



# City of Gloucester

## DRAFT Consolidated Annual Performance & Evaluation Report

CAPER PY20

July 1, 2020 - June 30, 2021

Mayor Sefatia Romeo Theken

September 10, 2021

## **CR-05 - Goals and Outcomes**

### **Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)**

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

Program Year 20 (PY20) marks the first year of accomplishments toward the goals and strategies identified in the Five Year 2020-2024 Consolidated Plan. The needs identified include: affordable housing; provision of local economic opportunities; provision of public facilities and infrastructure including accessibility; coordination and provision of public services; historic rehabilitation; and recovery from the COVID-19 pandemic. The following are the goals identified by the City to address these needs: residential rehabilitation, assistance to local businesses and job creation, public facility and infrastructure improvements where feasible, basic services, services for victims of domestic violence, employment training, health services, and down payment assistance for first time home buyers (FTHB). During PY20, the City of Gloucester continued making progress on our housing rehabilitation waitlist, administered COVID-19 small business/microenterprise grants, assisted many first time homebuyers, completed a public facility improvement project, and assisted with several public services responding to and recovering from COVID-19.

In response to COVID-19, the City of Gloucester issued nearly 50 grants to small businesses and microenterprises in order to retain many jobs and keep these businesses operating. We were also able to assist several local non-profit organizations in order to help address the exponential increase in demand. These include increased homeless shelter capacity, staff and resident COVID-19 testing at shelters, and increased capacity at the local food bank. We anticipate resuming our regular public service grant cycle in PY21.

### **Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)**

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Accessibility improvements to parks & recreations	Non-Homeless Special Needs	CDBG: \$104,626	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1000	0	0.00%			
Accessibility improvements to public housing	Public Housing Non-Homeless Special Needs	CDBG: \$0	Rental units rehabilitated	Household Housing Unit	10	0	0.00%			
Accessibility of sidewalks	Non-Homeless Special Needs	CDBG: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1000	0	0.00%			

Administration	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$159,313.24	Other	Other	1	0	0.00%	1	0	0.00%
Assistance to local businesses & job creation	Non-Housing Community Development	CDBG: \$100,000	Jobs created/retained	Jobs	35	49	140.00%	20	49	245.00%
Assistance to local businesses & job creation	Non-Housing Community Development	CDBG: \$0	Businesses assisted	Businesses Assisted	80	34	42.50%	20	0	0.00%
Basic services	Homeless Non-Homeless Special Needs	CDBG: \$10,000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	24000	0	0.00%	960	0	0.00%
COVID-19 Basic Services	Homeless Non-Homeless Special Needs	CDBG: \$170,000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2000	529	26.45%	4500	529	11.76%

COVID-19 Response	Non-Housing Community Development	CDBG: \$569,022	Businesses assisted	Businesses Assisted	15	0	0.00%	30	34	113.33%
Down Payment Assistance for FTHB	Affordable Housing	CDBG: \$43,000	Direct Financial Assistance to Homebuyers	Households Assisted	35	5	14.29%	12	5	41.67%
Employment training	Non-Housing Community Development	CDBG: \$0	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	125	0	0.00%	25	0	0.00%
Health Services	Homeless Non-Homeless Special Needs	CDBG: \$0	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	750	0	0.00%	120	0	0.00%
Housing Services	Non-Homeless Special Needs	CDBG: \$35,000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	20	49	245.00%	10	49	490.00%
Housing Services	Non-Homeless Special Needs	CDBG: \$0	Homelessness Prevention	Persons Assisted	0	0		5	0	0.00%

Public facility improvements	Homeless Non-Homeless Special Needs	CDBG: \$41,850	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5965	3642	61.06%	1000	3642	364.20%
Public infrastructure improvements	Non-Housing Community Development	CDBG: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	3400	0	0.00%	680	0	0.00%
Residential Rehabilitation	Affordable Housing	CDBG: \$44,071.77	Rental units rehabilitated	Household Housing Unit	32	3	9.38%	12	3	25.00%
Residential Rehabilitation	Affordable Housing	CDBG: \$50,548.50	Homeowner Housing Rehabilitated	Household Housing Unit	32	2	6.25%	12	2	16.67%
Services for victims of domestic violence	Homeless Non-Homeless Special Needs	CDBG: \$0	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1000	0	0.00%	200	0	0.00%

**Table 1 - Accomplishments – Program Year & Strategic Plan to Date**

**Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.**

During PY20, the City made excellent progress addressing several high priority areas. For example, we significantly exceeded our 5 year goals for job creation, job retention, and assistance to homeless residents. In addition, we reached 15% of our 5 year goal for downpayment assistance. We were able to utilize our CDBG funds to assist 5 new homeowners with downpayment assistance and completed housing rehabilitation projects on 5 units, including one rental property. We also successfully completed one ADA accessibility project at our local food pantry, which serves over 3,600 residents, and made significant progress toward the completion of another ADA accessibility improvement project. Assisting in COVID-19 response and recovery was the highest priority for PY20. Towards that effort, funding was provided to two local homeless shelters in order to support their efforts to continue providing shelter for residents and meet social distancing requirements. One of our greatest accomplishments was the implementation of a COVID-19 small business/microenterprise grant initiative. We were able to award nearly 50 grants to local small businesses and microenterprises who were impacted by revenue losses due to COVID-19 restrictions and closures. This resulted in the creation or retention of 49 jobs in PY20.

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## CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	<b>CDBG</b>
White	8,280
Black or African American	107
Asian	11
American Indian or American Native	538
Native Hawaiian or Other Pacific Islander	2
<b>Total</b>	<b>8,938</b>
Hispanic	129
Not Hispanic	8,809

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

### Narrative

There is no concentration of minority or low income populations in the City. Therefore, the City has created a target area that includes the highest percentage of low- and moderate- income residents in Gloucester. These neighborhoods include the following census tracts/block groups: census tract 221400, block groups 1, 2, & 3; 221500, block groups 1 & 2; census tract 221600, block groups, 1 & 2; census tract 221700, block groups 1 & 2; and census tract 221902, block group 2.



## CR-15 - Resources and Investments 91.520(a)

### Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	2,480,693	1,121,173

Table 3 - Resources Made Available

### Narrative

CDBG funds totaling \$2,480,692.93 were made available during PY20. This was comprised of the following sources: \$697,049 CDBG-CV; \$844,582.53 prior year resources; \$689,749 PY20 entitlement allocation; and \$249,312.40 program income. Of the \$1,121,173 expended, \$608,057.78 was for CDBG-CV response and recovery. The City of Gloucester allocated \$134,293 of HOME funding for the development of affordable senior housing

### Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Citywide	1	99	
Community Development Target Neighborhood	99	1	

Table 4 – Identify the geographic distribution and location of investments

### Narrative

The following programs served clients citywide: housing rehabilitation, public/basic services, down payment assistance, services for victims of domestic violence, and economic development. The Action Inc. homeless shelter, which assisted 49 clients, is located in a target census tract.

## Leveraging

**Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.**

Leveraged funds from private, state and local funds were utilized as follows in PY20:

Action Inc. was awarded \$200,000 in CPA funds to support tenant based rental/mortgage assistance, which aligns with our homelessness prevention priorities.

Approximately, \$100,000 in set-aside HOME funds from the North Shore HOME Consortium were allocated for the City of Gloucester's use.

The Gloucester Housing Authority (GHA) received over \$175,000 in Capital Improvement funds for program year 2020. This resource supports the City's priority to increase accessibility of housing for people with disabilities.

Community Preservation Act (CPA) funds and Gloucester Affordable Housing Trust (AHT) funds support the City's priority to provide affordable housing for low and moderate income residents; 10% of the annual allocation of these funds must be reserved for affordable housing in the community. CDBG funds also leverage CPA funds to improve the accessibility of parks, and recreational spaces for people with disabilities. CPA Committee awarded roughly \$788,000 in grants in PY20. Gloucester's Affordable Housing Trust committed \$250,000 to a housing rehabilitation project in PY20. This depleted their funding, but they anticipate receiving funds annually from a newly implemented short term rental tax.

The City of Gloucester receives approximately \$670,000 each year in Chapter 90 funds from the Commonwealth of Massachusetts, which is used to address aging public infrastructure through sidewalk/street improvements, including accessibility improvements.

Applicants submitting a proposed project for CDBG funding are required to show federal, state and local resources that will be used to support the activity. Public service sub-recipients funded in PY20 leveraged over \$3 million from the following agencies and sources:

Massachusetts Housing Partnership, Massachusetts Department of Children and Families, Massachusetts Division of Banks (Chapter 206), United Way, Community Preservation Act funds, grants, private foundations, charitable trusts and donations.

## CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	10	49
Number of Non-Homeless households to be provided affordable housing units	17	5
Number of Special-Needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>27</b>	<b>54</b>

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	25
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	24	5
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>24</b>	<b>30</b>

Table 6 – Number of Households Supported

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

The housing rehabilitation program continues to experience obstacles. During PY20 we struggled to secure contractors, despite successful efforts to recruit interested businesses. Many contractors were unable to hire sufficient crews to meet the demand being experienced by their industry at this time. We also saw an exorbitant increase in material costs and difficulty securing supplies. Our Housing Rehab Specialist also left their position during PY20. We have hired a full time Housing Rehab Specialist who will be starting in PY21. We had over 100 people begin applications for our First Time Home Buyer program,

but only 13 completed the application and 6 were able to find homes. Gloucester’s housing market is still difficult for LMI households to navigate and the City of Gloucester will review our FTHB program policies and consider increasing the amount offered to successful applicants. Recovery from COVID-19 continued to be a high priority during PY20, which impacted staff capacity for all traditional programs.

**Discuss how these outcomes will impact future annual action plans.**

At this time, no major changes are planned to CDBG programs. We anticipate COVID-19 recovery efforts winding down during PY21, allowing an increased focus on traditional basic services and other programs. The hiring of a full time Housing Rehab Specialist will increase capacity for the program, which we expect to result in an increased production of units in PY21. We are optimistic we will be able to meet our 5 year goal for housing rehabilitation.

**Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.**

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	3	0
Low-income	3	0
Moderate-income	4	0
<b>Total</b>	<b>10</b>	<b>0</b>

**Table 7 – Number of Households Served**

**Narrative Information**

Gloucester continues to assist the community with a variety of housing projects and support. The desire to create housing that is affordable to households with low/mod incomes is great, but the cost and complexity means their construction is lengthy. Gloucester continues to make progress on changes to zoning ordinances to allow for the development of accessory dwelling units and multi-unit housing by right in more neighborhoods across the city. The YMCA of the North Shore is in the planning and funding stages of a 44 unit elderly housing development that be 100% affordable. Some units would be restricted to affordability rates based on 30% and 60% of the AMI for a period of 50 years. The City has invested over \$100,000 in HOME funds, \$250,000 from the local AHT, and \$200,000 from the Community Preservation Committee. We also continue to explore options for investing in tenant based rental/mortgage assistance to prevent homelessness.

The City of Gloucester continues to assist low and moderate income households wherever possible and to support developments and housing programs that serve low income households of all levels.

## **CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)**

**Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:**

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

The City's High Risk Task Force, made up of provider agencies and outreach workers, police officers, a member of Community Development staff and other City employees, provides outreach to the most hard to reach homeless people on the streets. The High Risk Task Force indicates that since the Grace Center opened there has been a measureable reduction in ambulance calls, arrests, and incidents in public facilities involving adults in crisis.

Gloucester has an extensive network of health, mental health and social service providers. With strategic support of CDBG funding, the City assists these providers in their efforts to serve the homeless population. Services supported include those for seniors, youth, and battered and abused spouses. The CDBG program will also support a food bank, health and mental health services, and housing counseling.

During PY20, the City expanded the Community Impact Unit, an initiative of the local police department that seeks to connect residents struggling with addiction to services, including shelter and detox/rehabilitation centers.

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

Action, Inc. and Wellspring House, Inc. provide emergency shelter for homeless individuals and families in Gloucester. Once housed, these providers assess client needs through case management and connect homeless individuals and families to basic services, including nutrition, income benefits and health care. After basic needs are addressed, services such as education, child care, job training, transportation and financial literacy are provided or referred, as appropriate. There are no transitional shelters or housing in Gloucester.

The City of Gloucester is part of the North Shore Continuum of Care, which provides a regional network to assist the homeless and near-homeless with shelter, permanent housing, and supportive services. Members collaborate to apply for McKinney-Vento funds and administer the Point-in-Time count of unsheltered homeless.

The City collaborated with Action Inc, Wellspring, and HAWC to address the increased demand of sheltering during the COVID-19 pandemic. Assistance was provided to each organization in order to maintain capacity for homeless persons and families despite social distancing requirements. This included funding for hotel rooms, rental of satellite spaces, and costs for testing staff and residents.

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

Education and job training programs provide one of the primary methods of preventing homelessness by increasing household income. Wellspring's portfolio of housing includes emergency shelter for families and 11 units of permanent housing. Their Adult Learning Initiative is an eight week, full-time adult basic education program that is designed to bridge clients to better jobs and/or higher education for self-sufficiency. The program assists clients in preparing for the GED, completing remedial academic work to gain entry into college, and learning new skills to become more competitive in the job market. Wellspring also administers English proficiency classes and a job training program with job opportunities available to clients through a relationship with the North Shore Medical Center. During PY20, the City of Gloucester facilitated a collaboration between Wellspring and the local hospital which lead to the award of a grant from the Urban Renewal Program. This grant will supports the CNA training program, which had historically been funded by the City's CDBG program, and ensures graduates a position either in Gloucester or Beverly Hospitals.

Action, Inc.'s Certified Nurse Assistance and CDL training programs train and certify individuals for work in their respective industry and facilitate job placement through agreements with local businesses. Every student enrolled is a low-income individual. Wellspring and Action also provide short term financial assistance for families at-risk of homelessness with varied services including rental assistance for one to two years, along with budgetary counseling.

The State of Massachusetts has mandated policies for the discharge of youth aging out of foster care, patients exiting health and mental care facilities and offenders exiting the corrections system. The NSCoC regularly shares discharge planning information and updates from these agencies with homeless providers in Gloucester.

**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 of Gloucester utilizes Community Preservation funds, Affordable Housing Trust funds, and monies from the U.S. Department of Housing and Urban Development towards efforts to prevent and end homelessness through the provision of permanent housing and public services.

The North Shore Continuum of Care supports the development of new affordable housing as the best way to shorten the amount of time families and individuals experience homelessness. CoC funds are among the funding sources that Action, Inc. has utilized to bring new permanent housing units online for homeless individuals and families. Chronically homeless individuals and families are moved directly from shelters into permanent housing through the Action, Inc. Housing First Program. These families and individuals are supported through this transition by intense case management. Action, Inc. also provides housing for chronically homeless families through a Tenant Based Rental Assistance program. The Gloucester Housing Authority (GHA) works in partnership with Action, Inc. and other providers to supply permanent housing, including Single Room Occupancy (SROs) units, to homeless individuals. The GHA also has 12-13 slots of housing first units that are used to move homeless families directly out of emergency shelters into permanent housing. The Wellspring House, Inc. service model is aimed at moving families out of emergency shelters and into permanent housing. It provides intensive case management and emergency shelter to five homeless families. After the organization assists these families to find permanent housing, Wellspring provides stabilization services to insure that the families are stably housed.

With our aging housing stock, the City of Gloucester recognizes that the rehabilitation and repair of housing units is integral to the provision of affordable housing and addressing homelessness. We work with homeowners to address significant health and safety concerns so that they may continue to occupy their homes. We also work with landlords who rent to Gloucester Housing Authority tenants when they need assistance rectifying issues identified in their home inspections. Keeping these units available for low income renters is essential to homelessness prevention.

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

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

Gloucester Housing Authority (GHA) is the major provider of assisted housing the City. The GHA has 619 units of public housing and 580 Housing Choice Vouchers under lease. The GHA has accessible housing units and works to make modifications in housing units when residents have disabilities. The City supports and collaborates closely with the GHA regularly. It has been funded for the past several years by the Cape Ann Homeownership Center. The program offers pre, post and foreclosure counseling. CDBG funds have provided public facility improvements for its existing housing for the elderly and low income housing complexes. The City still works closely with the leaders of the GHA to assist whenever possible. GHA Board members also participate on the CPA Committee.

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

The GHA provides many programs through the Cape Ann Homeownership Center for existing clients in public housing. These programs are: the Housing First program, assisting families in transition from state-funded emergency shelters; Family Self-Sufficiency and Resident Opportunity; and Self-sufficiency programs which provide assistance to eligible residents for educational opportunities, job training and placement, computer and financial literacy services. The GHA works in tandem with local service providers and the City to ensure that public housing residents are continuously working toward self-sufficiency and eventual homeownership.

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

There are no troubled PHAs in Gloucester.



## **CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)**

**Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)**

Market conditions create the most significant barrier to housing affordability along with lack of developable land and high costs of construction, as most of the city's boundary is surrounded by water. Public policy and state regulations also restrict the development of wetlands, which comprise a significant percentage of Gloucester. The City develops and maintains affordable housing via several programs. Regulatory incentives are through inclusionary land provisions, such as the overlay special permit district with an option for higher density when developments include affordable housing. Gloucester currently fosters affordable housing through the City's Inclusionary Zoning Ordinance (IZO). The ordinance requires that 15 percent of all new residential developments involving eight or more dwelling units be made affordable. As a result of the City's 2017 Housing Production Plan, the following updates to this ordinance are being implemented: defining affordable as 60% AMI or less; adding a provision for developments with 6 to 8 units; simplifying the process for opting to make a cash contribution to the City's Affordable Housing Trust as an alternative to building affordable unit. During PY19 legislation was passed to allow localities to tax short term rentals. Gloucester has committed to directing revenue received from this tax towards affordable housing, but has yet to determine if this will be via the Affordable Housing Trust or other avenues.

The City also works to maintain affordable housing through its Housing Rehabilitation Program, funded with CDBG, and provides development assistance to non-profits for affordable housing for low and moderate income households. With limited exceptions, the development of multi-family housing is not by right and requires the approval of the City Council. Several residential districts do permit two-family housing by right and changes to the zoning ordinance are in process to add currently excluded districts. The City, through the Housing Rehabilitation Program, is able to ameliorate the effects of this policy by assisting homeowners to create two-family units in the districts where these units are permitted. Previously, public policy and City building regulations did not require accessible units in multi-family buildings. That policy has changed for new buildings. Generally, the high cost of improvements to create full accessibility in existing multi-residential structures is a barrier to increasing the City's stock of accessible units. The Gloucester CDBG-funded Housing Rehabilitation Program addresses this need in part by completing accessibility improvements to existing rental and homeowner units.

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

Limited funding is the primary barrier to addressing underserved needs in the Community. In Gloucester, there are roughly 5,300 lower income households and about 1,700 individuals living below the poverty level. Community Development funds support programs and services that directly reach this population, but growing demand and decreasing state, federal and local resources present a continuous

challenge. The City will continue to utilize local, state and federal funds, including CDBG monies to support programs, public facility improvements, and the maintenance and creation of affordable housing for the homeless, near homeless and non-homeless special needs. This program year the City committed to allocating the maximum allowable percentage of CDBG funds to public services.

### **Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)**

The City takes several actions itself and with agency and non-profit partners to address Lead Based Paint (LBP) hazards and increase access to housing without LBP hazards. A critical part of eliminating lead paint poisoning is education. The Gloucester Community Development Department, Building Department and the Health Department provide education to clients and the general public about LBP hazards. The City also partners with the Massachusetts Department of Public Health, through its Childhood Lead Poisoning Prevention Program (MassCLPPP) to increase awareness.

The City of Gloucester Health Department accepts and offers referrals for case management, crisis intervention and environmental services when incidences of lead poisoning arise in the community. Action, Inc. and the Gloucester Housing Authority both educate Gloucester residents about LBP hazards. The adopted regulations for the Gloucester CDBG funded Housing Rehabilitation Program insure that any project undertaken by the program where a child is under six years of age resides will include lead paint abatement. If the program expends over \$5,000 per housing unit, a lead risk assessment and inspection will be completed. All HUD-funded programs triggering temporary displacement of tenants will cover temporary relocation of residents in those units when relocation is necessary. The regulations also require any contractor working on LBP hazards to be experienced and certified. All contractors are required to observe lead safe practices during rehabilitation.

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

The Gloucester Rehabilitation program, funded with CDBG funds, will continue to assist income-eligible homeowners with safety and accessibility improvements so that they are able to remain in their home affordably. The Gloucester Rehabilitation program has funded income eligible homeowners with safety, health, code violations and accessibility improvements, along with lead paint abatement. In PY2019, the City will also partner with Action, Inc. to provide homeowners with weatherization and energy efficiency improvements with the goal of reducing their housing costs through a partnership between the City's Rehab Program and Action's Weatherization Program.

A total of 15 percent of Gloucester's CDBG allocation supports public services, including job training, nutrition, education and other services that help move families and individuals out of poverty. The City's economic development initiatives aim to increase the number of jobs for low- and moderate-income individuals. These opportunities help move people out of poverty as well as prevent households from slipping below the poverty line. The City also supports the provisions of Section 3 by encouraging contractors working on large contracts to train, hire and subcontract with low- and moderate-income residents in Gloucester.

Since PY15, the City has allocated CDBG funding to continue the Down Payments Assistance/First Time Homebuyer program. This program assists income eligible families and individuals with purchasing their first home. It also helps move families out of situations where they were housing burdened in an effort to end cyclical and generational poverty.

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

The Grants Division of the Community Development Department is the lead agency for the administration of the Community Development Block Grant (CDBG) program and the HOME Investment Partnerships program (HOME) in Gloucester. The City's longstanding experience in this role means that the institutional structure is well established. During PY20, the City of Gloucester committed to funding 50% of the Grants Administrator position using general fund monies. This commitment to the staffing of the Grants Division is another step towards building institutional structure.

Another key strength of the CDBG program is the City's productive partnerships with local, regional, state and federal organizations. City staff participate on many boards and task forces to provide coordinated efforts and minimize duplication of programs throughout the City.

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

The City of Gloucester is very fortunate in how well local organizations and government are willing and able to coordinate in an effort to maximize services to residents.

The Community Development Department both supports and leads efforts to enhance coordination between public and private housing providers and service organizations. The High-Risk Task Force, which was formed in 2011, is one example of the community's efforts to improve cooperation between both housing and human service providers. The Task Force, which is led by the Gloucester Health Department, is comprised of representatives from the Gloucester Housing Authority, Gloucester Police and Fire Departments, Community Development Department, Addison Gilbert Hospital, Action Inc., Veterans' Services and several other social service agencies serving the Gloucester area. Meetings are held once a month, during which the Task Force focuses on high-risk clients that need a range of services, oftentimes from different agencies or departments. The level of collaboration that is achieved as a result of these meetings has both increased the efficiency and effectiveness of service delivery for the provider and the client.

Cape Ann Resource Exchange is a networking group of human service providers and faith-based organizations in Cape Ann that was begun by Wellspring, Inc. in 2009 with the goal of establishing a shared understanding of available homeless prevention resources. The group is comprised of approximately 30 organizations that meet bimonthly. Since members each have homeless prevention resources that vary in amount and eligibility requirements, the regular meetings help the providers to better serve the community by pooling and coordinating resources to assist different populations.

The City of Gloucester is part of the North Shore Continuum of Care, which provides a regional network to assist the homeless and near-homeless with shelter, permanent housing and supportive services. Members collaborate to apply for McKinney-Vento funds and administer the Point-in-Time count of unsheltered homeless. The Community Development Department also manages the Community Preservation Funds and the Affordable Housing Trust by guiding these groups with regulations and housing information to assist their funding decisions.

The Grants Division holds an active membership in the National Community Development Association (NCDCA), a national nonprofit organization that represents more than 550 local governments across the country that administer federally-supported community and economic development, housing and human service programs, including the CDBG and HOME programs. Grants Division staff attend conferences and workshops sponsored by NCDCA as well as remain up to date on programmatic or budgetary changes through NCDCA communication.

**Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)**

The need for increased fair housing education, information and advocacy has been identified as an impediment to fair housing. To combat this, the City established a permanent Fair Housing Committee via City Ordinance. Other barriers to fair housing were lead paint and accessibility. The City Housing Rehab program refers clients with extensive lead hazards to the Get the Lead Out and MassCLPPP. Clients are referred to Community Teamworks, Inc. for their Home Modification Loan program, specifically designed to address elders and individuals with disabilities for home improvements. In the event these programs cannot cover the full cost of lead remediation or modifications we are able to offer gap funding.

Through its membership in the North Shore HOME Consortium, the City attends forums on Fair Housing and predatory lending with representatives of the state Fair Housing Division. City staff also attend trainings and information sessions hosted by the Mass Housing Partnership. The City continues to use written informational materials and pamphlets in multiple languages and formats provided through the Fair Housing Center of Greater Boston for outreach to community-based organizations, including religious and non-profit organizations. The Department's website contains information on fair housing, and contact information for the City's Fair Housing Officer, a position currently held by the Grants Administrator.

The Community Development Department supports the Gloucester Fair Housing Committee. The Analysis of Impediments to Fair Housing for Gloucester was completed in 2013. Staff participate in many forums, meetings and seminars, etc. to be better informed of the services available to serve the public.

## **CR-40 - Monitoring 91.220 and 91.230**

**Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements**

The overall goal with all CDBG and HOME funded activities is to ensure compliance with federal, state and local regulations and program requirements. All of the public service programs submit reports on program spending, accomplishments and number of clients serviced. No payments are made unless reports are up to date and accurate. The City of Gloucester has updated our monitoring policies and will be implementing a risk analysis for public service grantees to determine which applicants require a thorough, in person monitoring and which will be able to complete a monitoring questionnaire and provide supporting documents. The Housing Rehabilitation Program requires on-site initial Housing Quality Inspections and inspections are conducted throughout the construction process by a licensed professional. Following the COVID-19 national emergency, down payment assistance property inspections were waived and private home inspection reports were accepted in place of inspections performed by City staff. All public facility projects are monitored during construction. On-site interviews are conducted with construction workers and payroll affidavits are reviewed to insure compliance with Davis Bacon wages.

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

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

The City of Gloucester's goals and purpose of the Citizen Participation Plan is to encourage residents, agencies and other interested parties to participate in the planning process of the Five Year Consolidated Plan and the Annual Action Plan (AAP) as well as the Consolidated Annual Performance and Evaluation Report (CAPER). The CAPER, in accordance with HUD regulations was made available to the public for examination and comment for a period of at least 15 days. Copies of the PY20 Draft CAPER were made available to the public on our City's website, at the Community Development Department in the City Hall Annex, at the local Library, and at City Hall in the Clerk's Office. Public comment period was 18 days.

## **CR-45 - CDBG 91.520(c)**

**Specify the nature of, and reasons for, any changes in the jurisdiction’s program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.**

No changes to our program objectives are planned.

**Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?**

No

**[BEDI grantees] Describe accomplishments and program outcomes during the last year.**

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**CR-45 - CDBG 91.520(c)**

**Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.**

No changes to our program objectives are planned.

**Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?**

No

**[BEDI grantees] Describe accomplishments and program outcomes during the last year.**

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