

**CITY OF WORCESTER
PROPOSED SUBSTANTIAL AMENDMENT TO THE
CONSOLIDATED SUBMISSION FOR COMMUNITY PLANNING
& DEVELOPMENT (2015-2020)
FIRST YEAR ACTION PLAN / PROGRAM YEAR 41
JULY 1ST, 2015 – JUNE 30TH, 2016**

November 30, 2015

The City of Worcester is proposing to substantially amend its Consolidated Submission for Community Planning & Development (2015-2020), First Year Action Plan, July 1st, 2015 – June 30th, 2016 to fund:

1. HOME Investment Partnership Program - Tenant Based Rental Assistance South Middlesex Opportunity Council, Inc. (\$165,000; Supplemental Assistance)
2. Housing Opportunities for Persons With AIDS (HOPWA) - Perception Programs, Inc / Omega House Client Support Vehicle (\$17,902.60)

Please Note: The allocation amounts provided above are based upon estimates and are subject to change once formal bids are received. Final allocation amounts will be subject to 2 CFR 200.00 et. seq. (entitled “Uniform Administrative Requirements for Federal Awards”) for requirements formerly set forth in O.M.B. Circular A-122 and satisfaction of additional HOME Investment Partnership Program and Housing Opportunities for Persons With AIDS program eligibility criteria.

SUBSTANTIAL AMENDMENT TO THE FISCAL YEAR 2015-2016 ACTION PLAN:

HOME AND HOPWA REPROGRAMMING

INTRODUCTION

The City of Worcester Fiscal Year 2015-16 Annual Action Plan was submitted to the U.S. Department of Housing and Urban Development (HUD) on June 27, 2015 and received preliminary approval on August 18, 2015, and final approval on September 24, 2015. HUD Region I recommended the City begin its substantial amendment process prior to Congressional Release (CR) as the program year started on July 1, 2015.

The City respectfully submits this substantial amendment for your review and consideration. The proposed amendment stems from the 2014 Tenant Based Rental Assistance Request for Proposals (RFP), in which the city identified a second year extension and additional \$165,000 in HOME Investment Partnership Program funding. Additionally, some \$17,902.60 of unexpended balances in the Housing Opportunities for Persons with AIDS (HOPWA) program funding will be reallocated.

Title 24 Section 91.505 of the Code of Federal Regulations stipulates that participating jurisdictions shall amend their approved plans whenever they make one of the following decisions:

1. To make a change in its allocation priorities or a change in the method of distribution of funds;
2. To carry out an activity, using funds from any program covered by the Consolidated Plan (including program income) not previously described in the action plan; or
3. To change the purpose, scope, location, or beneficiaries of an activity.

The Regulation (CFR 91.505) further requires that jurisdictions identify in their citizen participation plans the criteria they will use for determining what constitutes a substantial amendment. Consistent with these requirements, the Citizen Participation Plan adopted by the City of Worcester as a component of its 2015 – 2020 Consolidated Five Year Plan identifies three criteria that will require a substantial amendment.

The Executive Office of Economic Development (EOED) will amend the City of Worcester Five-Year Consolidated Submission for Community Planning and Development whenever it makes one of the following changes:

1. To make a change in its allocation priorities or a change in the method of distribution of funds;
2. To carry out an activity, using funds from any program covered by the consolidated plan (including program income), not previously described in the action plan; or
3. To change the purpose, scope, location, or beneficiaries of an activity.

CITIZEN PARTICIPATION

In accordance with 24 CFR 91.105(c)(3) for local governments, the draft, proposed substantial amendment items were included in a Public Notice for the use of HOME and HOPWA funds was released for citizen review and comments on October 28, 2015 in the Worcester Telegram & Gazette. During the 30-day public comment period from October 29, 2015 through November 27, 2015 a Draft Substantial Amendment document, herein included, is also made available during regular business hours between 8:30 a.m. and 5:00 p.m., Monday through Friday at one or more of the following locations:

1. Housing Development Division, 455 Main Street, 4th Floor, City Hall, Worcester, MA 01608.
2. The City of Worcester website, Neighborhood Development Division documents page
<http://www.worcesterma.gov/e-services/document-center/neighborhood-development>

The City of Worcester Executive Office of Economic Development (EOED) – Housing Development Division will hold a public hearing on Monday, November 16, 2015, at 5:30 p.m., in City Hall Conference Room 401, 455 Main Street 4th Floor, Worcester, MA 01608.

A copy of the public hearing notice is presented in Attachment 1, along with a summary of citizen comments received at the public hearing and the remainder of the public comment period, if applicable. If necessary, the city's responses to these citizen comments are also included in Attachment 1. A description of the proposed activities and projects and their proposed allocation dollar amounts is included below and in Attachment 2.

PROPOSED ACTIVITY AMENDMENTS

The proposed amendments will allow the city to fund one (1) HOME and one (1) HOPWA eligible activities utilizing unexpended and reallocated funds.

1. SMOC Tenant-Based Rental Assistance (TBRA), \$165,000 supplemental assistance from Year 40 HOME allocation

The City's HOME funded TBRA for the homeless program is designed to assist unsheltered homeless individuals obtain safe, sanitary housing. The need for permanent housing for homeless and chronically homeless individuals is identified as a high priority in the City's 2015-2020 Consolidated Plan. The South Middlesex Opportunity Council (SMOC) applied for HOME funds as part of the 2014 TBRA Request for Proposals (RFP). SMOC's application was scored Highly Advantageous, and was awarded \$165,000 for 12-months of assistance to homeless individuals from July 1, 2014-June 30, 2015.

The original RFP included a provision that states, "\$330,000 in HOME funds will be awarded under this RFP over a 2 year period (contingent upon HOME funding through the U.S. Department of Housing & Urban Development (HUD))." Now, entering the second year of the award, City Housing Staff recommends a budget increase for supplemental assistance in the amount of \$165,000, to allow for a total award of \$330,000 in HOME funds to SMOC for the TBRA project, to be expended by June 30, 2016.

2. Perception Programs Omega House, \$17,902.60 from unexpended Year 40 HOPWA allocation

The Omega House is located in Willimantic, CT and serves 10 single HIV+ adult men and women with co-occurring mental health and substance abuse disorders. Omega House emphasizes the importance of access to income and education to further economic self-sufficiency. Residents work with a Housing Support Specialist that supports residents in the transition to independence.

Based on public input from the HOPWA review committee and a compelling proposal by the agency, it was determined that access to transportation is a vital need for residents living in rural Windham County, where community resources are out of reach without private transportation options. Given that the Year 41 (2015-2016) HOPWA allocation has been fully dedicated to five other programs, the HOPWA review committee approved the reallocation of Perception Programs' unexpended Year 40 funds to support the purchase of a safe, reliable vehicle as well as the insurance, maintenance, and gasoline costs associated with that vehicle, not to exceed \$17,902.60.

Contracts will be executed once formal scopes of work have been reviewed and determined to be cost reasonable per 2 CFR 200.00 et. seq. (entitled "Uniform Administrative Requirements for Federal Awards") for requirements formerly set forth in O.M.B. Circular A-122 and satisfaction of additional Community Development Block Grant (CDBG) program eligibility criteria and appropriate Environmental Reviews have been completed per 24 CFR Part 58.

Attachment 1:

PUBLIC HEARING NOTICE

AMEND CONSOLIDATED SUBMISSION FOR COMMUNITY PLANNING

CITY OF WORCESTER PROPOSED SUBSTANTIAL AMENDMENT TO ITS CONSOLIDATED SUBMISSION FOR COMMUNITY PLANNING & DEVELOPMENT (2015 - 20) FIRST YEAR ACTION PLAN JULY 1ST, 2015 - JUNE 30TH, 2016 NOTICE OF: 30-DAY PUBLIC COMMENT PERIOD & PUBLIC HEARING The City of Worcester is proposing to substantially amend its Consolidated Submission for Community Planning & Development (2015-2020), First Year Action Plan, July 1st, 2015 - June 30th, 2016 to fund: 1. HOME Tenant Based Rental Assistance (TBRA) (\$330,000) 2. Housing Opportunities for Persons with HIV/AIDS (HOPWA) Perception Programs, Inc / Omega House Client Support Vehicle (\$17,902.60). Please Note: The allocation amounts provided above are based upon estimates and are subject to change once formal bids are received. Final allocation amounts will be subject to 2 CFR 200.00 et. seq. (entitled "Uniform Administrative Requirements for Federal Awards") for requirements formerly set forth in O.M.B. Circular A-122 and satisfaction of additional HOME and HOPWA program eligibility criteria. The City invites all parties to submit any comments, written materials, letters, reports and documents relative to the above stated proposed Substantial Amendment to: Executive Office of Economic Development (EOED), 455 Main Street, 4th Floor, Worcester, MA 01608. Email: RiveraMA@worcesterma.gov by Monday, November 30, 2015. A public hearing will be held to answer questions and provide information with regard to the above stated proposed amendment. The public hearing is scheduled for: Monday, November 16, from 5:30-6:30 p.m., in City Hall Conference Room 401, 455 Main Street 4th Floor, Worcester, MA 01608. If you have any questions regarding this notice, or have concerns relative to the needs of non-English speaking or handicapped persons, please contact EOED – Miguel A. Rivera, at (508) 799-1400 x221, 455 Main Street, 4th Floor, Worcester, MA 01608, email: RiveraMA@worcesterma.gov.

October 28, 2015

**SUMMARY OF CITIZEN COMMENTS RECEIVED AT THE PUBLIC HEARING AND THE
REMAINDER OF THE PUBLIC COMMENT PERIOD AS WELL AS THE CITY'S RESPONSE
TO THESE CITY COMMENTS.**

Attachment 2: Proposed HOME and HOPWA Program Funding Reallocation

2014 – 2015 Entitlement Programs' Funding Reallocation

Grant Program	2015-2016 Project Name	Original Year 40 Funding Allocation	Reallocated funding amount	Total Program Activity Allocation
HOME	SMOC Tenant Based Rental Assistance	\$165,000.00	\$165,000.00	\$330,000.00
Housing Opportunities for Persons with HIV/AIDS (HOPWA)	Omega House Client Support Vehicle	\$0.00	\$17,902.60	\$17,902.60