



City of Gloucester

DRAFT Consolidated Annual Performance & Evaluation Report

CAPER PY22

July 1, 2022 - June 30, 2023

Mayor Greg Verga

September 12, 2023

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 22 (PY22) is the third year of documented accomplishments toward goals and strategies in the Five Year 2020-2024 Consolidated Plan. This report covers 7/1/22 – 6/30/23. Annual priorities to meet national objectives are Decent Housing, Suitable Living Environments, and Creating Economic Opportunities, meeting one of three CPD outcomes: Availability/Accessibility, Affordability, and Sustainability. Identified needs 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 COVID-19 preparation, response, and recovery. Planning and Administration activities were limited to a 20 percent cap on the annual Entitlement allocation, primarily used for grant management.

The goals identified by the City to address these needs are: 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 First Time Home Buyer Down Payment Assistance for (FTHB). Throughout PY22, the City of Gloucester continued assisting homeowners with housing rehabilitation, assisting first-time homebuyers, supporting public facility improvements, and assisting public service providers in serving low and moderate-income (LMI) populations in the City.

The City continued its regular public service grant cycle in PY22. The City will continue to prioritize public service providers and other partners that demonstrate the ability to meet the City's goals and needs, federal expenditure, national objective, and reporting requirements.

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.

Table 1 - Accomplishments - Program Year

Goal	Category	Funding	Outcome				
Administration	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development		Indicator	Expected	Actual	Unit of Measure	Percent complete
			Other	1	0	Other	0.00 %
Assistance to local businesses & job creation	Non-Housing Community Development		Indicator	Expected	Actual	Unit of Measure	Percent complete
			Jobs created/retained	8	0	Jobs	0.00 %
			Businesses assisted	5	0	Businesses Assisted	0.00 %
Basic services	Homeless Non-Homeless Special Needs		Indicator	Expected	Actual	Unit of Measure	Percent complete
			Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	750	0	Persons Assisted	0.00 %
Down Payment Assistance for FTHB	Affordable Housing		Indicator	Expected	Actual	Unit of Measure	Percent complete
			Public service activities for Low/Moderate Income Housing Benefit	0	5	Households Assisted	0 %
			Direct Financial Assistance to Homebuyers	10	5	Households Assisted	50.00 %
Employment training	Non-Housing Community Development		Indicator	Expected	Actual	Unit of Measure	Percent complete
			Public service activities other than Low/Moderate Income Housing Benefit	25	0	Persons Assisted	0.00 %
Housing Services	Non-Homeless Special Needs		Indicator	Expected	Actual	Unit of Measure	Percent complete
			Public service activities other than Low/Moderate Income Housing Benefit	10	0	Persons Assisted	0.00 %
			Homelessness Prevention	5	0	Persons Assisted	0.00 %
Public facility improvements	Homeless Non-Homeless Special Needs		Indicator	Expected	Actual	Unit of Measure	Percent complete
			Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	1000	0	Persons Assisted	0.00 %
Public infrastructure improvements	Non-Housing Community Development		Indicator	Expected	Actual	Unit of Measure	Percent complete
			Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	750	0	Persons Assisted	0.00 %

Residential Rehabilitation	Affordable Housing		Indicator	Expected	Actual	Unit of Measure	Percent complete
			Rental units rehabilitated	10	4	Household Housing Unit	40.00 %
			Homeowner Housing Rehabilitated	10	5	Household Housing Unit	50.00 %
			Housing for Homeless added	0	0	Household Housing Unit	0 %
			Housing for People with HIV/AIDS added	0	0	Household Housing Unit	0 %
Services for victims of domestic violence	Homeless Non-Homeless Special Needs		Indicator	Expected	Actual	Unit of Measure	Percent complete
			Public service activities other than Low/Moderate Income Housing Benefit	150	0	Persons Assisted	0.00 %

Table 2 - Accomplishments - Strategic Plan to Date

Goal	Category	Funding		Outcome				
Accessibility improvements to parks & recreations	Non-Homeless Special Needs	Source	Amount	Indicator	Expected	Actual	Unit of Measure	Percent complete
		CDBG	\$100,000.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	1000	0	Persons Assisted	0.00 %
Accessibility improvements to public housing	Public Housing Non-Homeless Special Needs	Source	Amount	Indicator	Expected	Actual	Unit of Measure	Percent complete
		CDBG	\$200,000.00	Rental units rehabilitated	10	0	Household Housing Unit	0.00 %
Accessibility of sidewalks	Non-Homeless Special Needs	Source	Amount	Indicator	Expected	Actual	Unit of Measure	Percent complete
		CDBG	\$100,000.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	1000	0	Persons Assisted	0.00 %
Administration	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	Source	Amount	Indicator	Expected	Actual	Unit of Measure	Percent complete
		CDBG	\$789,257.00	Other	1	1	Other	100.00 %
Assistance to local businesses & job creation	Non-Housing Community Development	Source	Amount	Indicator	Expected	Actual	Unit of Measure	Percent complete
		CDBG	\$850,000.00	Jobs created/retained	35	45	Jobs	128.57 %
				Businesses assisted	80	0	Businesses Assisted	0.00 %
Basic services	Homeless Non-Homeless Special Needs	Source	Amount	Indicator	Expected	Actual	Unit of Measure	Percent complete
		CDBG	\$709,085.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	0	0	Persons Assisted	0 %
				Public service activities other than Low/Moderate Income Housing Benefit	2400	345	Persons Assisted	14.38 %
COVID-19 Basic Services	Homeless Non-Homeless Special Needs	Source	Amount	Indicator	Expected	Actual	Unit of Measure	Percent complete
		CDBG	\$195,403.00	Public service activities other than Low/Moderate Income Housing Benefit	2000	2388	Persons Assisted	119.40 %
COVID-19 Response	Non-Housing Community Development	Source	Amount	Indicator	Expected	Actual	Unit of Measure	Percent complete
		CDBG	\$150,000.00	Businesses assisted	15	38	Businesses Assisted	253.33 %

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Down Payment Assistance for FTHB	Affordable Housing	Source	Amount	Indicator	Expected	Actual	Unit of Measure	Percent complete					
		CDBG	\$375,000.00						Public service activities for Low/Moderate Income Housing Benefit	0	5	Households Assisted	0 %
Employment training	Non-Housing Community Development	Source	Amount	Indicator	Expected	Actual	Unit of Measure	Percent complete					
		CDBG	\$50,000.00						Public service activities other than Low/Moderate Income Housing Benefit	125	29	Persons Assisted	23.20 %
Health Services	Homeless Non-Homeless Special Needs	Source	Amount	Indicator	Expected	Actual	Unit of Measure	Percent complete					
		CDBG	\$125,000.00						Public service activities other than Low/Moderate Income Housing Benefit	750	0	Persons Assisted	0.00 %
Housing Services	Non-Homeless Special Needs	Source	Amount	Indicator	Expected	Actual	Unit of Measure	Percent complete					
		CDBG	\$50,000.00						Public service activities other than Low/Moderate Income Housing Benefit	20	49	Persons Assisted	245.00 %
Public facility improvements	Homeless Non-Homeless Special Needs	Source	Amount	Indicator	Expected	Actual	Unit of Measure	Percent complete					
		CDBG	\$110,000.00						Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	5965	3642	Persons Assisted	61.06 %
Public infrastructure improvements	Non-Housing Community Development	Source	Amount	Indicator	Expected	Actual	Unit of Measure	Percent complete					
		CDBG	\$100,000.00						Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	3400	0	Persons Assisted	0.00 %
Residential Rehabilitation	Affordable Housing	Source	Amount	Indicator	Expected	Actual	Unit of Measure	Percent complete					
		CDBG	\$1,355,000.00						Rental units rehabilitated	32	11	Household Housing Unit	34.38 %
									Homeowner Housing Rehabilitated	32	10	Household Housing Unit	31.25 %
									Housing for Homeless added	0	0	Household Housing Unit	0 %
Services for victims of domestic violence	Homeless Non-Homeless Special Needs	Source	Amount	Indicator	Expected	Actual	Unit of Measure	Percent complete					
		CDBG	\$40,000.00						Public service activities other than Low/Moderate Income Housing Benefit	1000	149	Persons Assisted	14.90 %

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special attention to the highest priority activities identified.

CR-05 information is based on the PR-23 Accomplishments Report, and beneficiary data entered into IDIS during the program year. Throughout PY22, the City addressed needs in high-priority areas. We reached 28% of our 5-year goal for downpayment assistance. Gloucester utilized CDBG funds to assist ten new homeowners with downpayment assistance and completed housing rehabilitation projects on twenty one units; ten homeownership and eleven rental. Completing Housing Rehabilitation projects was the highest priority in PY22, as the program was in a period of rebuilding from dormancy and impacts of COVID-19. Assisting public service providers was the second highest priority for PY22, as many are still recovering from COVID-19. Funding was administered to nine public services to support their efforts to serve low and moderate-income, special needs, and other vulnerable populations. There was a cumulative accomplishment total of 4,279 persons served in PY22, of which 4,003 were LMI.

CR-10 - Racial and Ethnic composition of families assisted

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

91.520(a)

	CDBG
White	2,716
Black or African American	167
Asian	31
American Indian or American Native	27
Native Hawaiian or Other Pacific Islander	0
Total	2,941
Hispanic	340
Not Hispanic	2,601

Table 1 – Table of assistance to racial and ethnic populations by source of funds

Narrative

HUD collects demographic information for reporting purposes only. There is no concentration of minority or low-income populations in Gloucester. Therefore, the City has created a target area with the highest percentage of LMI residents. These neighborhoods include the following Census Tracts/Block Groups:

- Census Tract 221400, Block Groups 1, 2, & 3;
- Census Tract 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.

American Community Survey (ACS) estimates confirm that 93.1 percent of Gloucester's population is White, 2.2 percent is Black, .1 percent is American Indian and Alaska Native, 1.9 percent is Asian, .9 percent is some other race, and 1.9 percent is two or more races. Three percent of the population is Hispanic/Latino. As Gloucester's population is majorly White, CDBG programs/funding often assist White households, as reflected in the accomplishments data. Staff continues to try to assist households of all backgrounds and apply CDBG toward minority communities.

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	2,098,570	

Table 2 - Resources Made Available

Narrative

CDBG funds totaling \$2,098,570 were made available during PY22 and comprised of the following sources:

- \$844,582.53 prior year resources;
- \$707,711.00 PY21 entitlement allocation; and
- \$249,312.40 program income.

Of the \$543,164 expended, \$ was allocated as HOME funding for the development of affordable senior housing units at the site of the former YMCA Downtown. Staff continues to work with new and seasoned partners to spend available funds, including any incoming program income payments and prior year funds. Funds the City could not expend in PY22 will be put toward activities, including several public facilities activities, in PY23.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Citywide	75	99	
Community Development Target Neighborhood	25	1	Funds are targeted (but not always exclusively distributed) in the Community Development Target Neig

Table 3 – Identify the geographic distribution and location of investments

Narrative

CDBG funds are distributed within the City of Gloucester, with expenditures prioritized in the Community Development Target Neighborhood (boundaries described in CR-10). The following programs typically serve clients citywide: housing rehabilitation, public/basic services, Down Payment Assistance, services for victims of domestic violence, and economic development. Public facilities projects are concentrated in the target area. Major providers are also located there, often serving residents in the immediate area. For example, Action Inc. and the Open Door are 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 private, state, and local funds were utilized as follows in PY22:

Action Inc. was awarded \$200,000 in CPA funds to support tenant-based rental/mortgage assistance, which aligns with our homelessness prevention priorities. They receive McKinney-Vento funds through the North Shore Continuum of Care (CoC), and CDBG funds for homeless activities are often used with those CoC funds.

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 of increasing 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 used to support the activity. Public service subrecipients funded in PY22 leveraged over \$3 million from the following agencies/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	0	0
Number of Non-Homeless households to be provided affordable housing units	0	0
Number of Special-Needs households to be provided affordable housing units	0	0
Total	0	0

Table 4 – Number of Households

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

Table 5 – Number of Households Supported

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

The housing rehabilitation program improved greatly during PY22 and is continuing to grow. It became apparent that to meet the goals of the program we will need to hire additional staff in order to increase capacity. We anticipate hiring an additional project manager in PY23. Interest from contractors is growing as Gloucester's reputation is restored and we will be continuing efforts to recruit additional general and specialized contractors.

Approximately 200 people began applications for the First Time Home Buyer program, but only 17 completed the application, and five were able to find homes. Gloucester's high-priced housing market remains difficult for LMI

households to navigate, as the inventory of units is low, and rentals are difficult to find. The City periodically reviews FTHB policies to modify the amount offered to successful applicants.

Discuss how these outcomes will impact future annual action plans.

No major changes are planned for future CDBG programs and plans unless an unexpected need arises. The City’s Housing Rehab Specialist will continue to increase capacity for the program, address challenges posed by the market, and meet Consolidated Plan goals. Outcomes will embody creative solutions to addressing needs going forward, such as calls for collaboration with new partners. All programs will be monitored for progress and challenges towards completion.

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	9	0
Moderate-income	0	0
Total	12	0

Table 6 – Number of Households Served

Narrative Information

Gloucester continues to assist the community with various housing projects. The desire to create housing affordable to LMI households is a priority, but rising costs and complexity in scopes of work can result in lengthy construction timelines. Gloucester continues modifying zoning and addressing regulatory barriers to allow for denser development, including accessory dwelling units and multi-unit housing by-right across the City. The YMCA of the North Shore is in the demolition and construction stages of a 44-unit elderly housing development that is 100% affordable. Some units will be restricted to affordability rates based on 30% and 60% of the AMI for 50 years. The Gloucester Housing Authority is in the planning and funding stage of a senior housing development that will include 20 one-bedroom units in the heart of downtown Gloucester. Both of these projects have received significant funding from the City.

The City will continue to explore options for investing in tenant-based rental/mortgage assistance to prevent homelessness and support new developments and programs that serve LMI households of all levels. The City is open to collaboration with the North Shore HOME Consortium to achieve goals. The HOME-ARP Allocation Program will provide such opportunities in the coming years. The Consortium reports on HOME activities administered by the City of Peabody.

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

Gloucester has a High-Risk Task Force consisting of provider agencies, outreach workers, police officers, a member of the Community Development staff, and other City employees. The Task Force provides outreach to the hardest-to-reach people experiencing homelessness in the City.

Gloucester has an extensive network of health, mental health, and social service providers. The Grace Center is a day resource center in Gloucester that provides connections to supportive services and resources. Since the Grace Center opened, there has been a measurable reduction in ambulance calls, arrests, and incidents in public facilities involving adults in crisis. Action Inc. runs an emergency shelter that conducts its own outreach and has staff well-versed in reaching homeless and chronically homeless populations. Action Inc. works with North Shore Community Health/Gloucester Family Health Center to provide "Healthcare for the Homeless" and with Eliot Community Human Services to offer on-site mental health counseling. The City recently expanded its Community Impact Unit (CIU). The CIU is an initiative of the Gloucester Police Department that connects residents struggling with addiction to services such as shelter and detox/rehabilitation centers.

With the support of CDBG funding, the City assists providers in their efforts to serve the homeless. Supported services include those for seniors, youth and young adults, unaccompanied youth, veterans, and victims of domestic violence. The CDBG program also supports food banks, behavioral and mental health services, job training programs, housing counseling, and other activities to prevent and end homelessness.

Addressing the emergency shelter and transitional housing needs of homeless persons

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

The City is part of the North Shore Continuum of Care (CoC), which provides a regional network to assist the homeless, near homeless, and those at-risk with shelter, permanent housing, and supportive services. Members collaborate to apply for McKinney-Vento funds, administer the Point-in-Time (PIT) counts of unsheltered homeless, and handle Coordinated Entry. The City is also a member of the North Shore HOME Consortium, which offers a variety of housing programs and assistance. The Consortium handles the development of affordable rental housing through construction and rehabilitation. Short-term tenant-based rental assistance for very low-income households is also eligible.

The City collaborated with Action Inc., Wellspring, and HAWC to address increased demand during COVID-19. Funding for hotel rooms, rental of satellite spaces, and testing was provided to each organization to maintain capacity for the homeless despite social distancing. The City continues to support these organizations with CDBG funds annually.

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 provide some primary methods of preventing homelessness by increasing household income. Wellspring's housing portfolio includes emergency shelter for families and eleven permanent housing units. Their Adult Learning Initiative is an eight-week, full-time adult education program designed to bridge clients to better jobs, higher education, and self-sufficiency. The program assists clients in preparing for the GED, completing remedial academic work to enter college, and learning skills to become competitive in the job market. Wellspring also administers English proficiency classes and a job training program with opportunities available to clients through the North Shore Medical Center. This grant supports the CNA training program, funded by the CDBG program, and ensures graduates a position either in Gloucester or Beverly Hospitals.

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

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 North Shore CoC regularly shares discharge planning, information, and agency updates with homeless providers in Gloucester. The City will continue to help others avoid homelessness by pursuing partnerships with health care facilities, mental health facilities, foster care and youth facilities, and corrections programs/institutions where feasible.

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 works to shorten the time individuals/families experience homelessness, facilitate access to affordable housing, and prevent individuals/families who were recently homeless from becoming homeless again through CDBG and HOME partnerships. The City also utilizes Community Preservation Act (CPA) funds and Affordable Housing Trust funds to prevent and end homelessness by providing permanent housing and public services.

The North Shore CoC supports new affordable housing development as the best way to shorten periods of homelessness. Action, Inc. is the City's major resource for assistance to homeless individuals and a major partner in project-based initiatives. CoC funds are among the sources that Action, Inc. utilizes to bring new permanent units online for homeless individuals/families. The chronically homeless are moved directly from shelters into permanent housing through Action's Housing First Program. These families/individuals are supported through this transition by intensive

case management. Action also provides housing for chronically homeless families through a Tenant Based Rental Assistance program.

The Gloucester Housing Authority (GHA) works with Action and others to supply permanent housing, including Single Room Occupancy (SROs) units. The GHA has approximately twelve slots of Housing First units to move families out of emergency shelters and into permanent housing. Wellspring House's service model also aims to move families out of shelters and into permanent living situations; it provides case management and shelter to five homeless families. After the organization assists these families in finding housing, Wellspring provides stabilization services for the families. The GHA refers many households facing homelessness to Wellspring's Homeless Prevention Program to assist in preserving their housing and reducing shelter placements.

With the aging housing stock, Gloucester recognizes unit rehabilitation and repair are integral to providing affordable housing and addressing homelessness. The City's Housing Rehab Program works with homeowners to address health and safety concerns so they may continue to occupy their homes. The City also works with landlords who rent to GHA 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 City's major provider of assisted housing. The GHA has:

- 249 Family Housing Units
- 370 Elderly/Disabled Housing Units
- 730 Units for Rental Assistance Programs (601 Tenant-Based Housing Choice Vouchers, 32 Project-Based Vouchers)
- 16 Units for Affordable Homeownership Programs

The GHA has accessible units and modifies units when residents have disabilities. The City collaborates with the GHA regularly, funding the Cape Ann Homeownership Center for the past several years. The program offers pre, post, and foreclosure counseling. CDBG has funded facility improvements for elderly and low-income housing complexes. The City works with GHA leaders (Board members and staff) to assist whenever possible. 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 clients in public housing. These programs include the Housing First program, assisting families in transition from state-funded emergency shelters; Family Self-Sufficiency and Resident Opportunity; and Self-sufficiency programs. Self-sufficiency programs assist eligible residents regarding educational opportunities, job training and placement, homeownership and foreclosure, and computer and financial literacy services. The GHA works with local service providers and the City to ensure public housing residents are continuously working toward self-sufficiency and 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, lack of developable land, and high construction costs create barriers to housing affordability. Public policy and state regulations restrict development; meanwhile, wetlands and environmental constraints comprise a significant percentage of the City. The City regularly updates its Housing Production Plan (HPP) to help overcome these constraints and creatively produce more affordable housing. As a result of the HPP, the following updates were implemented: defining affordable as 60% AMI or less, adding a provision for developments with 6 - 8 units, and simplifying making a cash contribution to the Affordable Housing Trust.

The City develops/maintains affordable housing via several programs. Regulatory incentives are through inclusionary land provisions, such as the overlay district with higher-density options when developments include affordable housing. Gloucester fosters affordable housing through the Inclusionary Zoning Ordinance (IZO), requiring fifteen percent of all new developments involving 8+ dwelling units to be affordable. Gloucester passed legislation allowing localities to tax short-term rentals and committed to directing the revenue towards affordable housing. The City has yet to determine if this will be via the Affordable Housing Trust or other avenues.

The City maintains affordable housing through its Housing Rehabilitation Program (funded by CDBG) and assists nonprofits with affordable housing for LMI households. With limited exceptions, multi-family housing development is not by right and requires City Council approval. Several residential districts permit two-family housing by right. Changes to the zoning ordinance are in process to add excluded districts. Through the Housing Rehab Program, the City alleviates the effects of this policy by assisting homeowners in creating two-family units in districts where these units are permitted. Previously, building regulations did not require accessible units in multi-family buildings; that policy has changed for new buildings. The high cost of improvements to create full accessibility in existing multi-residential structures is a barrier to increasing the stock of accessible units. The Housing Rehab Program partly addresses this need by completing accessibility improvements to rental and homeowner units.

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

Limited funding is the main barrier to addressing underserved needs. Gloucester has roughly 5,500 lower-income households and about 2,000 individuals living below the poverty level. CDBG funds support programs and services that reach this population, but growing demand and decreasing resources present challenges. The City utilizes local, state, and federal funds to support public service programs, public facility improvements, and the maintenance/creation of affordable housing for the homeless and at-risk. The City commits to allocating the maximum percentage of CDBG funds to public services every year.

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

The City takes action and works with agencies and nonprofit partners to address Lead-Based Paint (LBP) hazards and increase access to housing without LBP. A critical part of eliminating lead paint is education. The Community Development Department, Building Department, and the Health Department educate clients and the public about

hazards and partner with the Massachusetts Department of Public Health through its Childhood Lead Poisoning Prevention Program (MassCLPPP). The City's Health Department offers referrals for case management, crisis intervention, and environmental services when incidences of LBP arise in the community. Action, Inc. and the GHA educate Gloucester residents about LBP hazards through their programs. The GHA enforces lead regulations per federal and state requirements.

Projects involving acquisition, construction, rehab, or demolition are evaluated for lead paint hazards and adherence to the Lead Paint Safety Rule. All proposed activities are reviewed to determine lead-safe applicability and compliance, especially properties built before 1978. The adopted regulations for the CDBG-funded Housing Rehabilitation Program ensure that any project undertaken where a child under six resides will include lead paint abatement. A lead risk assessment and inspection are completed if the program expends over \$5,000 per housing unit. All HUD-funded programs triggering temporary displacement of tenants will cover temporary relocation of residents in those units when relocation is necessary. Regulations also require any contractor working on LBP hazards to be experienced and certified; they must observe safe lead practices during rehabilitation. Written agreements with subrecipients require proper notification and the use of certified inspectors and contractors to ensure lead hazards are appropriately screened for, contained, and properly disposed of.

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

Poverty-level families are encouraged to participate in CDBG programs. The City collaborates with organizations, including anti-poverty agencies, to prioritize projects that serve this population. Housing and public service activities aim to assist as many extremely low-income families as possible, and income data is tracked through accomplishments in IDIS. These programs help move families out of situations where they were cost-burdened, hoping to end generational poverty. The CDBG-funded rehab program assists income-eligible homeowners with safety and accessibility improvements to remain in their homes. The program has funded eligible homeowners with safety, health, code violations, accessibility improvements, and lead paint abatement. The City has also partnered with Action, Inc. to provide weatherization and energy efficiency improvements to reduce housing costs. This program is made possible through a partnership between the City's Rehab Program and Action's Weatherization Program. The City also offers the Down Payments Assistance/First Time Homebuyer program, assisting income-households purchasing their first home.

Fifteen percent of Gloucester's CDBG allocation supports public services, including job training, nutrition, education, health services, and others that help elevate households out of poverty. Staff allocates the full 15 percent to those in need through local organizations each year. The City's economic development initiatives aim to increase the number of jobs for LMI individuals. These opportunities move people out of poverty and prevent slipping below the poverty line. The City supports federal provisions under Section 3 by encouraging contractors working on large contracts to train, hire and subcontract with LMI residents in Gloucester.

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 CDBG program and the HOME Investment Partnerships program (HOME) in Gloucester. The City's longstanding experience in this role means the institutional structure is well-established. The City works with the North Shore HOME Consortium when submitting Five-Year Consolidated Plans and Annual Action Plans.

During PY20, the City of Gloucester committed to funding 50% of the Grants Administrator position using general fund monies. This commitment to staffing the Grants Division is another step toward building an institutional structure. All projects are reviewed and approved by the Director of Community Development and the Mayor, and Grants Division staff participate in trainings to remain current with regulations and procedures.

Another strength of the CDBG program is the City's comprehensive partnerships with local, regional, state, and federal organizations. Staff participates in many Boards and Task Forces to coordinate efforts and minimize duplication. The Department solicits nonprofits and other agencies with expertise in providing services for LMI persons each year. Staff communicate with these agencies regularly and provide technical assistance upon request.

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

91.220(k); 91.320(j)

Gloucester has a history of local organizations and the government working together to maximize services for residents. The Community Development Department leads and supports efforts to enhance coordination between public/private housing providers and service organizations. The High-Risk Task Force, formed in 2011, is an example of the community's efforts to improve cooperation. The Task Force is led by the Gloucester Health Department and comprises representatives from the GHA, the Police and Fire Departments, the Community Development Department, Addison Gilbert Hospital, Action Inc., Veterans' Services, and other social service agencies serving the area. The monthly meetings focus on high-risk clients needing a range of services, often from different agencies or departments. The level of collaboration achieved due to these meetings has increased the efficiency and effectiveness of service delivery.

Cape Ann Resource Exchange is a networking group of human service providers and faith-based organizations on Cape Ann, begun by Wellspring, Inc. in 2009. They aim to establish and provide a shared understanding of available homeless prevention resources. The group has approximately 30 organization members and meets bimonthly. Since members have resources that vary in amount and eligibility, meetings help providers better serve the community by pooling and coordinating where feasible to assist different populations.

Gloucester is part of the North Shore CoC, providing 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 manages Community Preservation Funds and the Affordable Housing Trust by guiding these groups with regulations and housing information to assist their funding decisions.

Organizations receive Notices of Funding Availability (NOFAs) and notices of public hearings and comment periods. Staff interact with subrecipients during monitoring and provide technical assistance as needed. All information is available on the Town website, and paper copies are in Town Hall. Outreach has attracted agencies that serve LMI and special needs populations to public meetings; agencies participate in efforts related to the Consolidated Plan and Annual Action Plans, including surveys, providing written comments and data, and participating in focus groups. Staff also participate in formal housing and social services conversations through planning outside CDBG. The Grants Division holds active membership in the National Community Development Association (NCDA), a national nonprofit representing more than 550 local governments. It administers federally supported community, economic development, housing, and human service programs, including CDBG and HOME. Grants Division staff attend conferences and workshops sponsored by

NCDA, remaining up to date on programmatic or budgetary changes.

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 more fair housing education, information, advocacy, and expertise impedes fair housing choice. The City established a permanent Fair Housing Committee via a City Ordinance to counteract this. Other barriers are lead paint and accessibility issues. The Housing Rehab program refers clients with extensive lead hazards to the “Get the Lead Out” program and MassCLPPP. Clients are referred to Community Teamworks, Inc. for their Home Modification Loan program, designed to address home improvements for elders and individuals with disabilities. If these programs cannot cover the cost of lead remediation or modifications, the City can offer gap funding.

Through 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 MA Housing Partnership. The City uses written materials and pamphlets in multiple languages/formats through the Fair Housing Center of Greater Boston to reach community-based organizations, including religious and nonprofit organizations. The Department's website has fair housing information and contact information for the City's Fair Housing Officer, a position held by the Grants Administrator. The Community Development Department supports the Gloucester Fair Housing Committee. They work together to address recommendations in the Analysis of Impediments to Fair Housing (completed in 2013). Staff participates in forums, meetings, seminars, etc., to educate themselves on services available to overcome the effects of impediments.

The City pursues zoning that furthers fair housing access, i.e., the Inclusionary Zoning Ordinance. The City also prioritizes local resources to increase and improve affordable, fair housing opportunities (such as municipally owned land) and opportunities to proactively plan for affordable housing, such as the HPP. Permitted affordable housing projects must have an approved Affirmative Fair Housing Marketing Plan and Tenant Selection Plan, and the GHA enforces fair housing choice in its policies and procedures. CPA and Affordable Housing Trust funds create/preserve affordable units that enforce fair housing standards.

CDBG information is translated upon request. Interested parties can notify the Community Development Department in advance to arrange translators. In-person meetings are in venues that meet ADA accessibility requirements. Interested parties can notify the Department in advance to arrange additional accessibility accommodations for scheduled meetings

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

All CDBG and HOME-funded activities aim to ensure compliance with federal, state, and local regulations and program requirements. All programs submit reports on program spending, accomplishments, and the number of clients serviced. Quarterly reports are accompanied by invoices and supporting information that staff review for completeness. No payments are made unless reports are up to date and accurate. The City of Gloucester has updated its monitoring policies. It now implements a risk analysis for public service grantees to determine which applicants require thorough, in-person monitoring, and which can complete a monitoring questionnaire and provide supporting documents. Public notices notify the public of handicap accessibility at each meeting and include that reasonable accommodations are available upon advance request. Translations are also available upon request.

The Housing Rehabilitation Program requires on-site initial Housing Quality Inspections and inspections conducted by a licensed professional throughout the construction process. Rental housing activities are monitored yearly to ensure affordability terms are met. All public facility projects are monitored during construction. On-site interviews with construction workers, payroll affidavits, and wage sheets are reviewed to ensure compliance with Davis Bacon wages. Minority and Women's Business outreach requirements are in agreements. Reporting is done on HUD form 2516 annually for the period ending on September 30, as required.

Section 3 and Davis Bacon compliance language is included in written agreements and is encouraged even when compliance is not triggered. Eligible businesses are encouraged to register with HUD's Section 3 Business Registry at: <https://portalapps.hud.gov/Sec3BusReg/BRegistry/RegisterBusiness>. HUD's Section 3 Form 60002 is submitted annually, as required, as part of the CAPER. The City also submits the Semi-Annual Davis Bacon Reports, as required by HUD.

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 goals and purpose of the Citizen Participation Plan are to encourage residents, agencies, and other interested parties to participate in the planning process of the Five Year Consolidated Plan, the Annual Action Plan (AAP), and the Consolidated Annual Performance and Evaluation Report (CAPER). The CAPER, per HUD regulations, was made available to the public for review and comment for at least 15 days. Copies of the PY22 Draft CAPER were made available to the public on the City's website, at the Community Development Department in the City Hall Annex, at the local Library, and City Hall in the Clerk's Office. Written comments accepted through 9/28/23. Any comments received prior to submission will be incorporated or an explanation of their exclusion will be included.

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 program objectives are planned. The City of Gloucester advances the objectives stated in the Annual Action Plan (AAP) and Consolidated Plan to the fullest extent. Applications are collectively evaluated to ensure a balance between meeting objectives and the ability to move forward quickly.

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

No

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

CR-58 – Section 3

Identify the number of individuals assisted and the types of assistance provided

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
Total Number of Activities	0	0	0	0	0
Total Labor Hours	0				
Total Section 3 Worker Hours	0				
Total Targeted Section 3 Worker Hours	0				

Table 7 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG	HOME	ESG	HOPWA	HTF
Outreach efforts to generate job applicants who are Public Housing Targeted Workers	0				
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.	0				
Direct, on-the job training (including apprenticeships).	0				
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.	0				
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).	0				
Outreach efforts to identify and secure bids from Section 3 business concerns.	0				
Technical assistance to help Section 3 business concerns understand and bid on contracts.	0				
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.	0				
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.	0				
Held one or more job fairs.	0				
Provided or connected residents with supportive services that can provide direct services or referrals.	0				
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.	0				
Assisted residents with finding child care.	0				
Assisted residents to apply for, or attend community college or a four year educational institution.	0				
Assisted residents to apply for, or attend vocational/technical training.	0				
Assisted residents to obtain financial literacy training and/or coaching.	0				
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.	0				
Provided or connected residents with training on computer use or online technologies.	0				
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.	0				
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.	0				
Other.	0				

Table 8 – Qualitative Efforts - Number of Activities by Program

Narrative

No projects subject to Section 3 were conducted during PY22.