in State aid to the City of Lowell and the local budget have prohibited the City from being able to cover this funding gap, leaving many worthy and valuable programs unfunded or under-funded.

AP-38 Project Summary
Project Summary Information

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AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

According United States Census Bureau, in April of 2020 Lowell is home to 115,554 people, 51% of whom were members of minority groups. Historically, Lowell has served as a gateway for immigrants and refugees coming to the United States. From the early years when the Irish and the Germans arrived to build the canals and the mill buildings to the French- Canadians and Greeks who worked in these in the mills, Lowell has provided opportunities for many groups to stay and flourish here.

Since the 80's, Lowell has been experiencing significant growth in its minority populations, the largest and fastest growing of these include Southeast Asians and Latinos. Of late, Lowell has also seen a growing population of refugee communities resettling from the Democratic Republic of Congo, Ukraine, Haiti and Afghanistan. These trends are expected to continue over the coming years.

The City will continue to use the most current Low and Moderate Summary Income Data U.S. Census Block Group level information to prioritize the use of funds.

Geographic Distribution

| Target Area | Percentage of Funds |
|--------------------------------------|----------------------------|
| NRSA | |
| Neighborhood | |
| Neighborhood Impact Initiative - TBD | |
| City of Lowell | 100 |
| HOPWA MSA | 0 |

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Because the primary national objectives of HUDs programs are to benefit low-income and moderate-income residents, Lowell's block grant program funds will be targeted to low-income and moderate-income neighborhoods and activities that benefit the City as a whole, the majority of whose residents are low- or moderate-income. Guided by the eligibility requirements of the various Consolidated Plan programs, the City of Lowell has recognized the priority need categories for the five-year planning period. Relative priorities and target funding proportions were established through the synthesis of the needs information obtained through the plan development process described elsewhere in this

document.

Discussion

Neighborhood Initiatives target resources in block groups where more than 51% of residents are low- or moderate-income and where significant deterioration has led to limited private investment and declining property values. These programs help stabilize and revitalize neighborhoods through the concentrated investment of staff and financial resources from all City departments. Activities include improvements to neighborhood facilities, parks, and infrastructure through divisions of the Department of Public Works; enhanced inspections by officials from the Building Department; coordinated actions by public safety departments; and significant capital investment to enhance the appearance of the targeted area.

The City has directed resources to different neighborhoods each year, with a goal of addressing all of Lowell's low- and moderate-income neighborhoods. By concentrating resources in a target area, the City hopes to maximize the value and impact of its actions and expenditures.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The HOME Investment Partnerships provides both federal financing and technical assistance and is an administered program that expands the supply of decent, safe, affordable, and sanitary housing while strengthening the abilities of local governments to design and implement affordable housing strategies

| One Year Goals for the Number of Households to be Supported | |
|--|----|
| Homeless | 16 |
| Non-Homeless | 36 |
| Special-Needs | 2 |
| Total | 54 |

Table 9 - One Year Goals for Affordable Housing by Support Requirement

| One Year Goals for the Number of Households Supported Through | |
|--|----|
| Rental Assistance | 0 |
| The Production of New Units | 30 |
| Rehab of Existing Units | 7 |
| Acquisition of Existing Units | 20 |
| Total | 57 |

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

The HOME program will utilize the following programs to achieve the goals outlined above:

Area of focus will consist of owner occupied rehabilitation, rental housing development, and home buyer assistance.

AP-60 Public Housing – 91.220(h)

Introduction

Low- and moderate-income residents in Lowell utilize the local housing authority for access to affordable housing and related services. The mission of the Lowell Housing Authority (LHA) is to provide safe, decent, affordable housing and to create opportunities for resident's self-sufficiency and economic independence. The Lowell Housing Authority team, working in partnership with other housing providers, local government and our residents will strive to provide the highest level of housing and a variety of social service programs that will assist residents in achieving their highest level of self-sufficiency. The LHA administers approximately 1,480 Section 8 and Massachusetts rental vouchers and owns and operates 1,800 public housing units.

Actions planned during the next year to address the needs to public housing

Over the next year, the Lowell Housing Authority (LHA) has identified the major needs of our public housing residents and developments to be in the areas of accessibility and aging in place, infrastructure improvements, and expanded resident services in the areas of employment, self-sufficiency, socialization, health, and wellness. Supply chain issues and government mandated closures during the COVID pandemic of 2020 and 2021 have delayed some projects that have carried over to 2022.

Accessibility and Aging in Place: In 2022, the Authority will complete major renovations to a 20-unit State-aided elderly site. These renovations include kitchen and bath upgrades, walkway and driveway improvements and the creation of an additional accessible ADA unit. These interior and exterior renovations include many items that will allow our residents to age more comfortably in their units. A ten-unit family development is also being renovated to allow this property to convert to federal public housing. The focus is on kitchens, baths, energy improvements and accessibility. The addition of this building to our federal portfolio will result in higher subsidy, additional capital funding and resident access to self-sufficiency and social service programs. The authority is also focused on elevator replacements over the next several years. There are approximately fifteen elevators needing replacement. These replacements will drastically improve the reliability of operation and ensure our elderly and disabled residents have safe access in and out of units.

Resident Services: The Authority created a new Health and Wellness adviser who will be working on resident service programs during 2022. This position will be working with our community partners and administering a survey of all residents to better understand their needs to develop programming. The focus is expected to be in the areas of general health, substance abuse, mental health, and social behavior. The Authority recently received a Jobs Plus grant from the U.S. Department of HUD to increase employment at a 524-unit family development. The program has a staffing level of four and is aimed at breaking down any barriers to employment and improve the economic independence at this development. The Authority recently hired a new Self-Sufficiency coordinator who is charged with reviving and expanding program participation. This program offers financial incentives and aims to

connect participants with service providers so they may achieve their highest level of self-sufficiency.

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

The Authority continues to administer a HUD Section 8 homeownership voucher program with twenty-one current homeowner participants. These vouchers provide a mortgage subsidy for a fifteen-year period. At the expiration of the voucher term, the homeowner is in a better position to cover the home expense without needed subsidies. The Authority has also reserved three homeownership vouchers for residents of our public housing authority who are participants of Resident Self Sufficiency program and have the goal of homeownership.

The Lowell Housing Authority is a party to the redevelopment of the former Julian D. Steele site, now Rivers Edge on the Concord. To date, 155 units have been replicated on this site; housing a combination of homeowners and project-based section 8 voucher holders. Of the 155 units, more than 100 are owner occupied. The Authority is working with a local non-profit, the City of Lowell and the Massachusetts Department of Housing and Community Development to complete the final phase of this redevelopment effort. We anticipate the creation of up to fourteen (14) additional duplex builds (28 units) in the same style as the existing homes. These homes are deed restricted to be permanently affordable. Pending local and state approvals and the successful application for a subsidized homebuyer grant, it is expected that the final phase of this project will kick off in 2022/23.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

N/A

Discussion

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

The City continues to work with no profit organizations and housing providers to implement specific strategies to provide families, individuals, and unaccompanied youth and those living on the street opportunities to secure permanent housing placement. Goals and activities that the City will undertake to carry out these actions will be described in this section.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

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

The City has funded specific outreach work through a local nonprofit, with a focus on individuals who are sleeping in encampments and areas not meant for human habitation. Those individuals are encouraged to 1) seek services through an array of existing providers and 2) placed (either anonymously or by name with permission) on a “by name list” that identifies barriers to housing and a housing pathway for each individual. The City has also funded a low barrier day program that serves individuals who are in need of a safe place to be during the day.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City has helped to fund an additional congregate shelter beds through a local nonprofit to increase capacity and meet unmet needs in the city. The program is designed to be particularly low barrier, staffed by individuals with specific expertise in working with populations with HUD and chronic homelessness. We have also funded a Diversion program at the largest congregate shelter in the region to reduce length of stay and create alternative placements for individuals newly in homelessness or new to the area.

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

The City has collaborated with a local nonprofit to support their increased outreach and housing of unaccompanied homeless youth, including providing financial supports for a potential Youth Housing Development Project. We have increased collaboration with the VA, including a monthly meeting to focus on case conferencing identified veterans for housing pathways and placement. In collaboration

with our local community action agency, funds have been made available for tenancy preservation, as well as housing case management for individuals in emergency non-congregate shelters. The City, through the Director of Homelessness Initiatives, has created a housing subcommittee with a Plan for Housing for Individuals in Homelessness to further focus and streamline efforts to create housing.

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

Discussion

AP-70 HOPWA Goals– 91.220 (I)(3)

| One year goals for the number of households to be provided housing through the use of HOPWA for: | |
|--|---|
| Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family | 0 |
| Tenant-based rental assistance | 0 |
| Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds | 0 |
| Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds | 0 |
| Total | 0 |

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

The City of Lowell continues to work to eliminate barriers that may limit the production or feasibility of affordable housing construction that are within the capacity of a local government to address. Foremost among these are zoning and land-use regulations. In December of 2004, the Lowell City Council adopted a comprehensive reform of the City's zoning regulations. Amendments were made to this document in May 2018.

The City also embarked on the City's Master plan known as Sustainable Lowell 2025. The master plan is the result of an extensive planning process that took place with substantial public participation, data collection and analysis.

Adopted by the Lowell Planning Board and endorsed by the City Council, it serves as the City's Comprehensive Master and Sustainability Plan, and provides a shared vision for the on-going development and revitalization of the City. The Housing section specifically focuses on the City's efforts to maintain an abundance of affordable housing for rent or purchase and strive to maintain the relative affordability of housing in Lowell compared to other communities in the region.

The reasons for the high cost of housing in this area are diverse and complex, but many researchers have identified tax policies and land use regulations as contributing factors. Under the new zoning, more than 38% of the City's land area is zoned to allow multi-family development in residential or mixed-use zoning districts. The City allows significant density in these zones as described in the table below. Even the most restrictive single-family zone allows more than four units per acre. In addition, the City's Zoning Ordinance encourages the conversion of existing buildings including schools, churches, firehouses and obsolete industrial buildings into multi-family residential uses, even when those buildings are located in single-family zoning districts. In certain urban mixed-use zoning districts parking restrictions are limited to one space per unit, and a by-right waiver for half of residential parking requirements is provided if a parking structure is located between 400 to 1,500 feet from the project site based on the zoning district.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The ability of Massachusetts cities and towns to raise local revenues is restricted by the Proposition 2 ½ property tax regulations. These regulations limit the rate of growth of local tax levies and discourage communities from accepting additional housing development because of real and perceived fiscal

impacts on municipal budgets. Partially in response to the restrictions of Proposition 2 ½, many municipalities in Massachusetts have enacted strict zoning and other land-use regulations which significantly limit the available development opportunities for low-cost housing in general and multi-family housing specifically, thereby increasing the costs of producing affordable housing in the region.

Enacted by the City Council the Rental Unit Permit ordinance requires all rental units to hold a Rental Property Permit, with the exception of two-family owner-occupied and HUD-funded properties. Rental property permits are issued per dwelling unit, by Lowell's Department of Development Services following a satisfactory inspection of the property common areas and rental permits are issued per dwelling unit, and payment of the permit fee of \$150 per unit. The intent of the ordinance is to ensure the safety and quality of Lowell's housing stock.

Discussion:

Primary barriers to the production of affordable housing in Lowell and throughout Eastern Massachusetts remain the high cost of construction and high property values. These barriers are, for the most part, beyond the control of the local jurisdiction. The City of Lowell adopted the MA Stretch Energy Code. The Stretch Code is an appendix to the MA building code that requires enhanced energy standards for certain development projects. We expect that construction costs may increase for certain projects, primarily new construction, however in many cases the capital cost will be recouped with lower energy costs over the long run. While this will require additional upfront effort from developers, the Stretch Code will ultimately result in a higher quality of life and lower energy costs for individuals residing in new affordable housing units adhering to these regulations.

AP-85 Other Actions – 91.220(k)

Introduction:

Listed below are the actions planned to address obstacles to meeting underserved needs, foster and maintain affordable housing, reduce lead-based paint hazards, reduce the number of poverty-level families, develop institutional structure, and enhance coordination between public and private housing and social service agencies.

Actions planned to address obstacles to meeting underserved needs

The City of Lowell will continue to support non-profit organizations, the local housing authority, homeless providers, and special needs groups, including minority businesses, in their goal to meet the underserved persons of the community. The City will continue to communicate with these groups as their needs change or the demand dramatically increases over the next year. The City will provide technical assistance to providers in the pursuit of Federal, State, and other funding sources. The primary obstacle to meeting underserved needs of low-income and moderate-income populations continues to be the availability of funds. While we strive to encourage programs to become self-sufficient, organizations serving these populations continue to experience significant reductions in funding from both governmental and private sources. The City of Lowell's annual allocation of program funds have also seen cuts in the past years. Reductions in State aid to the City of Lowell and the local budget have prohibited the City from being able to cover this funding gap, leaving many worthy and valuable programs unfunded or under-funded.

Actions planned to foster and maintain affordable housing

In addition to the specific goals and priorities outlined in the Affordable Housing discussion included earlier in this document, the City continues to work with its community partner organizations on programs aimed at improving the quality and affordability of Lowell's housing stock. These efforts include the following: Energy Efficiency: In order to foster housing affordability and assist households in maintaining quality energy efficient housing, the City adopted HUD's policy requiring energy star certifications for new construction and substantial rehabilitation projects. Additionally, in instances where Consolidated Plan funds are used to assist homeowners with minor rehab work that might not trigger energy star standards, the City encourages the purchase of energy star appliances.

While limited housing stock and increased prices in the housing market has increased, Lowell has taken a proactive in supporting homebuyers through its First Time Homebuyer Program, funded with HOME dollars. Households participating in the homebuyer program are required complete a pre-purchase counseling training conducted by Merrimack valley Housing Partnership prior to applying to the City for

down payment assistance.

Actions planned to reduce lead-based paint hazards

The City of Lowell has incorporated procedures in the guidelines for all federally funded programs to meet the requirements of the federal lead-based paint regulations. Discussion of the Lead-Based Paint (LBP) requirements take place at the initial meeting with City staff and the Certification of Receipt of LBP information is signed by the applicant and kept in the applicant's file. If deteriorated paint is found in a home built before 1978 and lead hazard reduction work may be needed because painted surfaces will be disturbed during rehabilitation, the appropriate level of lead testing and other actions are initiated. The City contracts with a certified Risk Assessor to perform the necessary tests to determine if and where there is a lead hazard risk. The Assessment report identifies the presence and location of LBP and the areas that need to be addressed. If LBP is found, the homeowner is notified. As a condition of receiving funding, LBP hazards must be addressed and lead safe work practices are required for all rehabilitation work that disturbs painted surfaces. Appropriate lead hazard reduction measures are also incorporated into the Scope of Improvements. Clearance of the unit is required and a copy of the clearance report is given to the homeowner and kept in the homeowner's file. The above lead-based paint control actions enable the City of Lowell to abate lead issues and be in full compliance with the Federal Lead-Based Paint rules.

Actions planned to reduce the number of poverty-level families

Most activities undertaken by the City of Lowell with CDBG, HOME, ESG funds are efforts to reduce persons in poverty and improve the quality of life for Lowell residents, either directly or indirectly. Programs that directly influence the poverty level include: job enrichment, development and placement through education and economic development. Projects that indirectly affect poverty include those that upgrade the community and provide affordable housing. Consolidated Plan program funds are often used as matching funds for other grants that also reduce the number of poverty level families.

Actions planned to develop institutional structure

The central responsibility for the administration of the Consolidated Plan is assigned to the Department of Planning and Development (DPD). This agency will coordinate activities among the public and private organizations' efforts to realize the prioritized goals of the Consolidated Plan. Extensive public-private

partnerships have been established and organized to address the City's housing and community development needs. DPD will access, facilitate, and coordinate resource linkages and draw from the immediate sources of expertise in the community to strengthen existing partnerships and develop new collaborative relationships

Actions planned to enhance coordination between public and private housing and social service agencies

Public and assisted housing providers, private and governmental health, mental health, and service agencies are participants in the network described in this document. They are also the organizations with which the City of Lowell worked to develop the Consolidated Plan, and they are expected to continue active participation in the upcoming years.

The City strongly encourages collaborations in its RFPs for Consolidated Plan funds. A collaborative not only enhances the coordination of services among agencies but also helps consolidate the reporting requirements of block grant programs.

Discussion:

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

- The City has elected to consider the aggregate use of CDBG funds to determine the overall benefit of programs to persons of low and moderate income. This manner ensures that a minimum of 70% of the amount of CDBG funds are expended for activities that benefit such persons during the designated period.

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

| | |
|--|----------------|
| 1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed | 225,614 |
| 2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan. | 0 |
| 3. The amount of surplus funds from urban renewal settlements | 0 |
| 4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan | 0 |
| 5. The amount of income from float-funded activities | 0 |
| Total Program Income: | 225,614 |

Other CDBG Requirements

| | |
|---|-------|
| 1. The amount of urgent need activities | 0 |
| 2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan. | 0.00% |

HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(2)

| | | |
|---|--------------------|----|
| 1. A description of other forms of investment being used beyond those identified in Section 92.205 is | | 40 |
| | Annual Action Plan | |
| | 2022 | |

as follows:

The City of Lowell does not intend to use other forms of investment beyond those identified in Section 92.205.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The City does not intend on utilizing a resale restriction for homebuyer activities in this fiscal year, however as required in the following cases: Resale provisions shall be required when HOME funds are provided in the form of a development subsidy and provided as a direct subsidy to the homebuyer.

The recapture option allows the City to recapture the entire HOME subsidy, subject to net proceeds, if the HOME recipient decides to sell the unit. The homebuyer may sell the property to any willing buyer at market price after the affordability period. The homebuyer may sell the property during the affordability period to an income eligible buyer, subject to the terms of the written agreement. Recapture of the HOME funds when sufficient equity does not exist to repay the HOME funds entirely is based on the ratio of the HOME subsidy to the sum of the homeowner's investment (including down payment and any capital improvement investment made by the owner since purchase), plus the HOME subsidy:

$$\text{HOME Subsidy} / (\text{HOME Subsidy} + \text{Homeowner Investment}) \times \text{Net Proceeds} = \text{HOME Recapture Amount.}$$
 Repayments of recaptured funds shall be remitted directly to the City to be utilized for HOME eligible activities only.

All HOME-assisted units "designated as affordable units" shall meet the following criteria: The new purchaser must be low income, meeting the HOME Program definition, and occupy the property as the family's principal residence. The sales price must not exceed 43% debt to income backend ratio to be considered "affordable" to the new purchaser and not exceed the 95% of the area purchase price as provided by HUD.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired

with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

Homeownership units using resale provisions

The City will use a deed restriction to ensure the resale of the homeownership unit to a low income eligible buyer during the affordability period and provide a "Fair Return on Investment" to the owner. The sales price shall equal the sum of (v) the cost of the appraisal (w) the purchase price paid by the Owner, (y) the documented total cost of capital improvements made by the Owner, which costs shall be subject to approval by the City, in their sole discretion, at the time of the sale or transfer, excise taxes incurred by the Owner in connection with the sale of the Property and (z) a return on the Owner's investment equal to the product of (i) the sum of the Owner's original Down payment plus one-half of the aggregate of regular principal payments made by the Owner on the allowable secured debt on the Property multiplied by (ii) a fraction, the numerator of which shall be the Price Index for the last month preceding the sale minus the Price Index for the month preceding the Owner's purchase of the Property and the denominator of which shall be the Price Index for the month preceding the Owner's purchase of the Property. The "Price Index" shall mean the "Consumer Index for Urban Wage Earners and Clerical Workers All Items (November 1982 = 100)" Published by the Bureau of Labor Statistics of the United States Department of Labor or any comparable successor or substitute index designated by the City appropriately adjusted. In the event the Price Index ceases to use the November 1982 Index of 100 as the basis of calculation or if a substantial change is made in the terms or number of items contained in the Price Index, then the Price Index shall be adjusted to the figure that would have been arrived at had the manner of computing the Price Index in effect at the date of this Deed Rider not been changed.

Homeownership units using recapture provisions

The City requires that each borrower sign a Mortgage, Promissory Note, and HOME Written Agreement. These documents provide safe guards to ensure that the borrower remains in compliance with the terms and conditions included in those documents. Pursuant to 24 CFR 94.254(a)(ii), the City requires that the HOME funds be recaptured if the housing does not meet HUD's definition of homeownership. The borrower of HOME funds from the City must continue to occupy the Property as their principal place of residence for the duration of the period of affordability. If all or part of the Property or any interest in it is sold, rented, refinanced, conveyed or transferred (or if a beneficial interest in Borrower is sold, rented, refinanced, conveyed, transferred and Borrower is not a natural person), the loan is due and payable along with any accrued interest.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that

will be used under 24 CFR 92.206(b), are as follows:

The City of Lowell does not currently utilize HOME funds for refinancing of the multifamily housing debt for housing that is rehabilitated with HOME funds, nor does it intend to do so in this plan year.

**Emergency Solutions Grant (ESG)
Reference 91.220(l)(4)**

1. Include written standards for providing ESG assistance (may include as attachment)
 - A set of Written Standards governing the use of Emergency Solutions Grant funds for homelessness prevention and rapid re-housing activities was completed in accordance with HUD ESG Regulations. Published in 2010 and updated each year and have been updated to include ESG CV guidelines. A copy of the Written Standards are attached to the Action Plan as an appendix and available upon request.
2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.
 - Assessments for homeless individuals and families are coordinated jointly with the State of Massachusetts (Balance of State CoC) and include determining household needs and the creation of a comprehensive housing and service plan. Families are deemed eligible for emergency assistance through a preliminary assessment conducted by the Mass. Dept. of Housing and Community Dept. If eligible, families are referred to a shelter program or other available temporary accommodation (motel/hotel). Once secured in housing, a much more extensive assessment is conducted via the state's HMIS software platform. Families not eligible for shelter or hotel placement are referred to Community Teamwork, Inc.'s Housing Consumer Education Center to access rapid rehousing assistance from programs funded through either state or local ESG dollars or the Stabilized Housing for Families in Transition program. Homeless individuals are referred to the Lowell Transitional Living Center and, once in shelter, are assessed for housing assistance along with case management services.
3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).
 - The process for allocating ESG funds begins in December with the advertisement of the Annual Action Plan planning process, availability of funds, and the Request for Proposal (RFP). The schedule of the Action Plan process and RFP is advertised in the Lowell Sun, and emailed to all current subrecipients. DPD provides TA to applicants. ESG funding is based on priorities identified in the Five-Year Consolidated Plan. Applications are made available at the Department of Planning and Development as well as online via the City's website at www.lowellma.gov. Completed applications

were due in January. The Request for Proposal contains information about eligible activities under the ESG regulations including program requirements for all sub grantees. The RFP also contains a set of evaluation criteria, based on the priorities identified in the City's Five Year Consolidated Plan. A Citizens Advisory Committee meets throughout the Annual Action Plan process to review proposals and make funding recommendations to the City Manager and City Council. Throughout the process, City staff provide technical assistance to applicants as well as CAC members. A tentative award list is released as part of the Draft Annual Action Plan 30-day public comment period. A final Action Plan and award list is submitted to the City Council in May for final approval before the Plan is sent to HUD

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.
 - The Department of Planning and Development has implemented a Performance and Outcome Measurement System in order to quantify the effectiveness of programs and establish clearly defined outcomes. Using goals set by the subrecipients in their applications for funding, DPD drafts grant agreements which relate reimbursement specifically to accomplishments. Where possible, the focus is on outcome measurements rather than outputs. For example, a rapid re-housing program that uses ESG funds to provide housing stabilization services will report on the number of participants who receive case management services but may only be reimbursed based on the number of participants who actually attain stable, permanent housing. Subrecipients are reimbursed only when they can provide accurate and appropriate documentation that demonstrates program accomplishments and can provide backup documentation for eligible costs as spelled out in the contractual agreement. Subrecipients who do not accomplish their proposed goals are not reimbursed for their full grant amount, and funds are recaptured at fiscal yearend and made available for other ESG eligible programs in the following year. DPD staff work closely with subrecipients to ensure that these contract goals are reached. In the event of unforeseen circumstances, DPD staff may consider amending contractual goals when warranted. DPD Staff conduct thorough monitoring of all Consolidated Plan programs including those funded through ESG. Monitoring processes include detailed monthly desk audits of reimbursement requests as well as on-site visits to review program files and operations.
5. Describe performance standards for evaluating ESG.

The Department of Planning and Development has implemented a Performance and Outcome Measurement System in order to quantify the effectiveness of programs and establish clearly defined outcomes. Using goals set by the subrecipients in their applications for funding, DPD drafts grant agreements which relate reimbursement specifically to accomplishments. Where possible, the focus is on outcome measurements rather than outputs. For example, a rapid re-housing program that uses ESG funds to provide housing stabilization services will report on the number of

participants who receive case management services but may only be reimbursed based on the number of participants who actually attain stable, permanent housing. Subrecipients are reimbursed only when they can provide accurate and appropriate documentation that demonstrates program accomplishments and can provide backup documentation for eligible costs as spelled out in the contractual agreement. Subrecipients who do not accomplish their proposed goals are not reimbursed for their full grant amount, and funds are recaptured at fiscal yearend and made available for other ESG eligible programs in the following year. DPD staff work closely with subrecipients to ensure that these contract goals are reached. In the event of unforeseen circumstances, DPD staff may consider amending contractual goals when warranted. DPD Staff conduct thorough monitoring of all Consolidated Plan programs including those funded through ESG. Monitoring processes include detailed monthly desk audits of reimbursement requests as well as on-site visits to review program files and operations.

- For more information on the process of consulting with our project sponsors, see AP-10 "Consultation"

