

# CITY OF WORCESTER, MA



## CONSOLIDATED SUBMISSION FOR COMMUNITY PLANNING AND DEVELOPMENT

### FIVE YEAR PLAN (2020 – 2025) *And* FIRST YEAR ACTION PLAN (JULY 1<sup>ST</sup>, 2020 – JUNE 30<sup>TH</sup>, 2021)



*Prepared by:*  
**City Manager's Executive Office of Economic Development**



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## Executive Summary

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

#### 1. Introduction

The U.S. Department of Housing and Urban Development (HUD) requires that entitlement cities prepare a Consolidated Plan (ConPlan) to receive federal housing and community development funding. The City of Worcester, MA Five-Year Consolidated Submission for Community Planning and Development (7/1/2020 - 6/30/2025) combines into one document the requirements of four federal programs administered by HUD - the Community Development Block Grant (CDBG), the Home Investment Partnerships Program (HOME), the Housing Opportunities for Persons With AIDS (HOPWA), and the Emergency Solutions Grant (ESG). The Consolidated Plan allows the City of Worcester to shape its housing and community development programs into coordinated strategies and helps inform progress toward community development. The City of Worcester must submit a full Consolidated Plan every five years; yearly action plans are required as presented herein in this City of Worcester, MA First Year Action Plan (7/1/2020 - 6/30/2021).

While the City continues to make progress addressing community needs, it continues to face numerous existing and emerging needs and challenges. Updated analysis and research indicates the need for continued investment and effort around addressing affordable housing production, barriers to accessing affordable housing, and trends related to aging housing stock and deferred maintenance, as well as Rapid Re-housing or Continuum of Care (CoC)-supported projects. Consultation with citizens and service providers also stressed a continued need for social and human services and housing supportive services for low- to moderate-income and special needs populations including youth, recent immigrants, resettled refugees, the elderly and homeless, individuals with substance abuse and mental health challenges, and those living with HIV/AIDS.

In anticipation of declining federal entitlement grant allocations and uncertainty of federal fiscal resources moving forward, continued strategic leveraging of private investments and community-based resources are needed. As needs and issues often overlap and concentrate in neighborhoods, there is a need for more strategic, concentrated, neighborhood-based collaborations with private and community resources and cross-departmental collaborations. This is the model that the City implemented with an emphasis on place-based, neighborhood focused revitalization strategies carried out during the last few years in the Union Hill neighborhood, and will be implemented in the Green Island neighborhood as well. A focused, block by block approach to addressing infrastructure, housing and community development needs will likely be proposed for other communities as part of this and any future plans that use federal entitlement grant funds.

Unfortunately, the preparation of this Consolidated Plan and First Year Action Plan were delayed by several months as a result of the Covid-19 Pandemic. While the City was fortunate to have engaged in a very robust citizen participation/community public meeting outreach process during 2019, plan preparation was impacted in 2020 by the restrictions imposed by economic and societal lock downs and

by the need to amend the City's Fifth Year Action Plan to provide emergency HUD funding through the CARES Act to local agencies and programs in dire need. The City anticipates that as a result of COVID-19, public health and socioeconomic impacts will continue to be felt locally into the near to mid-term. As a result, much needed Public Services that provide social, health and human services to the community will continue to be a priority in the next Five-Year planning period.

## **2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview**

The Five-Year Consolidated Plan (2020-2025) Goals address a wide variety of needs in the community. Neighborhood stabilization and revitalization is the overarching goal in the community, which is achieved through many aspects. These include the improvements of public facilities (ie neighborhood centers, senior center, etc.) and public infrastructure such as roads, sidewalks, and parks. Another goal related to neighborhood stabilization is the maintenance, preservation, and sustainability of safe and healthy affordable housing. This is achieved through rehabilitation, creation of new housing, and/or demolition or redevelopment of blighted properties.

Just as important of the physical needs of the community is the goal of providing public services for the community, which includes, but not limited to Youth educational and recreational programs, Health services (COVID-19 Inclusive), Food access and security, Information and services for new immigrants, Transportation and access to public services.

In order to stay competitive and to provide economic opportunities for the community there is also a goal related to economic development and business assistance. The objective of these activities is to create and retain jobs for low and moderate income clientele, as well as making low income owned businesses competitive with technical assistance and facade improvements.

In regards to homeless programs the goals are to resolve barriers to housing for the homeless and expand resources for homeless prevention. There is also the specialized goal of creating housing opportunities for those diagnosed with HIV/AIDS.

The Five-Year Consolidated Plan (2020-2025) Goals are as follows:

1. Affordable Housing Development & Preservation
2. Healthy and Sustainable Housing
3. Neighborhood Stabilization & Revitalization
4. Economic Development & Business Assistance
5. Public Services for Low-Moderate Income Persons
6. Improvement and Preservation of Public Facilities
7. Expanded Resources for Homelessness Prevention
8. Resolve Barriers to Housing for Homeless Persons
9. Housing Opportunities for Persons with HIV/AIDS

The priority needs, objectives, and outcomes addressed by these goals are further described in SP-45, Goals Summary and AP-20, Annual Goals and Objectives, of this Consolidated Plan document.

### **3. Evaluation of past performance**

Using annual entitlement funds, the City of Worcester, through its interdepartmental efforts and with the assistance of numerous non-profit sub-recipients, has made a significant impact on community development needs in the past five years, addressing issues ranging from producing and preserving affordable housing and addressing homelessness, to providing social, health, and human services, including youth and elderly focused services and programming. The City also made numerous and much needed upgrades to non-profit owned community serving public facilities to make them safer, more accessible, more efficient, and better suited for their service to low-to moderate income populations. In tandem, numerous needed upgrades to City owned facilities, including community centers, roads, sidewalks, public safety, and parks and recreation buildings and land took place to better serve low-to moderate income neighborhoods and areas. The City also helped to preserve and create new jobs and investments through targeted loans and technical assistance to small business communities that benefitted low-moderate income populations and neighborhoods.

With respect to public service activities, a total of 17 CDBG funded programs worth \$639,784 were contracted during the current/fifth year action plan that provided services to 5,019 low- and moderate-income persons by addressing identified needs for health services, case management, youth programming, food and housing security, employment and job assistance, after school programming, recreational activities, financial assistance, elder transportation and community gardens. Through the five action plan years since 7/1/15, 24,174 LMI persons have benefited from 50 public services programs which were contracted utilizing \$3,091,111 in CDBG funds (which in turn leveraged \$7,939,564 in other public and private resources).

CDBG funds also helped City of Worcester provide much needed public facility improvements. Over the past five years \$14.1 million in CDBG funds were utilized on public facilities ranging from 9 streets being reconstructed (totaling 16,517 linear feet of roads/sidewalks), 2 major park and recreation land improvements, 6 firefighting trucks and 27 sets of firefighting equipment purchased, 3 major City of Worcester Senior Center improvements, 2 public school renovations resulting in new science labs and school nurse facilities, and 23 non-profit, community serving facility improvements ranging from energy efficiency improvements to ADA upgrades, to safety and structural improvements. Additionally, 4 City of Worcester fire stations were rehabilitated, and the preservation, rehabilitation, and relocation of 1 significant historical structure was completed.

In regards to affordable housing, Worcester has and continues to work with a myriad of non-profit and for profit developers whose goal is produce and preserve quality affordable housing. During the last 5 years the City created 25 new units (19 rental 6 homeowner) and rehabilitated 185 units (146 rental and 39 homeowner) with the end goal of producing descent and safe affordable housing units, that are free of potential environmental hazards including lead paint. Sixty-six (66) first time homebuyers also received first time home buyer assistance, which allowed program participants to own a home. Rental

assistance was provided with the HOME program to 154 households to reduce rent burdens and keep these households from homelessness. In separate but related programs, the City of Worcester was able to demolish 8 buildings, where the Department of Inspectional Services entered a demolition order based on them being unsafe or uninhabitable. This Department also was contracted using CDBG to provide Inspection Services in targeted low-income neighborhoods referenced as “sweeps”, where 4,040 inspections of housing units occurred.

The City also made in-roads in assisting homeless and chronically ill populations. During the last 5-years, ESG, HOPWA, and HOME funds provided homeless prevention and assistance programs. The HOME program provided rental assistance to 93 households, to prevent cost burdens and homelessness. HOPWA funds provided much needed and specialty supportive services to households coping with AIDS and HIV positive status. In addition to the supportive services provided 20 additional beds were provided to this specialty clientele. Using ESG funds there is a two prong approach to prevent homelessness and to address the needs of those currently experiencing homelessness, and during the last 5 years the program provided 673 shelter beds and 320 households with rental assistance or rapid rehousing assistance. In addition to this, over 300 households received supportive services in the form of case management to prevent homelessness or to prepare to lease homelessness.

The use of CDBG funds also helped to incentivize business creation, expansion, and enhancement through loans, grants, and technical assistance. In the past five years, the City expended \$847,434 in CDBG to assist 35 businesses and properties that have generated 67 jobs for low- and moderate-income persons, and generated \$1,684,098 in other investments.

#### **4. Summary of citizen participation process and consultation process**

Beginning in the summer of 2019, the Executive Office of Economic Development (EOED) engaged in a citizen participation process to identify community needs and provide community input on activities and programs to fund. Ten community needs assessment public meetings were held in different parts of the City, with at least one in each of the City Council districts. The meetings were attended by 145 total participants from neighborhoods with underserved, low-income, diverse, and minority residents. All meetings were intentionally held at locations accessible for potential and actual CDBG beneficiaries. The public meetings were advertised broadly through the City’s media office as well as through door-to-door neighborhood outreach with at least one bilingual staff member. A bilingual staff persons was present at each meeting to provide translation and/or facilitation in Spanish and Vietnamese. In addition, a special public hearing was also held in the Green Island neighborhood in July 2019 to focus attention on the needs of that, very low- income, inner-city neighborhood (65 persons participated).

The Five (5) Year Consolidated Plan informed the proposed first year (2020-2021) annual action plan outreach/funding recommendation process. In addition, after the announcement of the availability of Request for Proposals (RFP) for first year action plan funding through CDBG, HOPWA, and ESG, a Technical Assistance Workshop/Funding Overview meeting was held at City Hall in January 2020 (19 participants).

The Community Development Advisory Committee (CDAC) traditionally serves as the formal citizen body that provides input on funding applications submitted as part of the city's CDBG RFP process. The CDAC is a citizen advisory committee comprised of ten members, with two from each of Worcester's five council districts. The CDAC met three in 2020 to review and evaluate the CDBG proposals and listen to presentations and ask questions of all of the Public Services, Public Facilities and Improvements, and City Interdepartmental applicants that submitted proposals in response to the RFP.

HOPWA proposals were vetted by the city administration together with the HOPWA Advisory Committee. This committee is composed of experts in community health and the HIV/AIDS field in Worcester County and Connecticut. The process was similar to CDAC in its review, including holding a public meeting to introduce the HOPWA process and guidelines, a technical assistance meeting for interested applicants, and a review and ranking session held in public at City Hall.

ESG proposals were vetted by an ESG RFP Review Committee that was comprised of members of the Worcester City and County Continuum of Care (CoC), and local funders of such social services such as the United Way. The ESG RFP Review Committee also followed a similar process to the CDAC in its review, including holding a public meeting to introduce the ESG process and guidelines, a technical assistance meeting for interested applicants, and an RFP review and ranking session at City Hall.

## **5. Summary of public comments**

In conformity with HUD directives, the City of Worcester Draft Consolidated Submission for Community Planning and Development (2020-2025) and First Year Action Plan (July 1, 2020 – June 30, 2021) was made available for a public review and comment period from October 5, 2020 to October 13, 2020, 2020. A hardcopy of said Draft Consolidated Submission and First Year Annual Action Plan was available at the City of Worcester, Executive Office of Economic Development (EOED), City Hall, 455 Main Street, 4th Floor, Room 404, Worcester, MA 01608 (open 8:30 AM - 5 PM, normal working days) and was posted on the City's website.

A public hearing was also held at 5:30 PM, Wednesday, October 7, 2020 by the Worcester City Council Public Health and Human Services Committee to discuss the Draft Consolidated Plan / Draft Annual Action Plan recommendations and respond to interested parties. The hearing was televised and posted for review by the City's Cable TV network.

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

While no comments were received verbally or in writing during the above referenced comment period, six persons who attended the public hearing commented, all of whom spoke favorably of the proposed consolidated plan and proposed recommendations.

## **7. Summary**

<div>Over the next five years, the City of Worcester Consolidated Plan will provide a blueprint to address the needs of low and moderate populations that were identified from an extensive community

needs analysis and a robust citizen outreach/community public meetings process. Through Department of Housing and Urban Development funding working in concert with other public and private resources the plan will provide for the development and preservation of affordable housing, promote healthy and sustainable housing, provide for neighborhood stabilization and revitalization, promote economic development and assist businesses, provide public services for low-moderate Income persons, improve and preserve public facilities, expand resources for homelessness prevention, resolve barriers to housing for homeless persons, and provide housing opportunities for persons with HIV/AIDS.</div>

## The Process

### PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	WORCESTER	Office of Economic Development
HOPWA Administrator	WORCESTER	Office of Economic Development
HOME Administrator	WORCESTER	Office of Economic Development
ESG Administrator	WORCESTER	Office of Economic Development

**Table 1 – Responsible Agencies**

### Narrative

The City Manager's Executive Office of Economic Development (EOED) is the lead administering agency for the City of Worcester, MA, Five-Year Consolidated Submission for Community Planning and Development (7/1/2020 - 6/30/2025) and the First Year (7/1/2020 - 6/30/2021) Annual Action Plan. EOED administers CDBG, HOPWA, HOME and ESG formula grants for the City of Worcester, MA.

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## **PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)**

### **1. Introduction**

The City of Worcester’s Executive Office of Economic Development (EOED) embarked on the development of a 5-Year Consolidated Plan in the summer of 2019. As the lead agency of the planning process, EOED hosted a series of neighborhood meetings; consulted with non-profit organizations, City staff, and housing providers; posted public notices; held public hearings; and will implement a 30-day public comment period. Organizations and community stakeholders representing the following segments of the community were involved in the process:

- Housing Services and Assisted Housing – Group and individual consultations with for-profit and non-profit developers and the Worcester Housing Authority.
- Children and Youth Services – Focus group with service providers.
- Elderly Services – Consultation with City of Worcester Office of Elder Affairs and the Worcester Senior Center.
- Health Services – Worcester Public Health Division's Community Health Improvement Plan Update Public Process and ongoing collaboration through the Worcester County Continuum of Care.
- Persons with Disabilities – Consultation with City of Worcester Office of Human Rights and Disabilities.
- Persons with HIV/AIDS and their Families – Consultations with service providers.
- Low-Income Persons – Focus group with providers and funders of basic needs and safety net services.
- Homeless Persons including Veterans and Persons with Special Needs – Coordination with agencies and other governmental entities involved in the Worcester County Continuum of Care, including coordination with the following City of Worcester municipal departments/divisions: Public Health Division, Office of Emergency Operations, Health and Inspectional Services Division, Workforce Development, and the City Manager’s Office on Human Rights and Disabilities.
- Publicly Funded Institutions and Systems of Care – Coordination with corrections facilities, medical providers and mental health institutions including the Worcester County Sherriff’s Office, UMass Memorial Medical Center, Community Healthlink, local detox centers and the Department of Mental Health through the Worcester County Continuum of Care.
- State and Local Health and Child Welfare Agencies – Consultation to identify the addresses of housing units with lead-poisoned children. Ongoing collaboration with the MA Department of Public Health and the Worcester Public Health Division.
- Regional and Planning Efforts – Consultation with the Central MA Regional Planning Commission (CMRPC) and the Central MA Workforce Investment Board.

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

The EOED works to foster strong relationships and enhance cooperation and coordination between public and private service and housing providers. Development of the Consolidated Plan benefitted from input from a broad range of stakeholders who contributed through interviews and focus groups, in addition to those represented at public meetings and hearings. Entities participating in the process included agencies and groups with expertise in areas such as housing, youth services, case management, mental health, education, employment assistance, basic needs, and health services. As a means of gaining input, individual and group consultations were with providers of public and affordable housing, and services for homeless, special needs, and low-income populations.

The EOED conducted group-based technical assistance workshop on January 23, 2020 with a total of 19 participants from public and private agencies.

A number of plans and reports were consulted in preparation of this Consolidated Plan, reflecting policies, needs or significant research. These are contained in Section PR-10, Table 3.

The City of Worcester actively participates in ongoing efforts to enhance coordination with private industry, businesses, developers, and social service agencies in order to foster economic development. EOED, through the Business Assistance Division, plays a leadership role in the Worcester Business Resource Alliance (WBRA), a centralized network of business professionals, technical assistance providers, lenders, and community development organizations that collectively provide services to entrepreneurs and small business owners and managers. EOED also meets regularly with neighborhood business associations, and coordinates with the Worcester Regional Chamber of Commerce and Worcester Business Development Corporation. At the state level, EOED has strong partnerships with the Mass Office of Business Development and MassDevelopment, as well as relationships with the Massachusetts Life Sciences Center and the Massachusetts Manufacturing Extension Partnership (MassMEP).

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

Substantial consultation with Worcester area homeless service providers and clients has been a cornerstone of ongoing planning and efforts to address the unique needs of multiple priority subpopulations experiencing homelessness or at risk of becoming homeless. As part of the Consolidated Planning process referenced above, the City hosted a consultation workshop for homeless service providers to consider the evolution of Worcester's system in recent years, discuss current service access, and envision improvements to assist target populations. The workshop groups focused on three areas: 1) Access to Housing 2) Supportive Services 3) System Coordination. As a result of consultation efforts, coordination is ongoing related to these target populations: chronically and episodically homeless households with or without children, veterans, unaccompanied youth, and people living with HIV/AIDS, survivors of domestic violence, human trafficking and sexual exploitation.

Worcester is increasingly focusing on the Unaccompanied Youth population as a result of the Point-in-Time Survey on Unaccompanied Homeless Youth that has been conducted annually since 2009. The survey has helped the community gauge the extent of the problem, and garners resources to serve the often invisible population of homeless youth. The Survey on Unaccompanied Homeless Youth has been

spearheaded by Worcester's Teen Housing Task Force, now formally known as the Compass Network with 13 partner agencies, and has raised significant community awareness. Beginning in 2014, the Massachusetts Interagency Council on Housing and Homelessness (ICHH) now implements a state-wide survey on homeless youth via the local Continuum of Care Programs in the state. The MA ICHH Youth Point-in-Time survey was modeled after best practices in the Compass Network's efforts to understand the extent of risk factors associated with young adult housing instability in Worcester.

The City of Worcester's role through the Executive Office of Economic Development (EOED) is to coordinate and monitor the system of housing and services for the homeless in Worcester, working closely with community and governmental stakeholders through the following efforts:

- o The City coordinates housing and service policies in conjunction with the Central Massachusetts Housing Alliance (CMHA) via its advisory role on the CoC Board and planning process, and chairing the Monitoring and Evaluation Subcommittee for the local CoC.
- o The City partially funds and monitors the performance of Triage and Assessment, along with Diversion services, for Homeless Individuals. This provides valuable information regarding housing and service system performance and enables consistent cooperation in quality improvement for service operations.
- o The City continues to match funds for the Worcester County Homeless Management Information System (HMIS) that provides valuable data on the number and demographics of the homeless, and service outcomes in partnership with the CoC Lead Agency: CMHA.
- o The City continues to compile, analyze, and act on program monitoring reports obtained from funding agencies for all homeless housing and service programs.
- o The EOED works collaboratively with various municipal departments to enhance resources to address the multi-faceted issue of homelessness. These municipal players include the Division of Public Health, Office of Emergency Operations, Health and Inspectional Services Division, Workforce Development, Neighborhood Development, and the City Manager's Office on Human Rights and Disabilities.

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

Area-wide planning and coordination efforts of the Worcester County Continuum of Care continues to bear fruit. The CoC facilitates on-going consultation and coordination with organizations that provide housing and supportive services for special needs populations including elderly persons, persons with disabilities, persons with HIV/AIDS and homeless persons. The Central Massachusetts Housing Alliance (CMHA) has been designated to lead the annual CoC planning Process and is supported by the rest of Worcester County by chief executives of the county's three entitlement cities (Worcester, Fitchburg, and Leominster). A Continuum of Care board includes wide constituency based on HUD Guidance on Establishing and Operating a Continuum of Care. Sub-committees within the Continuum operate accordingly related to Veterans services, HMIS and data management, and monitoring and outcome evaluation. A working group is focused on improving the region's coordinated entry system for homeless individuals, while the closed-referral system for family housing operates in its own coordinated entry system. Corrections facilities, medical providers and mental health institutions (Worcester County Sheriff's Office, UMass Memorial Medical Center, Community HealthLink, local detox centers and the

Dept. of Mental Health) incorporate their discharge planning into the coordinated entry system with CoC partners as well. Evaluation of these working groups and subcommittees inform future funding, policies and outcome standards in serving homeless populations.

The CoC planning process is guided by two principals: an open & inclusive process with broad-based participation by citizens and stakeholders throughout the county; and, a comprehensive approach which develops, coordinates and integrates a system of care for homeless individuals and families, including major sub-populations such as the chronically homeless, mentally-ill, substance abusers, persons with HIV/AIDS, veterans, victims of domestic violence, children, adolescents, adults, and the elderly. Key features of the planning process include: active year-round planning, facilitating completion of planned activities; a committee structure that divides tasks among specialized groups, organized around participants' interests and expertise; work plans for the committees to ensure timely completion of necessary tasks; one vote per agency, encouraging broad participation and preventing dominance by any particular agency; a sub-regional process that helps ensure equitable treatment among geographic service areas; monitoring & evaluation of programs to ensure accountability and optimal service quality; and, widespread dissemination of information about the planning process which facilitates maximum participation.

The CoC planning grant awarded to the CMHA has enabled the CoC Advisory Board and the City to consult with one another in determining how to allocate Emergency Solutions Grant (ESG) funds. Members of the CoC board and diverse funding partners such as the United Way contribute to recommendations for ESG funds, with knowledge of existing needs and resources in the community. In the past 5 years, ESG funds have been used for prevention, rapid-rehousing, street outreach and emergency shelter operations to serve major sub-populations represented in our community. The decision to allocate funds to these activities is greatly informed by the gaps and resources currently available through the federal HEARTH act.

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

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	CENTRAL MASSACHUSETTS HOUSING ALLIANCE, INC.
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Employment Service-Fair Housing Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth

	<p><b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>CMHA is the lead agency for the annual Continuum of Care (CoC) planning process. This collaborative process involves ongoing consultations with the City and organizations that provide housing and support services for special needs populations including elderly persons, persons with disabilities, persons with HIV/AIDS and homeless persons. These consultations inform the needs assessment, strategic plan, and annual action plan updates.</p>
2	<p><b>Agency/Group/Organization</b></p>	<p>SMOC-GREATER WORCESTER HOUSING CONNECTION-AURORA PROGRAM</p>
	<p><b>Agency/Group/Organization Type</b></p>	<p>Services - Housing Services-Persons with Disabilities Services-homeless</p>
	<p><b>What section of the Plan was addressed by Consultation?</b></p>	<p>Housing Need Assessment Homelessness Strategy</p>

	<p><b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>Consulted on the extent of chronic homelessness and homelessness for people with disabilities. Outcomes include improved coordination of services for homeless households without children, chronically homeless, and improvement on Coordinated Assessment, Entry, and Housing Placement.</p>
<p>3</p>	<p><b>Agency/Group/Organization</b></p>	<p>COMMUNITY HEALTHLINK, INC.</p>
	<p><b>Agency/Group/Organization Type</b></p>	<p>Housing                      Services - Housing                      Services-Children                      Services-Persons with Disabilities                      Services-Persons with HIV/AIDS                      Services-homeless                      Services-Health                      Health Agency                      Regional organization</p>
	<p><b>What section of the Plan was addressed by Consultation?</b></p>	<p>Homelessness Strategy                      Homeless Needs - Chronically homeless                      Homelessness Needs - Unaccompanied youth                      HOPWA Strategy</p>

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is a HOPWA subrecipient and major recipient of Continuum of Care grants. Consulted at workshop with service providers. Anticipated outcomes include increased coordination with the CoC for monitoring and evaluation, services for people with disabilities, basic homeless needs, and coordinated entry.
4	<b>Agency/Group/Organization</b>	FRIENDLY HOUSE, INC.
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-homeless Services-Education Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth HOPWA Strategy Anti-poverty Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is a subrecipient of CDBG and HUD Continuum of Care funds. Consulted at workshop with service providers and during community input meetings. Anticipated outcomes include increased coordination for youth services and services for homeless families with children.

5	<b>Agency/Group/Organization</b>	Catholic Charities
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Elderly Persons Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Families with children Non-Homeless Special Needs Anti-poverty Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Ongoing coordination through the Continuum of Care and consulted at workshop with homeless service providers.
6	<b>Agency/Group/Organization</b>	AIDS PROJECT WORCESTER
	<b>Agency/Group/Organization Type</b>	Housing Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-homeless Services-Health Services-Education Services-Employment Health Agency
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Non-Homeless Special Needs HOPWA Strategy Anti-poverty Strategy

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	HOPWA subrecipient consulted at workshop with homeless service providers. Increased coordination for non-homeless special needs and the homeless strategy.
7	<b>Agency/Group/Organization</b>	AFRICAN COMMUNITY EDUCATION PROGRAM, INC.
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Education
	<b>What section of the Plan was addressed by Consultation?</b>	Anti-poverty Strategy Non-Housing Community Development Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	CDBG subrecipient consulted at Children and Youth Service Provider workshop and at the community needs assessment public hearings to provide input. The consultations support continued coordination and the inclusion of the organization's input in the Consolidated Plan and Annual Action Plans.
8	<b>Agency/Group/Organization</b>	Central MA Regional Planning Commission
	<b>Agency/Group/Organization Type</b>	Regional organization Planning organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	In-person consultation improves the coordination between the City of Worcester and the Central Massachusetts Regional Planning Commission.
9	<b>Agency/Group/Organization</b>	Central MA Workforce Investment Board
	<b>Agency/Group/Organization Type</b>	Services-Employment Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development Anti-poverty Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Face-to-face meetings improve coordination for employment and job training opportunities in addition to economic development efforts.
10	<b>Agency/Group/Organization</b>	CENTRO LAS AMERICAS
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Anti-poverty Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Subrecipient participation in the workshop for service providers and the community needs public hearing helped inform the priority needs and goals of the Consolidated Plan and the Annual Action Plans.
11	<b>Agency/Group/Organization</b>	City of Worcester Office of Elder Affairs
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons Other government - Local

	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Non-Housing Community Development Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Face-to-face consultation informed the Consolidated Plan and the Annual Action Plans by providing information related to the needs of elderly persons and fostering improved coordination.
12	<b>Agency/Group/Organization</b>	City of Worcester Office of Human Rights and Disabilities
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Face-to-face meeting to discuss needs related to persons with disabilities. The discussion informed the priority needs and goals of the Consolidated Plan and the Annual Action Plans.
13	<b>Agency/Group/Organization</b>	FAMILY HEALTH CENTER OF WORCESTER, INC.
	<b>Agency/Group/Organization Type</b>	Services-Health Services-Education Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Housing Community Development Needs

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Participation in the workshop for service providers and the community needs public hearings helped to inform the priority needs and goals of the Consolidated Plans and the Annual Action Plans.
14	<b>Agency/Group/Organization</b>	MAIN SOUTH COMMUNITY DEV CORP
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Education Services-Employment Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Anti-poverty Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	In-person consultation facilitated continued coordination and helped to inform the Consolidated Plan and the Annual Action Plans.
15	<b>Agency/Group/Organization</b>	Massachusetts Department of Public Health
	<b>Agency/Group/Organization Type</b>	Other government - State
	<b>What section of the Plan was addressed by Consultation?</b>	Lead-based Paint Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This collaboration ensures that statewide reporting for all children will Elevated Blood levels (EBLs) is managed collectively to catch each EBL prior to poisoned level occurring.

16	<b>Agency/Group/Organization</b>	OAK HILL COMMUNITY DEVELOPMENT CORPORATION
	<b>Agency/Group/Organization Type</b>	Services - Housing Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Anti-poverty Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The in-person consultation is anticipated to continue coordination and helped inform the Consolidated Plan and Annual Action Plans.
17	<b>Agency/Group/Organization</b>	SOUTHEAST ASIAN COALITION OF CENTRAL MA
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Elderly Persons Services-Education Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Housing Community Development Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Participation in the workshop for service providers and the community needs public hearing helped inform the priority needs and the goals of the Consolidated Plan and the Annual Action Plans.
18	<b>Agency/Group/Organization</b>	SOUTH WORCESTER NEIGHBORHOOD IMPROVEMENT CORPORATION
	<b>Agency/Group/Organization Type</b>	Services-Children Food Pantry

	<b>What section of the Plan was addressed by Consultation?</b>	Non-Housing Community Development Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The organization's participation helped inform the Needs Assessment and Strategic Plan sections of the Consolidated Plan.
19	<b>Agency/Group/Organization</b>	WORCESTER COMMON GROUND, INC.
	<b>Agency/Group/Organization Type</b>	Services - Housing Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The in-person consultation is anticipated to continue coordination and helped to inform the Consolidated Plan and Annual Action Plans.
20	<b>Agency/Group/Organization</b>	Worcester Housing Authority
	<b>Agency/Group/Organization Type</b>	PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consulted recently completed 5-Year Agency Plan to establish Authority mission, priorities and planned investments in coming years. Face-to-face meeting to gather input concerning public housing needs, planned programs, and activities.

21	<b>Agency/Group/Organization</b>	Worcester Senior Center
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The face-to-face meeting and ongoing collaboration provides critical input for meeting the needs of elderly persons.
22	<b>Agency/Group/Organization</b>	City of Worcester Public Health Division
	<b>Agency/Group/Organization Type</b>	Services-Health Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Non-Community Development Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Ongoing collaboration through the Worcester Lead Abatement Program guides the lead-based paint strategy. Additionally, EOED staff attended the Greater Worcester Regional Community Health Improvement Plan (CHIP) Update public meeting. The CHIP informs the priority needs and goals of the Consolidated Plan and the Annual Action Plans.

23	<b>Agency/Group/Organization</b>	WORCESTER EAST SIDE CDC
	<b>Agency/Group/Organization Type</b>	Services - Housing Community Development Corporation
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The in-person consultation is anticipated to continue coordination and inform the Consolidated Plan and the Annual Action Plans.

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

The City of Worcester developed its Consolidated Plan and Annual Action Plans as a result of extensive consultation with housing, social and health service providers, local and regional agencies, and the Worcester Housing Authority. The City has consulted with all of agencies known to be relevant to the Consolidated Plan.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Central MA Housing Alliance	The Continuum of Care Action Plan is an integral part of the City's efforts to address homelessness, including expanding resources for homeless prevention, resolving barriers to housing for homeless persons, and participating in a coordinated entry system.
2019 Comprehensive community Input / Neighborhood	Executive Office of Economic Development	Ten community needs public meetings were held in different parts of the City from June to October 2019 attended by 145 participants from neighborhoods with underserved, low-income, diverse, and minority residents. Spanish and Vietnamese interpretation provided.
ADA Self-Evaluation (2014)	City of Worcester	The goals of the Strategic Plan include public facility improvements that address the large number of aging buildings and other facilities that pose barriers to residents with disabilities.
CMWIB Strategic Plan FY 2015 to 2017	Central Massachusetts Workforce Investment Board	The goals of the Strategic Plan in the Consolidated Plan overlap with the CMWIB goals related to building the skills of the workforce and fostering economic development
Greater Worcester Region CHIP	Central MA Regional Public Health Alliance	The goals of the Strategic Plan align with the Greater Worcester Region Community Health Improvement Plan (CHIP) in order to improve upon the services provided to residents and to strengthen the public health system.

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Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Housing Market Study (2012)	City of Worcester	This report helps guide the Strategic Plan goals related to affordable housing development and preservation as well as healthy and sustainable housing.
Analysis of Impediments to Affordable Housing 2020	City of Worcester	This report helps guide the Strategic Plan goals related to affordable housing development and preservation.
HOPWA Needs Analysis (2011)	City of Worcester	This report informed the HOPWA Annual Action Plans.
Union Hill Neighborhood Revitalization Action Plan	City of Worcester and Worcester Business Development Corporation	The Union Hill Neighborhood Revitalization Action Plan (2014) guides revitalization efforts in the Union Hill neighborhood, a geographic priority area identified in the Strategic Plan.
Worcester Housing Authority 5-Year and Annual Plan	Worcester Housing Authority	The Worcester Housing Authority is responsible for providing decent, safe, and sanitary housing for very low- to moderate-income households, which overlaps with the Strategic Plan goals related to affordable housing and providing access to public housing.

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Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Green Island Neighborhood Input Meeting July 2019	Executive Office of Economic Development	A special public hearing was held in Green Island to focus attention on the needs of that very low-income, inner-city target area (65 persons participated)
Broadening Broadband Report (July 2020)	Worcester Regional Research Bureau, Inc.	Report on consideration of municipal ownership as a solution to Worcester’s Internet Challenges
City of Worcester Municipal Vulnerability Prepared	City Dept of Energy and Asset Management	Preparedness grant to complete a city-wide climate change vulnerability assessment, and conduct a number of targeted assessments of critical sectors.
Worcester for Everyone: A Regional Housing and Eco	Worcester Regional Chamber of Commerce	Housing Study of the Central Massachusetts Region

**Table 3 – Other local / regional / federal planning efforts**

**Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))**

The City of Worcester consulted and will continue to coordinate with the Central MA Workforce Investment Board and the Central MA Regional Planning Commission with regard to needs that go beyond the local jurisdiction, such as workforce development, transportation, and regional housing planning issues. Additionally, the City has a history of participation in state-wide efforts to eliminate childhood lead poisoning and has taken a lead role in the local coordination among critical agencies. The EOED collaborates with the MA Department of Public Health and the Worcester Department of Public Health, and is also actively involved with the Worcester Green and Healthy Homes Coalition (WGHC), a joint effort of public and private agencies, grassroots organizations, and concerned citizens committed to eliminating home health hazards, promoting energy efficiency, and improving health and quality of life in Worcester. Additionally, the EOED is enhancing collaboration with Worcester's Department of Public Health and Worcester Public Schools to provide in-home interventions for school age children that have direct health issues related to housing.

**Narrative (optional):**

In conformity HUD directives, the City of Worcester Draft Consolidated Submission for Community Planning and Development (2020-2025) and First Year Action Plan (July 1, 2020 – June 30, 2021) was made available for a public review and comment period from October 5, 2020 to October 13, 2020, 2020. A hardcopy of said Draft Consolidated Submission and First Year Annual Action Plan was available at the City of Worcester, Executive Office of Economic Development (EOED), City Hall, 455 Main Street, 4th Floor, Room 404, Worcester, MA 01608 (open 8:30 AM - 5 PM, normal working days) and was posted on the City's website.

A public hearing was also held at 5:30 PM, Wednesday, October 7, 2020 by the Worcester City Council Public Health and Human Services Committee to discuss the Draft Consolidated Plan / Draft Annual Action Plan recommendations and respond to interested parties. The hearing was televised and posted for review by the City's Cable TV network. While no comments were received verbally or in writing during the above referenced comment period. Six persons at the public hearing commented at public hearing all of whom spoke favorably of the proposed consolidated plan and proposed recommendations.

## **PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)**

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

Beginning in the summer of 2019, the Executive Office of Economic Development (EOED) engaged in a citizen participation process to identify community needs and provide community input on activities and programs to fund. Ten community needs assessment public meetings were held in different parts of the City, with at least one in each of the City Council districts. The meetings were attended by 145 total participants from neighborhoods with underserved, low-income, diverse, and minority residents. All meetings were intentionally held at locations accessible for potential and actual CDBG beneficiaries. The public meetings were advertised broadly through the City’s media office as well as through door-to-door neighborhood outreach with at least one bilingual staff member. A bilingual staff person was present at each meeting to provide translation and/or facilitation in Spanish and Vietnamese. In addition, a special public hearing was also held in the Green Island neighborhood in July 2019 to focus attention on the needs of that, very low- income, inner-city neighborhood (65 persons participated).

In addition to the above process and in preparation for the update to the Analysis of Impediments thirteen interview stakeholders were interviewed. In general, these stakeholders were either employees for the City of Worcester, involved in the non-profit or for-profit housing industry, employees for human services agencies or community groups, or working directly with fair housing issues in a professional setting. Interviews typically lasted one hour and were held at the interviewee’s place of work, on the telephone, or at a public location such as a coffee shop. In addition to formal interviews, a handful of meetings with local community stakeholders were held to learn about their involvement and perspectives on fair housing issues in Worcester.

As well as the above data collection efforts a survey was created by the AI consultant, to collect input from those involved in the private sector of housing, including real-estate brokers, real-estate developers, property managers, etc. This brief online survey included multiple choice questions with the option to comment, agree/disagree questions, plus open ended questions. In general, the questions inquired about barriers to building housing, effectiveness of certain regulations and policies, and which changes or reforms would be the most beneficial. The survey was open for the month of August 2019 and had 19 respondents. These outreach efforts were the basis for the AI along with policies, reports, and data. These results are summarized in MA-40, SP-55, and AP-75.

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The Five (5) Year Consolidated Plan informed the proposed first year (2020-2021) annual action plan outreach/funding recommendation process. In addition, after the announcement of the availability of Request for Proposals (RFP) for first year action plan funding through CDBG, HOPWA, and ESG, a Technical Assistance Workshop/Funding Overview meeting was held at City Hall in January 2020 (19 participants).

The Community Development Advisory Committee (CDAC) traditionally serves as the formal citizen body that provides input on funding applications submitted as part of the city's CDBG RFP process. The CDAC is a citizen advisory committee comprised of ten members, with two from each of Worcester's five council districts. The CDAC met three times in 2020 to review and evaluate the CDBG proposals and listen to presentations and ask questions of all of the Public Services, Public Facilities and Improvements, and City Interdepartmental applicants that submitted proposals in response to the RFP.

HOPWA proposals were vetted by the city administration together with the HOPWA Advisory Committee. This committee is composed of experts in community health and the HIV/AIDS field in Worcester County and Connecticut. The process was similar to CDAC in its review, including holding a public meeting to introduce the HOPWA process and guidelines, a technical assistance meeting for interested applicants, and a review and ranking session held in public at City Hall.

ESG proposals were vetted by an ESG RFP Review Committee that was comprised of members of the Worcester City and County Continuum of Care (CoC), and local funders of such social services such as the United Way. The ESG RFP Review Committee also followed a similar process to the CDAC in its review, including holding a public meeting to introduce the ESG process and guidelines, a technical assistance meeting for interested applicants, and an RFP review and ranking session at City Hall.

In conformity with HUD directives, the City of Worcester Draft Consolidated Submission for Community Planning and Development (2020-2025) and First Year Action Plan (July 1, 2020 – June 30, 2021) was made available for a public review and comment period from October 5, 2020 to October 13, 2020, 2020. A hardcopy of said Draft Consolidated Submission and First Year Annual Action Plan was available at the City of Worcester, Executive Office of Economic Development (EOED), City Hall, 455 Main Street, 4th Floor, Room 404, Worcester, MA 01608 (open 8:30 AM - 5 PM, normal working days) and was posted on the City's website.

A public hearing was also held at 5:30 PM, Wednesday, October 7, 2020 by the Worcester City Council Public Health and Human Services Committee to discuss the Draft Consolidated Plan / Draft Annual Action Plan recommendations and respond to interested parties. The hearing was televised and posted for review by the City's Cable TV network.

**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Community Input Public Meeting, 6/30/19 Frances Perkins Library, 470 W. Boylston St., 01606	Housing and community development needs addressed including public services and public improvements.	Attendance: 7	Facilitated process used to encourage and seek input using "open ended" questions and "voting and ranking" participant exercises.	All comments were received.	N/A
2	Community Input Public Meeting, 7/10/19 Worcester Senior Center, 128 Providence St., 01604	Housing and community development needs addressed including public services and public improvements; Non-English Speaking – Specify other language: Spanish	Attendance: 22	Facilitated process used to encourage and seek input using "open ended" questions and "voting and ranking" participant exercises.	All comments were received.	N/A
3	Community Input Public Meeting, 7/24/19 Grace Christian Center, 126 Elm St., 01609	Housing and community development needs addressed including public services and public improvements.	Attendance: 27	Facilitated process used to encourage and seek input using "open ended" questions and "voting and ranking" participant exercises.	All comments were received.	N/A

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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Public Hearing on Green Island Needs, 7/31/19, PNI Club, 290 Millbury St., 01610	Housing and community development needs addressed including public services and public improvements; Non-English Speaking – Specify other language: Spanish	Attendance: 65	Facilitated process used to encourage and seek input using "open ended" questions and "voting and ranking" participant exercises.	All comments were received.	<u>N/A</u>
5	Community Input Public Meeting, 8/6/19 Lincoln Park Towers, 11 Lake Ave., 01604	Housing and community development needs addressed including public services and public improvements.	Attendance: 19	Facilitated process used to encourage and seek input using "open ended" questions and "voting and ranking" participant exercises.	All comments were received.	N/A
6	Community Input Public Meeting, 8/20/19 The Journey Church, 25 Belmont St., 01605	Housing and community development needs addressed including public services and public improvements.	Attendance: 7	Facilitated process used to encourage and seek input using "open ended" questions and "voting and ranking" participant exercises.	All comments were received.	N/A

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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
7	Community Input Public Meeting, 9/3/19 Great Brook Valley Community Center, 180 Constitution Ave., 01605	Housing and community development needs addressed including public services and public improvements.	Attendance: 15	Facilitated process used to encourage and seek input using "open ended" questions and "voting and ranking" participant exercises.	All comments were received.	N/A
8	Community Input Public Meeting, 9/16/19 Mill Swan Head Start, 337 Mill St., 01602	Housing and community development needs addressed including public services and public improvements.	Attendance: 16	Facilitated process used to encourage and seek input using "open ended" questions and "voting and ranking" participant exercises.	All comments were received.	N/A
9	Community Input Public Meeting, 9/24/19 Gates Lane Elementary School, 1238 Main St., 01603	Housing and community development needs addressed including public services and public improvements.	Attendance: 8	Facilitated process used to encourage and seek input using "open ended" questions and "voting and ranking" participant exercises.	All comments were received.	N/A

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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
10	Community Input Public Meeting, 10/9/19 Holy Cross College Hogan Center, 1 College St., 01610	Housing and community development needs addressed including public services and public improvements; Non-English Speaking – Specify other language: Spanish	Attendance: 11	Facilitated process used to encourage and seek input using "open ended" questions and "voting and ranking" participant exercises.	All comments were received.	N/A
11	Community Input Public Meeting, 10/10/19 National Grid Sustainability Hub, 912 Main St., 01610	Housing and community development needs addressed including public services and public improvements; Non-English Speaking – Specify other language: Spanish	Attendance: 9	Facilitated process used to encourage and seek input using "open ended" questions and "voting and ranking" participant exercises.	All comments were received.	<u>N/A</u>

**Table 4 – Citizen Participation Outreach**

## Needs Assessment

### NA-05 Overview

#### Needs Assessment Overview

The Needs Assessment section of this City of Worcester Consolidated Plan contains Comprehensive Housing Affordability Strategy (CHAS) data generated for HUD by the U.S. Census 2011-2015 American Community Survey (ACS) and imbedded in most of the Econ Planning Suite templates in this document. In order to build on this baseline data and provide the most up to date analysis of recent demographic trends, the City of Worcester's Consolidated Plan also benefits from research and analysis of more recent U.S. Census releases including the latest available from the 2014-2018 American Community Survey (ACS).

The following needs have been identified for the City of Worcester, MA through the Housing Needs Assessment provided in this section:

Following several years of stagnation, the City's population, number of households, and median income have grown since 2015. The latest ACS data from 2014-2018 shows since 2011-2015, the city's population has increased +1%, the number of households increased by +4%, and the median income increased by +2%.

The number of families has declined (-5%), while the number of non-family households has increased (+13%) in Worcester since 2015. Non-family households now constitute 47% of all city households (up from 42% in 2011-15). There was however a significant growth (+28%) in very large families (7 or more members), which constitute 1% of all city households.

There was significant growth in single person households (+20%). Single person households now constitute 37% of all households (up from 33% in 2011-2015). Elder persons of age 65 or more constitute 33% of all single-person households.

High housing costs burdens are the most significant problems for both renters and home owners in Worcester. For households below 80% of median income, 34% of renters and 37% of owners experienced severe housing cost burdens of more than 50% of income, while 61% of renters and 65% of owners experienced cost burdens of more than 30% of income. For comparison, less than 2% of renters and 1% of owners at the same income levels experienced substandard housing conditions and less than 3% of renters and 2% of owners experienced crowded housing conditions in Worcester.

High housing cost burdens effect all types of households in Worcester. For example for households below 80% of median income, 36% of small families (2-4 members), 32% of large families (5 or more members), and 28% of elderly households (age 62 or more) experienced housing cost burdens of more than 50% of income, while 70% of small families, 66% of large families, and 81% of elderly households experienced housing cost burdens of more than 30% of income.

The following needs have been identified for the City of Worcester, MA through the Homeless Needs Assessment provided in this section:

## **NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)**

### **Summary of Housing Needs**

Following several years of stagnation, the City's population, number of households, and median incomes have grown since 2015. While CHAS data shows that the City's population, number of households, and median income remained static from 2009-2015, the latest ACS data from 2014-2018 shows since 2011-2015, the city's population has increased to 185,195 (+1%), the number of households increased to 71,145 (+4%), and the median income increased to \$46,407 (+2%).

While the number of persons per household declined from 2.50 to 2.41 (-4%) from 2011-2015 compared to 2014-2018, there was significant growth in single person households and very large households (with 7 or more persons). During this period, single person households increased to 26,545 (+20%) and very large households (7 or more members) grew to 934 (+28%). Other changes by number of persons per household during this period were: 2-persons (+1%), 3-persons (+2%), 4-persons (-10%), 5 persons (-21%), 6-persons (-11%). Single person households now constitute 37% of all households (up from 33% in 2011-2015).

The number of families has declined while the number non-family households has increased in Worcester since 2015. CHAS/ACS data defines family households as a subset of all households which contain two or more persons related by birth, marriage, or adoption. The latest ACS data from 2014-2018 shows that since 2011-2015, the total number of family households decreased to 37,943 (-5%), while the number of non-family households increased to 33,202 (+17%). Non-family households now constitute 47% of all city households (up from 42% in 2011-15). The latest ACS data on family size shows from that since 2011-2015, the number of small families (2-4 members) decreased to 32,585 (-3%), while the number of large families (5 or more members) decreased to 5,358 (-13%). There was however a significant growth (+28%) in very large families (7 or more members), which constitute 1% of all households.

High housing costs burdens are the most significant problems for both renters and home owners in Worcester. For households below 80% of median income, 34% of renters and 37% of owners experienced severe housing cost burdens of more than 50% of income, while 61% of renters and 65% of owners experienced cost burdens of more than 30% of income.

In comparison to the problem of high housing cost burdens, substandard housing conditions and overcrowded housing conditions were not as significant in Worcester. Less than 2% of renters and 1% of owners at the same income levels experienced substandard housing conditions (defined as lacking complete plumbing or kitchen facilities) and less than 3% of renters and 2% of owners experienced crowded housing conditions (defined as having more than 1 person per room).

High housing cost burdens effect all types of households in Worcester. For example for households below 80% of median income, 36% of small families (2-4 members), 32% of large families (5 or more members), and 28% of elderly households (age 62 or more) experienced housing cost burdens of more

than 50% of income, while 70% of small families, 66% of large families, and 81% of elderly households experienced housing cost burdens of more than 30% of income.

<b>Demographics</b>	<b>Base Year: 2009</b>	<b>Most Recent Year: 2015</b>	<b>% Change</b>
Population	181,045	183,380	1%
Households	68,249	68,575	0%
Median Income	\$45,944.00	\$45,472.00	-1%

**Table 4 - Housing Needs Assessment Demographics**

**Data Source:** 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

**Number of Households Table**

	<b>0-30% HAMFI</b>	<b>&gt;30-50% HAMFI</b>	<b>&gt;50-80% HAMFI</b>	<b>&gt;80-100% HAMFI</b>	<b>&gt;100% HAMFI</b>
Total Households	17,110	9,760	12,285	7,045	22,375
Small Family Households	4,935	3,660	4,905	3,090	11,080
Large Family Households	1,130	610	985	540	1,870
Household contains at least one person 62-74 years of age	3,100	1,675	2,350	1,110	3,970
Household contains at least one person age 75 or older	2,185	2,015	1,325	530	1,395
Households with one or more children 6 years old or younger	2,875	1,640	2,135	1,070	2,485

**Table 5 - Total Households Table**

**Data Source:** 2011-2015 CHAS

**Housing Needs Summary Tables**

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Substandard Housing - Lacking complete plumbing or kitchen facilities	470	90	130	15	705	70	15	25	10	120
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	160	170	125	50	505	10	0	10	40	60
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	380	225	245	10	860	25	40	125	50	240
Housing cost burden greater than 50% of income (and none of the above problems)	7,615	1,935	185	0	9,735	1,660	1,230	880	145	3,915

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	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	2,100	2,915	2,695	320	8,030	315	725	1,800	1,075	3,915
Zero/negative Income (and none of the above problems)	1,260	0	0	0	1,260	165	0	0	0	165

**Table 6 – Housing Problems Table**

Data 2011-2015 CHAS  
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Having 1 or more of four housing problems	8,630	2,415	685	75	11,805	1,765	1,285	1,035	250	4,335
Having none of four housing problems	4,845	4,430	6,765	3,415	19,455	445	1,630	3,800	3,305	9,180
Household has negative income, but none of the other housing problems	1,260	0	0	0	1,260	165	0	0	0	165

**Table 7 – Housing Problems 2**

Data 2011-2015 CHAS  
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	3,555	2,325	1,220	7,100	460	565	1,330	2,355
Large Related	835	245	165	1,245	105	195	265	565
Elderly	2,355	1,140	400	3,895	1,160	980	660	2,800
Other	3,690	1,545	1,185	6,420	335	280	555	1,170
Total need by income	10,435	5,255	2,970	18,660	2,060	2,020	2,810	6,890

Table 8 – Cost Burden > 30%

Data 2011-2015 CHAS  
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	2,925	735	65	3,725	440	410	300	1,150
Large Related	570	20	0	590	90	160	25	275
Elderly	1,525	340	100	1,965	915	460	260	1,635
Other	3,085	875	40	4,000	305	225	325	855
Total need by income	8,105	1,970	205	10,280	1,750	1,255	910	3,915

Table 9 – Cost Burden > 50%

Data 2011-2015 CHAS  
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	440	375	270	55	1,140	14	40	85	75	214
Multiple, unrelated family households	90	25	80	0	195	20	0	50	20	90

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Other, non-family households	25	0	45	4	74	0	0	0	0	0
Total need by income	555	400	395	59	1,409	34	40	135	95	304

**Table 10 – Crowding Information – 1/2**

Data Source: 2011-2015 CHAS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

**Table 11 – Crowding Information – 2/2**

Data Source  
Comments:

**Describe the number and type of single person households in need of housing assistance.**

There has been a significant growth in single person households in Worcester which increased to 26,545 (+20%) from 2014-2018 compared to 2011-2015. For comparison all other households (with 2 or more persons) declined to 44,600 (-3%) during the same period. Single person households now constitute 37% of all households (up from 33% in 2011-2015).

Elder persons (age 65 or more) constituted 33% of all single-person households in Worcester according to 2014-2018 ACS data. The number of such elder, single-person households grew to 8,781 (+14% from 2011-2015). Among elder households below 80% median Income, 28% experienced housing severe cost burdens of more than 50% of income, while 81% of elderly households experienced housing cost burdens of more than 30% of income.

Non-elders (less than age 65) constituted 67% of all single-person households in Worcester according to 2014-2018 ACS data. The number of non-elder singles grew to 17,764 (+23% from 2011-2015). Among non-elder households below 80% median income, 31% experienced severe housing cost burdens of more than 50% of income, while 79% experienced housing severe cost burdens of more than of more than 30% of income.

**Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.**

In fiscal year 2019 (7/1/18-6/30/19), SafeLink, the statewide domestic violence hotline answered 26,000 service related calls, in which 5% or 1,300 were from the Worcester County, or central, region of the

state of MA ([www.casamyrna.org/safelink/factsheet](http://www.casamyrna.org/safelink/factsheet)). The Young Women's Christian Association (YWCA) Daybreak Shelter Program is one of only two confidential emergency shelters that serve single adults and adults with dependent children affected by and fleeing domestic violence in the greater Worcester County and the central region of the state. According to the YWCA's 2020 application for Emergency Solutions Grant funding, in an effort to show the need for emergency shelter, their staff documented the number of requests for shelter that go unmet annually. Over the past year (2019), there were 756 requests for emergency shelter made by victims/survivors of domestic violence that could not be met, although advocates provided phone advocacy, support and referrals to housing assistance in an effort to keep victims safe.

### **What are the most common housing problems?**

High housing costs burdens are the most significant problems for both renters and home owners in Worcester. For households below 80% of median income, 34% of renters and 37% of owners experienced severe housing cost burdens of more than 50% of income, while 61% of renters and 65% of owners experienced cost burdens of more than 30% of income.

In comparison to the problem of high housing cost burdens, substandard housing conditions and overcrowded housing conditions were not as significant in Worcester. Less than 2% of renters and 1% of owners at the same income levels experienced substandard housing conditions (defined as lacking complete plumbing or kitchen facilities) and less than 3% of renters and 2% of owners experienced crowded housing conditions (defined as having more than 1 person per room).

### **Are any populations/household types more affected than others by these problems?**

High housing cost burdens effect all types of households in Worcester. For example for households below 80% of median income, 36% of small families (2-4 members), 32% of large families (5 or more members), and 28% of elderly households (age 62 or more) experienced housing cost burdens of more than 50% of income, while 70% of small families, 66% of large families, and 81% of elderly households experienced housing cost burdens of more than 30% of income.

### **Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance**

The Central Massachusetts Housing Alliance (CMHA) holds an annual legislative lunch highlighting the extent of homelessness in Worcester County and the resource needs associated with these populations. In their 2019 Homelessness Overview, CMHA describes the gap between Housing Costs and Income as a major characteristic linked with instability and an increased risk of homelessness. According to the 2018 Out of Reach report of the National Low Income Housing Coalition, Fair Market Rents (FMR) for a moderate two-bedroom apartment in Worcester and its surrounding communities is \$ 1,398 per month.

In order to afford a moderate two-bedroom apartment in the community, a household would need to earn \$26.88 per hour or \$55,920 annually. Workers earning \$12.75 (minimum wage) would need to work 2.1 full-time jobs.

In Worcester County, 113 households received homeless prevention funds through the Residential Assistance to Families in Transition (RAFT) program from CMHA. Within the 113 households: -The average family size was 3.7 individuals -66.4% of households reported themselves as “single parent households” -89.4% of households assisted had a female head of household -23.9% Percent were considered disabled -Educational attainment was low with 46.3% not completing high school and 42.5% completing a high school diploma or GED. -The ethnicity and race of these 113 families are: 46% Hispanic, 30% White, and 20.4% African American/Black, 3.6% Other.

Participation in the Tenancy Preservation Program (TPP) reveals characteristics of households facing eviction due to disability. The program works with tenants (households with children and without children) who are facing eviction as a result of behavior related to disability (i.e. mental illness, developmental disabilities, substance abuse, and age-related impairments). TPP differs from other prevention programs by focusing on clinical services specific to the housing problem, in consultation with the Housing Court Department, to provide intensive short-term case management and address the underlying issues threatening tenancy. Across Massachusetts, over one-third of TPP participants have had a history of homelessness and approximately half of the participants are single parents with children. Community Healthlink, Inc. (CHL) is the lead agency providing TPP to Worcester County. From July of 2018 through February of 2019, TPP opened 70 new cases, had 409 consultations with households facing eviction, made 435 referrals and preserved 87 tenancies and prevented homelessness for 95 households.

Formerly homeless individuals who are receiving rapid re-housing assistance are most in need of access to mainstream benefits and housing stabilization services. Individuals receiving Rapid Re-Housing for short-term (up to 3 months) and medium-term (4 to 24 months) rental assistance do receive housing relocation and stabilization services to help the individual move as quickly as possible into permanent housing and achieve stability. These services include counseling and case management in obtaining Federal, State, and local benefits. Tenants also require assistance in skill-building such as maintaining their unit and paying rent on time. The MA DHCD Supportive Housing Program has found that offering such skills to disabled people improves outcomes such as length of housing tenure, increased household income including earned income, and reduction in use of emergency services. Tenancy Preservation Programs further contribute to stabilization advocacy for those who have trouble maintaining stability due to a disability after RRH services have run out. Yet when case management is limited to the period of rapid re-housing assistance, disabled individuals in particular face challenges in accessing cash and non-cash benefits in time to maintain independent stability.

**If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:**

At-risk populations are defined using the following operational criteria, set forth by the Emergency Solutions Grant program regulations, and which are consistent with the estimates generated from CHAS

data. The definition of a household at-risk of homelessness: An individual or family who:

(i.) Has an annual income below 30% of median family income for the area; AND

(ii.) (ii.) Does not have sufficient resources or support networks immediately available to prevent them from moving

(iii.) (iii.) Meets one of the following conditions

(iv.) -Has moved because of economic reasons 2 or more times during the two months immediately preceding an application for assistance; OR -Is living in the home of another because of economic hardship; OR -Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; OR -Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State or local government programs for low-income individuals; OR -Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; OR -Is exiting a publicly funded institution or system of care; OR -Otherwise lives in housing that has characteristics associated with an increased risk of homelessness such as high cost burden, overcrowding, and substandard housing conditions.

(v.) Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

(vi.) Housing characteristics that have been linked with instability and an increased risk of homelessness include 1) Overcrowding, in which large families live together in too small of units, resulting in unstable conditions and the possible need for youth or young adults to leave home before they have the means to support themselves in stable housing, resulting in increase of youth homelessness; 2) Housing Cost Burden, in which households are contributing the majority of their income towards housing and unable to sustain stable situations; and 3) Substandard Conditions being experienced by low-income and extremely low-income households. These may include health risks, or in the event that a house is being foreclosed on because of landlord neglect, resulting in a household's risk of eviction or homelessness.

### **Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness**

Families with children at imminent risk of either residing in shelter or becoming unsheltered are underserved in the way of homelessness prevention. The increase of at-risk families tends to occur in tandem with the termination of local utility shut-off moratoriums, leaving households with extremely low area median income severely at risk of residing in shelters. Those at-risk are eligible for state financial assistance termed Residential Assistance to Families in Transition (RAFT). RAFT is administered by two providers in Worcester County: the Central Massachusetts Housing Alliance and RCAP Solutions. Eligible families may receive up to \$4,000 of flexible financial assistance within a 12-month period to avoid becoming homeless or to re-establish tenancy. RAFT helps families who are behind on rent, mortgage, or utility payments. However, providers have found that RAFT funds are fully expended statewide before the end of the fiscal year (traditionally in April), just as trends in the number of families accessing shelter increases.

### **Discussion**



**NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)**

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

**Introduction**

For Consolidated Planning purposes, HUD defines DISPROPORTIONATE NEED as when the proportion of persons within a category of need who are members of a particular racial or ethnic group are at least 10% higher than the percentage of all persons in said category of need. The next four tables provide CHAS data for housing that has HOUSING PROBLEMS by City of Worcester racial and ethnic groups as per Housing Area Median Family Income (HAFMI) levels. The CHAS data identifies the following four types of HOUSING PROBLEMS: 1.) unit lacks complete kitchen facilities, 2.) unit lacks complete plumbing facilities, 3.) unit has more than one person per room, 4.) cost burden is greater than 30% of income.

**0%-30% of Area Median Income**

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	12,810	2,880	1,425
White	6,545	1,460	725
Black / African American	1,360	175	254
Asian	600	65	245
American Indian, Alaska Native	100	20	0
Pacific Islander	4	0	0
Hispanic	3,970	1,030	155

**Table 12 - Disproportionally Greater Need 0 - 30% AMI**

Data 2011-2015 CHAS  
Source:

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

**30%-50% of Area Median Income**

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	7,340	2,425	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
White	4,180	1,520	0
Black / African American	1,080	185	0
Asian	310	85	0
American Indian, Alaska Native	14	0	0
Pacific Islander	0	0	0
Hispanic	1,635	630	0

**Table 13 - Disproportionally Greater Need 30 - 50% AMI**

Data 2011-2015 CHAS  
Source:

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

**50%-80% of Area Median Income**

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	6,215	6,070	0
White	3,675	3,730	0
Black / African American	920	550	0
Asian	645	440	0
American Indian, Alaska Native	4	0	0
Pacific Islander	0	25	0
Hispanic	935	1,080	0

**Table 14 - Disproportionally Greater Need 50 - 80% AMI**

Data 2011-2015 CHAS  
Source:

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

**80%-100% of Area Median Income**

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,720	5,325	0
White	1,195	3,790	0
Black / African American	230	450	0
Asian	155	340	0
American Indian, Alaska Native	20	15	0
Pacific Islander	0	0	0
Hispanic	95	680	0

**Table 15 - Disproportionally Greater Need 80 - 100% AMI**

Data 2011-2015 CHAS  
Source:

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

**Discussion**

Analysis of the CHAS data presented in the last four tables determines which racial/ethnic groups have a disproportionately greater need with regard to housing problems. The below listed groups have a DISPROPORTIONATE NEED when the percentage of persons with said HOUSING PROBLEMS within these groups is more than 10% GREATER THAN THE CITYWIDE POPULATION as a whole.

Within 0-30% Housing Area Median Family Income (HAMFI), 75% (12,810) citywide households have one or more of the four above listed HOUSING PROBLEMS. The percentage (and number) of households with one or more housing problems by racial/ethnic group: 100% (4) PACIFIC ISLANDER, 83% (100) American Indian, Alaskan Native, 77% (3,970) Hispanic, 76% (1,360) Black / African American, 75% (6,545) White, 66% (600) Asian. Thus within this HAFMI, PACIFIC ISLANDERS HAVE A DISPROPORTIONATE NEED relative to HOUSING PROBLEMS (although they account for only 4 households).

Within 0-30% Housing Area Median Family Income (HAMFI), 8% (1,245) citywide households had NO/NEGATIVE INCOME. The percentage (and number) of households with no/negative income by racial/ethnic group: 27% (245) ASIAN, 14% (254) Black / African American, 8% (725) White, 3% (155) Hispanic and 0% (0) American Indian, Alaska Native and Pacific Islander. Thus within this HAFMI, ASIANS HAVE A DISPROPRTIONATE NEED relative to NO/NEGATIVE INCOME.

Within 31-50% HAMFI, 75% (7,340) citywide households have one or more of the four above listed HOUSING PROBLEMS while none had zero/negative income. Within this same income range, the percentage (and number) of households with one or more HOUSING PROBLEMS by racial/ethnic group: 100% (4) AMERICAN INDIAN, ALASKA NATIVE, 93% (410) ASIAN, 89% (760) BLACK / AFRICAN AMERICAN,

67% (4,000) White, 63% (940) Hispanic, 0% (0) Pacific Islander. Thus within this HAFMI, AMERICAN INDIANS, ALASKAN NATIVES, ASIANS and BLACK / AFRICAN AMERICANS HAVE A DISPROPORTIONATE NEED relative to HOUSING PROBLEMS.

Within 51-80% HAMFI, 48% (6,205) citywide households have one or more of the four above listed HOUSING PROBLEMS while none had zero/negative income. Within this same income range, the percentage (and number) of households with one or more HOUSING PROBLEMS by racial/ethnic group were: 56% (860) Black / African American, 46% (4,030) White, 44% (290) Asian, 43% (825) Hispanic, 0% (0) American Indian, Alaska Native and Pacific Islander. Within 51-80% HAMFI, no racial / ethnic groups had a disproportionate need given that the percentage of households that have one of more problems did not exceed 10% of the citywide percentage for any particular population group.

Within 81-100% HAMFI, 34% (2,455) citywide households have one or more of the four above listed HOUSING PROBLEMS while none had zero/negative income. Within this same income range, the percentage (and number) of households with one or more HOUSING PROBLEMS by racial/ethnic group were: 37% (255) Black / African American, 37% (75) Asian, 34% (1,885) White, 27% (190) Hispanic, 0% (0) American Indian, Alaska Native and Pacific Islander. Within 81-100% HAMFI, no racial / ethnic groups had a disproportionate need given that the percentage of households that have one of more problems did not exceed 10% of the citywide percentage for any particular population group.

**NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)**

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

**Introduction**

For Consolidated Planning purposes, HUD defines DISPRPORTIONATE NEED as when the proportion of persons within a category of need who are members of a particular racial or ethnic group are at least 10% higher than the percentage of all persons within said category of need. The next four tables provide CHAS data for housing that has SEVERE HOUSING PROBLEMS by City of Worcester racial and ethnic groups as per Housing Area Median Family Income (HAMFI) levels. The four SEVERE HOUSING PROBLEMS are: 1.) unit lacks complete kitchen facilities, 2.) unit lacks complete plumbing facilities, 3.) unit has more than 1.5 persons per room, 4.) cost burden is greater than 50% of income.

**0%-30% of Area Median Income**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	10,395	5,290	1,425
White	5,400	2,605	725
Black / African American	1,150	385	254
Asian	555	110	245
American Indian, Alaska Native	85	30	0
Pacific Islander	4	0	0
Hispanic	3,010	1,985	155

**Table 16 – Severe Housing Problems 0 - 30% AMI**

Data 2011-2015 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

**30%-50% of Area Median Income**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	3,700	6,060	0
White	2,030	3,675	0
Black / African American	700	565	0
Asian	205	180	0
American Indian, Alaska Native	8	4	0
Pacific Islander	0	0	0
Hispanic	695	1,570	0

**Table 17 – Severe Housing Problems 30 - 50% AMI**

Data 2011-2015 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

**50%-80% of Area Median Income**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	1,720	10,565	0
White	1,085	6,320	0
Black / African American	195	1,275	0
Asian	165	930	0
American Indian, Alaska Native	0	4	0
Pacific Islander	0	25	0
Hispanic	250	1,760	0

**Table 18 – Severe Housing Problems 50 - 80% AMI**

Data 2011-2015 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

**80%-100% of Area Median Income**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	325	6,720	0
White	125	4,860	0
Black / African American	90	585	0
Asian	60	440	0
American Indian, Alaska Native	20	15	0
Pacific Islander	0	0	0
Hispanic	10	765	0

**Table 19 – Severe Housing Problems 80 - 100% AMI**

Data 2011-2015 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

**Discussion**

Analysis of the CHAS data presented in the last four tables determines which racial/ethnic groups have a DISPROPORTIONATE NEED with regard to SEVERE HOUSING PROBLEMS. The below listed groups have a DISPROPORTIONATE NEED when the percentage of persons with said SEVERE HOUSING PROBLEMS within these groups is more than 10% GREATER THAN THE CITYWIDE POPULATION as a whole.

Within 0-30% Housing Area Median Family Income (HAMFI), 55% (8,590) citywide households have one or more above listed SEVERE HOUSING PROBLEMS. Within this same income range, the percentage (and number) of households with one or more SEVERE HOUSING PROBLEMS by racial/ethnic group: 100% (25) PACIFIC ISLANDER, 66% (65) BLACK / AFRICAN AMERICAN, 54% (5,190) White, 53% (2,305) Hispanic, 45% (330) Asian and 0% (0) American Indian, Alaska Native. Thus within this HAFMI, PACIFIC ISLANDERS and BLACK / AFRICAN AMERICANS have a disproportionately greater need with regard to SEVERE HOUSING PROBLEMS.

Within 0-30% Housing Area Median Family Income (HAMFI), 8% (1,245) citywide households had NO/NEGATIVE INCOME. The percentage (and number) of households with no/negative income by racial/ethnic group: 27% (245) ASIAN, 14% (254) Black / African American, 8% (725) White, 3% (155) Hispanic and 0% (0) American Indian, Alaska Native and Pacific Islander. Thus within this HAFMI, ASIANS HAVE A DISPROPRTIONATE NEED relative to NO/NEGATIVE INCOME.

Within 31-50% HAMFI, 32% (2,800) citywide households have one or more of the above listed SEVERE HOUSING PROBLEMS, while none had no/negative income. Within this same income range, the

percentage (and number) of households with one or more SEVERE HOUSING PROBLEMS by racial/ethnic group: 53% (450) BLACK / AFRICAN AMERICAN, 30% (1,785) White, 29% (400) Hispanic, 28% (120) Asian, 0% (0) American Indian, Alaska Native, Pacific Islander. Thus within this HAFMI, BLACK / AFRICAN AMERICANS had a DISPROPORTIONATE NEED with regard to SEVERE HOUSING PROBLEMS.

Within 51-80% HAMFI, 18% (2,320) citywide households have one or more of the above listed SEVERE HOUSING PROBLEMS, while none had no/negative income. Within this same income range, the percentage (and number) of households with one or more SEVERE HOUSING PROBLEMS by racial/ethnic group: 33% (215) ASIAN, 28% (430) BLACK / AFRICAN AMERICAN, 19% (365) Hispanic, 14% (1,235) White, 0% (0) American Indian, Alaska Native and Pacific Islander. Thus within this HAFMI, ASIANS and BLACKS / AFRICAN AMERICANS had a DISPROPORTIONATE need with regard to SEVERE HOUSING PROBLEMS.

Within 81-100% HAMFI, 6% (410) citywide households have one or more of the four above listed SEVERE HOUSING PROBLEMS, while none had no/negative income. Within this same income range, the percentage (and number) of households with one or more SEVERE HOUSING PROBLEMS by racial/ethnic group: 10% (70) Hispanic, 6% (305) White, 5% (10) Asian, 4% (25) Black / African American (25), 0% (0) American Indian, Native Alaska and Pacific Island. Within 81-100% HAMFI, no racial/ethnic group had a disproportionate need given that the percentage of households that have one or more severe housing problems did not exceed 10% of that citywide percentage for any particular population group.

**NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)**

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

**Introduction:**

For Consolidated Planning purposes, HUD defines DISPRPORTIONATE NEED as when the proportion of persons within a category of need who are members of a particular racial or ethnic group are at least 10% higher than the percentage of all persons within said category of need. The next table provides CHAS data for housing cost burdens (defined as the percentage of income spent for housing) as per different racial / ethnic groups.

**Housing Cost Burden**

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	38,445	14,245	14,420	1,480
White	27,010	8,145	8,180	735
Black / African American	2,940	1,960	1,675	254
Asian	2,075	930	720	250
American Indian, Alaska Native	75	24	115	0
Pacific Islander	40	20	4	0
Hispanic	5,590	2,985	3,475	195

**Table 20 – Greater Need: Housing Cost Burdens AMI**

Data 2011-2015 CHAS  
Source:

**Discussion:**

Households with Acceptable Housing Cost Burdens of 30% or less of income: Citywide, 56% (38,445 households). By race / ethnic group: 63% (40) Pacific Islander, 61% (27,010) White, 52% (2,075) Asian, 46% (5,590) Hispanic, 43% (2,940) Black / African American, 35% (75) American Indian, Alaskan Native. Households with HIGH HOUSING COST BURDENS of over 30% of income: Citywide, 44% (30,145). By race / ethnic group: 65% (139) AMERICAN INDIAN, ALASKAN NATIVE, 57% (3,889) BLACK / AFRICAN AMERICAN, 54% (6,685) HISPANIC, 48% (1,900) Asian, 39% (17,060) White, 38% (24) Pacific Islander. Thus AMERICAN INDIANS, ALASKAN NATIVES, BLACK / AFRICAN AMERICANS, HISPANICS have a DISPROPORTIONATE NEED with regard to experiencing HIGH HOUSING COST BURDENS of over 30% of income.

Households with SEVERELY HIGH HOUSING COST BURDENS of over 50% of income: Citywide 21% (14,420). By race / ethnic group: 54% (115) AMERICAN INDIAN, ALASKAN NATIVE, 28% (3,475) Hispanic,

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25% (1,675) Black / African American, 19% (8,180) White, 18% (720) Asian, 6% (4) Pacific Islander. Thus AMERICAN INDIANS, ALASKAN NATIVES have a DISPROPORTIONATE NEED with regard to experiencing SEVERLY HIGH HOUSING COST BURDENS of more than 50% of income.

## **NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)**

### **Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?**

As per analysis presented over the last few pages, certain City of Worcester racial/ethnic groups were identified as having disproportionately greater needs as per Housing Area Median Family Income (HAMFI) levels with regard to the CHAS categories of HOUSING PROBLEMS, SEVERE HOUSING PROBLEMS, NO/NEGATIVE INCOME, HIGH HOUSING COST BURDENS, and SEVERE HOUSING COST BURDENS.

HOUSING PROBLEMS - Housing that has at least one of four types of housing problems: 1.) unit lacks complete kitchen facilities, 2.) unit lacks complete plumbing facilities, 3.) unit has more than one person per room, 4.) cost burden is greater than 30% of income. As per income levels the following racial/ethnic groups have a DISPROPORTIONATE NEED with HOUSING PROBLEMS (number of households in parenthesis): 0-30% HAMFI - PACIFIC ISLANDERS (4) 31-50% HAMFI - AMERICAN INDIAN, ALASKAN NATIVE (4), ASIAN (410), BLACK / AFRICAN AMERICAN (760).

SEVERE HOUSING PROBLEMS – Housing that has at least one of four types of severe housing problems: 1.) unit lacks complete kitchen facilities, 2.) unit lacks complete plumbing facilities, 3.) unit has more than 1.5 persons per room, 4.) cost burden is greater than 50% of income. As per income levels the following racial/ethnic groups have a DISPROPORTIONATE NEED with SEVERE HOUSING PROBLEMS (number of households in parenthesis): 0-30% HAMFI – PACIFIC ISLANDERS (25), BLACK / AFRICAN AMERICAN (65), 31-50% HAMFI – BLACK/AFRICAN AMERICAN (450), 51-80% HAMFI – ASIAN (255), BLACK/AFRICAN AMERICAN (430).

NO/NEGATIVE INCOME – Households that have No/Negative Income are only found within 0-30% HAMFI. At this income level, the following racial/ethnic group has a DISPROPORTIONATE NEED with NO/NEGATIVE INCOME (number of households in parenthesis): ASIAN (245).

HIGH HOUSING COST BURDENS – Households that expend more than 30% of income on housing. The following racial/ethnic groups have a DISPROPORTIONATE NEED with HIGH HOUSING COST BURDENS OF OVER 30% (number of households in parenthesis): 0-30% HAMFI – AMERICAN INDIAN/ALASKAN NATIVE (139), HISPANIC (1,900), BLACK/AFRICAN AMERICAN (3,889).

SEVERE HOUSING COST BURDENS – Households that expend more than 50% of income on housing. The following racial/ethnic group has a DISPROPORTIONATE NEED with SEVERE HOUSING COST BURDENS OF OVER 50% (number of households in parenthesis): AMERICAN INDIAN/ALASKAN NATIVE (115).

### **If they have needs not identified above, what are those needs?**

The expansion of home ownership continues to be an important cornerstone to the City of Worcester's neighborhood stabilization and revitalization efforts. An examination of home ownership rates among racial/ethnic groups shows that most minority households have disproportionately lower levels of home

ownership when compared to citywide rates among the whole population. The U.S. Census 2014-2018 American Community Survey reported that the citywide home ownership rate was 42%. The following home ownership rates (with numbers of households in parenthesis) were reported among the city's racial/ethnic groups: 60% (21) Pacific Islander, 51% (21,621) White, non-Hispanic, 45% Asian (1,907), 26% BLACK / AFRICAN AMERICAN (2,158), 26% AMERICAN INDIAN, ALASKA NATIVE (76), 18% HISPANIC(2,362). Thus BLACK / AFRICAN AMERICANS, AMERICAN INDIAN, ALASKA NATIVES, and HISPANICS have DISPROPORTIONATELY LOWER HOME OWNERSHIP levels when compared to the citywide rate. Expansion of minority home ownership opportunities in Worcester can both help the city achieve its neighborhood stabilization and revitalization goals as well as address issues of DISPROPORTIONATE NEED for MINORITY HOME OWNERSHIP.

**Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?**

The City of Worcester is comprised of 44 U.S. Census tracts, of which 26 tracts had 51% or more of their populations being persons of Low-Moderate Income (LMI) - defined by HUD as households whose incomes were 80% or less of the metropolitan area median income as adjusted for family size. These 26 LMI tracts were: 7304.01, 7304.02; 7305.00; 7310.02; 7311.01, 7311.02, 7312.03, 7312.04, 7313.00, 7314.00, 7315.00, 7316.00, 7317.00, 7318.00, 7319.00, 7320.01, 7322.01, 7322.02; 7322.03, 7323.02, 7324.00, 7325.00, 7326.00, 7327.00, 7329.02, and 7330.00. (see attached Low Income Population City of Worcester Map for locations). An examination of the attached Demographic Analysis of Target Areas Tables show that these 26 LMI tracts has a greater proportion of the city's racial and ethnic minority populations. According to the latest U.S. Census 2014-2018 American Community Survey (ACS) estimates the citywide percentages by racial and ethnic populations were: 57% White, non-Hispanic, 21% Hispanic, 12% Black/African American, non-Hispanic, 7% Asian, non-Hispanic, 3% Other/Multi-Race, non-Hispanic. In the 26 tracts with majority Low-Moderate Income populations, the following percentages were reported for racial and ethnic populations: 46% White, non-Hispanic, 29% Hispanic, 13% Black/African American, non-Hispanic, 9% Asian, non-Hispanic, 3% Other/Multi-Race, non-Hispanic.

One of these tracts, 7325.00, (the Green Island neighborhood) is one of the most distressed with high levels of poverty, crime, problems with idle youth including gangs and drugs, absentee property ownership, vacant/boarded-up buildings, empty lots and other economic distress factors. CDBG investments in the Green Island Revitalization Initiative (a new City driven initiative modeled after the recent Union Hill Initiative) benefit a distressed neighborhood in which 71% of residents are low- to moderate-income and suffers from dilapidated roads/sidewalks, aging and maintenance deferred housing, chronic issues with flooding and drainage, as well possibly pollution and contamination. Informed by neighborhood needs analysis, the initiative will address housing, roads, sidewalks, parks, sewer and drainage systems, lighting, intersection signalization, and help to frame, complement, and offset development impacts associated with the construction of the new minor league baseball stadium

Another tract, 7324.00 (Union Hill), was ranked as the city's most distressed and the sixth most distressed in the State with high levels of poverty, crime, problems with idle youth including gangs and

drugs, foreclosed properties, absentee property ownership, vacant/boarded-up buildings, empty lots and other economic distress factors. This tract has been the focus of the Union Hill Neighborhood Revitalization Initiative which continues to work across multiple City departments in concert with key community institutions and stakeholders to improve the quality of life in that area.

**NA-35 Public Housing – 91.205(b)**

**Introduction**

**Totals in Use**

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *

**Table 21 - Public Housing by Program Type**

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

**Characteristics of Residents**

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	
									Average Annual Income
Average length of stay	5	5	6	6	7	7	0	8	
Average Household size	4	2	1	2	1	2	1	4	

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	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
# Homeless at admission	1	0	7	1	0	1	0	0
# of Elderly Program Participants (>62)	0	6	950	278	47	226	5	0
# of Disabled Families	8	10	689	904	206	677	20	0
# of Families requesting accessibility features	35	39	2,282	2,062	257	1,755	42	1
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 22 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	30	30	2,078	1,813	241	1,529	36	1	0
Black/African American	5	9	194	245	16	222	6	0	0
Asian	0	0	0	0	0	0	0	0	0

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Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
American Indian/Alaska Native	0	0	10	4	0	4	0	0	0
Pacific Islander	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 23 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

**Ethnicity of Residents**

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	23	17	1,187	1,009	113	890	2	0	0
Not Hispanic	12	22	1,095	1,053	144	865	40	1	0

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 24 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

**Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:**

The current demand for the need of accessible units for public housing applicants continues to overshadow the supply of accessible units in the WHA housing inventory. The turnover rate for units with accessible features is low, especially for multiple bedroom applicants. Budget constraints and lack of available funding for the renovation and production of units with accessible features continues to be the main barrier that handicapped families face.

**Most immediate needs of residents of Public Housing and Housing Choice voucher holders**

The need for employment readiness is one of the immediate needs of families in both our public and leased housing program. Programs such as “A Better Life” and the Family Self-Sufficiency (FSS) and Resident Opportunity and Self-Sufficiency (ROSS) Programs provide families in both programs with educational and job training opportunities. The need for affordable childcare is necessary for families trying to achieve economic success. The lack of affordable childcare continues to be a major obstacle. Additional educational opportunities for WHA youth have also become a glaring need. Forced into distance learning arrangements, housing authority youth are at risk for learning loss as they deal with a lack of broadband connectivity and social distancing guidelines.

**How do these needs compare to the housing needs of the population at large**

For those families living within the same socio-economic group, the needs are quite similar. There are a number of factors that may contribute in making life a bit more difficult. The first being that market rate rents continue to climb at a much higher rate than wages for unsubsidized families and the self-sufficiency programming and opportunities available public and leased housing families don't exist.

**Discussion**

**NA-40 Homeless Needs Assessment – 91.205(c)**

**Introduction:**

This section is representative of the data collected on both the sheltered and unsheltered homeless population in Worcester County. Data collected provides vital information on the nature and extent of homelessness by race/ethnicity, while also providing information of Veterans with families as well as families with children.

**Homeless Needs Assessment**

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	927	7	1,529	0	895	175
Persons in Households with Only Children	1	2	2	0	0	0
Persons in Households with Only Adults	486	160	2,026	0	0	0
Chronically Homeless Individuals	54	30	0	0	0	0
Chronically Homeless Families	144	11	0	0	0	0
Veterans	0	0	0	0	0	0
Unaccompanied Child	0	0	0	0	0	0
Persons with HIV	0	0	0	0	0	0

**Table 25 - Homeless Needs Assessment**

Data Source Comments:

Indicate if the homeless population is:  Has No Rural Homeless

**If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):**

Data that was available for the number of persons exiting homelessness each year and the number of days that persons experiencing homelessness is an estimate based on inferences of the length of stay in shelters.

The estimate of households with children does not include those moving from one temporary location to another or living doubled-up because they lack a home of their own. It is difficult to count this population accurately as they are living in unstable conditions.

The number of day's homeless, for household without children and the chronically homeless individuals according to the Triage and Assessment Center for Homeless Individuals reports an average shelter stay to be between 15 & 5 days, depending on the month. About half of those individuals exit homelessness successfully while another 10 to 20% are assumed to leave successfully without reporting the housing outcomes to the shelter. The other 30% of homeless individuals may have multiple episodes between multiple locations, or live outside in the summer. The durations for this population in the winter is likely to be longer, sometimes far longer. If 70% of individuals are no longer homeless in approximately 14 days, and the other 30% take approximately 120 days to resolve their homeless episode on average, the number of days of homelessness experienced by individuals staying in shelter could be on average of 45 days per person.

With regard to Veterans and their families, Worcester continues to see great success in the number of persons becoming and exiting homelessness each year. The reduction in Veterans homelessness is mainly due to the resource-rich service providers that utilize supportive housing and rapid re-housing methods, which provide Veteran-specific services across the county.

The data reported for unaccompanied youth may provide an incomplete picture of homeless youth in Worcester as homeless youth often avoid identification, are doubled up with other homeless youth, or are not engaged with homeless service providers within the CoC, as a result, many homeless youth are not successfully captured in the annual PIT count. While the exact scope of youth homelessness remains unclear, the risk associated with it are well documented. According to the Worcester County 2019 Youth Count (Commonwealth total of 1957 surveys taken) Worcester had 340 surveys, 46 met the "HUD Definition" of youth homelessness. 84 of those polled were housed but had been homeless in the past. Of those 77 met the "Commission Definition" 3 were under 18, 22 were LGBTQ, 24 were in foster care, 9 were in the juvenile/criminal justice system, 35 were parenting with custody/pregnant and 8 did not have High School diplomas. Youth often leave home due to some form of

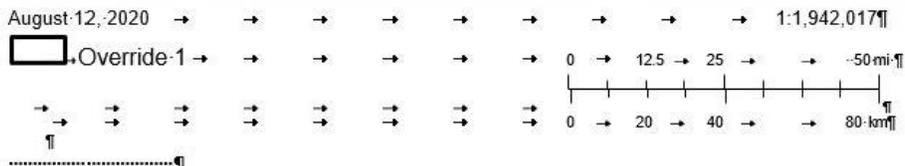
significant family conflict, such as abuse, neglect, substance abuse, lack of acceptance of gender identity or sexual orientation among others. Aging out of the foster care system and declining to accept DCF voluntary services or because they have been separated from family due to their own housing instabilities. Each of these factors are associated with trauma, compounding the challenges faced during homelessness. Depression and other mental health disorders are common, as well as chronic physical health issues, including asthma, diabetes and hepatitis. Youth experiencing homelessness are highly vulnerable to being exploited and trafficked in the sex trade and are often forced to engage in unsafe behaviors associated with survival such as selling drugs and stealing. These risks increase as the time spent experiencing homelessness increases. Worcester continues to be known as a leader in the effort to address Unaccompanied Youth Homelessness in the community. The Compass Network (LUK, Inc.) continues to lead the efforts in Worcester.

**Nature and Extent of Homelessness: (Optional)**

<b>Race:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
White	1,033	154
Black or African American	359	14
Asian	22	1
American Indian or Alaska Native	6	0
Pacific Islander	4	0
<b>Ethnicity:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
Hispanic	583	40
Not Hispanic	841	129

Data Source  
Comments:

**NA-40-Homeless-Needs-Assessment--Service-Area--Worcester-City-and-County-CoC-(MA-506)**



**NA-40 Map**

### **Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.**

Families with children continue to count for a larger percentage of the homeless population in Worcester County, although there was a decrease from 2018-2019 Point in Time count of 13%, the trend of increased family size continued. It is difficult to count this population accurately as they are living in unstable situations. On average, a family will move about five times before entering shelter, resulting in frequent school changes and hardships for children. The numbers of persons in homeless family households changed from 1088 to 936 from 2018 to 2019 a decrease of 14%. The type of families in need of housing assistance tend to be families with single-parent female head of households, as discussed in the NA-10 housing needs assessment.

Other characteristics among Veteran and non-Veteran families in need of housing assistance are disabilities that inhibit the ability to work , and increasing family size coupled with the lack of resources for affordable and quality housing.

### **Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.**

Data collected from HMIS does not report race and ethnicity for sheltered persons experiencing homelessness. The table above indicates the following racial breakdown by percentage of sheltered homeless person: 72.5% White; 25.2% Black or African American; 1.54% Asian, .4% American Indian or Alaska Native .2% Pacific Islander. The ethnicity of sheltered homeless persons in 2019 was found to be 40.9% Hispanic and 58.0% Not Hispanic. Street Outreach workers conducting the Point in Time Count on January 30, 2019 did not record racial or ethnic characteristics for unsheltered homeless persons.

### **Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.**

From 2018 to 2019, the total number of homeless persons in Worcester County decreased by 14% from 1852 to 1593. The number of unsheltered or street homeless individuals decreased slightly from 156 in 2018 to 151 in 2019, or .2%.

The total number of homeless individuals decreased from 764 to 659 in 2019 a 14% decrease. The decrease in Unaccompanied Homeless Adult Individuals and Chronically Homeless individuals (both Veterans and non-Veterans) can be attributed to street outreach efforts, the continued implementation of Federal, State and Local rapid rehousing programs (RRH), and Continuum of Care Permanent Supportive Housing programs for individuals with disabilities.

### **Discussion:**

## NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

### Introduction:

### HOPWA

<b>Current HOPWA formula use:</b>	
Cumulative cases of AIDS reported	1,790
Area incidence of AIDS	32
Rate per population	10
Number of new cases prior year (3 years of data)	96
Rate per population (3 years of data)	10
<b>Current HIV surveillance data:</b>	
Number of Persons living with HIV (PLWH)	1,091
Area Prevalence (PLWH per population)	128
Number of new HIV cases reported last year	0

Table 26 – HOPWA Data

Data Source Comments:

### HIV Housing Need (HOPWA Grantees Only)

<b>Type of HOPWA Assistance</b>	<b>Estimates of Unmet Need</b>
Tenant based rental assistance	12
Short-term Rent, Mortgage, and Utility	0
Facility Based Housing (Permanent, short-term or transitional)	0

Table 27 – HIV Housing Need

Alternate Data Source Name:

Worcester City and County CoC Data

Data Source Comments:

Describe the characteristics of special needs populations in your community:

<i>Persons with Disabilities Among Civilian Non-Institutionalized in Worcester, MA</i>	<i>TOTAL</i>	<i>With a Disability</i>	<i>Percent With a Disability</i>
Total civilian noninstitutionalized population	185,421	<b>40,764</b>	22.0%
Population under 5 years	10,228	<b>92</b>	0.9%
With a hearing difficulty		92	0.9%
With a vision difficulty		0	0.0%
Population 5 to 17 years	25,355	<b>2,556</b>	10.0%
With a hearing difficulty		455	1.8%
With a vision difficulty		366	1.4%
With a cognitive difficulty		1,119	4.4%
With an ambulatory difficulty		256	1.0%
With a self-care difficulty		360	1.4%
Population 18 to 64 years	124,972	<b>23,416</b>	18.7%
With a hearing difficulty		1,847	1.5%
With a vision difficulty		2,646	2.1%
With a cognitive difficulty		7,557	6.0%
With an ambulatory difficulty		4,819	3.9%
With a self-care difficulty		2,116	1.7%
With an independent living difficulty		4,431	3.5%
Population 65 years and over	23,079	<b>14,700</b>	63.7%
With a hearing difficulty		2,107	9.1%
With a vision difficulty		542	2.3%
With a cognitive difficulty		1,878	8.1%
With an ambulatory difficulty		5,005	21.7%
With a self-care difficulty		1,624	7.0%
With an independent living difficulty		3,544	15.4%

*Source American Community Survey (2019)*

#### NA45 Table

Describe the characteristics of special needs populations in your community:

(See attached Table)

### **What are the housing and supportive service needs of these populations and how are these needs determined?**

The vast majority of clients rely on Supplemental Security Income (SSI) as their main source of income. SSI provides income benefits to persons who have been determined to be disabled, but do not have a substantial work history (Social Security Disability Insurance or SSDI is paid to those who become disabled and have 'paid in' sufficient amounts through previous employment).

Considering the prevailing rents in Worcester County, a single person receiving SSI payments would either be substantially rent burdened or completely unable to afford housing in their communities. HUD recommends that households pay no more than 30% of their income towards rent.

Rent for a 0 Bedroom, Efficiency or Single-Room Occupancy unit in the City of Worcester is 90% of earned monthly income for an individual receiving SSI. Rent for a 1 Bedroom unit in the City of Worcester exceeds monthly SSI payments to a single individual, at 120% of total SSI income

Persons with HIV/AIDS Data provided by the MA Department of Public Health on the income of clients receiving DPH funded HIV related services in Worcester County illustrate how HIV disease and poverty are dual epidemics. In order to be eligible for HOPWA services, including rental assistance, an HIV+ individual must have a low income, defined as 80% or less than the area median income (AMI). These definitions are from local income data and vary significantly from state to state, even from community to community and are defined by the federal government. While 80% of AMI is the maximum income a household can have and be eligible for HOPWA, the actual households served tend to fall within lower AMI categories.

Alcohol and other Drug Addictions With the guidance and support of local partners, Worcester Division of Public Health established the Regional Response to Addiction Partnership (RRAP). This new coalition was formed to coordinate regional activities around substance abuse prevention, treatment, and recovery. It combines membership and activities from several other groups that had been meeting independently with a focus on a single substance or population. Many participating in the partnership also provide services to households with supportive housing needs and help determine strategies to comprehensively address those needs.

### **Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:**

Size of the population with HIV/AIDS in the Worcester EMSA: From 2014-2016, the average annual HIV diagnosis rate in Worcester County was 6.6 people per year. The diagnosis of HIV infection has slowly increased in Worcester County, which can most likely be attributed to the increasing trends of injection drug use in the region. In 2018, the average total number of people living with HIV/AIDS (PLWH/A) in Worcester County was 1,933, a rate of 242.1 people per 100,000. The prevalence of PLWH/A in Worcester County has gradually been increasing (from 1,457 in 2009 and 1,536 in 2011), the number of deaths per year have significantly increased from 15 in 2011 to 20 in 2016.

Characteristics of the population with HIV/AIDS in the Worcester EMSA: The gender, place of birth, race/ethnicity, exposure mode, and age at infection diagnosis are all indicators that can characterize the population with HIV/AIDS and their families.

In Worcester County, 72% of PLWH/A are male and 28% are female. 52% of Worcester County PLWH/A were born in the US, from 2014-2016, 7% were born in a US dependency, the other 41% were born in non-US locations.

The most common mode of exposure to infection occurs through injection drug use (6%) (IDU) and male-to-male sex (43%). Heterosexual sex is the third most common mode of exposure. Finally, in 2016 the age at diagnosis occurred most commonly in between the ages of 25 and 49. The majority of PLWH/A in Worcester County currently (25%) are between 45 and 54 years old. In Worcester County in 2018, 49% of PLWH/A were White (non-Hispanic), 19% were Black (non-Hispanic), and 29% were Hispanic/Latino

In Windham County, CT 14 of those 18 households (77.8%) diagnosed in 2018 with HIV were male. Of the 18, 44.4 % were White, 33.3% were Hispanic, and only 11.1% were Black. The most common risk, or mode, for exposure, was male-to-male sex (44.4%), while the rate for mode of exposure for IDU and heterosexual sex accounted for 16.7%, respectively.

Data related to size and characteristics of People Living with HIV/AIDS (PLWHA) and their families in the Worcester EMSA is drawn from the Massachusetts Office of Health and Human Services' Regional HIV/AIDS Epidemiologic Profile of Worcester County (<http://www.mass.gov/lists/hiv-aids-epidemiologic-profiles#massachusetts-cities.pdf>), Massachusetts: 2018, and the Connecticut Department of Public Health HIV Surveillance Program: Windham County People with HIV Infection by Risk, Sex, Race, and Age Group data tables for 2018 ([https://portal.ct.gov/-/media/Departments-and-Agencies/DPH/AIDS—Chronic-Diseases/surveillance.city\\_county\\_Windham\\_5yr.pdf](https://portal.ct.gov/-/media/Departments-and-Agencies/DPH/AIDS-Chronic-Diseases/surveillance.city_county_Windham_5yr.pdf))

## **Discussion:**

### **Lack of Affordable Housing**

The greatest housing need for persons living with HIV and AIDS in Worcester County is permanent, affordable housing.

- High incidence of poverty among PLWHA in Worcester County with many only receiving SSI as source of income
- Fair Market Rents valued at 120% or more of an individual's monthly SSI payment
- Rising costs of rent and utilities in a tight housing market and slow economy
- Long waiting lists for subsidized housing
- Focus groups prioritizing emergency assistance and vouchers as greatest need

### **Barriers to Accessing Housing**

People with HIV/AIDS face serious challenges in finding and maintaining housing.

- Histories of criminal activity or substance abuse and poor credit and housing histories limit many from successfully applying for housing
- Program requirements such as rules regarding sobriety
- Homeless eligibility requirements
- Issues related to children or partners
- Lack of financial resources to pay move-in costs
- Difficulty finding decent, safe, affordable housing or landlords unwilling to accept housing subsidies

## **NA-50 Non-Housing Community Development Needs – 91.215 (f)**

### **Describe the jurisdiction’s need for Public Facilities:**

Public facilities provide residents with access to essential services and provide the foundation for successful community development. In Worcester, many of the existing neighborhood and public facilities such as community centers, health and education facilities, parks, food banks, homeless shelters, and youth centers suffer from old age, deferred maintenance, and heavy use. Nearly three-quarters of the non-profit facilities in Worcester were built before 1975, and approximately 58 percent were built by 1950. In terms of municipally-owned public facilities, the City of Worcester is responsible for over 4.5 million square feet of buildings and facilities that either directly service residents, or exist to house activities that service residents. Roughly 30 percent of these City-owned buildings serving the public were built before 1950, and about 72 percent were built by 1975.

Accessibility improvements are needed for City-owned facilities that serve the public, as captured in the 2014 ADA Self-Evaluation report that provides a summary of architectural barriers and proposed barrier removal solutions for the City’s 11 major municipal buildings, three libraries, one police station, 10 fire stations, and over 20 open spaces. Like many cities in the Commonwealth of Massachusetts, Worcester has a large number of aging buildings and other facilities that pose barriers to residents with disabilities, and the sheer amount of work that would be required to bring these older facilities into compliance is daunting. While most City-owned facilities built or renovated after the year 2000 are substantially more accessible and meet most architectural requirements, additional accessibility improvements to public facilities are necessary. At the neighborhood level, residents and stakeholders most commonly cited the condition of existing parks and public recreational facilities, or the lack thereof, as the most pressing public facilities need.

Depending on further analysis and strategizing based on neighborhood needs and preliminary engineering studies, CDBG will assist with small to medium sized upgrades of infrastructure including, but not limited to, road and/or sewer/drainage reconstruction within the Green Island neighborhood (Census Tract 7325). CDBG Investments will spearhead infrastructure improvements associated with the Green Island Revitalization Initiative, a new City driven initiative modeled after the recent Union Hill Initiative. They will address a distressed neighborhood in which 78% of residents are low- to moderate-income and which suffers from dilapidated roads/sidewalks, aging and maintenance deferred housing, chronic issues with flooding and drainage, as well possibly pollution and contamination.

The investments made with these CDBG funds will provide an area benefit for the Green Island neighborhood. In 2017 the City reached an agreement with a minor league baseball team, the Pawtucket (RI) Red Sox, to relocate their team to Worcester. The relocation will entail the construction of a new, multi-million dollar baseball stadium and over 180,000 sq.ft. of new, mixed-use development immediately adjacent to the Canal District and the Green Island neighborhood. Neighborhood infrastructure investments will provide a community benefit and complement other anticipated investments while helping to mitigate and offset any new development impacts.

### **How were these needs determined?**

The public facilities needs of the City of Worcester Consolidated Plan were determined through an analysis of community and neighborhood based needs in combination with a robust citizen outreach/community public meetings process.

Community/neighborhood based analysis drew from the latest demographic data from the U.S. Census American Community Survey, the mapping of low- and moderate-income census tracts, the identification of institutions, assets, and liabilities, and the ability to leverage other public and private resources. The analysis has identified the most distressed inner city areas for targeted investment as exemplified by the Union Hill neighborhood over the last several years, and the newly launched efforts to revitalize the Green Island neighborhood.

The citizen outreach/community public meetings process was conducted in 11 neighborhood locations from June – October, 2019, by the Executive Office of Economic Development (EOED) which engaged in a citizen participation process to identify community needs and provide community input on activities and programs to fund. Ten community needs assessment public meetings were held in different parts of the City, with at least one in each of the City Council districts. The meetings were attended by 145 total participants from neighborhoods with underserved, low-income, diverse, and minority residents. All meetings were intentionally held at locations accessible for potential and actual CDBG beneficiaries. The public meetings were advertised broadly through the City's media office as well as through door-to-door neighborhood outreach with at least one bilingual staff member. A bilingual staff person was present at each meeting to provide translation and/or facilitation in Spanish and Vietnamese. In addition, a special 11th public hearing was also held in the Green Island neighborhood in July 2019 to focus attention on the needs of that, very low- income, inner-city neighborhood (65 persons participated).

The need to address the poor conditions of roads and/or sidewalks ranked as the top need identified through the above processes, including the need for roadway and sidewalk resurfacing, traffic and pedestrian improvements, and more crosswalks, flashing crosswalks, better signage and street lights. Within the Green Island neighborhood the top public facilities needs were improved traffic and parking, flooding control (including infrastructure to mitigate flooding), greening and hazard mitigation (including clean-up of industrial contamination and air/water pollution, and green and sustainable new/redevelopment).

### **Describe the jurisdiction's need for Public Improvements:**

Like many East Coast cities, Worcester experiences general infrastructure needs for streets, water and sewer, and other improvements. The City of Worcester Department of Public Works & Parks maintains all public streets and right-of-way amenities, including approximately 515 miles of streets, 700 miles of sidewalks, and 13,800 street lights. The need for streets and sidewalk improvements was a consistent theme throughout the Consolidated Planning process. Agencies serving children and youth, for example, cited public improvements as a critical strategy for addressing neighborhood safety and increasing the ability of youth to access services and resources. Similarly, the City's Office on Disabilities emphasized the need for improving the condition and accessibility of public rights-of-way for persons with

disabilities.

Through a targeted interdepartmental neighborhood revitalization initiative in the predominantly low- and moderate-income Green Island neighborhood, public improvements have been identified as a priority need. The initiative, which has come to involve over \$3 million in planned or currently underway public investments around streets and infrastructure in addition to housing improvements, code enforcement, public safety, and public health, prioritized the following public improvements:

- Tree plantings
- Street and sidewalk improvements
- Water main replacements
- Park upgrades
- Repainting and enhancing crosswalks at major intersections
- Implementing new or fixing existing ADA compliant curb cuts

### **How were these needs determined?**

The need for public improvements were determined through analysis of community and neighborhood based needs in combination with an active citizen outreach/community public meetings process, as has been thoroughly described in the last section.

The following were the most critically needed public improvements (by number of votes received) from participants in ten community needs assessment public meetings, held from June through October 2019: poor conditions of roads and/or sidewalks (73), crime/illegal activity/safety issues (54), lack of existing property maintenance (36), lack of affordable housing (32), lack of public transportation or poor service (31), not enough parks or recreational areas nearby (24), vacant properties (14), lack of quality housing (12), not enough businesses or right type of business nearby (9), foreclosures (2). Participant comments received relative to crime/illegal activity/safety issues included the need to address high drug use, property crime, increased police presence, and community communication with police.

### **Describe the jurisdiction's need for Public Services:**

The following were the most critically needed social services (by number of votes) received from participants in ten community needs assessment public meetings, held from June through October 2019: job readiness/placement programs (58), youth programming (50), health care services (43), individual case management (41), transportation services (33), daycare/childcare (32), safety and crime prevention (32), services for immigrants and cultural groups (28), housing stability services (25), assistance for former convicts/incarcerated (24), food pantry and food security programs (24), information & referral (22), home purchasing counseling (13), tax and financial assistance or counseling (6). Participant comments received relative to the top four above ranked social services included the need for increased vocational programs and training for higher skilled jobs, the need to increase youth centers and programs, and provide more programs for teens (age 13+) and prevention of gang involvement and juvenile delinquency, the need for more mental health services (especially for youth in

crisis), addiction and substance abuse counseling, post-rehab/transitional support, the need for more one-on-one case review services, centralized resources and outreach.

In addition to the outcomes from consultations and public participation, the needs for public services impacting community health are captured in the Greater Worcester Region Community Health Improvement Plan (CHIP). The CHIP utilized a participatory, community-driven approach to engage community members, area healthcare providers, academic institutions, community based organizations, and other municipalities for the development of a comprehensive plan to improve upon the services provided to residents and to strengthen the public health system. Needs of the most vulnerable populations were prioritized: elderly persons, youth, immigrants/refugees, people of color, GLBTQ, child-bearing women, and people with disabilities. In light of the priority needs and populations, the CHIP sets five domains for action: healthy eating and active living, with a focus on transportation and the built environment, behavioral health, including mental health and substance abuse, primary care and wellness, with a focus on fostering a culturally responsive environment, violence and injury prevention, including safety and crime, health equity and health disparities.

Beyond the provision of specific public services, the need to improve access to these services and other opportunities emerged as a common theme throughout community meetings and consultations. Barriers preventing residents, especially vulnerable populations, from accessing services and other opportunities such as employment training include lack of transportation and the need to improve public transit, as well as a lack of affordable housing. Language and cultural barriers are also significant and serve to isolate households and impede successful utilization of community resources.

### **How were these needs determined?**

Beginning in the summer of 2019, the Executive Office of Economic Development (EOED) engaged in a citizen participation process to identify community needs and provide community input on activities and programs to fund. The EOED hosted a series of community meetings using a facilitated process to encourage and seek input. Both "open ended" questions were asked and "voting and ranking" exercises were used with participants. The process addressed both housing and community development needs including public services and public improvements.

Ten community needs assessment public meetings were held in different parts of the City, with at least one in each of the City Council districts. The meetings were attended by 141 total participants from neighborhoods with underserved, low-income, diverse, and minority residents. All meetings were intentionally held at locations accessible for potential and actual beneficiaries. The public meetings were advertised broadly through the City's media office as well as through door-to-door neighborhood outreach with at least one bilingual staff member. At each of the meetings, two bilingual staff persons were present that were able to provide translation and/or facilitation in Spanish and Vietnamese. In addition, a special public hearing was also held in the Green Island neighborhood in July 2019 to focus attention on the needs of that, very low- income, inner-city neighborhood (65 persons participated). The Five (5) Year Consolidated Plan informed the proposed first year (2020-2021) annual action plan outreach/funding recommendation process. In addition, after the announcement of the availability of Request for Proposals (RFP) for first year action plan funding through CDBG, HOPWA, and ESG, a Technical Assistance Workshop/Funding Overview meeting was held at City Hall in January 2020 (19

participants).

The Community Development Advisory Committee (CDAC) traditionally serves as the formal citizen body that provides input on funding applications submitted as part of the city's CDBG RFP process. The CDAC is a citizen advisory committee comprised of ten members, with two from each of Worcester's five council districts. This year, the CDAC met six times in February and March 2020 to review and evaluate the CDBG proposals and listen to presentations and ask questions of all of the Public Services, Public Facilities and Improvements, and City Interdepartmental applicants that submitted proposals in response to the RFP.

While the CDAC issues initial advisory recommendations on funding allocations, it is the city administration, through the city manager, that ultimately recommends which CDBG projects and activities to fund which form the basis of the annual action plan.

# Housing Market Analysis

## MA-05 Overview

### Housing Market Analysis Overview:

The Housing Market Analysis section of this City of Worcester Consolidated Plan contains Comprehensive Housing Affordability Strategy (CHAS) data generated for HUD by the U.S. Census 2011-2015 American Community Survey (ACS) and imbedded in most of the Econ Planning Suite templates in this document. In order to build on this baseline data and provide the most up to date analysis of recent demographic trends, the City of Worcester's Consolidated Plan also benefits from research and analysis of more recent U.S. Census releases including the latest available from the 2014-2018 American Community Survey (ACS).

A summary of significant characteristics of Worcester's housing market and economy are detailed in the following section, including:

After a period of several years of stagnation, the last couple of years have witnessed intensifying economic pressures on the City of Worcester's housing market owing to a resurgence of growth in population and households and a corresponding decline in available housing units.

From 2011-2015 to 2014-2018, the number of housing units in the city has increased by 3% while the number of households increased by 4%. These trends reverse a decline that occurred from 2007-2011 to 2011-2015 in the number of units (-4%) and households (-2%).

Owner occupied units grew by 1% from 2011-2015 to 2014-2018, following a -10% decline from 2007-11 to 2011-2015. Renter occupied units grew by 6% from 2011-2015 to 2014-2018, following a 4% increase from 2007-2011 to 2011-2015. Owner occupied units now comprise 42% of all occupied units (down from 47% in 2007-2011). Renter occupied units now comprise 58% of all occupied units (up from 53% in 2007-2011).

Although 9% of all housing units were vacant in 2014-2018, only a third of these vacant units were available for occupancy (for sale or rent). The supply of vacant units available for occupancy (for sale or rent) has dropped by -37% since 2007-2011.

Two-thirds of vacant housing units were not available for occupancy in 2014-2018, including units rented or sold but not occupied, units held for seasonal use, and other vacant units not on market. In 2014-2018, the City had a homeowner vacancy rate of just 1.6% and a renter vacancy rate of only 4.1% (down from 2.3% and 6.9% respectively in 2007-11).

## MA-10 Number of Housing Units – 91.210(a)&(b)(2)

### Introduction

After a period of several years of stagnation, the last couple of years have witnessed intensifying economic pressures on the City of Worcester’s housing market owing to a resurgence of growth in population and households and a corresponding decline in available housing units.

When comparing ACS/CHAS data from 2011-2015 to 2014-2018, the number of housing units in the city has increased by 3% (to 77,920) while the number of occupied units (households) increased by 4% (to 71,145). These trends reverse a decline that occurred from 2011-2015 to 2014-2018 in the number of units (-4%) and households (-2%).

Owner occupied units grew by 1% (to 29,807) from 2011-2015 to 2014-2018, following a -10% decline from 2007-2011 to 2011-2015. Renter occupied units grew by 6% (to 41,338) from 2011-2015 to 2014-2018, following a 4% increase from 2007-2011 to 2011-2015. Owner occupied units now comprise 42% of all occupied units (down from 47% in 2007-2011). Renter occupied units now comprise 58% of all occupied units (up from 53% in 2007-2011).

Although 9% (6,775) of all housing units were vacant in 2014-2018, only a third (2,284) of these vacant units were available for occupancy (including 490 units for sale and 1,794 for rent). The supply of vacant units available for occupancy through sale or rent has dropped by -37% or -1,325 units (from 3,609 to 2,284) since 2007-2011. In comparison from 2011-2015 to 2014-2018 the number of households in Worcester increased by +4% or +2,569 (from 68,576 to 71,145 units).

Two-thirds of vacant housing units (4,491) were not available for occupancy in 2014-2018, including 616 units rented but not occupied, 303 units sold but not occupied, 366 units held for seasonal use, and 3,206 other vacant units not on market.

In 2014-2018, the City had a homeowner vacancy rate of just 1.6% (defined as the percent of all owner occupied housing available for sale), down from 2.3% in 2007-2011. In 2014-2018, the City had a renter vacancy rate of only 4.1% (defined as the percent of all renter housing available for rent), down from 6.9% in 2007-2011.

While there was significant growth (+12%) in properties of 20 or more units from 2011-2015 to 2014-2018, there were otherwise only minimal changes in the proportions of units per structure since 2007-11. The percent of units per residential properties for 2007-11, 2011-2015, and 2014-2018 were 1-unit (39%, 38%, 38%), 2-4 units (33%, 34%, 34%), 5-19 units (15%, 14%, 14%), 20 or more units (13%, 13%, 14%).

With regard to the number of bedrooms by tenure the most significant changes were for 0-bedroom units which increased by +251% (to 158) for owner occupied units and +30% (to 2,156) for renter occupied units between 2011-2015 data and 2014-2018. Other changes by number of bedrooms and tenure during that same period were for owner occupied by number of bedrooms: 1 (-6%), 2 (+2%), 3 or more (+2%), for renter occupied by number of bedrooms: 1(+3%), 2 (+9%), 3 or more (+4%).

### All residential properties by number of units

Property Type	Number	%
1-unit detached structure	24,110	32%

Property Type	Number	%
1-unit, attached structure	4,695	6%
2-4 units	25,920	34%
5-19 units	10,785	14%
20 or more units	9,910	13%
Mobile Home, boat, RV, van, etc	305	0%
<b>Total</b>	<b>75,725</b>	<b>100%</b>

**Table 28 – Residential Properties by Unit Number**

Data Source: 2011-2015 ACS

### Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	45	0%	1,655	4%
1 bedroom	930	3%	10,035	26%
2 bedrooms	7,970	27%	14,280	37%
3 or more bedrooms	20,555	70%	13,100	34%
<b>Total</b>	<b>29,500</b>	<b>100%</b>	<b>39,070</b>	<b>101%</b>

**Table 29 – Unit Size by Tenure**

Data Source: 2011-2015 ACS

### Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

Federal funds are usually targeted to families and individuals with income at or below 80% AMI. However there are some specialty programs that up to 120% of AMI.

### Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

It isn't anticipated that there will be any loss overall of affordable housing inventory. Projects will either renew their affordability period or new projects should make up for any losses.

### Does the availability of housing units meet the needs of the population?

After a period of several years of stagnation, the last couple of years have witnessed intensifying economic pressures on the City of Worcester's housing market owing to a resurgence of growth in population and households and a corresponding decline in available housing units. When comparing ACS/CHAS data from 2011-2015 to 2014-2018, the number of housing units in the city has increased by 3% (to 77,920) while the number of occupied units (households) increased by 4% (to 71,145). These trends reverse a decline that occurred from 2011-2015 to 2014-2018 in the number of

units (-4%) and households (-2%).

Owner occupied units grew by 1% (to 29,807) from 2011-2015 to 2014-2018, following a -10% decline from 2007-2011 to 2011-2015. Renter occupied units grew by 6% (to 41,338) from 2011-2015 to 2014-2018, following a 4% increase from 2007-2011 to 2011-2015. Owner occupied units now comprise 42% of all occupied units (down from 47% in 2007-2011). Renter occupied units now comprise 58% of all occupied units (up from 53% in 2007-2011).

Although 9% (6,775) of all housing units were vacant in 2014-2018, only a third (2,284) of these vacant units were available for occupancy (including 490 units for sale and 1,794 for rent). The supply of vacant units available for occupancy has dropped by -37% (from 3,609) since 2007-2011. During that same period, the number of households in Worcester grew by 1%.

Two-thirds of vacant housing units (4,491) were not available for occupancy in 2014-2018, including 616 units rented but not occupied, 303 units sold but not occupied, 366 units held for seasonal use, and 3,206 other vacant units not on market.

In 2014-2018, the City had a homeowner vacancy rate of just 1.6% (defined as the percent of all owner occupied housing available for sale), down from 2.3% in 2007-2011. In 2014-2018, the City had a renter vacancy rate of only 4.1% (defined as the percent of all renter housing available for rent), down from 6.9% in 2007-2011.

The number of units in residential properties remained consistent when comparing 2014-2018 data to 2011-2015 data or even with 2007-2011. The percent of units in residential properties for 2007-11, 2011-2015, and 2014-2018: Single-units (39%, 38%, 38%), 2-4 units (34%, 34%, 33%), 5-19 units (14%, 14%, 15%), 20 or more units (14%, 13%, 13%). The only significant growth occurred in properties of 20 or more units, which grew by 12% when comparing 2011-2015 with 2014-2018 data.

With regard to the number of bedrooms by tenure the only significant changes were for 0-bedroom units which increased by +251% (to 158) for owner occupied units and +30% (to 2,156) for renter occupied units when comparing 2011-2015 data with 2014-2018. Zero-bedroom units now comprise 1% of owner units and 5% of renter units. Other changes by number of bedrooms and tenure from 2011-2015 to 2014-2018 were for owner occupied by number of bedrooms: 1 (-6%), 2 (+2%), 3 or more (+2%), for renter occupied by number of bedrooms: 1 (+3%), 2 (+9%), 3 or more (+4%).

### **Describe the need for specific types of housing:**

According to the most recent Analysis of Impediments to Fair Housing, there is still a wide variety of housing needs within the City. These can mostly be categorized as anything from SRO's to family units in locations throughout the City, but mostly on site's that have access to transportation hubs. There is also a need for accessible units, but more importantly accessible units that are centrally located to shopping, entertainment, transportation areas that are also accessible friendly.

### **Discussion**

Worcester has continued to out perform in regards to demand in the Commonwealth, as evidenced in this story from Forbes where Worcester is listed at #10 of the hottest housing markets, [The Hottest Housing Markets Right Now In 2020](https://www.forbes.com/sites/andrewdepietro/2020/10/26/the-hottest-housing-markets-right-now-in-2020), <https://www.forbes.com/sites/andrewdepietro/2020/10/26/the-hottest-housing-markets-right-now-in-2020>

hottest-housing-markets-right-now-in-2020. "In the Boston metro area, homes available for sale declined by only 14.4% — from 10,330 homes in September 2018, down to 8,847 in September 2020. By contrast, in the Worcester area, housing inventory has been cut in half by its record number of sales: From 3,184 homes two years ago, down to just over 1,600 available for sale in 2020." This is another indicator of market demand and a need for continued affordable housing.

## MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

### Introduction

CHAS/ACS data shows that after a slump in values from \$248,300 in 2005-2009 to \$205,200 in 2011-2015 (-17%), median home values have risen in the City of Worcester to \$220,700 by 2014-2018 (+8%) and to \$245,200 (+11%) by 2018 (ACS single year estimate). Thus median home values in the City have returned to pre-housing slump levels by 2018, and have continued to escalate 2018-2020.

CHAS/ACS data shows despite the slump in housing values from 2009-2015, median contract rents continued rise throughout this period. Median contract rents in the city rose from \$716 in 2005-09 to \$825 in 2011-2015 (+15%) to \$1,064 in 2014-2018 (+29%) to \$1,112 (+5%) by 2018 (ACS single year estimate). Thus median rent values in Worcester have increased by \$396 (+55%) from 2009-2018 in comparison to median home values that had regained parity following several years of losses in value owing to the housing market slump.

Reflective of continual rising rental costs, CHAS/ACS data shows that the percentage of city renters that paid less than \$1,000 rent in dropped from 82% in 2007-2011 to 38% by 2018. During that same period, the percent that paid over \$1,000 in rent jumped from 18% to 62%.

### Cost of Housing

	Base Year: 2009	Most Recent Year: 2015	% Change
Median Home Value	248,300	205,200	(17%)
Median Contract Rent	716	825	15%

Table 30 – Cost of Housing

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	8,305	21.3%
\$500-999	21,645	55.4%
\$1,000-1,499	7,725	19.8%
\$1,500-1,999	1,015	2.6%
\$2,000 or more	390	1.0%
<b>Total</b>	<b>39,080</b>	<b>100.0%</b>

Table 31 - Rent Paid

Data Source: 2011-2015 ACS

### Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	5,800	No Data

<b>% Units affordable to Households earning</b>	<b>Renter</b>	<b>Owner</b>
50% HAMFI	13,930	1,445
80% HAMFI	29,115	7,375
100% HAMFI	No Data	12,270
<b>Total</b>	<b>48,845</b>	<b>21,090</b>

**Table 32 – Housing Affordability**

Data Source: 2011-2015 CHAS

## Monthly Rent

<b>Monthly Rent (\$)</b>	<b>Efficiency (no bedroom)</b>	<b>1 Bedroom</b>	<b>2 Bedroom</b>	<b>3 Bedroom</b>	<b>4 Bedroom</b>
Fair Market Rent	850	942	1,192	1,494	1,654
High HOME Rent	850	942	1,192	1,494	1,654
Low HOME Rent	770	825	990	1,143	1,275

**Table 33 – Monthly Rent**

Data Source: HUD FMR and HOME Rents

## Is there sufficient housing for households at all income levels?

Review items and report on Analysis of Impediments, looks preliminarily more SRO housing is needed, as well as family units as well, close to transportation.

## How is affordability of housing likely to change considering changes to home values and/or rents?

Between 2018 and 2019, the multifamily sales price rose 17%. This rate is significantly above the inflation rate of approximately 2%. This significant year over year rise is likely to considerably change the rental prices throughout the city. Multifamily housing makes up a majority of the housing stock of the city including almost all of the city affordable housing stock. In addition, the city's lack of sale and rental inventory are significant contributors to the price increases seen throughout the city. With sales inventory under 1 month and less than 1% rental vacancy, significant appreciation will continue without additional housing supply becoming available.

## How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

HOME rents as they stand are slightly higher than Area Median Rents by about \$80-130, depending on the bedroom size. Knowing this when reviewing proforma's of developers, rents expected should be tempered based on the AMR numbers to provide an accurate income stream, which will make the project more viable in the long term.

**Discussion**

# MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

## Introduction

The aging housing stock in Worcester poses numerous challenges, including the increased prevalence of lead-based paint hazards. Older homes are also more likely to need repairs in order to provide safe, decent and affordable housing. The inadequate conditions of existing units may be associated with the lack of complete kitchen or plumbing facilities, more than one person per room, lead paint hazards, or having a cost burden greater than 30%. Low- to moderate-income families who rent are disproportionately affected by these substandard housing conditions and other housing-related issues.

## Definitions

The City of Worcester defines "substandard" as a structure is below the housing quality standards used in the Section 8 Housing Assistance Payment Program. The "substandard condition, but suitable for rehabilitation" definition, takes the analysis a step further. A pre-rehabilitation inspection report describing the deficiencies in each structure to be rehabilitated and a detailed scope and budget are necessary to make a determination regarding the feasibility of rehabilitation. This takes into account whether the structure will be improved enough to bring it into a standard condition and if the funds needed to achieve this are below the local or programmatic limits.

For the HOME program HUD determines the maximum subsidy limits amounts, which are based on the Participating Jurisdiction's Section 221(d)(3) program limits for the metropolitan area, each year.

Although these limits only apply to the HOME program they are used as a guidepost for the CDBG rehab program as well to determine project economic feasibility, and other factors.

## Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	9,560	32%	18,750	48%
With two selected Conditions	365	1%	1,340	3%
With three selected Conditions	30	0%	125	0%
With four selected Conditions	0	0%	15	0%
No selected Conditions	19,550	66%	18,850	48%
<b>Total</b>	<b>29,505</b>	<b>99%</b>	<b>39,080</b>	<b>99%</b>

**Table 34 - Condition of Units**

Data Source: 2011-2015 ACS

## Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	2,905	10%	1,520	4%

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
1980-1999	4,950	17%	4,530	12%
1950-1979	7,010	24%	10,565	27%
Before 1950	14,630	50%	22,465	57%
<b>Total</b>	<b>29,495</b>	<b>101%</b>	<b>39,080</b>	<b>100%</b>

**Table 35 – Year Unit Built**

Data Source: 2011-2015 CHAS

### Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	21,640	73%	33,030	85%
Housing Units build before 1980 with children present	2,085	7%	1,420	4%

**Table 36 – Risk of Lead-Based Paint**

Data Source: 2011-2015 ACS (Total Units) 2011-2015 CHAS (Units with Children present)

### Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

**Table 37 - Vacant Units**

Data Source: 2005-2009 CHAS

### Need for Owner and Rental Rehabilitation

There is still a high need for housing rehabilitation in the City of Worcester. About 80% of the total housing units in the City were built prior to 1979. The City still has a substantial number of substandard rental units. The COVID-19 pandemic also added more complications that results in the need for Housing Rehabilitation.

Due to the severe widespread economic consequences created by the COVID-19 pandemic, low/moderate income individuals have suffered immediate economic hardships beginning in March of 2020. On April 1st, 2020, The Realtor Association of Central Massachusetts and Masslandlords, Inc. estimated that 20-30% of tenants in the city were not able to pay rent due to the COVID-19 outbreak. As a consequence, landlords have been unable to afford mortgage payments and lack the funds to perform property maintenance on their rental units. Without proper maintenance, low/moderate income

individuals are at risk of living within uninhabitable housing units, ultimately increasing the risk of injury, illness, emotional distress, and homelessness.

The City of Worcester's Housing Rehabilitation funds is used to address sanitary and building code issues through the repair and rehabilitation of units and common areas inhabited by low/moderate income tenants and/or owners. Especially during this time of social distancing, providing this funding will allow tenants housing stability and a safe environment to shelter within during the COVID-19 pandemic. Without this funding, these units may fall into disrepair and become uninhabitable, putting tenants at risk of homelessness.

We are projecting that the demand from Owners and landlords for Housing Rehabilitation funds are going to grow as a result of the Pandemic. As the economy continues to slow, we predict a slowdown in rent payments; making it more difficult for landlords to reinvest in their properties. Currently, Housing staff receives multiple inquiries per week for rehabilitation grants. We anticipate this to grow as the impacts of the pandemic becomes more felt by residents and homeowners.

### **Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards**

Based on the 2018 numbers from the State for Worcester, 34% of children under 6 are living in pre 1978 housing.

### **Discussion**

## MA-25 Public and Assisted Housing – 91.210(b)

### Introduction

The Worcester Housing Authority (WHA) has over 3,000 public housing units. There is also 3,934 leased housing units in the City, overall the WHA has a diverse housing stock including:

- 3000 public housing units
- 3934 leased housing units (3595 federal, 339 state)
- 24 separate developments
- 4 elderly only developments
- 12 elderly/young disabled
- 8 family developments
- Largest development is GBV (federal) Curtis (state) combination total 962 units
- 15 transitional housing units (15 state)
- 42 beds 689 developments (adults and adolescents with special needs)
- 423 DMH/DMR leased units (341 federal, 82 state)

### Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	20	37	2,472	2,027	301	1,726	246	301	0
# of accessible units									
<b>*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition</b>									

Table 38 – Total Number of Units by Program Type

**Describe the supply of public housing developments:**

**Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:**

Senior Only

Elm Park Tower Apartments, 425 Pleasant Street

This 16-story senior-only building offers one and two-bedroom apartments with views of historic Elm Park.

Lincoln Park Tower Apartments, 11 Lake Avenue

Overlooking the shores of Lake Quinsigamond, this active senior community is in close proximity to shops and restaurants.

Webster Square Towers East & West, 1050 & 1060 Main Street

The "Towers", located in the heart of Webster Square, provide its residents a variety of conveniences.

Elderly/Disabled

Pleasant Tower Apartments, 275 Pleasant Street

This 8-story high-rise offers its residents an onsite management office, 24-hour security and weekly doctor and nurse visits.

Murray and Wellington Apartments, 50 Murray Avenue & 30 Wellington Street

For people who enjoy the conveniences and atmosphere of urban living but also enjoy the intimacy of a neighborhood, Murray and Wellington Apartments fits the bill.

Belmont Tower Apartments, 40 Belmont Street

Belmont Tower Apartments offer panoramic views of Worcester to the residents of this 19-story building.

Mill Pond Apartments - 600 Mill Street, Addison Apartments - 2 Addison Street, and Mayside Apartments - 20 May Street

These garden style studio and one-bedroom wheelchair accessible and conventional apartments offer residents a quiet suburban setting to call home.

Lafayette Place, 2 Lafayette Place

Whether living in a conventional 1-bedroom apartment or enjoying the camaraderie of congregate style living, residents are regularly visited by a doctor and nurse, enjoy monthly community meals and regular social events.

Curran Terrace, 201 Providence Street

Idyllically set, residents at this development enjoy the wildlife that make daily visits to the on site pond.

Greenwood Gardens, 327 Greenwood Street

Residents of this small, one-bedroom garden style apartment development enjoy the close proximity of banks, restaurants, and the grocery store

Booth Apartments, 1 Haven Lane

This quiet, out of the way development of newly renovated 1-bedroom apartments offers residents the ease of apartment living.

Family Housing

Great Brook Valley and Curtis Apartments, Tacoma Street

Families living in one, two, three, four and five bedroom apartments enjoy on-site daycare, educational and recreational programming, health and nutritional services and a variety of other services.

Lakeside Apartments, Lakeside Avenue

Located near Webster Square and Coes Reservoir, this secluded family development offers one, two, and three bedroom apartments.

Scattered Site Family Housing

North/Providence, Southwest Gardens, Hooper St., Lewis St., Main South Gardens and Scattered Sites

These two, three, four and five bedroom conventional and wheelchair accessible apartments are located in some of Worcester's more established neighborhoods.

Source: Worcester Housing Authority website

## Public Housing Condition

Public Housing Development	Average Inspection Score
Addison Street Apartments	96
Belmont Tower Apartment	97
Booth Apartments	91
Great Brook Valley	90
John Curran Apartments	97
Murray Ave Apartments	96
Pleasant Tower Apartments	98
Providence North	90
Southwest Garden Apartments	84

Table 39 - Public Housing Condition

### Describe the restoration and revitalization needs of public housing units in the jurisdiction:

On a monthly basis, the Worcester Housing Authority (WHA) Executive Director meets with the Resident Advisory Board and annually they review suggestions for capital improvements. An assessment of capital needs is conducted by the Capital Planning Office and reviewed with residents prior to the development of a capital budget. A five (5) year Capital Plan has been established for the agency and on an annual basis a capital budget is presented to HUD for review and approval.

### Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

The WHA offers a wide variety of resident programming. The types of programming are varied offering children an opportunity for academic success, providing young adults with the opportunity to earn their high school diploma equivalency, and offering those residents whose primary language is not English opportunities to improve and enhance their language skills.

While these activities offer families a means of attaining self-sufficiency, WHA collaborates with local agencies to offer additional recreational, health and well-being programming. Some program/classes offered are:

- Computer Training
- High School Equivalency
- English as a Second Language
- Homework Centers (with Tutoring)
- Career Counseling and Job Placement Assistance
- Food Pantries
- On-site Dental, Nursing, and Physicians Services
- On-site Nutritional and Fitness Classes
- Boys & Girls Club Programming

- Offsite YMCA Elderly programming
- Free Veterinary Clinics (Dogs & Cats)

The WHA has long realized that a portion of its success is dependent upon the satisfaction of its residents. Continuing on a long standing tradition of fostering partnerships and building resident leadership opportunities, WHA supports 13 formally recognized tenant organizations. They are the conduit through which ideas and issues are presented to the WHA administration. In turn, the administration facilitates new policies, operational and programmatic changes, and enhancements for residents through tenant organizations. Additionally, a WHA Resident Advisory Board meets monthly with the Executive Director to discuss policy, operations and programming, and other areas that have a direct effect on the people it serves.

The Authority is also working to enhance the living environment of families residing in our developments. A Smoke Free Policy has been in effect about one year, and has received the support of a majority of residents. The Policy prohibits residents from smoking within their apartments. The intent of this initiative is to promote a healthier environment for all residents, especially those with breathing ailments such as asthma.

### **Discussion:**

The Worcester Housing Authority mission is to offer its residents a clean, safe and well-maintained living environment in which to live and raise their families. The WHA is dedicated to providing its families with an environment that will be a source of pride for its residents and an asset to the community at-large. The WHA continues to seek out opportunities and develop strategies that will assist both its present and future residents in obtaining the necessary educational, training and employment skills necessary to achieve social and economic self-sufficiency. In its continuing effort to provide additional affordable housing opportunities to the community, the WHA actively seeks out development opportunities and craft solutions that will serve both the needs of the community and become an asset to the surrounding neighborhoods.

## MA-30 Homeless Facilities and Services – 91.210(c)

### Introduction

Facilities and services that meet the needs of the homeless population are targeted based, on the extent to which they further the achievements of HUD’s goals which are articulated in Opening Doors: Federal Strategic Plan to Prevent and End Homelessness.

The strategy at the local level is to meet the needs of homeless population, by considering the housing and supportive service needs in each stage of the process. The stages are, preventing homelessness, outreach and assessment, emergency shelter services (ES), transitional housing (TH) and helping homeless individuals (especially chronically homeless) make the transition to permanent and independent living.

Veterans Inc. offers similar asset-building training for Veterans and their families.

Homeless Families access job readiness training through the Central Massachusetts Housing Alliance’s Personal Opportunities for Work, Education and Renewal (POWER) Program. The program focuses on strengthening education and job skills by building upon the commitment and motivation of participants based on their own career goals.

Preventions, Emergency Shelter and Rapid Re-Housing services are supported by state, local, and private funds, while the federal Continuum of Care supports the majority of projects (thirty-one) under fourteen sponsor agencies to provide Permanent Supportive Housing and Transitional Housing that address the needs of the homeless population.

EA-eligible families can access HomeBASE assistance, designed as the original housing-first strategy for families. HomeBASE offers a pathway out of shelter, or to avoid shelter entirely. In FY19, HomeBASE allowed up to \$6,000 per household to assist in securing housing.

### Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	976	82	164	371	0
Households with Only Adults	478	82	332	481	0
Chronically Homeless Households	0	0	0	163	0
Veterans	183	0	0	269	0

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Unaccompanied Youth	93	0	1	0	0

**Table 40 - Facilities and Housing Targeted to Homeless Households**

Data Source Comments:

**Full answers to MA-30**

Q1

Veterans Inc. offers similar asset-building training for Veterans and their families.

Homeless Families access job readiness training through the Central Massachusetts Housing Alliance’s Personal Opportunities for Work, Education and Renewal (POWER) Program. The program focuses on strengthening education and job skills by building upon the commitment and motivation of participants based on their own career goals.

Q2

EA-eligible families can access HomeBASE assistance, designed as the original housing-first strategy for families. HomeBASE offers a pathway out of shelter, or to avoid shelter entirely. In FY19, HomeBASE allowed up to \$6,000 per household to assist in securing housing.

## **Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons**

Assisting persons with access to mainstream services complements housing stability and decreases the possibility of returning to homelessness.

In Massachusetts all persons are eligible for health insurance. Mainstream services include cash-based services that increase participants' income from non-employment services from program entry to program exit date. Examples include Social Security Income (SSI), Social Security Disability Income (SSDI), and Veterans Disability benefits.

Staff within the CoC are trained on how to access publicly-funded resources, as well as the Legal Aid System who assists in applications, advocates and appeals denials of public benefits.

The Family Health Center of Worcester offers homeless families with children basic services to fully access care, including health benefits advising, health insurance and food stamps enrollment assistance, medical interpretation, care coordination for patients with chronic illness, patient advocacy, exercise and wellness programs, and community health education

The Homeless Outreach & Advocacy Project (HOAP) through Community Healthlink connect the regions homeless individuals, many with mental illness and addiction challenges to healthcare and basic human services. HOAP was established with a commitment to link the region's homeless to a comprehensive array of services that would include screenings, assessments, counseling, rehabilitation, and referral to other support systems. Physicians, registered nurses and nurse practitioners employed by The Family Health Center of Worcester perform medical evaluations at HOAP, located at 162 Chandler Street in Worcester, and also visit area shelters to evaluate and refer people for treatment. Outreach performed by HOAP staff is done in the community, through a variety of shelters and other emergency care programs. Staff also seeks to establish contact with homeless individuals at vacant lots, and even along railroad tracks and bridges. Basic services are also available at HOAP's primary care clinic and staff offices. HOAP offers services in partnership with other local agencies, including healthcare providers, mental health and substance abuse treatment providers, faith-based communities and local city and community organizations. HOAP staff help manage scattered-site housing in the Worcester area for unaccompanied homeless adults and at-risk families.

A comprehensive guide for Employment and Training Resources in Worcester, MA developed by Ascentria Care Alliance, Central MA Workforce Investment Board, Worcester Community Action Council, Worcester Interfaith, Worcester Central Career Center and Worcester Community Connections of YOU, Inc. for unaccompanied homeless adults, South Middlesex Opportunity Council (SMOC) operates the Mobile for Resource Team to assist individuals in attaining financial self-sufficiency. This is achieved by helping homeless individual's secure permanent housing, obtain employment or training/education programs leading them to permanent employment.

Homeless Families access job readiness training through the CMHA's POWER (Personal Opportunities for Work, Education and Renewal). The program focuses on strengthening education and job skills by building upon the commitment and motivation of participants based on their own career goals.

The Continuum of Care through its supportive housing model ensures that residents participate in Case Management to supplement outcomes for housing stabilization, including employment and non-

employment benefits. The Mainstream Resources Committee of the CoC meets quarterly and reviews Annual Performance Reports in order to promote maximum utilization of mainstream resources. These and other services are referenced in section SP-40 Institutional Delivery Structure.

**List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.**

Prevention services make a profound impact on the stability of families and individuals who are at-risk due to disabilities, housing quality, and cost. Resources for flexible prevention and shelter diversion assistance are inadequate compared to the number of at-risk households. Stakeholders engage homeless individuals, veterans, youth and families through Outreach. This informal network includes street outreach workers, first responders, hospitals, law enforcement, and neighborhood centers, with the knowledge of resources to connect homeless persons to shelters or permanent housing.

Emergency Shelters (ES) are operated by the Central MA Housing Alliance, Catholic Charities, Friendly House, and scattered sites. Families must be eligible for Emergency Assistance (EA) through the Dept. of Transitional Assistance to qualify for shelter, with common placements in hotels/motels across the state. Abby's House, Friendly House, and the Interfaith Hospitality Network offer rooms for families not eligible for EA, which has revealed itself as a need in the region.

Unaccompanied youth under 18 access ES through LUK, Inc. in Worcester and Fitchburg. There is a need locally and state-wide for unaccompanied youth housing services.

The SMOC Triage and Assessment Center is the front door into the system for individual adults. The aim is to provide temporary ES placement with a focus on rapid re-housing, as shelter demands rise during winter months, Net of Compassion is a collaborative effort that brings outreach, counseling and assistance to homeless individuals in the streets of Worcester. Services are provided through 3 integrated programs: Hotel Grace, Main Street Saturdays and ongoing outreach and peer counseling. The seasonal overflow shelter enables the focus on Triage & Rapid Re-Housing to continue effectively during extreme cold with 50 beds being available on a first come basis each night the weather dips below 32 degrees. Hotel Grace provides a warm meal, counseling, outreach and referral services and volunteer legal services. ES facilities/services are available for targeted populations such as veterans and victims of domestic violence. Our Father's House in North County operates ES and RRH for individual adults.

Transitional Housing (TH) for individuals and families is up to 24 months, enabling stabilization before transitioning to permanent housing. This supports individuals exiting the justice system, in recovery from alcohol/drugs, and disabled family households. A single medical respite bed in the City bridges gap between hospital release and homelessness.

Permanent Supportive Housing (PSH) is prioritized to address the needs of chronically homeless individuals and disabled families. Without a designated length of stay, participants receive services that reduce return to homelessness and ensure stability. Landlords are hesitant to rent to homeless and formerly homeless households without supportive services. Safe Haven is a form of supportive housing that serves hard-to-reach, primarily unsheltered, persons with severe mental illness that have been

unable or unwilling to participate in housing or supportive services. Access to PSH is bolstered by the CoC Coordinated Entry system, (see SP-60 Homelessness Strategy).

In FY19, the City allocated 40% of its ESG funds to Rapid Re-Housing (RRH). RRH for homeless individuals is largely provided by SMOC through the Triage Center, where assessments are done within 48 hours and placed in the community according to the most appropriate housing placement and services to meet their needs.

EA-eligible families can access HomeBASE assistance, designed as the original housing-first strategy for families. HomeBASE offers a pathway out of shelter, or to avoid shelter entirely.

## MA-35 Special Needs Facilities and Services – 91.210(d)

### Introduction

The Massachusetts Department of Housing and Community Development’s most recent Subsidized Housing Inventory (SHI) was the primary source used to evaluate the city’s supply of income-based housing, including facilities for seniors/elderly and disabled persons. The total units within family oriented developments (5,196) represented 52.8% of the total supply, and units within senior/disabled developments (3,834) accounted for another 38.9%. The remaining 8.3% were either senior disabled care units (586) or owner units (232). As of 2019 the Worcester Housing Authority operated a portfolio of 3,000 units of public rental housing and 1,387 leased housing units. Of those served 40% are elderly, 20% are non-elderly disabled and 40% are families.

### HOPWA Assistance Baseline Table

Type of HOWA Assistance	Number of Units Designated or Available for People with HIV/AIDS and their families
TBRA	8
PH in facilities	10
STRMU	0
ST or TH facilities	30
PH placement	48

Table 41– HOPWA Assistance Baseline

Alternate Data Source Name:  
Worcester City and County CoC Data

Data Source Comments:

**Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs**

**Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing**

The City of Worcester continues in coordination with the Continuum of Care with efforts to ensure that persons are not routinely discharged into homelessness, specifically coordinating access to appropriate supportive housing for such persons. In 2012, a Discharge Planning Committee was created to eliminate inappropriate discharges from State systems, local hospitals, and other health care providers. The Committee has quarterly meetings that focus primarily on inappropriate discharges from local hospitals and emergency shelters, along with the continuous monitoring of referral forms and processes, have

reduced inappropriate referrals. The City of Worcester, alongside the Worcester Police and Worcester County Sheriff's office as well as other stakeholders including Directors of Social Service departments at two major City of Worcester Hospitals (UMass Memorial and St. Vincent's Hospital) assist in this effort. The Discharge Planning Committee also addresses the need for appropriate supportive housing for persons returning from the mental health system. It works to support and address discharges from State Hospital without appropriate community housing in place, as well as terminations both voluntarily and involuntarily) from the State-supported community residential system for the chronically and mentally ill. According to the Continuum of Care Consolidated Application submitted for FY2019, the Department of Mental Health (DMH) indicated that 28% of persons discharged were to the legal system, 42% to families or non-family housing, 20% to community residences, 7% to other DMH facilities and 2% to other locations. CoC Permanent Supportive Housing providers and DMH staff meet regularly to ensure compliance and appropriate service planning for individuals in need of supportive services. The City continues their longstanding working relationship with one of the area's largest community health providers, Community Healthlink, Inc. CHL is the County's largest non-profit provider of housing, health and supportive services for the special needs population, including people with disabilities, HIV/AIDS and homelessness. CHL is a provider funded partially by HUD under the City of Worcester HOPWA grants, as well as CoC Permanent Supportive Housing and Shelter + Care programs. CHL is a major stakeholder in the City's Plan to End Homelessness by providing both "front door", (outreach, assessment, triage and diversion services) and "back door" (housing, supportive service, primary care options) for low income, at-risk and immigrant populations.

**Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)**

Stakeholders from both mental and physical health institutions are made aware of supportive services and supportive housing resources through the Coordinated Assessment and Entry process facilitated by the Continuum of Care. Additionally, these entities are at the month HHB (Housing and Homelessness Benefits) meeting facilitated by the CoC Lead Agency. Front line service providers, concerned citizens and current and former recipients of services attend, to spread awareness and foster connections for supportive services and special needs providers. The Director of the leading home health agency in Worcester also participates in discharge planning, in coordination with the Continuum of Care to improve housing and supportive services for the elderly without family that lose their homes, but may not qualify for nursing home admission.

A Community Roundtable on Youth Homelessness, coordinated by the City of Worcester and the CoC, takes place with over 25 multi-sector children and youth-serving agencies. A key goal of the roundtable is to reduce youth homelessness by assuring appropriate discharges and transitional care for youth transitioning from the Massachusetts Foster Care System. The State Department of Children and Families and the Worcester Public Schools are represented. The City consults and actively participates in the Worcester Community Connections Coalition (WCCC). The WCCC program is unique as its goals

include the empowerment of low income, inner city households through the coordination of resources already in the community, and by bringing out the voices of residents in the planning for local resources by ensuring that services meet the needs of the people and by helping parents to become more confident, competent and nurturing. Funding for this program by the Massachusetts Department of Children and Families (MA DCF) has been steady since 2001, in order to provide family-based services, supportive preventive programs and coalition supported services. The WCCC provides referrals and resources that benefit families with disabilities who may need support through employment, child care, and other supportive services that help improve their livelihood and reduce risks, ensuring housing stability.

The principal stakeholders involved in efforts to reduce inappropriate discharges from the corrections system include the Chair of Corrections Discharge Planning Committee, the Director of Dismas House, which is the principal provider of transitional and permanent housing for ex-offenders. The Worcester County Sheriff and Director of Discharge Planning for the State Prisons, as well as the Director of the Assessment Center for homeless individuals in the CoC. Written protocols for referrals and referral information to the community-based housing providers and the Assessment Center for home individuals continue to be effective since their establishment. Data shows 72% of inmates were released to community housing, 15% to residential treatment and 7% to sober housing for the area.

**For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))**

Research shows the need for continued investment and effort around addressing affordable housing production and barriers to accessing affordable housing and trends related to aging housing stock and deferred maintenance. Particularly, supportive housing providers report a shortage of single room occupancy units that are below Fair Market Rent (FMR) and thus accessible to individuals below 30% AMI transitioning from shelter or transitional housing to permanent housing through ESG Rapid Rehousing or a Continuum of Care (CoC) supported project. Consultation with citizens and service providers stresses the continued need for social and human services and housing supportive services for low- to moderate-income and special needs populations including youth, recent immigrants, resettled refugees, the elderly and homeless, individuals with substance abuse and mental health challenges, and those living with HIV/AIDS.

Efforts to address the needs of victims of domestic violence (DV), including their families, are associated with the state wide network that permits out-of-area placements for families remaining at risk. DV families have priority access to CoC funded transitional housing and state and city funded rapid rehousing programs to promote rapid and safe community reintegration. Crisis intervention and safe housing is a priority, and is supported by the United Way and private foundations ESG funds support shelter operations for 3 local organizations Net of Compassion, South Middlesex Opportunity Council (SMOC) and Veterans Inc.

Net of Compassion. Hotel Grace is an emergency cold weather shelter for the homeless. Fifty (50) beds are available on a first come first serve basis, each night that the weather dips below 32 degrees. In addition to a warm and safe place to sleep, Hotel Grace provides a warm meal, counseling and

outreach and referral services and volunteer legal services. In the course of a winter, Hotel Grace serves more than 400 individuals.

SMOC (South Middlesex Opportunity Council) The GWHC Triage Center provides emergency housing assessment and placement including into emergency beds for those who are homeless, which services support the City's overall goal of rapid rehousing. For fiscal year 2018-2019, 324 individuals were placed into housing. The emergency shelter and case management services of the Triage Center contribute to these successful outcomes toward reducing and eliminating homelessness.

Veterans Inc. Through this ESG funding Veterans Inc., provides 54 sheltered veterans with intensive case management services including assistance accessing VA and other benefits, health and mental health referrals and follow-up, substance abuse treatment, development of employment plans, housing stabilization budget plans, referral to legal aid, housing search and placement when the Veteran is ready and other services.

## **MA-40 Barriers to Affordable Housing – 91.210(e)**

### **Negative Effects of Public Policies on Affordable Housing and Residential Investment**

In 2019 the City of Worcester began the process to update its Analysis of Impediments to Fair Housing. The City of Worcester received assistance from the Central Massachusetts Regional Planning Commission (CMRPC) and Barrett Planning Group LLC to develop this Analysis of Impediments to Fair Housing. Together, the consultants used a multi-dimensional approach to research and develop the plan. As a recipient of both Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) funding, the City of Worcester has a legal obligation to conduct this analysis and to address the issues it presents. To protect people from housing discrimination, communities must take steps to affirmatively further fair housing by identifying factors that contribute to housing discrimination and work to mitigate these impacts. The following were the barriers identified by subject:

#### **HOUSING POLICY**

##### **Issues Identified**

- Focus group participants relayed that the City lacks a comprehensive policy or vision about furthering fair housing in Worcester.
- Regionally Worcester is doing more than its fair share in the production of affordable housing units, compared to many wealthier towns who have far less than their “fair share” of 10% affordable units to all units in the community.
- Another critical barrier is the lack of policy coordination among those who build and manage affordable units and those providing services to vulnerable populations.

#### **FAIR HOUSING TESTING AND REPORTING**

##### **Issues Identified**

- An impediment to determining what the City needs in terms of housing is the lack of data. Community Legal Aid only has data on claims filed with their agency and they have been reluctant to share the information they have with the City.

#### **AWARENESS, EDUCATION AND OUTREACH**

##### **Issues Identified**

- Awareness of Fair Housing Rights, especially for recent immigrants and those with Limited English proficiency who are vulnerable to abuse. Some landlords are also unaware of their responsibilities under Fair Housing.
- Retaliation from a housing discrimination complaint, of which the most common include (in descending order): disability, race, families with children, national origin, sex, color, religion, other. Lack of translations services for leases in other languages and explanation of rights in other languages. Landlord discrimination from not understanding their requirements under the law. Discrimination against Section 8 voucher holders.
- Landlord perception that small and large families they see are receiving housing assistance and/or will not honor the terms of a lease.
- There was not a consensus regarding the impact of college students on the availability and cost of rental housing in Worcester neighborhoods.
- Worcester is the largest resettlement city in Massachusetts and is home to 30 percent of all refugees

in the state. Approximately one in five residents of Worcester was born outside the United States. Over half of the foreign-born population in Worcester estimates that they speak English “less than very well”.

#### ZONING & REGULATORY REFORMS

##### Issues Identified

- Restrictions on height, land use density, parking requirements, the lack of accessory dwelling unit and inclusionary zoning elements interfere with housing production and make it difficult for developers to create anything other than large-lot, single-family, market-rate units.
- Excessive minimum parking requirements (as high as two spaces per dwelling unit) impedes the redevelopment, expansion or construction of new residential units.
- Other burdensome regulations included unworkable setbacks and height restrictions that prevent traditional building forms and excessively limit development potential.
- Sober housing classifications are controversial in the city. Classifications are based on the number of people living in the home. The majority of sober housing is classified as a congregate living situation rather than as a single-family home.
- A significant part of why the zoning code and housing regulations has gone essentially unchanged for decades is the amount of local resistance to policy change. A “Not in my backyard (NIMBY)” attitude prevails throughout the public.
- Smaller-scale living quarters such as in-law apartments, accessory dwelling units, or tiny homes are not allowed or limited.

#### ADDRESSING HOUSING QUALITY AND NEIGHBORHOOD DISINVESTMENT

##### Issues Identified

- As market conditions have changed, there is more competition between for profits and non-profits. This competition has limited the available pool of units to develop as affordable.
- High developments and maintenance costs (related to the code requirements at the local and State level) and lack of financing contribute to the challenges associated with creating affordable housing.

#### HOUSING COST BURDEN AND RACE

##### Issues Identified

The incidence of housing problems – mainly housing cost burden -- is significantly higher among minority households, especially Asian and Black or African American renters with very low and extremely low incomes.

#### FORECLOSURE POLICY

##### Issues Identified

- Foreclosures can have an impact of affordable units as tenants can often be the last informed or remain uninformed until the power or heat is shutoff to a unit. Luckily foreclosures have decreased by over 50% from a peak 388 in 2012, but can still be triggered by something as simple infractions like overdue water and/or sewer bills.

#### LEAD PAINT ISSUES

##### Issues Identified

- With the lead laws requiring property owners to remove or cover all lead paint hazards in homes built prior to 1978 where any child under the age of 6 resides, owners may not be willing to rent to families with children under the age of 6.

## NEED FOR ACCESSIBLE UNITS

### Issues Identified

- The lack of affordable barrier-free units is the major issue that renters with disabilities face in Worcester. Existing handicapped units are often unaffordable for many renters or they do not have an adequate number of rooms for families. For handicapped renters with Section 8 vouchers looking for an apartment, there is about one accessible unit per year that becomes available, making it highly competitive and challenging to accommodate renters with disabilities. Complicating the issue is that there are often differences in sidewalk quality, roadway crossings, access to transit, and shopping opportunities located in areas where the tenant can access.

## ADEQUATE PUBLIC TRANSIT

### Issues Identified

- Transit is under-provided and not near the level that it should be at for a city of Worcester's size. This limitation affects health and well-being, jobs and the economy, and access to housing. The lack of adequate transit is an institutional barrier to health and intertwined with fair housing concerns. There is no educational program about bicycle transit, beyond the Earn-a-Bike program.

## HIV/AIDS HOUSING OPTIONS

### Issues Identified

- A need for a wider range of housing available to people with HIV/AIDS from housing with nursing support to more independent living arrangements.

## MA-45 Non-Housing Community Development Assets – 91.215 (f)

### Introduction

The Non-Housing Community Development Assets section of this City of Worcester Consolidated Plan contains Comprehensive Housing Affordability Strategy (CHAS) data generated for HUD by the U.S. Census 2011-2015 American Community Survey (ACS) and imbedded in most of the Econ Planning Suite templates in this document. In order to build on this baseline data and provide the most up to date analysis of recent demographic trends, the City of Worcester’s Consolidated Plan also benefits from research and analysis of more recent U.S. Census releases including the latest available from the 2014-2018 American Community Survey (ACS).

### Economic Development Market Analysis

#### Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	74	0	0	0	0
Arts, Entertainment, Accommodations	7,799	0	12	0	-12
Construction	2,397	0	4	0	-4
Education and Health Care Services	22,460	0	33	0	-33
Finance, Insurance, and Real Estate	3,598	0	5	0	-5
Information	1,373	0	2	0	-2
Manufacturing	7,229	0	11	0	-11
Other Services	2,814	0	4	0	-4
Professional, Scientific, Management Services	5,480	0	8	0	-8
Public Administration	0	0	0	0	0
Retail Trade	8,414	0	13	0	-13
Transportation and Warehousing	2,928	0	4	0	-4
Wholesale Trade	2,733	0	4	0	-4
Total	67,299	0	--	--	--

Table 42 - Business Activity

**Data Source:** 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)

## Labor Force

Total Population in the Civilian Labor Force	93,370
Civilian Employed Population 16 years and over	84,130
Unemployment Rate	9.90
Unemployment Rate for Ages 16-24	19.67
Unemployment Rate for Ages 25-65	6.86

**Table 43 - Labor Force**

Data Source: 2011-2015 ACS

Occupations by Sector	Number of People
Management, business and financial	17,825
Farming, fisheries and forestry occupations	3,745
Service	11,680
Sales and office	18,720
Construction, extraction, maintenance and repair	5,245
Production, transportation and material moving	4,275

**Table 44 – Occupations by Sector**

Data Source: 2011-2015 ACS

## Travel Time

Travel Time	Number	Percentage
< 30 Minutes	55,305	70%
30-59 Minutes	17,690	22%
60 or More Minutes	6,070	8%
<b>Total</b>	<b>79,065</b>	<b>100%</b>

**Table 45 - Travel Time**

Data Source: 2011-2015 ACS

## Education:

### Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	5,605	915	6,520

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
High school graduate (includes equivalency)	17,345	2,350	7,340
Some college or Associate's degree	18,800	1,910	4,425
Bachelor's degree or higher	24,255	1,310	3,905

**Table 46 - Educational Attainment by Employment Status**

Data Source: 2011-2015 ACS

### Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	310	1,180	895	3,470	3,020
9th to 12th grade, no diploma	1,755	1,705	1,990	3,795	2,625
High school graduate, GED, or alternative	8,260	7,375	6,105	13,560	7,870
Some college, no degree	12,520	5,605	4,290	6,980	2,755
Associate's degree	800	2,085	2,345	3,860	1,285
Bachelor's degree	3,135	7,655	3,770	7,640	2,695
Graduate or professional degree	470	3,075	2,445	4,890	2,675

**Table 47 - Educational Attainment by Age**

Data Source: 2011-2015 ACS

### Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	21,470
High school graduate (includes equivalency)	28,641
Some college or Associate's degree	33,645
Bachelor's degree	47,763
Graduate or professional degree	62,518

**Table 48 – Median Earnings in the Past 12 Months**

Data Source: 2011-2015 ACS

### Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

The major employment sectors within the City of Worcester are Educational Services and Health Care and Social Assistance, Retail Trade, Manufacturing, and Professional, Scientific, and Technical Services. A

significant proportion of the workforce is employed in either Education or Health Services, which has both advantages and disadvantages. The primary advantages are that these industries are relatively stable and offer a wide range of employment opportunities; the primary disadvantage is that the community would benefit from more diverse employment opportunities. It is important to consider that external factors outside of a community's control also drive employment in certain industries (e.g. comparative cost advantages of overseas manufacturing have adverse local effects for that industry).

**Describe the workforce and infrastructure needs of the business community:**

Technology is driving changes in the needs of the business community, not only locally in the city of Worcester, but also on a global scale. Businesses, particularly in manufacturing and production, are rendering certain jobs obsolete through automation and other forms of efficiency. While these innovations and changes generally have a positive effect on the economy and the environment, the workforce is forced to adapt and/or learn new skills. The ubiquity of technology, and specifically the internet, is also fueling business needs for employees with skills in STEM (Science, Technology, Engineering, and Math), including: computer programming, web development, network security, etc.

**Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.**

During the 5-year planning period, there will be significant public and private investment being generated in the City of Worcester, particularly in the Downtown area and within the Life Sciences ecosystem. These investments are primarily real estate investments, occurring in entertainment, residential, hotel development projects, and life sciences real estate. This activity fuels job opportunities in three primary sectors – construction, professional, scientific, technical services and service/hospitality. Workforce development needs that may result from these investments could be job training programs specific to construction trades, STEM and hospitality.

**How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?**

Educational attainment in the city of Worcester could be stronger to support some of the jobs being created, specifically in the Education and Health Services industries. The jobs that are being created through recent and planned private real estate investment (construction, hospitality) do not require as much educational attainment. The city of Worcester also has a large immigrant population, with various levels of educational attainment, but recognizing this demographic trend, it will be important to continue supporting English as a Second Language (ESL) programs.

**Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.**

Job creation and job placement are critical components of any economic development strategy. Workforce training initiatives in the City of Worcester would naturally assist the objective of helping local residents secure job opportunities. There are many workforce training programs that exist currently, and there is also an opportunity to further develop these programs. The City's Executive Office of Economic Development has a Division of Workforce Development including the MassHire Worcester Career Center. When considering the average educational attainment / skills, these workforce training programs are essential in the effort to bridge the skills gap and ensure Worcester job seekers are adequately prepared and qualified.

**Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?**

Yes

**If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.**

Yes, the City of Worcester participates in a CEDS for the region, prepared by the Central Massachusetts Regional Planning Commission, most recently updated in 2019. The CEDS includes an analysis of population, income/poverty, education, workforce/employment, infrastructure, and changes in tax levy. Specifically, the action plan proposed in the CEDS as it relates to workforce/employment is largely consistent with the City of Worcester's Consolidated Plan. It proposes workforce training in emerging industries to bridge any skill gaps and other industries that are currently major employers in the city and region.

**Discussion**

The City of Worcester aims to continue economic activities by supporting small business expansion, retention, and creation through our CDBG Business Development allocations. As macro-economic conditions change, we remain focused on responding to local industry-specific economic challenges by working in partnership with small business agencies including the Workforce Central Career Center.

The City will continue to provide public services funding in support of job training, employment education and worker readiness programs.

## **MA-50 Needs and Market Analysis Discussion**

### **Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")**

The City of Worcester is comprised of 44 U.S. Census tracts, of which 26 tracts had 51% or more of their populations being persons of Low-Moderate Income (LMI) - defined by HUD as households whose incomes were 80% or less of the metropolitan area median income as adjusted for family size. These 26 LMI tracts were: 7304.01, 7304.02; 7305.00; 7310.02; 7311.01, 7311.02, 7312.03, 7312.04, 7313.00, 7314.00, 7315.00, 7316.00, 7317.00, 7318.00, 7319.00, 7320.01, 7322.01, 7322.02; 7322.03, 7323.02, 7324.00, 7325.00, 7326.00, 7327.00, 7329.02, and 7330.00. (See attached Low Income Population City of Worcester Map for locations).

These 26 LMI census tracts form the historical, inner city core of Worcester that historically developed from 1860s - 1920s during the city's industrial boon period. These neighborhoods are primarily comprised of highly concentrated one, two, and three-family wooden framed houses which contain the majority of Worcester's housing with multiple housing problems, and are in need of significant rehabilitation. The population density of these tracts equals 7,469 persons per square mile compared to 4,816 citywide, with 11 of the tracts having densities ranging from 10,263 – 22,017 per square mile. One of these tracts, 7325.00, (the Green Island neighborhood) is one of the most distressed with high levels of poverty, crime, problems with idle youth including gangs and drugs, absentee property ownership, vacant/boarded-up buildings, empty lots and other economic distress factors. CDBG investments in Green Island (a new City driven initiative modeled after the recent Union Hill Initiative) benefit a highly distressed neighborhood which suffers from dilapidated roads/sidewalks, aging and maintenance deferred housing, chronic issues with flooding and drainage, as well possibly pollution and contamination. Informed by neighborhood needs analysis, the initiative will address housing, roads, sidewalks, parks, sewer and drainage systems, lighting, intersection signalization, and help to frame, complement, and offset development impacts associated with the construction of the new minor league baseball stadium in the area.

### **Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")**

An examination of the attached Demographic Analysis of Target Areas Tables show that these 26 LMI tracts has a greater proportion of the city's racial and ethnic minority populations. According to the latest U.S. Census 2014-2018 American Community Survey (ACS) estimates the citywide percentages by racial and ethnic populations were: 57% White, non-Hispanic, 21% Hispanic, 12% Black/African American, non-Hispanic, 7% Asian, non-Hispanic, 3% Other/Multi-Race, non-Hispanic. In the 26 tracts with majority Low-Moderate Income populations, the following percentages were reported for racial and ethnic populations: 46% White, non-Hispanic, 29% Hispanic, 13% Black/African American, non-Hispanic, 9% Asian, non-Hispanic, 3% Other/Multi-Race, non-Hispanic.

### **What are the characteristics of the market in these areas/neighborhoods?**

The LMI target area tracts are characterized by high densities of population, housing stock that is older and in need of repairs, and lower than average economic and social indices. These LMI target tracts contained 57.7% of the city's population on 37.3% of the city's land area. In 2018, the median household income was \$35,644 in these LMI tracts compared to \$46,967 for the city. The low-moderate income population of these target area tracts was 71.3% compared to the citywide average of 57.3%. Similarly, the percent of population in poverty was 29.8% within these tracts compared to 17.9% citywide. These LMI target tracts have a much higher percentage of housing that is renter occupied compared to the city as a whole. Within these tracts 68.4% of units were renter occupied compared to 53.2% citywide. The 2018 median gross monthly rent was \$1,007 in the LMI target tracts, not much below the citywide monthly rent of \$1,064. The median rent levels within the LMI tracts had risen 47.1% since 2010 compared to 20.9% citywide. Thus the housing cost burden of renter households within these LMI target areas has risen at more than twice the rate compared to the city overall. The median value of owner-occupied housing was \$207,794 in 2018 (down -16.0% since 2010) compared with a citywide value of \$245,200 (up 4.9% since 2010). Within these LMI tracts 58.2% of housing was built prior to 1940, compared to 48.9% citywide, while 21.9% of housing was owner-occupied, compared with 38.6% citywide.

### **Are there any community assets in these areas/neighborhoods?**

As part of the historic core of the city, these LMI target tracts are home to many of the city's major institutions and offer convenient access to historic, cultural, and economic opportunities. Adcare Hospital, African Community Education Center, Becker College, Boys and Girls Club, Centro Las Americas, Clark University, Community Healthlink, CSX, Family Health Center of Worcester, Friendly House, Great Brook Valley Health Center, Holy Cross College, Kennedy Health Center, Massachusetts College of Pharmacy and Health Sciences, Price Chopper, Providence and Worcester Railroad, United Way, University of Massachusetts Medical Center, Veterans, Inc., Senior Center, Southeast Asian Coalition of Central Mass, Spectrum Health Care Systems, Walmart, the Worcester Art Museum, Worcester Polytechnic Institute, YMCA, YWCA, and Y.O.U, Inc. are some of the major institutions located within these LMI tracts who have played a significant role in leveraging resources and providing community based services and employment opportunities.

Major commercial nodes and economic corridors such as Downtown, Cambridge Street, Chandler Street, Grafton Street, Green Street, Greenwood Street, Highland Street, Kelly Square, Lincoln Street, Main Street, Millbury Street, Park Avenue, Pleasant Street, Shrewsbury Street, Southbridge Street, and Webster Square crisscross these neighborhoods and are lined with hundreds of small and large businesses, restaurants, stores, shops, and service establishments.

Within these neighborhoods are located 32 public parks totaling 9,184 acres of open space and recreational land.

### **Are there other strategic opportunities in any of these areas?**

Depending on further analysis and strategizing based on neighborhood needs and preliminary engineering studies, CDBG will assist with small to medium sized upgrades of infrastructure including,

but not limited to, road and/or sewer/drainage reconstruction within the Green Island neighborhood (Census Tract 7325). CDBG Investments will spearhead infrastructure improvements associated with the Green Island Revitalization Initiative, a new City driven initiative modeled after the recent Union Hill Initiative. They will address a distressed neighborhood in which 78% of residents are low- to moderate-income and which suffers from dilapidated roads/sidewalks, aging and maintenance deferred housing, chronic issues with flooding and drainage, as well possibly pollution and contamination.

The investments made with these CDBG funds will provide an area benefit for the Green Island neighborhood. In 2017 the City reached an agreement with a minor league baseball team, the Pawtucket (RI) Red Sox, to relocate their team to Worcester. The relocation will entail the construction of a new, multi-million dollar baseball stadium and over 180,000 sq.ft. of new, mixed-use development immediately adjacent to the Canal District and the Green Island neighborhood. Neighborhood infrastructure investments will provide a community benefit and complement other anticipated investments while helping to mitigate and offset any new development impacts.

## **MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)**

### **Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.**

For broadband needs of most low mod clients, there is the ability to install the wiring easily. For any new construction the goal is to make sure the infrastructure is included in the design. From the perspective of the Worcester Housing Authority (WHA), the need for broadband wiring and connections for its residents has grown exponentially since the start of the COVID19 pandemic. This lack of connectivity has been especially apparent when it comes to WHA youth, who have been forced into distance learning arrangements since the closure of Worcester Public Schools in mid-March. In addition to the absence of broadband connectivity, WHA youth also lack the proper technology (laptops and tablets) to access their virtual lessons and assignments, putting them at greater risk for learning loss. The WHA's elderly residents, who have been feeling the effects of social isolation due to social distancing guidelines, are likewise unable to connect with the outside world due to being unable to afford basic internet service.

The WHA is currently in the process of preparing an RFP to explore the costs related to establishing a Wi-Fi network at the Curtis and Great Brook Valley Apartments, which will provide residents – especially families – with internet service at no cost.

### **Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.**

Currently, those who live in the City of Worcester only have access to the products and services provided by Spectrum. Unfortunately, customer service and representative response times have been slow and inconsistent, leaving many residents dissatisfied. By allowing more than one broadband internet service provider serve the people of Worcester residents will be able to have options in who they wish to use, creating much needed competition in the area.

## **MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)**

### **Describe the jurisdiction's increased natural hazard risks associated with climate change.**

Increased flooding is the primary natural hazard that is expected to increase due to climate change. Increases in severe weather events are all expected to contribute to more frequent flooding within the city. The Massachusetts Multi-Hazard Mitigation Plan estimates that precipitation will increase 6 to 14% by volume by the year 2050. This estimate also includes winter precipitation as with increasing temperatures, much of the winter precipitation is projected to be in the form of rain rather than snow. As temperatures increase, evidence shows that there is already an increase in the frequency of severe weather events including thunderstorms, damaging winds/tornados, and category 4 and 5 hurricanes. Increased heavy rainfall events may also lead to more frequent dam design failures, which occur when spillways overflow due to flow rates exceed design capacity. This type of failure may have a secondary result of increased riverine flooding below dams. With increased rainfall, flooding events can be expected to increase and become more of a concern, specifically in areas already effected by flooding events.

### **Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.**

Figure 1. shows the percentages of low- to moderate- income households for each census tract within the city of Worcester. Low- to moderate- income census tracts are primarily located in the center of the city; centered on the downtown neighborhood. Based on Figure 1 and Figure 2. (Worcester National Flood Hazard map), there is not a direct correlation between the location of possible future flooding events and low/moderate income neighborhoods. These flooding events are not expected to disproportionately affect low- to moderate- income residents.

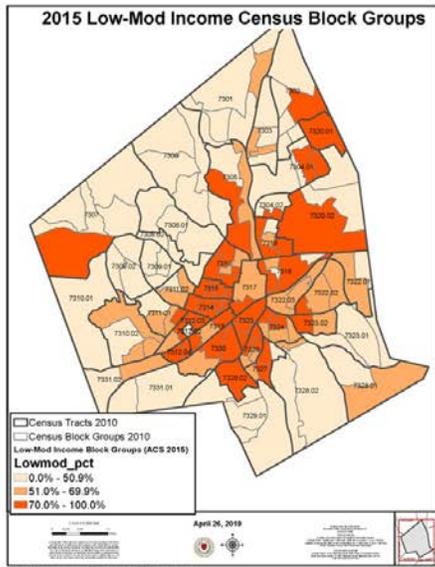


Figure 2. Worcester low- to moderate-income census tracts

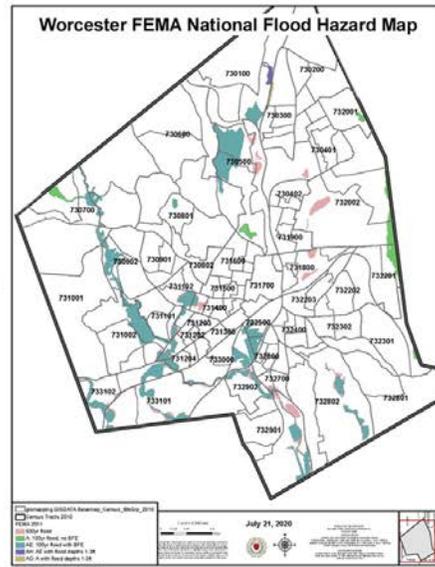


Figure 2. FEMA National Flood Hazard Layer

## Hazard Mitigation

# Strategic Plan

## SP-05 Overview

### Strategic Plan Overview

The City of Worcester is comprised of 44 U.S. Census tracts, of which 26 tracts had 51% or more of their populations being persons of Low-Moderate Income (LMI) - defined by HUD as households whose incomes were 80% or less of the metropolitan area median income as adjusted for family size. These 26 LMI tracts were: 7304.01, 7304.02; 7305.00; 7310.02; 7311.01, 7311.02, 7312.03, 7312.04, 7313.00, 7314.00, 7315.00, 7316.00, 7317.00, 7318.00, 7319.00, 7320.01, 7322.01, 7322.02; 7322.03, 7323.02, 7324.00, 7325.00, 7326.00, 7327.00, 7329.02, and 7330.00. (see attached Low Income Population City of Worcester Map for locations). An examination of the attached Demographic Analysis of Target Areas Tables show that these 26 LMI tracts has a greater proportion of the city's racial and ethnic minority populations. According to the latest U.S. Census 2014-2018 American Community Survey (ACS) estimates the citywide percentages by racial and ethnic populations were: 57% White, non-Hispanic, 21% Hispanic, 12% Black/African American, non-Hispanic, 7% Asian, non-Hispanic, 3% Other/Multi-Race, non-Hispanic. In the 26 tracts with majority Low-Moderate Income populations, the following percentages were reported for racial and ethnic populations: 46% White, non-Hispanic, 29% Hispanic, 13% Black/African American, non-Hispanic, 9% Asian, non-Hispanic, 3% Other/Multi-Race, non-Hispanic. One of these tracts, 7325.00, (the Green Island neighborhood) is one of the most distressed with high levels of poverty, crime, problems with idle youth including gangs and drugs, absentee property ownership, vacant/boarded-up buildings, empty lots and other economic distress factors. CDBG investments in the Green Island Revitalization Initiative (a new City driven initiative modeled after the recent Union Hill Initiative) benefit a distressed neighborhood in which 71% of residents are low- to moderate-income and suffers from dilapidated roads/sidewalks, aging and maintenance deferred housing, chronic issues with flooding and drainage, as well possibly pollution and contamination. Informed by neighborhood needs analysis, the initiative will address housing, roads, sidewalks, parks, sewer and drainage systems, lighting, intersection signalization, and help to frame, complement, and offset development impacts associated with the construction of the new minor league baseball stadium. Another tract, 7324.00 (Union Hill), was ranked as the city's most distressed and the sixth most distressed in the State with high levels of poverty, crime, problems with idle youth including gangs and drugs, foreclosed properties, absentee property ownership, vacant/boarded-up buildings, empty lots and other economic distress factors. This tract has been the focus of the Union Hill Neighborhood Revitalization Initiative which continues to work across multiple City departments in concert with key community institutions and stakeholders to improve the quality of life in that area.

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## SP-10 Geographic Priorities – 91.215 (a)(1)

### Geographic Area

Table 49 - Geographic Priority Areas

<b>1</b>	<b>Area Name:</b>	Green Island Revitalization Initiative
	<b>Area Type:</b>	Local Target area
	<b>Other Target Area Description:</b>	
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	Comprehensive
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	The boundaries of the Green Island Revitalization Initiative target area correspond with U.S. Census Tract 7325.00 Block Group (BG) 2. The Green Island Revitalization Initiative target area is bounded on the north by Lamartine Street, on the east by Interstate Highway I-290, on the south by Endicott Street and Crompton Park and on the west by Quinsigamond Avenue.

<p><b>Include specific housing and commercial characteristics of this target area.</b></p>	<p>The attached Demographic Analysis of Target Areas Table, shows that the Green Island target area (tract 7325.00 BG 2) was defined as having a “very high concentration of multiple housing problems” as compared to the city as a whole. Within this target area 91.0% of housing was built before 1940 (compared to 48.9% citywide). The percent of units lacking complete plumbing or complete kitchen facilities was 5.6% compared to under 0.8% of citywide units. Within this target area only 9.2% of housing was owner occupied compared to 38.6% citywide and from 2010-2018, the number of owner occupied units declined by -46.3%! Within this target area, 74.3% of renters had high housing cost burdens in which households paid 30% or more of their income for housing compared with 49.9% of renters citywide. The Green Island target area has a disproportionate percentage of low and moderate (LMI) population given that it had 77.5% LMI (20.2% higher than the citywide percentage of 57.3% LMI). Similarly, the percent of persons in poverty for the Green Island target area was 39.1% (21.2% higher than the citywide percentage of 17.9%). The Green Island target Area has a disproportionate share of other socio-economic distress factors. For instance, 71.8% of persons aged 25 or more were high school graduates (compared to 87.2% citywide). Within the target area, 43.7% of households had no vehicle, compared with 15.9% citywide.</p>
<p><b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b></p>	<p>A special public hearing was held in the Green Island neighborhood in July 2019 to focus attention on the needs of that, very low- income, inner-city neighborhood (65 persons participated).</p>

	<p><b>Identify the needs in this target area.</b></p>	<p>Through a targeted interdepartmental neighborhood revitalization initiative in the predominantly low- and moderate-income Green Island neighborhood, public improvements have been identified as a priority need. The initiative, which has come to involve over \$3 million in planned or currently underway public investments around streets and infrastructure in addition to housing improvements, code enforcement, public safety, and public health, prioritized the following public improvements:</p> <ul style="list-style-type: none"> <li>• Tree plantings</li> <li>• Street and sidewalk improvements</li> <li>• Water main replacements</li> <li>• Park upgrades</li> <li>• Repainting and enhancing crosswalks at major intersections</li> <li>• Implementing new or fixing existing ADA compliant curb cuts</li> </ul>
	<p><b>What are the opportunities for improvement in this target area?</b></p>	
	<p><b>Are there barriers to improvement in this target area?</b></p>	<p>The target area has experienced progressive decline over recent decades resulting in a multitude of barriers to improvement. These barriers include aging and poorly maintained housing stock, foreclosures, absentee landlords, speculative investing, declining property values, vacant land parcels, illegal dumping, deteriorating public infrastructure, crime: drugs, violence and gangs, and poorly performing public schools. Given the uncertainty of federal fiscal resources moving forward, continued strategic leveraging of private investments and community-based resources are needed. As needs and issues often overlap and concentrate in neighborhoods, there is a need for more strategic, concentrated, neighborhood-based collaborations with private and community resources and cross-departmental collaborations.</p>
<p><b>2</b></p>	<p><b>Area Name:</b></p>	<p>Low-Moderate Income Census Tracts</p>
	<p><b>Area Type:</b></p>	<p>Local Target area</p>

<b>Other Target Area Description:</b>	
<b>HUD Approval Date:</b>	
<b>% of Low/ Mod:</b>	
<b>Revital Type:</b>	Comprehensive
<b>Other Revital Description:</b>	
<b>Identify the neighborhood boundaries for this target area.</b>	The City of Worcester is comprised of 44 U.S. Census tracts, of which 26 tracts had 51% or more of their populations being persons of Low-Moderate Income (LMI) - defined by HUD as households whose incomes were 80% or less of the metropolitan area median income as adjusted for family size. These 26 LMI tracts were: 7304.01, 7304.02; 7305.00; 7310.02; 7311.01, 7311.02, 7312.03, 7312.04, 7313.00, 7314.00, 7315.00, 7316.00, 7317.00, 7318.00, 7319.00, 7320.01, 7322.01, 7322.02; 7322.03, 7323.02, 7324.00, 7325.00, 7326.00, 7327.00, 7329.02, and 7330.00. (See attached Low Income Population City of Worcester Map for locations).
<b>Include specific housing and commercial characteristics of this target area.</b>	An examination of the attached Demographic Analysis of Target Areas Tables show that these 26 LMI tracts were defined as having a “very high concentration of multiple housing problems” as compared to the city as a whole. Within these LMI tracts 58.2% of housing was built before 1940 (compared to 48.9% citywide). Within these LMI tracks only 21.9% of housing was owner occupied compared to 38.6% citywide and from 2010-2018, the number of owner occupied units declined by - 5.2%. These LMI tracts have a disproportionate share of other socio-economic distress factors. For instance the percentage of persons in poverty in the LMI tracts was 29.8% (compared to 17.9% citywide). For persons aged 25 or more, 80.4% were high school graduates (compared to 87.2% citywide) and among persons aged 16 or more 8.1% were unemployed (compared to 4.4% citywide). Within these LMI tracts, 26.7% of households had no vehicle, compared with 15.9% citywide.

<p><b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b></p>	<p>Neighborhood needs were determined through an analysis of community and neighborhood based needs in combination with a robust citizen outreach/community public meetings process. Community/neighborhood based analysis drew from the latest demographic data from the U.S. Census American Community Survey, the mapping of low- and moderate-income census tracts, the identification of institutions, assets, and liabilities, and the ability to leverage other public and private resources.</p> <p>The citizen outreach/community public meetings process was conducted in 10 neighborhood locations from June – October, 2019, by the Executive Office of Economic Development (EOED) which engaged in a citizen participation process to identify community needs and provide community input on activities and programs to fund. Community needs assessment public meetings were held in different parts of the City, with at least one in each of the City Council districts. The meetings were attended by 145 total participants from neighborhoods with underserved, low-income, diverse, and minority residents. All meetings were intentionally held at locations accessible for potential and actual CDBG beneficiaries. The public meetings were advertised broadly through the City’s media office as well as through door-to-door neighborhood outreach with at least one bilingual staff member. A bilingual staff person was present at each meeting to provide translation and/or facilitation in Spanish and Vietnamese.</p>
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<p><b>Identify the needs in this target area.</b></p>	<p>The LMI census tracts have experienced progressive decline over recent decades resulting in problems such as:</p> <ul style="list-style-type: none"> <li>• Aging and poorly maintained housing stock</li> <li>• Foreclosures</li> <li>• Absentee landlords</li> <li>• Speculative investing</li> <li>• Declining property values</li> <li>• Vacant land parcels</li> <li>• Illegal dumping</li> <li>• Deteriorating public infrastructure</li> <li>• Crime: drugs, violence and gangs</li> <li>• Poorly performing public schools</li> </ul>
<p><b>What are the opportunities for improvement in this target area?</b></p>	
<p><b>Are there barriers to improvement in this target area?</b></p>	<p>The target area has experienced progressive decline over recent decades resulting in a multitude of barriers to improvement. These barriers include aging and poorly maintained housing stock, foreclosures, absentee landlords, speculative investing, declining property values, vacant land parcels, illegal dumping, deteriorating public infrastructure, crime: drugs, violence and gangs, and poorly performing public schools. Given the uncertainty of federal fiscal resources moving forward, continued strategic leveraging of private investments and community-based resources are needed. As needs and issues often overlap and concentrate in neighborhoods, there is a need for more strategic, concentrated, neighborhood-based collaborations with private and community resources and cross-departmental collaborations.</p>

**General Allocation Priorities**

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

The allocation of priorities were determined through an analysis of community and neighborhood based needs in combination with a robust citizen outreach/community public meetings process. Community/neighborhood based analysis drew from the latest demographic data from the U.S. Census American Community Survey, the mapping of low- and moderate-income census tracts, the

identification of institutions, assets, and liabilities, and the ability to leverage other public and private resources. The analysis has identified the most distressed inner city areas for targeted investment as exemplified by the Union Hill neighborhood over the last several years, and the newly launched efforts to revitalize the Green Island neighborhood.

The citizen outreach/community public meetings process was conducted in 11 neighborhood locations from June – October, 2019, by the Executive Office of Economic Development (EOED) which engaged in a citizen participation process to identify community needs and provide community input on activities and programs to fund. Ten community needs assessment public meetings were held in different parts of the City, with at least one in each of the City Council districts. The meetings were attended by 145 total participants from neighborhoods with underserved, low-income, diverse, and minority residents. All meetings were intentionally held at locations accessible for potential and actual CDBG beneficiaries. The public meetings were advertised broadly through the City's media office as well as through door-to-door neighborhood outreach with at least one bilingual staff member. A bilingual staff person was present at each meeting to provide translation and/or facilitation in Spanish and Vietnamese. In addition, a special 11th public hearing was also held in the Green Island neighborhood in July 2019 to focus attention on the needs of that, very low- income, inner-city neighborhood (65 persons participated).

## SP-25 Priority Needs - 91.215(a)(2)

### Priority Needs

Table 50 – Priority Needs Summary

1	<b>Priority Need Name</b>	Development of new affordable housing
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Individuals veterans Persons with HIV/AIDS Elderly Frail Elderly Persons with Physical Disabilities
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts Green Island Revitalization Initiative
	<b>Associated Goals</b>	Affordable Housing Development & Preservation Neighborhood Stabilization & Revitalization
	<b>Description</b>	Development of new affordable housing is one of the many needs identified through the Consolidated Plan public input process. The purpose of developing new affordable housing is to create housing for people that might not otherwise be able to afford it.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
2	<b>Priority Need Name</b>	Development of new mixed-income housing
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Elderly Persons with Physical Disabilities
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts Green Island Revitalization Initiative
	<b>Associated Goals</b>	Affordable Housing Development & Preservation Neighborhood Stabilization & Revitalization
	<b>Description</b>	Development of new mixed-income housing is one of the needs identified in the Con Plan. The purpose of developing new mixed-income housing is to allow affordable housing that isn't concentrated in certain geographic areas in the City.
	<b>Basis for Relative Priority</b>	Development of new mixed-income housing
<b>3</b>	<b>Priority Need Name</b>	Rehabilitation of existing housing stock
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Elderly Persons with Physical Disabilities
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts Green Island Revitalization Initiative
	<b>Associated Goals</b>	Affordable Housing Development & Preservation Neighborhood Stabilization & Revitalization

	<b>Description</b>	Due to the age of the housing stock this is a large need for the City. The purpose of rehabilitating the existing housing stock is to eliminate code violations, which will allow the units to meet minimum HQS (Housing Quality Standards). This is more involved than simple maintenance or repair which may only address a couple of issues.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
4	<b>Priority Need Name</b>	Housing maintenance services
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Elderly Frail Elderly
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts Green Island Revitalization Initiative
	<b>Associated Goals</b>	Affordable Housing Development & Preservation Neighborhood Stabilization & Revitalization Public Services for Low-Moderate Income Persons
	<b>Description</b>	The purpose of housing maintenance services is to allow the access to maintenance services for low-moderate individuals. This is below the level of full rehabilitation and usually is applied as a public service for the elderly population.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
5	<b>Priority Need Name</b>	Housing repair services
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Elderly Persons with Physical Disabilities
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts Green Island Revitalization Initiative
	<b>Associated Goals</b>	Affordable Housing Development & Preservation Neighborhood Stabilization & Revitalization
	<b>Description</b>	The purpose of housing repair services is to eliminate code violations, which will allow the units to meet minimum HQS (Housing Quality Standards).
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
<b>6</b>	<b>Priority Need Name</b>	Assistance for first time homebuyers
	<b>Priority Level</b>	High
	<b>Population</b>	Moderate Middle Large Families Families with Children
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts Green Island Revitalization Initiative
	<b>Associated Goals</b>	Affordable Housing Development & Preservation Neighborhood Stabilization & Revitalization
	<b>Description</b>	The purpose of providing assistance to first time homebuyers is to allow homeownership to become more affordable and to allow homeownership in areas where it couldn't occur without assistance.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.

7	<b>Priority Need Name</b>	Systematic housing inspections
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Elderly Persons with Physical Disabilities
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts Green Island Revitalization Initiative
	<b>Associated Goals</b>	Healthy and Sustainable Housing Neighborhood Stabilization & Revitalization
	<b>Description</b>	The purpose of systematic housing inspection activities is to make sure the neighborhood is a suitable and healthy living environment for all.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
8	<b>Priority Need Name</b>	Housing contaminant and pest abatement
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Elderly
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts Green Island Revitalization Initiative

	<b>Associated Goals</b>	Healthy and Sustainable Housing Neighborhood Stabilization & Revitalization
	<b>Description</b>	Housing Contaminant and Pest Abatement is one of the needs identified in the Con Plan. The purpose of abating pests and housing contaminants is to make sure the unit meets HQS (Housing Quality Standards), leading to a healthier unit and neighborhood.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
<b>9</b>	<b>Priority Need Name</b>	Housing inspections and code enforcement
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Elderly Persons with Physical Disabilities
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts
	<b>Associated Goals</b>	Healthy and Sustainable Housing
	<b>Description</b>	The purpose of the housing inspections and code enforcement activity is to make sure units are meeting minimum HQS (Housing Quality Standards), which improves the sustainability of the unit and the neighborhood.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
<b>10</b>	<b>Priority Need Name</b>	Home energy efficiency improvements
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Elderly
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts
	<b>Associated Goals</b>	Healthy and Sustainable Housing
	<b>Description</b>	The purpose of home energy efficiency improvements is to rehab structures with more efficient design and products, leading to a more energy efficient unit.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
11	<b>Priority Need Name</b>	Weatherization of homes
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Elderly
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts
	<b>Associated Goals</b>	Healthy and Sustainable Housing
	<b>Description</b>	The purpose of weatherizing homes is to make the envelope of the structure more energy efficient.

	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
<b>12</b>	<b>Priority Need Name</b>	Environmental preservation
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts
	<b>Associated Goals</b>	Healthy and Sustainable Housing Public Services for Low-Moderate Income Persons
	<b>Description</b>	Environmental preservation is one of the needs identified in the Con Plan.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
<b>13</b>	<b>Priority Need Name</b>	Demolition of blighted properties
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts Green Island Revitalization Initiative
	<b>Associated Goals</b>	Neighborhood Stabilization & Revitalization
	<b>Description</b>	The demolition of blighted properties contributes to neighborhood revitalization and stability by removing threats to human health, safety, and public welfare.

	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
<b>14</b>	<b>Priority Need Name</b>	Elimination of area and spot blight
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts Green Island Revitalization Initiative
	<b>Associated Goals</b>	Neighborhood Stabilization & Revitalization
	<b>Description</b>	The elimination of area and spot blight is intended to improve appearance, safety, and quality of life aspects of geographic areas experiencing slum and blight conditions.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
<b>15</b>	<b>Priority Need Name</b>	Infill development
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts Green Island Revitalization Initiative
	<b>Associated Goals</b>	Neighborhood Stabilization & Revitalization
	<b>Description</b>	Infill development will help address abandoned, vacant, and underutilized lots, which emerged as a common neighborhood need during the Consolidated Planning process.

	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
16	<b>Priority Need Name</b>	New streets and sidewalks
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Non-housing Community Development
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts Green Island Revitalization Initiative
	<b>Associated Goals</b>	Neighborhood Stabilization & Revitalization Improvements and Preservation of Public Facilities
	<b>Description</b>	New streets and sidewalks are critical for addressing pedestrian safety, improving neighborhood conditions, and increasing access to services and resources by low- and moderate-income residents.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
17	<b>Priority Need Name</b>	Improvement of existing public infrastructure
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Non-housing Community Development
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts Green Island Revitalization Initiative
	<b>Associated Goals</b>	Neighborhood Stabilization & Revitalization Improvements and Preservation of Public Facilities

	<b>Description</b>	The reconstruction and expansion of existing public infrastructure is needed due to old age, deferred maintenance, and heavy use. Needs include, but are not limited to, streets and sewer networks.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
<b>18</b>	<b>Priority Need Name</b>	Small business assistance
	<b>Priority Level</b>	High
	<b>Population</b>	Non-housing Community Development
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts
	<b>Associated Goals</b>	Neighborhood Stabilization & Revitalization Economic Development & Business Assistance
	<b>Description</b>	Direct assistance to small businesses helps individual businesses grow, thrive, and provide jobs and services to neighborhood residents.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
<b>19</b>	<b>Priority Need Name</b>	Job and employment opportunities
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Rural Individuals Families with Children veterans Persons with HIV/AIDS Victims of Domestic Violence Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts
	<b>Associated Goals</b>	Economic Development & Business Assistance
	<b>Description</b>	Expanding economic opportunities for low- and moderate-income persons through fostering job and employment opportunities helps stabilize communities.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
<b>20</b>	<b>Priority Need Name</b>	Attraction and retention of new businesses
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Non-housing Community Development
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts
	<b>Associated Goals</b>	Economic Development & Business Assistance
	<b>Description</b>	Attracting and retaining businesses helps foster employment opportunities and contribute to economic development.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
<b>21</b>	<b>Priority Need Name</b>	Job and skills training
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children veterans Persons with HIV/AIDS Victims of Domestic Violence Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts
	<b>Associated Goals</b>	Economic Development & Business Assistance Public Services for Low-Moderate Income Persons
	<b>Description</b>	Job and skills training helps low- and moderate-income individuals achieve self-sufficiency, individual and household stability, and economic opportunity.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
<b>22</b>	<b>Priority Need Name</b>	Recreational and community facilities
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Non-housing Community Development
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts
	<b>Associated Goals</b>	Economic Development & Business Assistance
	<b>Description</b>	Parks and public recreational facilities, or the lack thereof, are a public facility need; improving recreational and community facilities will increase the livability of neighborhoods and improve public health conditions.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
<b>23</b>	<b>Priority Need Name</b>	Economic development loans and capital
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts
	<b>Associated Goals</b>	Economic Development & Business Assistance
	<b>Description</b>	Economic development loans and investment capital assist businesses in preserving and creating new economic opportunities that help provide jobs for neighborhoods and community residents.

	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
24	<b>Priority Need Name</b>	Small business and storefront improvements
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Non-housing Community Development
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts Green Island Revitalization Initiative
	<b>Associated Goals</b>	Neighborhood Stabilization & Revitalization Economic Development & Business Assistance
	<b>Description</b>	Assistance to small businesses that enhances their attractiveness through façade and infrastructure improvements and help attract more customers while new creating jobs.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
25	<b>Priority Need Name</b>	Technical assistance to small businesses
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts
	<b>Associated Goals</b>	Economic Development & Business Assistance

	<b>Description</b>	Technical and financial assistance for small businesses increases assets and creates local jobs; assistance includes but is not limited to workshops, marketing, and business plan assistance.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
26	<b>Priority Need Name</b>	Improving public facilities for public services
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts

	<b>Associated Goals</b>	Improvements and Preservation of Public Facilities
	<b>Description</b>	Preserve and improve public facilities that provide vital public services that address community needs. Such facilities may include but are not limited to non-profit neighborhood and community centers, health centers, and senior centers.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
<b>27</b>	<b>Priority Need Name</b>	Revitalization of neighborhoods
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Non-housing Community Development
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts Green Island Revitalization Initiative
	<b>Associated Goals</b>	Neighborhood Stabilization & Revitalization
	<b>Description</b>	Neighborhood and commercial corridor revitalization efforts target low- to moderate-income neighborhoods in order to address living conditions, improve neighborhood infrastructure, and support and foster business and economic development.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
<b>28</b>	<b>Priority Need Name</b>	Improving public facilities serving public safety
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate Non-housing Community Development
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts
	<b>Associated Goals</b>	Improvements and Preservation of Public Facilities
	<b>Description</b>	Preserve and improve public facilities that support public safety and security, such as police and fire stations, and their associated equipment and resources like fire trucks.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
<b>29</b>	<b>Priority Need Name</b>	Energy improvements for public facilities
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Non-housing Community Development
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts
	<b>Associated Goals</b>	Improvements and Preservation of Public Facilities
	<b>Description</b>	Provide energy efficiency improvements for public facilities in order to promote sustainability and create a suitable living environment.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
<b>30</b>	<b>Priority Need Name</b>	Accessibility improvements for public facilities
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate Middle Elderly Elderly Frail Elderly Persons with Physical Disabilities Persons with Developmental Disabilities Non-housing Community Development
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts
	<b>Associated Goals</b>	Improvements and Preservation of Public Facilities
	<b>Description</b>	Remove architectural barriers and provide other public facility accessibility improvements for persons with disabilities.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
<b>31</b>	<b>Priority Need Name</b>	Youth educational and recreational programs
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Public Housing Residents Individuals Families with Children Unaccompanied Youth Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Non-housing Community Development

	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts
	<b>Associated Goals</b>	Public Services for Low-Moderate Income Persons
	<b>Description</b>	Provide youth with the skills, knowledge, and support they need to lead healthy and productive lives, through keeping youth in school, improving their academic achievement, helping them learn job skills, and reducing criminal activity and violence.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
32	<b>Priority Need Name</b>	Neighborhood public safety improvements
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Non-housing Community Development
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts
	<b>Associated Goals</b>	Neighborhood Stabilization & Revitalization Public Services for Low-Moderate Income Persons
	<b>Description</b>	Provide neighborhood and public safety improvements to support a suitable living environment for predominantly low- and moderate-income individuals and areas.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
	33	<b>Priority Need Name</b>
<b>Priority Level</b>		High

	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Persons with Physical Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts
	<b>Associated Goals</b>	Public Services for Low-Moderate Income Persons Expanded Resources for Homeless Prevention
	<b>Description</b>	Support information and referral and direct case management services that help connect low- and moderate-income residents to much needed social and human services.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
34	<b>Priority Need Name</b>	Health services (COVID-19 Inclusive)
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts
	<b>Associated Goals</b>	Public Services for Low-Moderate Income Persons
	<b>Description</b>	Provide services addressing the physical and health needs of vulnerable and low – to moderate-income populations.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
<b>35</b>	<b>Priority Need Name</b>	Youth employment opportunities

	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Families with Children Unaccompanied Youth Non-housing Community Development
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts
	<b>Associated Goals</b>	Public Services for Low-Moderate Income Persons
	<b>Description</b>	The unemployment rate for youth is higher than that for adults. Providing low-to moderate-income youth employment opportunities establishes a foundation for long-term self-sufficiency and community economic stability.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
<b>36</b>	<b>Priority Need Name</b>	Food access and security
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Non-housing Community Development
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts
	<b>Associated Goals</b>	Public Services for Low-Moderate Income Persons
	<b>Description</b>	Increasing access to healthy food and supporting greater food security for low- to moderate-income residents and special needs populations, including the elderly, helps improve public health and community economic stability.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
<b>37</b>	<b>Priority Need Name</b>	Housing security and eviction prevention
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts
	<b>Associated Goals</b>	Public Services for Low-Moderate Income Persons Expanded Resources for Homeless Prevention Housing Opportunities for Persons with HIV/AIDS
	<b>Description</b>	Providing services that enable individuals and families to remain in their home, including eviction prevention services, stabilizes communities and neighborhoods.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
<b>38</b>	<b>Priority Need Name</b>	Senior and elderly services
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate Middle Elderly Public Housing Residents Elderly Frail Elderly Persons with Physical Disabilities Non-housing Community Development
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts
	<b>Associated Goals</b>	Public Services for Low-Moderate Income Persons
	<b>Description</b>	Providing services for elderly persons including but not limited to home maintenance assistance, social, medical, and human services.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
<b>39</b>	<b>Priority Need Name</b>	Services for disabled or special needs population
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts
	<b>Associated Goals</b>	Public Services for Low-Moderate Income Persons Expanded Resources for Homeless Prevention
	<b>Description</b>	Provide services and increase access for disabled and special needs populations, including reasonable accommodations, and conformance with the American with Disabilities Act.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
40	<b>Priority Need Name</b>	Information and services for new immigrants

	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Non-housing Community Development
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts
	<b>Associated Goals</b>	Public Services for Low-Moderate Income Persons
	<b>Description</b>	Provide information and services for new and recent immigrants to include interpretation and translation services, and information, referral, and access to local medical, social, and human services.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
<b>41</b>	<b>Priority Need Name</b>	Transportation and access to public services
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Individuals Families with Children Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts
	<b>Associated Goals</b>	Public Services for Low-Moderate Income Persons Housing Opportunities for Persons with HIV/AIDS
	<b>Description</b>	Providing transportation services to low- and moderate-income persons facilitates access to much needed public services and fills a common resource gap that exists in the community.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
42	<b>Priority Need Name</b>	Substance abuse services
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Unaccompanied Youth Persons with Alcohol or Other Addictions Non-housing Community Development
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts
	<b>Associated Goals</b>	Public Services for Low-Moderate Income Persons
	<b>Description</b>	Providing substance abuse recovery programs and substance abuse prevention/education activities helps to save and stabilize the lives of low- and moderate income individuals, improving public health, and helping to stabilize communities and households.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
43	<b>Priority Need Name</b>	Mental health and substance abuse services
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle

	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts
	<b>Associated Goals</b>	Expanded Resources for Homeless Prevention Resolve Barriers to Housing for Homeless Persons
	<b>Description</b>	Delivering services to low- and moderate-income individuals to help save and stabilize lives, including: mental health and/or substance abuse crisis intervention, ongoing therapy and outpatient treatment, case management, and care coordination, improving public health, and helping to stabilize communities and households.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
<b>44</b>	<b>Priority Need Name</b>	Access to public housing
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Chronic Homelessness Individuals Families with Children veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with HIV/AIDS and their Families Victims of Domestic Violence
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts

	<b>Associated Goals</b>	Expanded Resources for Homeless Prevention Resolve Barriers to Housing for Homeless Persons
	<b>Description</b>	Providing affordable housing resources to very low-to-moderate income households through partnerships with Public Housing Authorities, including housing access for special needs and people experiencing homelessness.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
45	<b>Priority Need Name</b>	Case management services
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Large Families Elderly Chronic Homelessness veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts
	<b>Associated Goals</b>	Expanded Resources for Homeless Prevention Resolve Barriers to Housing for Homeless Persons Housing Opportunities for Persons with HIV/AIDS
	<b>Description</b>	Assessing and coordinating the delivery of individualized services to meet the needs of program participants. Case Management may include counseling, developing individualized service plans, securing, and coordinating services, obtaining Federal, State, and local benefits, and monitoring and evaluating program participant progress over time.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
46	<b>Priority Need Name</b>	Coordinated entry system

	<b>Priority Level</b>	High
	<b>Population</b>	Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts
	<b>Associated Goals</b>	Resolve Barriers to Housing for Homeless Persons
	<b>Description</b>	Strategies to better match people experiencing homelessness to the most appropriate types of housing assistance based on the assessment of household needs. Referrals are based on streamlined knowledge of program requirements and available openings and services.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
47	<b>Priority Need Name</b>	Discharge planning
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts
	<b>Associated Goals</b>	Expanded Resources for Homeless Prevention
	<b>Description</b>	The planning of services to prevent homelessness for individuals who are leaving health care institutions, jails and prisons, protective youth services, or the armed forces.

	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
48	<b>Priority Need Name</b>	Housing search and advocacy
	<b>Priority Level</b>	High
	<b>Population</b>	Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts
	<b>Associated Goals</b>	Resolve Barriers to Housing for Homeless Persons Housing Opportunities for Persons with HIV/AIDS
	<b>Description</b>	Providing services that help families and individuals, including homeless, search for sustainable housing options, which may include landlord negotiation, education, the promotion of fair housing, and elimination of housing discrimination.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
49	<b>Priority Need Name</b>	Rapid re-housing rental assistance
	<b>Priority Level</b>	High

	<b>Population</b>	Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts
	<b>Associated Goals</b>	Resolve Barriers to Housing for Homeless Persons Housing Opportunities for Persons with HIV/AIDS
	<b>Description</b>	Helping families and individuals quickly move out of homelessness and into permanent housing by providing short-term or medium-term financial assistance and supportive services.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.
<b>50</b>	<b>Priority Need Name</b>	Housing stabilization funds
	<b>Priority Level</b>	High
	<b>Population</b>	Large Families Families with Children Elderly Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly
	<b>Geographic Areas Affected</b>	Low-Moderate Income Census Tracts

	<b>Associated Goals</b>	Expanded Resources for Homeless Prevention
	<b>Description</b>	Homeless prevention programs to assist households with very low income in obtaining or maintaining housing by providing first and/or last months' rent, security deposits, rental/utility arrears or utility payments.
	<b>Basis for Relative Priority</b>	There was no tiering of the needs as all the needs identified are of the highest priority.

**Narrative (Optional)**

## SP-30 Influence of Market Conditions – 91.215 (b)

### Influence of Market Conditions

<b>Affordable Housing Type</b>	<b>Market Characteristics that will influence the use of funds available for housing type</b>
Tenant Based Rental Assistance (TBRA)	<p>Tenant-based rental assistance (TBRA) is a rental subsidy that the City utilizes To help individual households afford housing costs such as rent and security deposits. The City of Worcester is located in a more expensive housing market, being heavily influenced by the Boston, MA market (Greater Boston Metropolitan Statistical Area). Many renters and owner occupied households have a cost burden greater than 30% of their monthly income. There is a clear need to respond appropriately to this abundant housing problem. The Worcester Housing Authority administers the Section 8 Voucher Program, and demand for this program far exceeds the supply of vouchers. To help ease the gap, with single unsheltered homeless population, the City of Worcester has in the past and will most likely continue in the future to allocate HOME Program funds.</p>
TBRA for Non-Homeless Special Needs	<p>The market conditions in Worcester illustrate a high cost burden for low income households with high market housing costs. The City of Worcester supports a number of other programs with ESG funds to support the rapid re-housing of homeless individuals as well as homelessness prevention activities. HOME funds are also used to support the construction of affordable housing units; several units within these projects have been identified for extremely-low and low-income households. Additionally, the City of Worcester has identified HOME funds to support a TBRA program specifically designed for unsheltered homeless individuals. These funds will provide up to 24 months of rental assistance. Partnerships with local social service agencies will provide wrap-around support services to help ensure long-term stability and self-sufficiency of those assisted. Additionally, HOPWA TBRA funds are used throughout Worcester County and Wilmington County CT to support eligible households by supplementing their income for afford housing.</p>

<b>Affordable Housing Type</b>	<b>Market Characteristics that will influence the use of funds available for housing type</b>
New Unit Production	<p>Market factors influencing development of new housing units, and particularly affordable housing units include: lower costs of land, cost of infrastructure improvements required for development of land, development impact fees; construction regulations; and general economic conditions, including income and employment levels and market interest rates. With nearly 50% of Worcester’s housing stock having been built before 1940, the City recognizes the value of supporting redevelopment projects, particularly in cases where planned improvements result in safer, higher-quality and more energy efficient homes for Worcester residents.</p> <p>Through partnerships with for-profit and non-profit housing organizations, funding will support the objective to provide affordable housing to lower income households by expanding and maintaining the supply of decent, safe, sanitary accessible, and mixed income rental housing; strengthening the ability of state and local governments to provide housing and leveraging private sector participation. Eligible activities that would increase legitimate units in the City with HOME and CDBG funds are acquisition and rehabilitation of existing rental housing, new construction of rental housing, and conversion of commercial/industrial space into residential units. The City will focus funding to alleviate market funding gaps in projects that yield the highest return to the local economy and community, and have the highest potential to spur concurrent projects.</p>
Rehabilitation	<p>Market factors influencing the rehabilitation of housing include: age of housing stock; general economic conditions, including income and employment levels as factors which affect whether homeowners repair their homes or not; positive rate of return; presence of lead-based paint, and market interest rates. Given Worcester is an older City on the East coast, there are many older homes with demonstrated housing problems and presence of lead paint. An older housing stock necessitates a disproportional amount of funding, in comparison to newer markets, to maintaining a healthy housing stock. Of the City’s current housing stock, over 50% was constructed prior to 1940 and older housing, which typically carries greater maintenance costs, is more likely to fall into substandard condition. The City will continue to prioritize a portion of its Federal funds to assist low income homeowners with housing rehabilitation. CDBG housing rehab funds are awarded to bring units into compliance and afford the residents safe, sanitary, healthy homes. Often rehab funds are used in conjunction with the City’s lead paint abatement program. Funding is provided as a contingent Grant, forgiven after a five-year affordability restrictive period.</p>

<b>Affordable Housing Type</b>	<b>Market Characteristics that will influence the use of funds available for housing type</b>
Acquisition, including preservation	There are a number of opportunities to redevelop older commercial sites which serve economic, recreational and historic purposes, which can add to the vitality of their surroundings. As a result of Worcester’s planning efforts, North Main Street, the Arts District, and the Downtown prioritize the use of existing HOME subsidy programs to facilitate project that have economic and redevelopment benefits in addition to housing and/or historic preservation value. Projects in these areas also provide subsidy to close financing gaps that might compromise the economic viability of the Downtown redevelopment. Efforts will continue to promote the conversion of historic mill buildings and vacant upper stories of commercial buildings in the downtown area to residential units, artist’s live/work spaces, and other uses deemed appropriate; and continue to take advantage of available opportunities to market and promote downtown Worcester as a city on the move, a Gateway City.

**Table 51 – Influence of Market Conditions**

**SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)**

**Introduction**

The following is the anticipated resources the City is expected to receive from CDBG, HOME, HOPWA, and ESG programs. CDBG funds will be used for housing, public improvements, and public service activities. The HOME program is mainly used for new rental housing unit production. HOPWA is used for case management and rental assistance for people living with HIV/AIDS. ESG funds are used primarily for homeless prevention and reducing barriers to housing for the homeless population. CDBG , HOME, ESG, and HOPWA are estimated to be level funded over the 5 year period.

**Anticipated Resources**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	4,617,183	50,000	2,051,862	6,719,045	26,876,180	Expectations for remainder of ConPlan based on level funding.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	1,624,201	15,000	815,296	2,454,497	9,817,988	Expectations for remainder of ConPlan based on level funding.
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	651,256	0	111,470	762,726	3,050,904	Expectations for remainder of ConPlan based on level funding.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	385,068	0	5,138	390,206	1,560,824	Expectations for remainder of ConPlan based on level funding.

Table 52 - Anticipated Resources

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

Federal funds will be used to leverage other public and private resources in the housing, public facilities, public services, and economic development areas. Matching fund requirements, along with the needed documentation, are specified in the subrecipient agreements. Matching funds include non-federal cash sources, infrastructure, appraised land/real property, and site preparation, construction materials, and donated labor. The City and its program partners will seek funds from the following sources to support the goals identified in this ConPlan: Project-based Section 8 certificates through the Worcester Housing Authority, Low-income housing tax credits, project financing at favorable interest rates from the MassHousing and local lenders, and private contributions to subrecipients.

The City of Worcester will continue to identify funding from the Massachusetts Rental Voucher Program, operated by the Dept. of Housing and Community Development, as a source of additional match. In order to meet its ESG match requirements, the City of Worcester requires all ESG subrecipients to demonstrate a 100% match using other eligible federal, state, local, or private resources.

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

The Non-Housing Community Development Needs Analysis in the 5-Year Consolidated Plan provides a description of the needs associated with publicly owned land and property. The City of Worcester owns over 4.5 million square feet of buildings and facilities that either directly service residents, or exist to house activities that service residents. Many of these buildings and facilities may be used to address needs identified in the Conplan, yet many of the facilities are also in need of improvements due to old age, deferred maintenance, and heavy use.

In an effort to address public facilities goals contained in the 2020-2024 Consolidated Plan \$300,000 in CDBG funds have been allocated in the First Year Action Plan to improve streets, sidewalks, and other forms of eligible public infrastructure within the Green Island neighborhood (in tandem with improvements made by other city departments, public and private partners. Likewise, \$310,000 in CDBG funds has been allocated to the Neighborhood Development Fund which will also be used to improve streets, sidewalks, sewers, and other forms of eligible public infrastructure. Both of the allocations will benefit low- and moderate-income persons and communities.

**Discussion**

Overall the projected trend is level funding of Federal Funds in the remaining three years of the five year Conplan in order to address identified priority needs.

## SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

<b>Responsible Entity</b>	<b>Responsible Entity Type</b>	<b>Role</b>	<b>Geographic Area Served</b>
City of Worcester Executive Office of Economic Development	Government	Economic Development Homelessness Ownership Rental neighborhood improvements public facilities public services	Jurisdiction
City of Worcester Neighborhood Development Division	Government	neighborhood improvements public facilities public services	Jurisdiction
City of Worcester Business Assistance Division	Government	Economic Development	Jurisdiction
City of Worcester Department of Inspectional Services		neighborhood improvements public services	Jurisdiction
City of Worcester Public Health Division		Non-homeless special needs public services	Jurisdiction
City of Worcester Department of Public Works & Parks	Government	neighborhood improvements public facilities	Jurisdiction
City of Worcester Office of Human Rights and Disabilities	Government	Homelessness Non-homeless special needs	Jurisdiction
Worcester Housing Authority	PHA	Public Housing	Jurisdiction
Central MA Workforce Investment Board	Regional organization	Economic Development	Region
Central MA Regional Planning Commission	Public institution	Planning	Jurisdiction

<b>Responsible Entity</b>	<b>Responsible Entity Type</b>	<b>Role</b>	<b>Geographic Area Served</b>
Private Developers	Private Industry	Ownership Rental	Jurisdiction
Worcester County Continuum of Care	Continuum of care	Homelessness	Region
Non-Profits / Community-Based Organizations	Subrecipient	public facilities public services	Jurisdiction

**Table 53 - Institutional Delivery Structure**

**Assess of Strengths and Gaps in the Institutional Delivery System**

Worcester benefits from the presence of many non-profit organizations and public institutions that deliver a wide range of programs and vital services to low and moderate income residents, homeless individuals and families, as well as special needs populations. While the Executive Office of Economic Development (EOED) is the lead agency for Consolidated Plan activities, non-profit organizations and public entities complete the institutional framework and partner with the EOED to address the needs of the community. The EOED has worked diligently to develop and manage strong relationships with institutional partners to ensure effective program delivery in meeting the needs of its residents. EOED bolsters the institutional delivery system in its approach to manage and allocate HUD Entitlement funds. The Strategic plan is carried out by the City engaging in outreach efforts to determine and then execute that plan by:

- Holding various community needs assessment meetings to identify community needs and funding priorities.
- Having a clear and objective federal grant application process for interested parties in place.
- Reaching out to current and potential community partners by targeting both organizations and institutions that have previously received funding, and those that have not for distribution of applications.
- Organizing and sponsoring technical assistance sessions to help applicants complete the application process and ensure that programs or activities are appropriate for HUD funding.
- Making a conscious effort to avoid duplication of services and delivery systems.

Another strength of the institutional framework relates to recent changes in the delivery of Affordable Housing Development activities and programs. In seeking to better meet community needs and increase efficiencies, the City of Worcester shifted from a once a year housing RFP application process to an “open door”, rolling application process. This process is designed to help individuals, homeowners, and both private and not-for-profit developers meet a broad range of community development needs, and to facilitate:

- Appropriate evaluation and underwriting
- Selection of project ready, viable, sound proposals.
- Technical assistance to applicants with less experience.
- More flexibility by allowing opportunities to apply for housing related CDBG funds throughout the year (housing projects and needs are typically market and time sensitive).

While the institutional delivery system is functioning well, there is always room for improvement in eliminating silos, in ensuring easy access to services, and in better outreach and communication. Local gaps persist in coordination, collaboration and information sharing among the various entities responsible for program delivery, however, efforts are underway to have less gap each year. Many organizations are engaged in a multitude of efforts to coordinate and collaborate with one another, but service provider partners have identified a need for enhanced coordination. The issue stems in part from confidentiality rules that prohibit or hinder agencies from collaborating on client services, however, it points to gaps and weaknesses in the following areas:

- Awareness of existing resources amongst organizations
- Coordinated intake and referral procedures.
- Connections between service providers, philanthropic organizations, and private industry that may provide increased resources.

Additionally, the service delivery structure weakens by the year-to-year unpredictability of operational and federal funding. Needs and demand that exceed available resources, and differing levels of management and development experience from agency to agency.

### Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
<b>Homelessness Prevention Services</b>			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	X
Mortgage Assistance	X		X
Rental Assistance	X	X	X
Utilities Assistance	X	X	X
<b>Street Outreach Services</b>			
Law Enforcement	X	X	
Mobile Clinics	X	X	
Other Street Outreach Services	X	X	
<b>Supportive Services</b>			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	
Education	X	X	X
Employment and Employment Training	X	X	X
Healthcare	X	X	
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation			

<b>Other</b>			

**Table 54 - Homeless Prevention Services Summary**

**Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)**

Worcester has numerous programs and resources to serve the homeless population. The City and the Worcester County Continuum of Care (CoC) working closely through a coordinated, diverse system of housing and services grounded in a “Housing First” approach. The City and the Continuum of Care both continually looks at avenues to ensure the safety and long-term stability of homeless families and individuals. Organizational partners involved in the centralized service delivery system strive to meet the needs of the homeless population and address the housing and supportive services needs of each individual/family in each stage of the process. This includes preventing homelessness, outreach and assessment, emergency shelter services, transitional housing and helping homeless persons (especially chronically homeless) make the transition to permanent independent living.

The CoC is guided by two principles:

- Prevention and/or Diversion from Homelessness for families with children
- Rapid Re-Housing
- Community coordination with landlords, housing authorities, subsidized housing providers

**Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above**

The service delivery system for special needs population and persons experiencing homelessness is strengthened through the CoC Advisory Board that was established to provide support and direction, develop policies, and oversee programs to fulfill the mission of the CoC. The CoC Board serves in an advisory capacity to ensure successful program outcomes and effective overall management of the Worcester County Continuum of Care for which the Central Massachusetts Housing Alliance, Inc. (CMHA), is the Lead Agency, and ultimately responsible.

With the support of CMHA staff, the CoC Advisory Board:

- Identifies emerging or changing needs among homeless individuals and families and attracts new resources or adjusts current funding levels to best address those needs
- Implements and supports the policies to ensure that they are the best use of available resources or the homeless population through a coordinated assessment and entry system
- Makes decisions on applications for new and/or renewed project funding based on a specific set of review criteria including monitoring and evaluation of specific program performance and

documentation of an effective and transparent prioritization of resources to those with the greatest needs.

- Assists in the development and implementation of policies that will ensure an effective Coordinated Entry System and maximize the use of existing CoC and mainstream resources to address client service needs.

The CoC facilitates on-going consultation and coordination with organizations that provide housing and supportive services for special needs populations including elderly persons, persons with disabilities, persons with HIV/AIDS and homeless persons. However, the gap persists in the service delivery system in large part because the need and demand exceed the available resources. This is especially true for individuals dealing with chronic substance abuse and families with mental illness. Other weaknesses, include emergency shelter placements flexible prevention and diversion assistance, unaccompanied youth housing services, and medical respite beds.

**Emergency Shelter Placements** The SMOC Triage and Assessment Center is the front door into the system for individual homeless adults. The aim is to provide temporary emergency shelter placement with a focus on Rapid Re-Housing. Because shelter demand rises during the winter months, the City relies on "Hotel Grace" run by the Net of Compassion as a seasonal overflow shelter to enable the focus on Triage & Rapid Re-Housing to continue effectively during extreme cold.

**Prevention and Diversion Assistance** Prevention services make a profound impact on the stability of families and individuals who are at-risk due to disabilities, housing quality, and cost burden. In the past the resources for flexible prevention and shelter diversion were inadequate compared to the number of households at-risk. The City has been continually working with provider agencies to ensure that this gap decreases.

**Unaccompanied Youth** Unaccompanied youth under the age of 18 access emergency shelter through LUK, Inc. in Worcester, yet there is a need locally and state-wide for unaccompanied youth housing services.

**Medical Respite Beds** Transitional Housing (TH) for individuals and families is up to 24 months, enabling stabilization before transitioning to permanent housing. TH programs support individuals exiting the justice system, in recovery from alcohol/drugs, and disabled family households. A single medical respite bed in Worcester bridges the gap between hospital release and homelessness. Providers have expressed that one medical respite bed does not meet the need of the community, particularly with increased discharges from substance abuse and detox facilities. Community Healthlink, Inc., (CHL) does have 11 respite beds available to the community.

**Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs**

The City will continue to be actively involved with the CoC, which serves as the primary means for uncovering and addressing gaps in the institutional structure and service delivery system. Strategies to address priority needs through the allocation of Emergency Solutions Grant (ESG) funds are developed by the City in conjunction with the CoC Advisory Board. Members of the CoC board and diverse funding partners such as the United Way contribute to recommendations for ESG funds, with knowledge of existing needs and resources in the community. In the past 5 years, ESG funds have been used for prevention, rapid re-housing, street outreach, and emergency shelter operations to serve major sub-populations represented in our community. The decision to allocate funds to these activities is greatly informed by the gaps and resources currently available through the Federal HEARTH Act.

## SP-45 Goals Summary – 91.215(a)(4)

### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing Development & Preservation	2020	2024	Affordable Housing	Low-Moderate Income Census Tracts Green Island Revitalization Initiative	Development of new affordable housing Development of new mixed-income housing Rehabilitation of existing housing stock Housing maintenance services Housing repair services Assistance for first time homebuyers	CDBG: \$14,176,035 HOME: \$12,272,485	Rental units constructed: 75 Household Housing Unit  Rental units rehabilitated: 90 Household Housing Unit  Homeowner Housing Added: 75 Household Housing Unit  Homeowner Housing Rehabilitated: 125 Household Housing Unit  Direct Financial Assistance to Homebuyers: 50 Households Assisted  Tenant-based rental assistance / Rapid Rehousing: 100 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Healthy and Sustainable Housing	2020	2024	Non-Housing Community Development	Low-Moderate Income Census Tracts Green Island Revitalization Initiative	Systematic housing inspections Housing contaminant and pest abatement Housing inspections and code enforcement Home energy efficiency improvements Weatherization of homes Environmental preservation	CDBG: \$1,349,700	Buildings Demolished: 15 Buildings  Housing Code Enforcement/Foreclosed Property Care: 4235 Household Housing Unit

3	Neighborhood Stabilization & Revitalization	2020	2024	Non-Housing Community Development	Low-Moderate Income Census Tracts	Development of new affordable housing Development of new mixed-income housing Rehabilitation of existing housing stock Housing maintenance services Housing repair services Assistance for first time homebuyers Systematic housing inspections Housing contaminant and pest abatement Demolition of blighted properties Elimination of area and spot blight Infill development New streets and sidewalks	CDBG: \$4,791,425	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1953 Persons Assisted
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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
						Improvement of existing public infrastructure Small business assistance Small business and storefront improvements Revitalization of neighborhoods Neighborhood public safety improvements		

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Economic Development & Business Assistance	2020	2024	Non-Housing Community Development	Low-Moderate Income Census Tracts	Small business assistance Job and employment opportunities Attraction and retention of new businesses Job and skills training Recreational and community facilities Economic development loans and capital Small business and storefront improvements Technical assistance to small businesses	CDBG: \$3,463,990	Facade treatment/business building rehabilitation: 25 Business  Jobs created/retained: 45 Jobs  Businesses assisted: 25 Businesses Assisted

5	Public Services for Low-Moderate Income Persons	2020	2024	Non-Homeless Special Needs Non-Housing Community Development	Low-Moderate Income Census Tracts	Housing maintenance services Environmental preservation Job and skills training Youth educational and recreational programs Neighborhood public safety improvements Information and referral to public services Health services (COVID-19 Inclusive) Youth employment opportunities Food access and security Housing security and eviction prevention Senior and elderly services Services for	CDBG: \$3,283,635	Public service activities other than Low/Moderate Income Housing Benefit: 5081 Persons Assisted
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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
						disabled or special needs population Information and services for new immigrants Transportation and access to public services Substance abuse services		
6	Improvements and Preservation of Public Facilities	2020	2024	Non-Housing Community Development	Low-Moderate Income Census Tracts	New streets and sidewalks Improvement of existing public infrastructure Improving public facilities for public services Improving public facilities serving public safety Energy improvements for public facilities Accessibility improvements for public facilities	CDBG: \$6,530,440	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 98325 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Expanded Resources for Homeless Prevention	2020	2024	Homeless	Low-Moderate Income Census Tracts	Information and referral to public services Housing security and eviction prevention Services for disabled or special needs population Mental health and substance abuse services Access to public housing Case management services Discharge planning Housing stabilization funds	ESG: \$988,360	Tenant-based rental assistance / Rapid Rehousing: 330 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	Resolve Barriers to Housing for Homeless Persons	2020	2024	Homeless	Low-Moderate Income Census Tracts	Mental health and substance abuse services Access to public housing Case management services Coordinated entry system Housing search and advocacy Rapid re-housing rental assistance	ESG: \$962,670	Homeless Person Overnight Shelter: 3345 Persons Assisted  Other: 500 Other
9	Housing Opportunities for Persons with HIV/AIDS	2020	2024	Homeless Non-Homeless Special Needs	Low-Moderate Income Census Tracts	Housing security and eviction prevention Transportation and access to public services Case management services Housing search and advocacy Rapid re-housing rental assistance	HOPWA: \$3,813,630	Tenant-based rental assistance / Rapid Rehousing: 125 Households Assisted  Homelessness Prevention: 350 Persons Assisted  Housing for People with HIV/AIDS added: 50 Household Housing Unit  HIV/AIDS Housing Operations: 550 Household Housing Unit

Table 55 – Goals Summary

## Goal Descriptions

1	<b>Goal Name</b>	Affordable Housing Development & Preservation
	<b>Goal Description</b>	The affordable housing development & preservation goal includes the development of new and mixed use affordable housing, rehabilitation of existing housing stock, maintenance & repair services, and assistance to first time homebuyers.
2	<b>Goal Name</b>	Healthy and Sustainable Housing
	<b>Goal Description</b>	The healthy and sustainable housing goal includes environmental preservation, weatherization & energy efficiency improvements, housing inspections & code enforcements, systematic housing inspections, and contaminant and pest abatement.
3	<b>Goal Name</b>	Neighborhood Stabilization & Revitalization
	<b>Goal Description</b>	The neighborhood stabilization & revitalization goal includes the development of new affordable housing, development of new mixed-income housing, rehabilitation of existing housing stock, housing maintenance services, housing repair services, assistance for first-time homebuyers, systematic housing inspections, housing contaminant and pest abatement, housing inspections and code enforcement, demolition of blighted properties, elimination of area and spot blight, infill development, new streets and sidewalks, improvement of existing public infrastructure, small business assistance, small business and storefront improvements, revitalization of neighborhoods, and neighborhood public safety improvements.
4	<b>Goal Name</b>	Economic Development & Business Assistance
	<b>Goal Description</b>	The economic development & business assistance goal includes small business assistance, job and employment opportunities, attraction and retention of new businesses, job and skills training, recreational and community facilities, economic development loans, and capital, small businesses and storefront improvements, and technical assistance to small businesses.

5	<b>Goal Name</b>	Public Services for Low-Moderate Income Persons
	<b>Goal Description</b>	The public services for low-moderate income persons goal includes housing maintenance services, environmental preservation, youth educational and recreational programs, neighborhood public safety improvements, information and referral to public services, health services, youth employment opportunities, food access and security, housing security and eviction prevention, senior and elderly services, services for disabled or special needs population, information and services for new immigrants, transportation and access to public services, and substance abuse services.
6	<b>Goal Name</b>	Improvements and Preservation of Public Facilities
	<b>Goal Description</b>	The improvements and preservation of public facilities goal includes new streets and sidewalks, improvement of existing public infrastructure, improving public facilities for public services, improving public facilities serving public safety, energy improvements for public facilities, and accessibility improvements for public facilities.
7	<b>Goal Name</b>	Expanded Resources for Homeless Prevention
	<b>Goal Description</b>	Ensure sufficient resources are available for helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.
8	<b>Goal Name</b>	Resolve Barriers to Housing for Homeless Persons
	<b>Goal Description</b>	This goal is designed to help 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 and facilitating access for homeless individuals and families to affordable housing units.

9	<b>Goal Name</b>	Housing Opportunities for Persons with HIV/AIDS
	<b>Goal Description</b>	Using City of Worcester HOPWA funds, community-based organizations offer housing resources to PLWHA, including short-term rent, mortgage, and utility assistance payments, rental assistance, and supportive services to address varying needs and barriers to stable housing: Recognizing that being stably housed plays a critical role in ensuring that individuals living with HIV live healthy and productive lives, this goal ensures that housing assistance and supportive services are available to low-income people living with HIV/AIDS (PLWHA) in the areas of Worcester County and Northeastern Connecticut in order to avoid homelessness, or obtain stable housing.

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)**

It is estimated the City of Worcester will provide 76 new units, 35 rehabbed units, and 100 rental assistance units, that over the 5-year period cover by this plan.

## **SP-50 Public Housing Accessibility and Involvement – 91.215(c)**

### **Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)**

The WHA is currently not under a Section 504 Voluntary Compliance Agreement.

### **Activities to Increase Resident Involvements**

The WHA encourages all residents to become active members of their communities and has formally recognized 13 tenant associations that are encouraged participate and engage other residents to take an active role at their sites. Representatives from each resident council meet with the WHA CEO on a regular monthly basis to discuss issues that may have a direct impact on tenant's well-being and quality of life. Additionally, the WHA has regularly scheduled Monthly Resident Meetings with members of the WHA Public Safety, Maintenance and Property Management staffs to discuss issues with tenants that are germane to that specific location.

### **Is the public housing agency designated as troubled under 24 CFR part 902?**

No

### **Plan to remove the 'troubled' designation**

N/A

## **SP-55 Barriers to affordable housing – 91.215(h)**

### **Barriers to Affordable Housing**

In 2019 the City of Worcester began the process to update its Analysis of Impediments to Fair Housing. The City of Worcester received assistance from the Central Massachusetts Regional Planning Commission (CMRPC) and Barrett Planning Group LLC to develop this Analysis of Impediments to Fair Housing. Together, the consultants used a multi-dimensional approach to research and develop the plan. As a recipient of both Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) funding, the City of Worcester has a legal obligation to conduct this analysis and to address the issues it presents. To protect people from housing discrimination, communities must take steps to affirmatively further fair housing by identifying factors that contribute to housing discrimination and work to mitigate these impacts. The following were the barriers identified by subject:

#### **HOUSING POLICY**

##### **Issues Identified**

- Focus group participants relayed that the City lacks a comprehensive policy or vision about furthering fair housing in Worcester.
- Regionally Worcester is doing more than its fair share in the production of affordable housing units, compared to many wealthier towns who have far less than their “fair share” of 10% affordable units to all units in the community.
- Another critical barrier is the lack of policy coordination among those who build and manage affordable units and those providing services to vulnerable populations.

#### **FAIR HOUSING TESTING AND REPORTING**

##### **Issues Identified**

- An impediment to determining what the City needs in terms of housing is the lack of data. Community Legal Aid only has data on claims filed with their agency and they have been reluctant to share the information they have with the City.

#### **AWARENESS, EDUCATION AND OUTREACH**

##### **Issues Identified**

- Awareness of Fair Housing Rights, especially for recent immigrants and those with Limited English proficiency who are vulnerable to abuse. Some landlords are also unaware of their responsibilities under Fair Housing.
- Retaliation from a housing discrimination complaint, of which the most common include (in descending order): disability, race, families with children, national origin, sex, color, religion, other. Lack of translations services for leases in other languages and explanation of rights in other languages. Landlord discrimination from not understanding their requirements under the law. Discrimination against Section 8 voucher holders.
- Landlord perception that small and large families they see are receiving housing assistance and/or will not honor the terms of a lease.
- There was not a consensus regarding the impact of college students on the availability and cost of rental housing in Worcester neighborhoods.
- Worcester is the largest resettlement city in Massachusetts and is home to 30 percent of all refugees

in the state. Approximately one in five residents of Worcester was born outside the United States. Over half of the foreign-born population in Worcester estimates that they speak English “less than very well”.

## ZONING & REGULATORY REFORMS

### Issues Identified

- Restrictions on height, land use density, parking requirements, the lack of accessory dwelling unit and inclusionary zoning elements interfere with housing production and make it difficult for developers to create anything other than large-lot, single-family, market-rate units.
- Excessive minimum parking requirements (as high as two spaces per dwelling unit) impedes the redevelopment, expansion or construction of new residential units.
- Other burdensome regulations included unworkable setbacks and height restrictions that prevent traditional building forms and excessively limit development potential.
- Sober housing classifications are controversial in the city. Classifications are based on the number of people living in the home. The majority of sober housing is classified as a congregate living situation rather than as a single-family home.
- A significant part of why the zoning code and housing regulations has gone essentially unchanged for decades is the amount of local resistance to policy change. A “Not in my backyard (NIMBY)” attitude prevails throughout the public.
- Smaller-scale living quarters such as in-law apartments, accessory dwelling units, or tiny homes are not allowed or limited.

## **Strategy to Remove or Ameliorate the Barriers to Affordable Housing**

### HOUSING POLICY

#### Response/Recommendations

As highlighted in the Fair Housing Programs and Activities section above, the City of Worcester has been doing a tremendous amount of work in relation to affordable and fair housing through multi-pronged initiatives and programs, including those supported by annual HUD entitlement funding. However, the City should also consider focusing on producing a comprehensive affordable housing strategy/policy. Participants in the AI process generally agreed that there is too little coordination between the work of various governmental and quasi-government agencies, nonprofits, and advocacy groups in Worcester. Bringing the myriad of stakeholders together under a coherent, city-wide policy could have a major, beneficial impact. Although not all parties may have the same goals regarding housing production, it may be useful to see what each stakeholder is looking to achieve, and how the efforts could complement each other toward achieving common overall goals in a city wide framework. Within each group their also maybe an opportunity to increase coordination in how, where, and what type of affordable housing is produced.

### FAIR HOUSING TESTING AND REPORTING

#### Response/Recommendations

Worcester needs a partner in its efforts to identify, understand, and address housing discrimination. Unfortunately, the development of this AI was severely hampered by the failure of the local testing program at Community Legal Aid to provide data. The City should consider directing its own funds toward improved testing and accountability, if necessary by securing a partner willing to report

substantive and detailed data on a predictable schedule.

#### AWARENESS, EDUCATION AND OUTREACH

##### Response/Recommendations

Many people are unaware of their fair housing rights, and many property owners are unaware of their fair housing responsibilities. The City has housing organizations and advocates, but not everyone is working together or working toward commonly understood and agreed-upon outcomes. A City-sponsored and organized annual fair housing conference could go a long way toward building awareness and consensus and positioning the City to take a leadership role in regional fair housing advocacy. The City of Worcester Office of Human rights seems to be the Department best suited to educate the public on Fair Housing Rights issues identified above. Additionally, through both the Human Rights Office, and non-profit partners, the City should coordinate strategic and grassroots outreach efforts to educate, empower, and raise awareness of Fair Housing rights, issues, and concerns. The outreach should have clear, transparent, and measureable annual goals. The items above should be reviewed and strategically incorporated into efforts regarding awareness of Fair Housing Rights.

#### **Strategy to remove (cont.)**

#### ZONING & REGULATORY REFORMS

##### Response/Recommendations

- The City should consider allowing at least two-family density development in all residential districts in Worcester to maximize housing unit supply and opportunity.
- The City should continue efforts to reduce parking minimums and establish flexibility in parking requirements, particularly for multi-family housing and within mixed-use districts.
- The City should amend setback requirements to be more flexible and reflective of actual traditional building forms. For example, many triple decker buildings were historically constructed with little or no front set back, and side yards are often much smaller than what is required. Reducing or eliminating these could increase the value of those units and spur reinvestment opportunities.
- Evaluate whether height limitations are too restrictive, and propose changes as necessary: Many participants cited height restrictions as a key barrier to redeveloping triple-deckers in the city. Dimensional regulations should be reviewed to bring them more in line with the building stock the City actually has.
- The City should explore allowing multi-family development in additional areas of the city – particularly those areas with good transportation access or located in close proximity to mixed use or commercial zones. Comments from realtors and developers suggested that there are not enough areas of the City where new multi-family housing can be built. Additionally, changing the site dimensional requirements (setbacks, parking, etc.) to allow for the demolition and rebuilding of existing three-four family units in existing multi-family districts, would allow more parts of the City to experience multifamily re-development which might be more cost effective and attractive to the current and future market.
- Existing City demographics, and citizen input, suggest the City should pursue strategies for increasing the availability of both smaller and larger unit sizes. There is significant market demand throughout the City for studio, one bedroom, micro-lofts and even SROs, as well as an under production, and need, for larger family-sized units, especially where public transportation is available.

- The City should consider allowing expanded opportunities to create additional dwelling units within existing buildings in certain circumstances.
- The City should revisit the prohibition on unrelated occupants. Currently the City limits sharing of dwelling units to no more than three unrelated occupants. This policy is said to limit the ability of landlords to fully lease up some properties, especially near colleges. However, the City needs to be mindful of fair housing protections for people with disabilities, such as adults living in group homes or sober houses.
- As the City has experienced a reinvigorated interest by developers for new development projects in the past 5 – 7 years, it should explore the feasibility and potential benefits of implementing an inclusionary zoning requirements, as well as mandatory mixed-income unit requirements for larger scale new projects that utilize any City financial assistance through tax incentives or other local government funds.

**ADDRESSING HOUSING QUALITY AND NEIGHBORHOOD DISINVESTMENT**

Worcester has a high number of deteriorated and abandoned properties and many are in neighborhoods where a high proportion of minorities and lower-income residents live. These properties range from old industrial buildings that are fully or partially vacant to poorly maintained and abandoned housing units. The properties have a negative impact on the surrounding neighborhood by signaling disinvestment, presenting hazards to the neighborhood's residents' safety and health, and creating areas that may attract criminal activity. The existence of deteriorated and abandoned property in neighborhoods decreases property values and limits homeowners' abilities to grow equity in their homes and threatens the health of residents who live in this housing stock.

- Since 2013, using in large part federal entitlement funds like CDBG, the City has experimented with a "targeted" and strategic approach to neighborhood revitalization that has meant significantly investing in the housing and infrastructure of specific neighborhood over a dedicated amount of time. In contrast to more "scatter shot" approaches of investing in several projects and areas at the same time without any geographic or programmatic focus, this model has shown to be impactful and generate third party investment and cooperation by residents and institutional partners in the revitalization efforts, particularly as there is more certainty and resources brought to bear. A large component of these efforts has also involved improvements and upgrades to the community appearance and community safety. This approach has resulted in more transformative outcomes. The Union Hill neighborhood was the first area where this model was implemented, and the City should continue to implement this model in other low-to-moderate income neighborhoods using federal, local, and leveraged private funds.
- The City should study the landscape of options for incentivizing housing maintenance and upgrades. There should be more resources beyond CDBG for interior and exterior repairs, for instance the possibility of a Neighborhood Challenge Grant for owner-matched cosmetic improvements to enhance housing curb appeal, and improve neighborhood identity and image through signage, art, or aesthetic improvements.
- The City needs to reassess its approach to code enforcement. On one hand, strict enforcement may unduly penalize the most vulnerable renters in Worcester, but on the other hand, inconsistent or weak enforcement simply encourages irresponsible landlords to ignore health, safety, and quality-of-life problems faced by their tenants. The City should also consider re-positioning and empowering the Inspection Services Department to better provide pro-active code enforcement, including implementation of a "Rental/Landlord Registry" program that requires landlord owned units to pass inspection before approval for rental, and for re-inspection at least yearly. The program could and should also include a landlord training/educational component.
- The City administers a Chapter 139 process whereby dilapidated, abandoned, or unsafe properties that have been repeatedly cited by Code Enforcement become slated for receivership or demolition after the owners have been afforded an administrative hearing and appeal process. Too often properties become "stuck" in this process, with no tangible outcome or improvements expected or made within reasonable time frames. An audit or assessment of said program should be conducted to seek improvements to it, including but not limited to, potential funding pools to assist the owners in rehabbing and re-activating abandoned or unsafe residential units.

**HOUSING COST BURDEN AND RACE**

Response/Recommendations

It is recommended this topic be added to the list of items requiring further study.

**FORECLOSURE POLICIES**

Response/Recommendations

It is recommended this topic be added to the list of items requiring further study.

**LEAD PAINT ISSUES**

Response/Recommendations

The City of Worcester Housing Development Division manages a \$5.6 million HUD lead abatement grant. A requirement of this grant is community outreach to homeowners and landlords. The city has partnered with the Realtor association of Central Massachusetts and MassLandlords in order to improve the communication of the rights and responsibilities of homeowners and landlords to follow both the Massachusetts lead law and well as federal fair housing and lead disclosure standards. Landlords are specifically made aware of their responsibility not to discriminate against tenant with children in order to skirt applicable lead laws. In addition, the program coordinates with both Worcester Health and Worcester Public School departments to ensure children under 6 receive lead testing prior to enrolling in school.

**NEED FOR ACCESSIBLE UNITS**

Response/Recommendations

It is recommended this topic be added to the list of items requiring further study.

**ADEQUATE PUBLIC TRANSIT**

Response/Recommendations

It would be a good time to re-vision the transit system and make sure it leverages all resources in the most needed areas. It is also recommended that there is further education and expansion of bicycle transit within the City. It is recommended this topic be added to the list of items requiring further study.

**HIV/AIDS HOUSING OPTIONS**

Response/Recommendations

It is recommended an update to the 2011 HOPWA Needs Analysis is conducted to determine the current State of the needs so actions can be tailored to relevant data.

**OTHER RECOMMENDATIONS**

The City should reconsider adopting the Community Preservation Act (CPA) and establishing a Municipal Affordable Housing Trust Fund.

**Strategy to remove (cont.)**

## **SP-60 Homelessness Strategy – 91.215(d)**

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

The City will continue its current strategies in reaching out to shelter and unsheltered homeless persons and assessing their individual needs. Community organizations are working to engage partners and stakeholders to create a holistic system of outreach. Continued, engagement with Hospitals, Law Enforcement, detox centers, and other services that may commonly encounter homeless individuals.

Without disclosing sensitive personal information (HIPPA), the partners then strategize using common resources and learning from success stories on how to ensure the safety and improved life condition of the individuals and the community.

Outreach to homeless families focuses on collaboration with first responders, local governments, and neighborhood centers that most frequently come into contact with newly homeless families. The agencies know how to contact emergency shelters with designated overflow beds.

There are homeless outreach services in the City that offer immediate and long-term assistance to unsheltered individuals as well. These outreach teams spend time at frequented locations such as the downtown corridor that includes Union Station - the centralized multi-modal transit station, the Public Library, and other public buildings, as well as parks and roadways prone to panhandling and loitering throughout the City. Soup kitchens and food pantries are other locations that outreach workers are able to successfully identify and engage with such individuals. Unfortunately, some individuals do refuse services for various personal reasons including substance abuse and chronic mental health issues, but many eventually accept help through long-term engagement of the street outreach workers.

Eliot Community Human Services (Eliot CHS) offers a variety of mental health and other supportive services to the adult homeless population. They provide mental health assessments, treatment, advocacy, benefit assistance, housing assistance and other referrals. They also provide tangible items such as food and blankets to build trust while engaging individuals to accept services who are both in need of housing and broad stabilization services. Street outreach for individuals is completely supported by a PATH grant. Two (2) Full Time Equivalent (FTE) street outreach workers are part of the HOAP Project (Homeless Outreach and Advocacy Program) operated by CHL in Worcester; the other, in North Worcester County. Workers have immediate access to shelters and RRH housing slots. The Bridge of Central Mass provides outreach to street homeless in South County through collaboration with local first responders ensuring complete geographic coverage.

The Greater Worcester Housing Connection (GWHC) outreach efforts consist of strategies like food and transportation, and offer connections to other community-based resources including sources of financial support, food pantries, food stamps, and fuel assistance for those who are not homeless. They collaborate with the Worcester Police Department Crisis Intervention Team and other service providers to identify and engage with very low income persons or potential clients. Funding for this outreach

began in 2014 through the City's annual ESG allocation for one full-time Outreach Worker to provide essential services and case management.

LUK, Inc. and Stand Up for Kids both have outreach teams that specialize in reaching the youth and young adult population, which is often less visible, but still in prominent need of housing and services.

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

One key achievement since the City's previous Consolidated Plan is the successful paradigm shift from a shelter model, in which individuals or families may endure long-stays in shelter, to "Housing First", Triage, Assessment, and Rapid Re-Housing model. This included the construction of a new Triage and Assessment Center for homeless individuals in 2013. "Housing First" refers also to the strategy of avoiding homeless shelters entirely through placement into housing immediately upon becoming homeless using the Triage and Assessment model whenever housing is available. Triage and Assessment includes screening for eligibility into other service systems and making referrals to appropriate levels of care in the appropriate geographic locations.

Understanding that permanent housing is the ultimate goal, but not the first step for all that are homeless, the City will continue to support intensive case management for shelters and transitional housing on-site as a stepping stone to achieving long-term stable housing. Case Management services are vital to ensure that the Triage and Assessment model, which includes individualized housing stability plans, functions and serves the wide needs of households that are literally homeless.

**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 will continue the success of its Rapid Re-Housing (RRH) model across providers, which requires a written needs assessment and individual service plans for all referrals. The needs assessments include a Housing Barriers Assessment Process to examine barriers such as criminal background, and poor rental history, financial barriers, and housing maintenance or self-sufficiency barriers such as substance abuse and/or mental illness. Barrier assessments help providers prioritize the need and length of assistance appropriate to each household to assist in the transition to permanent housing and independent living. The City has a role in the CoC's development of a Coordinated Entry policy to improve access to housing and services, including community-based affordable housing. The process will continue to improve access to CoC housing and services for homeless individuals and families through:

- Assessing needs in a uniform manner
- Prioritizing need for precious housing and service resources

- Matching needs with available resources in a cost-effective manner to shorten period(s) of homelessness and improve housing stability.

Coordinated Entry workgroups include case management and supervisory staff from agencies that provide housing and supportive services to homeless families and Veterans, youth, and individuals from throughout the CoC. Notices of the time and place of workgroup meetings are widely disseminated via the Lead Agency e-distribution list, which opens up the Coordinated Entry process for any providers in the community and region. The Worcester Housing Authority prioritizes homeless families and individuals for admission to public housing, and works collaboratively with case management staff of shelters and transitional housing to minimize barriers to public housing.

As working groups match households with housing options, they also share and discover barriers and challenges for housing their respective populations. These discussions productively inform the City and CoC's role in what needs to be done to better facilitate access to affordable housing units in a community-wide effort to end homelessness.

Meanwhile, the CoC plans to increase the number of permanent supportive housing units available for chronically homeless persons. This includes funding reallocations from transitional housing beds to permanent supportive housing (PSH), which will enable supportive service funds to accompany the PSH subsidies. The City and CoC will work in tandem to end Chronic Homelessness by 2020 through the use of Rapid Re-Housing funds focused on the chronically homeless.

Case Management services will assist homeless households in increasing income and public benefits as a way to ensure housing stability, decreasing the possibility of returning to homelessness, and shortening the period of time that households are homeless. The CoC collects information on the length of stay for emergency shelter, transitional housing, and the Safe Haven program to establish baseline data for homeless episodes. In 2019, HMIS data showed the following mean length of stay for homeless episodes: Shelter, 62 days; Safe Haven, 12 months; and Transitional Housing, 13 months. The CoC Program Monitoring and Evaluation Committee has set a target to reduce the length of stay in these facilities, which will include the incorporation of technical assistance and training for staff on reducing length of stays in each facility.

Providers currently use their own follow-up data to track and prevent returns to homelessness. They use this to identify patterns that might be useful in improving the quality of services providers. The CoC indicates that episodes tracked by transitional housing providers for families showed that fewer than 2% became homeless again after completion of the program.

**Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs**

The strategy for Worcester to provide a continuum of homeless prevention (HP) services to families and individuals at-risk involves the use of flexible funds for utility and rent arrearages, appropriate referrals and case management, workforce training, discharge planning, and public education efforts. Flexible funds can prevent homelessness for those imminently at-risk. According to the Central Massachusetts Housing Alliance, Inc. (CMHA), \$1,300 could pay for the deposit on a new apartment, while \$2,600 can pull a person back from the edge of homelessness.

Educational efforts with first responders such as schools, healthcare providers, neighborhood centers, and food pantries, can help identify persons at-risk of homelessness, and will encourage appropriate referrals to divert households from homelessness. Outreach to landlords will preserve tenancies through mediation, advocacy, and intervention services.

To assure that people being discharged from public institutions and systems of care do not become homeless, the City will continue its work with providers, the medical community, and the Continuum of Care Discharge Planning working group to examine and implement the best possible discharge planning procedures and work towards creating additional respite beds in the City to bridge the critical gap between hospital release and triage for the homeless. Positive working relationships exist between providers and institutions discharging people at-risk of homelessness. The City will work to strengthen coordinated re-entry for Veterans and former prisoners to address existing gaps in services for those populations. The City is committed to preventing youth homelessness by assuring appropriate transitional care for youth aging out of the Massachusetts Foster Care system.

## **SP-65 Lead based paint Hazards – 91.215(i)**

### **Actions to address LBP hazards and increase access to housing without LBP hazards**

The City of Worcester, through the Executive Office of Economic Development's (EOED) Housing Division, is an existing Lead Hazard Reduction (LHR) grantee and has been awarded funds under the Lead Hazard Control and LHR program in fiscal year 2019, 2015, 2012, 2009, and 2007. As of January 2020, the Housing Division's Worcester Lead Abatement Program (WLAP) had completed 269 Units from the \$3.4 million in funds awarded from the previous 2015 Lead Hazard Reduction Demonstration grant. Through HUD's Lead Hazard Reduction 2019 funds, the City of Worcester's Housing Division will remediate lead paint hazards in 250 moderate, low and very low income units of housing using \$5,000,000 in lead abatement funds, as well as further remediate 120 of those same units using \$600,000 in Healthy Homes supplemental funding over a 42 month period (01/02/2020 - 06/30/2023). The Worcester Lead Abatement Program can provide up to \$10,000 per unit to assist with lead abatement in approved properties with low/moderate income tenants. In addition, WLAP coordinates the Massachusetts "Get the Lead Out" loan program funded by MassHousing for additional abatement assistance over the \$10,000 per unit threshold. Additionally, this grant will be matched by \$603,121 in other public and private resources to further provide lead paint and soil abatement, as well as provide primary prevention services in the form of outreach and education to low and moderate income families with children under age six within the City of Worcester.

In addition, any CDBG funded housing rehabilitation project over \$25,000 will be de-lead in conjunction with the rehabilitation activities to take place. For projects between \$5,000 and \$24,999, a lead report will be obtained prior to rehabilitation work taking place. Any area of work that contains lead paint will be conducted using EPA RRP and Massachusetts Lead Safe Renovator standards. The EOED's Worcester Lead Abatement Program anticipates applying for subsequent rounds of HUD Healthy Homes funding on a 3-year basis (2021 and 2023). The WLAP intends to request a total of \$625,000 in CDBG funding primarily for HUD Lead Hazard Reduction/Healthy Homes matching funding (\$125,000 per year for 5 years). It is estimated that during the 5-year period a total of 300 units of housing will be made lead safe.

To ensure that units that have undergone grant-funding rehabilitation continue to benefit low-income families long after project completion, homeowners and investors must agree to the placement of a five-year Affordable Housing Restriction on each unit that will undergo rehabilitation using funding from the Lead Hazard Reduction grant, capping rents at HUD Fair Market Rent. As an additional stipulation of the Affordable Housing Restriction, preference must be given to families with children under the age of six years old to inhabit available units.

The City of Worcester has made lead hazard reduction a policy priority for over 25 years. By providing lead abatement through the Worcester Lead Abatement Program, as well as the incorporation of lead abatement in any CDBG housing rehabilitation projects, over time the lead in housing stock for lower income earners will be addressed. Additional support for lead hazard reduction activities is provided by Worcester's Department of Inspectional Services which employs two, full-time lead paint staff enforcing both Massachusetts and Federal Lead Paint codes funded by tax levy. Lead hazard enforcement from

the Department of Inspectional Services ensures that landlords using private funding are remediating properties identified to contain lead hazards.

### **How are the actions listed above related to the extent of lead poisoning and hazards?**

The Massachusetts Department of Public Health continues to classify Worcester as a “high-risk” municipality for childhood lead poisoning. Among the criteria used to determine risk are the number of Worcester children identified as having elevated blood lead levels each year, the age of the existing housing stock, and other socioeconomic factors including the percentage of low-income families. Worcester is home to 14,655 children under the age of 6 comprising 8% of the city’s total population. Children under six years of age are at an increased risk for becoming lead poisoned and suffering the long-term consequences of lead exposure which negatively impact learning, behavior, and development. Worcester’s older housing stock further increases the risk of lead exposure among young children. As of 2018, 79% of Worcester’s housing units were built before 1978 (compared to 70% state-wide), the year that lead paint was banned. Of those units, 32,221 were built before 1940 and are more likely to contain lead painted surfaces and hazards.

Socioeconomic factors can also impact rates of lead poisoning among children, as families may face additional barriers to living in safe, affordable housing units. An estimated 4,982 families in Worcester with young children under five years of age report having incomes below the federal poverty level. Additionally, 34.8% of the Worcester population speaks a language other than English at home, which may hinder the receipt of information on tenant’s rights, affordable housing programs, and available home rehabilitation services. Through funding provided by HUD’s Lead Hazard Reduction grant, income-qualifying units can be made lead-safe at little to no cost, further expanding the number of lead-safe units available for families with young children.

### **How are the actions listed above integrated into housing policies and procedures?**

The activities of the Worcester Lead Abatement Program are in direct support of the Lead Law (MGL c. 111, § 189A through 199B) put forth and enforced by the Massachusetts Department of Public Health, Childhood Lead Poisoning Prevention Program. Our assistance supports Section 197 of the Lead Law which states, “Whenever a child under six years of age resides in any premises in which any paint, plaster or other accessible structural material contains dangerous levels of lead, the owner shall abate or contain said paint, plaster or other accessible structural materials in accordance with the requirements of subsection (b) or (c).”

The Worcester Lead Abatement Program (WLAP) has separate policy and procedures for conducting Lead Hazard Control activities through the HUD Office of Lead Hazard Control and Healthy Homes (OLHCHH), however the WLAP policies are also integrated in the CDBG Housing Policy and Procedures. This includes following HUD dust clearance standards which are more stringent than Massachusetts standards.

The type of housing rehabilitation activities that may be under taken include “Testing for and abatement of lead-based paint”; and “Lead-based paint testing and abatement as a standalone program or included as rehabilitation as noted above (24 CFR § 570.202(f)“.

The CDBG Housing Policy and Procedures also states that per the Consolidated Plan requirements, the City of Worcester shall consult with Worcester's Housing Development Division (HDD), who is the department charged with coordinating the City's lead-based paint strategy and reducing lead hazards in housing assisted with federal funds.

The City is committed to using CDBG funds to conduct Lead Paint Hazard activity's complementing the WLAP program through matching funds and allows the program to address more lead hazard activities, where OLHCHH projects are over funding limits but the projects are necessary due to at risk children.

## **SP-70 Anti-Poverty Strategy – 91.215(j)**

### **Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families**

According to the U.S. Census Bureau, 17.1% of Worcester's population is below the poverty level, which is nearly double that of the overall Massachusetts' population (9.4%), but a reduction from last plans number 5 years ago of 21.4%. Given the high proportion of residents living in poverty, the City of Worcester Executive Office of Economic Development (EOED) focuses on using its HUD entitlement grant program funds for initiatives and projects that provide the maximum benefit to very low, low and moderate income individuals and households. The City's anti-poverty strategy seeks to support programs that provide basic food and shelter, as well as social and human services and job and life skills training and other advancement opportunities necessary for an individual or family to move out of poverty.

Many of the City's programs impact poverty-level families, and the following two Consolidated Plan goals and associated strategies have a direct influence on reducing the number of families living at or below the poverty level:

Public Services for Low-Moderate Income Persons, including, but not limited to, job and skills training, youth educational and recreational programs, and youth employment opportunities

Economic Development & Business Assistance, including small business assistance, job and employment opportunities, attraction and retention of new businesses, economic development loans and capital, and façade improvements.

Through these goals, the City seeks to use CDBG funds to generate jobs and enable low- and moderate-income residents to become and continue to be economically secure and self-sufficient.

The EOED also coordinates with the Central Massachusetts Workforce Investment Board (CMWIB) around programs and initiatives that support the City's goal of reducing poverty. The primary role of the CMWIB is to convene civic and business leadership, and utilize their insights to direct public funds aimed at building the skills of the workforce in our area. The CMWIB also oversees the One Stop Career Center in Worcester, known as Workforce Central. This coordination helps ensure the non-duplication of services that provide employment training and job opportunities, and aids in maximizing the impact of the limited resources available for these types of services and programs.

In addition, representatives from the EOED, the executive director of the CoC convening agency (Central Massachusetts Housing Alliance - CMHA), and more than 30 other key CoC stakeholders have met and worked together continuously over the last several years in order to determine CoC gaps, identify resources and prioritize needs to prevent homelessness and

rapidly re-house those persons who are homeless in accordance with the goals established in the Plan to End Homelessness in Worcester. The proposals contained in this Consolidated Plan are the fruit of these collaborations and have been determined through on-going dialogue between EOED, the CoC and the Commonwealth of Massachusetts Department of Housing and Community Development (DHCD) to be part of a balanced regional approach to meeting the plan's goals. Locally-relevant data from recent Housing Inventory Counts (HIC) and Point In Time (PIT) counts supports these funding decisions. They are consistent with the Worcester City and County CoC Action Plans and support national priorities established in Opening Doors: Federal Strategic Plan to Prevent and End Homelessness.

### **How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan**

The EOED is the lead agency responsible for drafting this report, and oversees the investments made in economic development, public services, and neighborhood revitalization. The department works on a daily basis with developers, public officials, and community leaders and organizations seeking to increase the accessibility to jobs and affordable housing for low- to moderate-income persons.

Worcester uses federal resources to increase homeownership and affordable housing opportunities through the following programs:

- owner occupied rehabilitation,
- rental rehabilitation development,
- new construction of affordable units,
- down payment assistance for first-time homebuyers,
- the Worcester Lead Abatement Program, and
- the Healthy Homes program.

The coordination also extends to addressing homelessness. An example of the coordination of anti-poverty programs and policies is represented by the South Middlesex Opportunity Council (SMOC) Greater Worcester Housing Connection (GWHC) which broke ground on a state-of-the-art Triage and Assessment Center located at 25 Queen Street. The Center was open in 2013 and consists of 25 emergency triage beds and 15 single occupancy rooms. It operates 24 hours a day/seven days a week, and provides essential services including emergency housing triage, diversion, housing needs assessment, housing placement, meals, case management, employment assistance, life skills training, transportation and linkages to health, behavioral health, domestic violence, legal and other needed services. The city has also funded homeless street outreach resources through the Emergency Solutions Grant (ESG) to engage, assess and link these homeless persons with services including housing, benefits and employment.

## **SP-80 Monitoring – 91.230**

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

The City of Worcester has an internal management plan to assure the proper and compliant implementation of the Strategic Plan and the Annual Plan activities. Procedures have been put in place to assure proper compliance with all program requirements for the CDBG, HOME, HOPWA, and ESG entitlements. **\*\*[As a result of the Covid-19 pandemic all on-site monitoring activities referred to below have been suspended until further notice].**

Project managers are responsible for monitoring their assigned projects and activities. Priority is given to new projects or organizations. Monthly “desk audits” of grant subrecipients’ programs allow project managers a chance to track the timeliness of expenditures and the status of program outcomes, through subrecipient Project Cash Requests (PCR) documentation. Additionally on-site monitoring provides an opportunity for staff members to ensure subrecipients are in compliance with Federal regulations and are actively working to achieve the objectives outlined in their grant agreements and the Annual Action Plan. Site visits also allow subrecipients to receive technical assistance and provide feedback about program administration. By carefully examining subrecipients’ performance through desk audits and on-site monitoring, the City can conduct a risk assessment to identify which subrecipients require more comprehensive monitoring. High-risk sub-recipients might include those new to the CDBG, HOME, ESG, or HOPWA programs, those who experienced turnover in key staff positions or a change in goals or direction, those with previous compliance or performance problems including failure to meet schedules, submit timely reports, or clear monitoring or audit findings, and those undertaking multiple CDBG, HOME, ESG, or HOPWA funded activities for the first time.

An on-site monitoring schedule is prepared based on this risk assessment. First, the assigned monitor will contact the agency to explain the purpose of monitoring and schedule a date and time for the on-site visit. Once this is completed, a confirmation letter is sent before the scheduled visit to confirm all aspects of the monitoring and to explain what can be expected.

During the actual visit, a thorough review of the subrecipient’s files ensures they comply with all regulations governing their administrative, financial and programmatic operations and that they are achieving their performance objectives within schedule and budget. A clear written record of the on-site visit is kept by using one or more of the City of Worcester/HUD monitoring checklists. The assigned monitor will fill out the form during the visit. At the end of the visit, the monitor concludes the visit by reviewing the tentative conclusions from the monitoring. Once the on-site visit is completed, the monitor prepares a formal written letter describing the results of the visit, providing recognition of the subrecipient’s strengths and weaknesses. If the subrecipient is experiencing problems or is failing to comply with regulations, these issues will be specifically outlined in the monitoring follow-up letter, along with recommendations or requirements to address and rectify problems. If a concern or finding is issued for noncompliance with Federal rules and regulations, the monitoring follow-up letter will provide recommendations on how the situation can be remedied. When a finding is issued, the

monitoring follow-up letter will identify a deadline for when the specific issues must be corrected. The monitor will then follow-up with the organization to make sure the corrections have been made.

\*\*[As a result of the Covid-19 pandemic all on-site monitoring activities referred to above have been suspended until further notice].

## Expected Resources

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

#### Introduction

The following is the anticipated resources the City is expected to receive from CDBG, HOME, HOPWA, and ESG programs. CDBG funds will be used for housing, public improvements, and public service activities. The HOME program is mainly used for new rental housing unit production. HOPWA is used for case management and rental assistance for people living with HIV/AIDS. ESG funds are used primarily for homeless prevention and reducing barriers to housing for the homeless population. CDBG, HOME, ESG, and HOPWA are estimated to be level funded over the 5 year period.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	4,617,183	50,000	2,051,862	6,719,045	26,876,180	Expectations for remainder of ConPlan based on level funding.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	1,624,201	15,000	815,296	2,454,497	9,817,988	Expectations for remainder of ConPlan based on level funding.
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	651,256	0	111,470	762,726	3,050,904	Expectations for remainder of ConPlan based on level funding.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	385,068	0	5,138	390,206	1,560,824	Expectations for remainder of ConPlan based on level funding.

Table 56 - Expected Resources – Priority Table

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

Federal funds will be used to leverage other public and private resources in the housing, public facilities, public services, and economic development areas. Matching fund requirements, along with the needed documentation, are specified in the subrecipient agreements. Matching funds include non-federal cash sources, infrastructure, appraised land/real property, and site preparation, construction materials, and donated labor. The City and its program partners will seek funds from the following sources to support the goals identified in this ConPlan: Project-based Section 8 certificates through the Worcester Housing Authority, Low-income housing tax credits, project financing at favorable interest rates from the MassHousing and local lenders, and private contributions to subrecipients.

The City of Worcester will continue to identify funding from the Massachusetts Rental Voucher Program, operated by the Dept. of Housing and Community Development, as a source of additional match. In order to meet its ESG match requirements, the City of Worcester requires all ESG subrecipients to demonstrate a 100% match using other eligible federal, state, local, or private resources.

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

The Non-Housing Community Development Needs Analysis in the 5-Year Consolidated Plan provides a description of the needs associated with publicly owned land and property. The City of Worcester owns over 4.5 million square feet of buildings and facilities that either directly service residents, or exist to house activities that service residents. Many of these buildings and facilities may be used to address needs identified in the Conplan, yet many of the facilities are also in need of improvements due to old age, deferred maintenance, and heavy use.

In an effort to address public facilities goals contained in the 2020-2024 Consolidated Plan \$300,000 in CDBG funds have been allocated in the First Year Action Plan to improve streets, sidewalks, and other forms of eligible public infrastructure within the Green Island neighborhood (in tandem with improvements made by other city departments, public and private partners. Likewise, \$310,000 in CDBG funds has been allocated to the Neighborhood Development Fund which will also be used to improve streets, sidewalks, sewers, and other forms of eligible public infrastructure. Both of the allocations will benefit low- and moderate-income persons and communities.

**Discussion**

Overall the projected trend is level funding of Federal Funds in the remaining three years of the five year Conplan in order to address identified priority needs.

## Annual Goals and Objectives

### ***AP-20 Annual Goals and Objectives***

#### **Goals Summary Information**

<b>Sort Order</b>	<b>Goal Name</b>	<b>Start Year</b>	<b>End Year</b>	<b>Category</b>	<b>Geographic Area</b>	<b>Needs Addressed</b>	<b>Funding</b>	<b>Goal Outcome Indicator</b>
<b>1</b>	Affordable Housing Development & Preservation	2020	2024	Affordable Housing	Low-Moderate Income Census Tracts Green Island Revitalization Initiative	Development of new affordable housing Development of new mixed-income housing Rehabilitation of existing housing stock Housing maintenance services Housing repair services Assistance for first time homebuyers	CDBG: \$2,835,206 HOME: \$2,454,498	Rental units constructed: 15 Household Housing Unit Rental units rehabilitated: 18 Household Housing Unit Homeowner Housing Added: 1 Household Housing Unit Homeowner Housing Rehabilitated: 25 Household Housing Unit Direct Financial Assistance to Homebuyers: 10 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 30 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Healthy and Sustainable Housing	2020	2024	Non-Housing Community Development	Green Island Revitalization Initiative	Systematic housing inspections Housing contaminant and pest abatement Housing inspections and code enforcement Home energy efficiency improvements Weatherization of homes Environmental preservation Demolition of blighted properties	CDBG: \$269,940	Buildings Demolished: 3 Buildings Housing Code Enforcement/Foreclosed Property Care: 847 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Neighborhood Stabilization & Revitalization	2020	2024	Non-Housing Community Development	Low-Moderate Income Census Tracts	Development of new affordable housing Development of new mixed-income housing Housing repair services Assistance for first time homebuyers Housing contaminant and pest abatement Housing inspections and code enforcement Demolition of blighted properties Elimination of area and spot blight Infill development Improvement of existing public infrastructure	CDBG: \$958,285	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1953 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Economic Development & Business Assistance	2020	2024	Non-Housing Community Development	Low-Moderate Income Census Tracts	Small business assistance Job and employment opportunities Attraction and retention of new businesses Job and skills training Recreational and community facilities Economic development loans and capital Small business and storefront improvements Technical assistance to small businesses	CDBG: \$692,797	Facade treatment/business building rehabilitation: 5 Business Jobs created/retained: 9 Jobs Businesses assisted: 5 Businesses Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Public Services for Low-Moderate Income Persons	2020	2024	Non-Homeless Special Needs Non-Housing Community Development	Low-Moderate Income Census Tracts	Youth educational and recreational programs Information and referral to public services Health services (COVID-19 Inclusive) Food access and security Information and services for new immigrants Transportation and access to public services Case management services	CDBG: \$656,727	Public service activities other than Low/Moderate Income Housing Benefit: 5081 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Improvements and Preservation of Public Facilities	2020	2024	Non-Housing Community Development	Low-Moderate Income Census Tracts	New streets and sidewalks Improvement of existing public infrastructure Improving public facilities serving public safety Energy improvements for public facilities Accessibility improvements for public facilities	CDBG: \$1,306,088	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 98325 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Expanded Resources for Homeless Prevention	2020	2024	Homeless	Low-Moderate Income Census Tracts	Information and referral to public services Housing security and eviction prevention Services for disabled or special needs population Mental health and substance abuse services Access to public housing Case management services Discharge planning Housing search and advocacy	ESG: \$197,672	Homelessness Prevention: 66 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	Resolve Barriers to Housing for Homeless Persons	2020	2024	Homeless	Low-Moderate Income Census Tracts	Information and referral to public services Services for disabled or special needs population Mental health and substance abuse services Access to public housing Case management services Coordinated entry system Housing search and advocacy Rapid re-housing rental assistance Housing stabilization funds	ESG: \$192,534	Homelessness Prevention: 669 Persons Assisted Other: 100 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
9	Housing Opportunities for Persons with HIV/AIDS	2020	2024	Homeless Non-Homeless Special Needs	Low-Moderate Income Census Tracts	Housing security and eviction prevention Transportation and access to public services Case management services Housing search and advocacy Rapid re-housing rental assistance	ESG: \$762,726	Tenant-based rental assistance / Rapid Rehousing: 25 Households Assisted Homelessness Prevention: 70 Persons Assisted Housing for People with HIV/AIDS added: 10 Household Housing Unit HIV/AIDS Housing Operations: 110 Household Housing Unit

Table 57 – Goals Summary

**Goal Descriptions**

1	<b>Goal Name</b>	Affordable Housing Development & Preservation
	<b>Goal Description</b>	
2	<b>Goal Name</b>	Healthy and Sustainable Housing
	<b>Goal Description</b>	The healthy and sustainable housing goal includes environmental preservation, weatherization & energy efficiency improvements, housing inspections & code enforcements, systematic housing inspections, and contaminant and pest abatement.

<b>3</b>	<b>Goal Name</b>	Neighborhood Stabilization & Revitalization
	<b>Goal Description</b>	The neighborhood stabilization & revitalization goal includes the development of new affordable housing, development of new mixed-income housing, rehabilitation of existing housing stock, housing maintenance services, housing repair services, assistance for first-time homebuyers, systematic housing inspections, housing contaminant and pest abatement, housing inspections and code enforcement, demolition of blighted properties, elimination of area and spot blight, infill development, new streets and sidewalks, improvement of existing public infrastructure, small business assistance, small business and storefront improvements, revitalization of neighborhoods, and neighborhood public safety improvements.
<b>4</b>	<b>Goal Name</b>	Economic Development & Business Assistance
	<b>Goal Description</b>	
<b>5</b>	<b>Goal Name</b>	Public Services for Low-Moderate Income Persons
	<b>Goal Description</b>	The public services for low-moderate income persons goal includes housing maintenance services, environmental preservation, youth educational and recreational programs, neighborhood public safety improvements, information and referral to public services, health services, youth employment opportunities, food access and security, housing security and eviction prevention, senior and elderly services, services for disabled or special needs population, information and services for new immigrants, transportation and access to public services, and substance abuse services.
<b>6</b>	<b>Goal Name</b>	Improvements and Preservation of Public Facilities
	<b>Goal Description</b>	The improvements and preservation of public facilities goal includes new streets and sidewalks, improvement of existing public infrastructure, improving public facilities for public services, improving public facilities serving public safety, energy improvements for public facilities, and accessibility improvements for public facilities.
<b>7</b>	<b>Goal Name</b>	Expanded Resources for Homeless Prevention
	<b>Goal Description</b>	Ensure sufficient resources are available for helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

8	<b>Goal Name</b>	Resolve Barriers to Housing for Homeless Persons
	<b>Goal Description</b>	This goal is designed to help 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 and facilitating access for homeless individuals and families to affordable housing units.
9	<b>Goal Name</b>	Housing Opportunities for Persons with HIV/AIDS
	<b>Goal Description</b>	Using City of Worcester HOPWA funds, community-based organizations offer housing resources to PLWHA, including short-term rent, mortgage, and utility assistance payments, rental assistance, and supportive services to address varying needs and barriers to stable housing: Recognizing that being stably housed plays a critical role in ensuring that individuals living with HIV live healthy and productive lives, this goal ensures that housing assistance and supportive services are available to low-income people living with HIV/AIDS (PLWHA) in the areas of Worcester County and Northeastern Connecticut in order to avoid homelessness, or obtain stable housing.

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

The City of Worcester is creating 17 projects to address the goals identified in year 1 (7/1/20 - 6/30/21) of the Action Plan. These 17 projects will address the relevant goals that they are meeting and identify the sources of funds to be used.

#### Projects

#	Project Name
1	PUBLIC SERVICES
2	NEIGHBORHOOD DEVELOPMENT FUND
3	PUBLIC FACILITIES FUND
4	AFFORDABLE HOUSING PROGRAMS
5	ECONOMIC DEVELOPMENT
6	DEBT SERVICE
7	HOPWA20 AIDS PROJECT WORCESTER
8	HOPWA20 COMMUNITY HEALTHLINK
9	HOPWA20 MONTACHUSETT OPPORTUNITY COUNCIL
10	HOPWA20 CT PERCEPTION PROGRAMS
11	HOPWA20 GRANTEE ADMIN
12	HESG20 - WORCESTER
13	CDBG PLANNING & ADMINISTRATION
14	HOME ADMIN
15	TBRA (TENANT BASED RENTAL ASSISTANCE)
16	GREEN ISLAND
17	CODE ENFORCEMENT

**Table 58 – Project Information**

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

**AP-38 Project Summary**  
**Project Summary Information**

<b>1</b>	<b>Project Name</b>	PUBLIC SERVICES
	<b>Target Area</b>	Low-Moderate Income Census Tracts
	<b>Goals Supported</b>	Public Services for Low-Moderate Income Persons
	<b>Needs Addressed</b>	Youth educational and recreational programs Information and referral to public services Health services (COVID-19 Inclusive) Food access and security Information and services for new immigrants Transportation and access to public services Case management services
	<b>Funding</b>	CDBG: \$656,727
	<b>Description</b>	Public Services activities other than Low/Moderate Income Housing Benefit.
	<b>Target Date</b>	6/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is projected that 5,742 persons will be served by public service activities during the first year action plan (7/1/2020 - 6/30/2021). It is estimated that 69% (or approx. 3,968) will be persons from families/households and 31% (or approx. 1,774) being individual adults. Among persons to be served it is estimated that 86% (approx. 4,941) will be of extremely low income (0-30% Median Household Income), 10% (approx. 572) will be of very low income (31-50% Median Household Income), and 4% (approx. 229) will be of low income (51-80% Median Household Income).
	<b>Location Description</b>	Service site addresses (all City of Worcester, MA): AFRICAN COMMUNITY EDUCATION (ACE), 10 Irving St., 01609 and 484 Main St., 01608; CATHOLIC CHARITIES, 10 Hammond St., 01610; CENTRO LAS AMERICAS, 11 Sycamore St., 01608 and 174 Tacoma St. 01605; COMMUNITY BUILDERS, 16 Laurel St., 01608; DISMAS HOUSE, 30 Richards St., 01603, FAMILY HEALTH CENTER OF WORCESTER, 26 Queen St., 01610; FRIENDLY HOUSE, 36 Wall St., 01604 and 16 Laurel St., 01608; QUINSIGAMOND VILLAGE COMMUNITY CENTER, 16 Greenwood St., 01607; RACHEL'S TABLE, 1050 Main St., 01603; SALVATION ARMY SALLY'S PLACE, 640 Main St., 01608, SOUTHEAST ASIAN COALITION OF CENTRAL MA, 484 Main St., 01608; SOUTH WORCESTER NEIGHBORHOOD CENTER, 47 Camp St., 01603 and 50 Canton St., 01610; SPECTRUM HEALTH SYSTEMS, 25 Pleasant St., 01609, WORCESTER HOUSING AUTHORITY, 40 Belmont St., 01605.

	<b>Planned Activities</b>	AFRICAN COMMUNITY EDUCATION (ACE) - After School Program; CATHOLIC CHARITIES Stabilization Case Management; CENTRO LAS AMERICAS - Case Management, Emergency Food Pantry; COMMUNITY BUILDERS - Volunteer Income Tax Preparation Assistance; DISMAS HOUSE – BAR None (Basic Advocacy for Reentry); FAMILY HEALTH CENTER OF WORCESTER - Emergency Dental Services, Healthcare for Homeless Families; FRIENDLY HOUSE - Case Management, Youth Development; QUINSIGAMOND VILLAGE COMMUNITY CENTER – Basic Needs Services; RACHEL'S TABLE - Children's Milk Fund; SALVATION ARMY SALLY’S PLACE – Homeless Drop-in Center; SOUTHEAST ASIAN COALITION OF CENTRAL MA – Case Management, Employment and Education; SOUTH WORCESTER NEIGHBORHOOD CENTER – Case Management; SPECTRUM HEALTH SYSTEMS (TASKS FOR TRANSIT, INC.) – Job Fare Kit Pogram; WORCESTER HOUSING AUTHORITY – Elder Transportation program..
2	<b>Project Name</b>	NEIGHBORHOOD DEVELOPMENT FUND
	<b>Target Area</b>	Low-Moderate Income Census Tracts
	<b>Goals Supported</b>	Neighborhood Stabilization & Revitalization
	<b>Needs Addressed</b>	Development of new affordable housing Development of new mixed-income housing Rehabilitation of existing housing stock Housing maintenance services Housing repair services Assistance for first time homebuyers Systematic housing inspections Housing contaminant and pest abatement Elimination of area and spot blight Infill development New streets and sidewalks Small business assistance Technical assistance to small businesses Revitalization of neighborhoods Neighborhood public safety improvements
	<b>Funding</b>	CDBG: \$469,984
	<b>Description</b>	Public Facilities Improvements other than Low/Moderate Income Housing Benefit.
	<b>Target Date</b>	6/30/2021

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The population of the Green Island Target Area (Census Tract 7325.00) was 1,953 persons (2017 US Census American Community Survey), of which 1,935 persons (99%) lived in households, of which 1,276 (65%) were in family households (two or more persons related by birth, marriage, or adoption). Low and Moderate Income Population comprised 82.7% (the 5th highest percent among the city's 44 census tracts. 33.9% of persons were in poverty (compared to 22.1% citywide).
	<b>Location Description</b>	The Green Island Neighborhood target area corresponds to U.S. Census Tract 7325.00. Located just south of the city's downtown, it is a 0.31 square mile, triangular shaped tract bordered on the east by I-290, the southwest by Providence and Worcester Railroad, and the northwest by CSX railroad. The neighborhood is an urbanized, older, predominantly low income inner city neighborhood of mixed uses – housing (mostly 1-3 family wood frame), industrial and warehouses, small commercial stores and bars. Mostly developed 1860s – 1920s along the former Blackstone Canal (which runs underneath Harding St.).
	<b>Planned Activities</b>	CDBG funds will be targeted to the revitalization of the Green Island Neighborhood in tandem with the construction of the new minor league baseball stadium and mixed-use development in the area. Similar to recent efforts in the Union Hill neighborhood, the city plans to use a multi-departmental approach to work with residents and stakeholders to develop a revitalization plan which will redevelop homes (exteriors and internal core systems), businesses, streets, sidewalks, trees, and other improvements and seek to preserve neighborhood affordability.
<b>3</b>	<b>Project Name</b>	PUBLIC FACILITIES FUND
	<b>Target Area</b>	Low-Moderate Income Census Tracts Green Island Revitalization Initiative
	<b>Goals Supported</b>	Improvements and Preservation of Public Facilities
	<b>Needs Addressed</b>	New streets and sidewalks Improvement of existing public infrastructure Improving public facilities for public services Improving public facilities serving public safety Energy improvements for public facilities Accessibility improvements for public facilities
	<b>Funding</b>	CDBG: \$1,006,279

	<b>Description</b>	
	<b>Target Date</b>	6/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Beneficiaries to be served through public facilities improvement projects to be funded through CDBG during the First Year Action plan are: WORCESTER SENIOR CENTER – annually serves 3,000 low- and moderate-income persons; YWCA OF CENTRAL MA – annually serves 8,100 low- and moderate-income persons.
	<b>Location Description</b>	City of Worcester locations of the public facilities improvement projects to be funded through CDBG during the First Year Action plan are: SENIOR CENTER (Census Tract 7327.00); YWCA OF CENTRAL MA (Census Tract 7317.00).
	<b>Planned Activities</b>	Planned activities to be funded through public facilities improvement projects under CDBG during the First Year Action plan are: SENIOR CENTER – Kitchen Upgrades; YWCA OF CENTRAL MA – Parking Lot Redesign and Reconstruction.
<b>4</b>	<b>Project Name</b>	AFFORDABLE HOUSING PROGRAMS
	<b>Target Area</b>	Low-Moderate Income Census Tracts Green Island Revitalization Initiative
	<b>Goals Supported</b>	Affordable Housing Development & Preservation
	<b>Needs Addressed</b>	Development of new affordable housing Development of new mixed-income housing Rehabilitation of existing housing stock Housing maintenance services Housing repair services Assistance for first time homebuyers Infill development
	<b>Funding</b>	CDBG: \$2,193,665 HOME: \$2,121,077
	<b>Description</b>	Affordable Housing Programs have the objective of creating decent affordable housing for Low-Moderate Families and individuals.
	<b>Target Date</b>	6/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that at least 60 Low-Moderate income families will benefit from the activities being proposed.

	<b>Location Description</b>	Locations where most activities will take place will be in the Low-Moderate Income Census Tracts in the City.
	<b>Planned Activities</b>	The Affordable Housing Programs include the development of new and mixed use affordable housing, rehabilitation of existing housing stock, maintenance & repair services, and assistance to first time homebuyers. CHDO set aside of (\$243,630.15 or 15%) of the FY2020 HOME fund grant of \$1,624,201.00
<b>5</b>	<b>Project Name</b>	ECONOMIC DEVELOPMENT
	<b>Target Area</b>	Low-Moderate Income Census Tracts
	<b>Goals Supported</b>	Economic Development & Business Assistance
	<b>Needs Addressed</b>	Small business assistance Job and employment opportunities Attraction and retention of new businesses Job and skills training Recreational and community facilities Economic development loans and capital Small business and storefront improvements Technical assistance to small businesses
	<b>Funding</b>	CDBG: \$628,329
	<b>Description</b>	Economic Development and Business Assistance.
	<b>Target Date</b>	6/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 5 Businesses will be assisted, 9 jobs created or retained, and 5 businesses will receive Facade treatment/business building rehabilitation.
	<b>Location Description</b>	City of Worcester.
	<b>Planned Activities</b>	It is estimated that 10 Businesses will be assisted, 10 jobs created or retained, and 5 businesses will receive Facade treatment/business building rehabilitation.
<b>6</b>	<b>Project Name</b>	DEBT SERVICE
	<b>Target Area</b>	Low-Moderate Income Census Tracts
	<b>Goals Supported</b>	Affordable Housing Development & Preservation
	<b>Needs Addressed</b>	Development of new affordable housing
	<b>Funding</b>	CDBG: \$290,000

	<b>Description</b>	Repayment of part of debt service for HUD Section 108 Loan granted for Gardner-Kilby-Hammond (GKH) Initiative.
	<b>Target Date</b>	6/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Development of new affordable housing
	<b>Location Description</b>	City of Worcester
	<b>Planned Activities</b>	Repayment of Section 108 loan for KGH loan, which resulted in the creation of affordable housing.
7	<b>Project Name</b>	HOPWA20 AIDS PROJECT WORCESTER
	<b>Target Area</b>	Low-Moderate Income Census Tracts
	<b>Goals Supported</b>	Housing Opportunities for Persons with HIV/AIDS
	<b>Needs Addressed</b>	Housing security and eviction prevention Transportation and access to public services Case management services Housing search and advocacy Rapid re-housing rental assistance Housing stabilization funds
	<b>Funding</b>	HOPWA: \$334,970
	<b>Description</b>	AIDS Project Worcester uses HOPWA funds to continue its Housing Services Program for people living with HIV/AIDS (PLWHA) in Central MA, through homelessness prevention and rental start up assistance.
	<b>Target Date</b>	6/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Households with at least one member living with HIV/AIDS: 10 will receive rental assistance. 70 will receive STRMU assistance. 60 will receive case management.
	<b>Location Description</b>	City of Worcester Eligible Metropolitan Statistical Area (EMSA)
	<b>Planned Activities</b>	The program consists of four components: 1) Short-term rent, mortgage, and utility assistance (STRMU); 2) Permanent Housing Placement, providing payments for the first and last months' rent for eligible clients; 3) Tenant-Based Rental Assistance and 4) Housing Case Management.
	<b>Project Name</b>	HOPWA20 COMMUNITY HEALTHLINK

<b>8</b>	<b>Target Area</b>	Low-Moderate Income Census Tracts
	<b>Goals Supported</b>	Housing Opportunities for Persons with HIV/AIDS
	<b>Needs Addressed</b>	Transportation and access to public services Mental health and substance abuse services Case management services Housing search and advocacy
	<b>Funding</b>	HOPWA: \$139,343
	<b>Description</b>	Description Community Healthlink, Inc. is a non-profit organization that provides housing supportive services to people living with HIV/AIDS.
	<b>Target Date</b>	6/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	20 households with at least one family member living with HIV/AIDS will receive supportive services.
	<b>Location Description</b>	City of Worcester Eligible Metropolitan Statistical Area (EMSA)
	<b>Planned Activities</b>	Housing Supportive Services within Permanent Supportive Housing programs assist tenants in maintaining permanent housing; maintaining their use of community resources and benefits; and achieve short term goals towards self-sufficiency.
	<b>9</b>	<b>Project Name</b>
<b>Target Area</b>		Low-Moderate Income Census Tracts
<b>Goals Supported</b>		Housing Opportunities for Persons with HIV/AIDS
<b>Needs Addressed</b>		Housing security and eviction prevention Transportation and access to public services Case management services Housing search and advocacy Rapid re-housing rental assistance
<b>Funding</b>		HOPWA: \$178,309
<b>Description</b>		Montachusett Opportunity Council operates a permanent housing program serving chronically homeless individuals living with HIV/AIDS and their family members in North Worcester County.
<b>Target Date</b>		6/30/2021

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	12 chronically homeless individuals living with HIV/AIDS and their family members will receive rental assistance.
	<b>Location Description</b>	City of Worcester Eligible Metropolitan Statistical Area (EMSA).
	<b>Planned Activities</b>	Funding for Rental Assistance and Supportive Services for the Housing First Supportive Housing program, a scattered site 7-unit permanent housing program in North Worcester County.
<b>10</b>	<b>Project Name</b>	HOPWA20 CT PERCEPTION PROGRAMS
	<b>Target Area</b>	Low-Moderate Income Census Tracts
	<b>Goals Supported</b>	Housing Opportunities for Persons with HIV/AIDS
	<b>Needs Addressed</b>	Transportation and access to public services Case management services Housing search and advocacy Housing stabilization funds
	<b>Funding</b>	HOPWA: \$90,567
	<b>Description</b>	Funding for Supportive Services and Permanent Housing Placement, providing payments for the first and last months rent for eligible clients.
	<b>Target Date</b>	6/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	15 chronically homeless individuals living with HIV/AIDS and their family members will receive rental assistance. 30 households with at least one family member living with HIV/AIDS will receive supportive services.
	<b>Location Description</b>	Located in Willimantic, Connecticut within the City of Worcester Eligible Metropolitan Statistical Area (EMSA).
	<b>Planned Activities</b>	HOPWA supportive services assess and facilitate positive life skills for individuals to create Individualized Service Plans that include employment, alternative income sources, access to affordable housing, and housing retention skills. HOPWA operating costs facilitate maintenance of the Summit House vehicle to transport clients to and from medical and employment appointments. HOPWA permanent housing placement offers financial assistance in the form of rental start-up support to residents who are transitioning to independent living.
	<b>Project Name</b>	HOPWA20 GRANTEE ADMIN

11	<b>Target Area</b>	Low-Moderate Income Census Tracts
	<b>Goals Supported</b>	Housing Opportunities for Persons with HIV/AIDS
	<b>Needs Addressed</b>	Health services (COVID-19 Inclusive) Housing security and eviction prevention
	<b>Funding</b>	HOPWA: \$19,537
	<b>Description</b>	
	<b>Target Date</b>	6/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
12	<b>Project Name</b>	HESG20 - WORCESTER
	<b>Target Area</b>	Low-Moderate Income Census Tracts
	<b>Goals Supported</b>	Expanded Resources for Homeless Prevention Resolve Barriers to Housing for Homeless Persons
	<b>Needs Addressed</b>	Information and referral to public services Housing security and eviction prevention Substance abuse services Mental health and substance abuse services Access to public housing Case management services Coordinated entry system Discharge planning Housing search and advocacy Rapid re-housing rental assistance Housing stabilization funds
	<b>Funding</b>	ESG: \$390,206
	<b>Description</b>	Emergency Solutions Grant Program supports City-wide strategies to address the housing needs of homeless and at-risk households in the City of Worcester.
	<b>Target Date</b>	6/30/2021

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 573 homeless and at-risk households (individual and family).
	<b>Location Description</b>	City of Worcester
	<b>Planned Activities</b>	FY2020 \$385,068 + Prior Year Resources \$5,138 = \$390,206.00 Street Outreach \$37,576 Emergency Shelter \$149,316 Rapid Re-Housing/ Homelessness Prevention \$154,296 HMIS \$15,000 Admin \$28,880 (7.5% of \$385,068)
<b>13</b>	<b>Project Name</b>	CDBG PLANNING & ADMINISTRATION
	<b>Target Area</b>	Low-Moderate Income Census Tracts
	<b>Goals Supported</b>	Affordable Housing Development & Preservation Healthy and Sustainable Housing Neighborhood Stabilization & Revitalization Economic Development & Business Assistance Public Services for Low-Moderate Income Persons Improvements and Preservation of Public Facilities

<p><b>Needs Addressed</b></p>	<p>Development of new affordable housing  Development of new mixed-income housing  Rehabilitation of existing housing stock  Housing maintenance services  Housing repair services  Assistance for first time homebuyers  Systematic housing inspections  Housing contaminant and pest abatement  Housing inspections and code enforcement  Home energy efficiency improvements  Weatherization of homes  Environmental preservation  Demolition of blighted properties  Elimination of area and spot blight  Infill development  New streets and sidewalks  Improvement of existing public infrastructure  Small business assistance  Job and employment opportunities  Attraction and retention of new businesses  Job and skills training  Recreational and community facilities  Economic development loans and capital  Small business and storefront improvements  Technical assistance to small businesses  Improving public facilities for public services  Revitalization of neighborhoods  Improving public facilities serving public safety  Energy improvements for public facilities  Accessibility improvements for public facilities  Youth educational and recreational programs  Food access and security  Housing security and eviction prevention  Senior and elderly services  Services for disabled or special needs population  Information and services for new immigrants  Transportation and access to public services</p>
<p><b>Funding</b></p>	<p>CDBG: \$967,061</p>
<p><b>Description</b></p>	<p>CDBG Planning and Admin up to 20% of total Entitlement Grant.</p>
<p><b>Target Date</b></p>	<p>6/30/2021</p>

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>14</b>	<b>Project Name</b>	HOME ADMIN
	<b>Target Area</b>	Low-Moderate Income Census Tracts
	<b>Goals Supported</b>	Affordable Housing Development & Preservation
	<b>Needs Addressed</b>	Development of new affordable housing Development of new mixed-income housing Rehabilitation of existing housing stock Housing maintenance services Housing repair services Infill development
	<b>Funding</b>	HOME: \$163,420
	<b>Description</b>	FFY19 HOME Admin funding for salaries & fringe and indirect expenses.
	<b>Target Date</b>	6/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>15</b>	<b>Project Name</b>	TBRA (TENANT BASED RENTAL ASSISTANCE)
	<b>Target Area</b>	Low-Moderate Income Census Tracts
	<b>Goals Supported</b>	Affordable Housing Development & Preservation
	<b>Needs Addressed</b>	Housing stabilization funds
	<b>Funding</b>	HOME: \$170,000
	<b>Description</b>	HOME Tenant-Based Rental Assistance Program.
	<b>Target Date</b>	6/30/2021

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	At least 30 homeless households.
	<b>Location Description</b>	City of Worcester.
	<b>Planned Activities</b>	Rental Assistance of up to 24 months for each household.
<b>16</b>	<b>Project Name</b>	GREEN ISLAND
	<b>Target Area</b>	Low-Moderate Income Census Tracts Green Island Revitalization Initiative
	<b>Goals Supported</b>	Affordable Housing Development & Preservation Neighborhood Stabilization & Revitalization
	<b>Needs Addressed</b>	Development of new affordable housing Development of new mixed-income housing Rehabilitation of existing housing stock Housing maintenance services Housing repair services Assistance for first time homebuyers Systematic housing inspections Housing contaminant and pest abatement Elimination of area and spot blight Infill development New streets and sidewalks Small business assistance Economic development loans and capital Small business and storefront improvements Technical assistance to small businesses Revitalization of neighborhoods Neighborhood public safety improvements
	<b>Funding</b>	CDBG: \$300,000

	<p><b>Description</b></p>	<p>In 2019, the City is expected to begin the Green Island Neighborhood Initiative. The approach to this new neighborhood focused initiative will be modelled in part after the impactful multi-departmental effort at revitalizing and improving the Union Hill neighborhood (2013 - 2019) through strategically placed and focused housing, infrastructure, and public safety improvements. The City anticipates the project to have the added emphasis of preservation of affordable housing as the neighborhood is proximate to the multi-million dollar development of a new minor league baseball stadium to be affiliated with the Boston Red Sox and anticipated to be operational by 2021. The stadium development, and associated anticipated market changes, may impact Green Island neighborhood residents, including potential market changes related to increased housing prices. The City will commence with public outreach and participation efforts to help define the existing and anticipated needs of the neighborhood residents and stakeholders in the summer of 2019, with an anticipated five year dedication of involvement to helping improve and stabilize the predominantly low-to moderate income neighborhood through the use of federal, non-profit, and private funds.</p>
	<p><b>Target Date</b></p>	<p>6/30/2021</p>
	<p><b>Estimate the number and type of families that will benefit from the proposed activities</b></p>	<p>The population of the Green Island Target Area (Census Tract 7325.00) was 1,953 persons</p>
	<p><b>Location Description</b></p>	<p>Map provided with Action Plan.</p>
	<p><b>Planned Activities</b></p>	<p>The initiative will therefore have the added emphasis of helping existing homeowners stay in and maintain their homes, as well as keep rent increases controlled through affordability restrictions placed on any housing improvements made with HUD originated funds.</p>
<p><b>17</b></p>	<p><b>Project Name</b></p>	<p>CODE ENFORCEMENT</p>
	<p><b>Target Area</b></p>	<p>Low-Moderate Income Census Tracts</p>
	<p><b>Goals Supported</b></p>	<p>Healthy and Sustainable Housing</p>
	<p><b>Needs Addressed</b></p>	<p>Systematic housing inspections  Housing contaminant and pest abatement  Housing inspections and code enforcement  Home energy efficiency improvements  Weatherization of homes  Environmental preservation</p>

<b>Funding</b>	CDBG: \$207,000
<b>Description</b>	The Systematic Housing Inspections Program is expected to arrest neighborhood decline and deterioration by proactively identifying and inspecting for code violations in neighborhoods and by undertaking activities to demolish hazardous buildings in order to stabilize immediate area, and to eliminate specific conditions of blight or physical decay on a spot basis throughout the City of Worcester.
<b>Target Date</b>	6/30/2021
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 847 units of housing will be inspected benefitting up to that amount of families with the proposed activity. At least 3 families in the surrounding areas to the projects sites will benefit from this activity.
<b>Location Description</b>	The Systematic Housing Inspections Program will take place will be in a Low-Moderate area's of the City. Previous locations included Union Hill and Main South areas. Demolition activities can occur throughout the City.
<b>Planned Activities</b>	Sweeps & Clearance Activities

## **AP-50 Geographic Distribution – 91.220(f)**

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

The City of Worcester is comprised of 44 U.S. Census tracts, of which 26 tracts had 51% or more of their populations being persons of Low-Moderate Income (LMI) - defined by HUD as households whose incomes were 80% or less of the metropolitan area median income as adjusted for family size. These 26 LMI tracts were: 7304.01, 7304.02; 7305.00; 7310.02; 7311.01, 7311.02, 7312.03, 7312.04, 7313.00, 7314.00, 7315.00, 7316.00, 7317.00, 7318.00, 7319.00, 7320.01, 7322.01, 7322.02; 7322.03, 7323.02, 7324.00, 7325.00, 7326.00, 7327.00, 7329.02, and 7330.00. (See attached Low Income Population City of Worcester Map for locations). An examination of the attached Demographic Analysis of Target Areas Tables show that these 26 LMI tracts has a greater proportion of the city's racial and ethnic minority populations. According to the latest U.S. Census estimates (from 2018), the percentages by racial and ethnic populations were: 45.7% White, non-Hispanic, 29.9% Hispanic, 12.9% Black/African American, non-Hispanic, 8.1% Asian, non-Hispanic, 2.3% multi-race, non-Hispanic, 1.1% all other single races. In comparison with these 26 tracts with majority Low-Moderate Income populations, the latest U.S. Census estimates (from 2018) reported the following citywide percentages by racial and ethnic populations: 53.3% White, non-Hispanic, 23.1% Hispanic, 11.7% Black/African American, non-Hispanic, 8.8% Asian, non-Hispanic, 2.7% multi-race, non-Hispanic, 0.4% all other single races.

An examination of the attached Demographic Analysis of Target Areas Tables also shows that these 26 LMI tracts were defined as having a “very high concentration of multiple housing problems” as compared to the city as a whole. Within these LMI tracts 58.2% of housing was built before 1940 (compared to 48.9% citywide). Within these LMI tracks only 21.9% of housing was owner occupied compared to 38.6% citywide and from 2010-2018, the number of owner occupied units declined by - 5.2%. These LMI tracts have a disproportionate share of other socio-economic distress factors. For instance the percentage of persons in poverty in the LMI tracts was 29.8% (compared to 17.9% citywide). For persons aged 25 or more, 80.4% were high school graduates (compared to 87.2% citywide) and among persons aged 16 or more 8.1% were unemployed (compared to 4.4% citywide). Within these LMI tracts, 26.7% of households had no vehicle, compared with 15.9% citywide. One of these LMI tracts, 7325.00, was ranked as one of the top 5 of the city's most distressed and the with high levels of poverty, crime, problems with idle youth including gangs and drugs, foreclosed properties, absentee property ownership, vacant/boarded-up buildings, empty lots and other economic distress factors. This tract is the focus of the Green Island neighborhood which will work across multiple City departments in concert with key community institutions and stakeholders to improve the quality of life in that area.

The boundaries of the Green Island Revitalization Initiative target area correspond with U.S. Census Tract 7325.00 Block Group (BG) 2. The Green Island Revitalization Initiative target area is bounded on the north by Lamartine Street, on the east by Interstate Highway I-290, on the south by Endicott Street

and Crompton Park and on the west by Quinsigamond Avenue.

### Geographic Distribution

Target Area	Percentage of Funds
Low-Moderate Income Census Tracts	55
Green Island Revitalization Initiative	36

**Table 59 - Geographic Distribution**

### Rationale for the priorities for allocating investments geographically

The rationale for the priorities for allocating investments geographically were determined through an analysis of community and neighborhood based needs in combination with a robust citizen outreach/community public meetings process.

Community/neighborhood based analysis drew from the latest demographic data from the U.S. Census American Community Survey, the mapping of low- and moderate-income census tracts, the identification of institutions, assets, and liabilities, and the ability to leverage other public and private resources. The analysis has identified the most distressed inner city areas for targeted investment as exemplified by the Union Hill neighborhood over the last several years, and the newly launched efforts to revitalize the Green Island neighborhood.

The citizen outreach/community public meetings process was conducted in 11 neighborhood locations from June – October, 2019, by the Executive Office of Economic Development (EOED) which engaged in a citizen participation process to identify community needs and provide community input on activities and programs to fund. Ten community needs assessment public meetings were held in different parts of the City, with at least one in each of the City Council districts. The meetings were attended by 145 total participants from neighborhoods with underserved, low-income, diverse, and minority residents. All meetings were intentionally held at locations accessible for potential and actual CDBG beneficiaries. The public meetings were advertised broadly through the City’s media office as well as through door-to-door neighborhood outreach with at least one bilingual staff member. A bilingual staff person was present at each meeting to provide translation and/or facilitation in Spanish and Vietnamese. In addition, a special 11th public hearing was also held in the Green Island neighborhood in July 2019 to focus attention on the needs of that, very low- income, inner-city neighborhood (65 persons participated).

### Discussion

As discussed above, 55% non-administrative, First Year Annual Action Plan (7/1/2020 – 6/30/2021) funds are targeted to activities located or that serve the above reported 26 LMI Census Tracts, while 36% of allocated funds will directly serve the Green Island Neighborhood Revitalization Target Area. Through a targeted interdepartmental neighborhood revitalization initiative in the predominantly low- and moderate-income Green Island neighborhood, public improvements have been identified as a priority need. The initiative, which has come to involve over \$3 million in planned or currently underway public investments around streets and infrastructure in addition to housing improvements, code enforcement, public safety, and public health, prioritized the following public improvements:

- Tree plantings
- Street and sidewalk improvements
- Water main replacements
- Park upgrades
- Repainting and enhancing crosswalks at major intersections
- Implementing new or fixing existing ADA compliant curb cuts

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

The City of Worcester will directly support households with rental assistance, production of new units, rehabilitation of existing units, and acquisition of existing units through the following goals:

- Goal 1 Affordable Housing Development & Preservation,
- Goal 7 Expanded Resources for Homeless Prevention
- Goal 8 Resolve Barriers to Housing for Homeless Persons, and
- Goal 9 Housing Opportunities for Persons with HIV/AIDS.

Below is the summary breakdown of the support provided from the above goals.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	0
Non-Homeless	89
Special-Needs	25
Total	114

**Table 60 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	55
The Production of New Units	16
Rehab of Existing Units	43
Acquisition of Existing Units	0
Total	114

**Table 61 - One Year Goals for Affordable Housing by Support Type**

#### Discussion

While it is estimated that nearly 500 homeless individuals or those who will be prevented from homelessness will be served with ESG/HOPWA funds between Emergency Shelter, Street Outreach, Homeless Prevention and Rapid Rehousing, the above number includes only those who will be supported by a direct rental assistance subsidy through ESG or HOPWA’s STRMU/PHP and TBRA projects.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

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

The WHA has several actions planned during the next year to address the city's needs to public housing. One of the larger items moving forward is the **Gateway Cities Revitalization Program**. The WHA recently received notice from the MA Department of Housing and Community Development that it has been funded \$10 million for its Gateway Cities Revitalization Project. Entitled "Inspire to Grow", this project will allow the WHA to make significant capital improvements to its Curtis Apartments development and increase its capacity in helping residents achieve self-sufficiency. With the construction of a new Economic Opportunity Center (a one-stop destination where residents can take part in self-sufficiency programming, Life Skills Courses, and work with Family and Resident Services staff), the WHA will be able to turn over office space at 30, 32, and 34 Great Brook Valley Avenue to 18 new units (6 fully accessible) to welcome new individuals and families into the housing authority. Furthermore, the relocation of the Worcester Comprehensive Education and Care Network into the new EOC will open up additional space for 18 more units to be created at the Great Brook Valley Apartments (not funded by this award). Twenty new rear staircases at the Curtis Apartments will also bring much needed safety upgrades and will improve curbside appeal. Additionally, the development of landscaped green space at the rear of the Curtis Apartments will increase connectivity throughout the Great Brook Valley community, making the neighborhood and the WHA a more welcoming place than ever before. Actions to encourage public housing residents to become more involved in management and participate in homeownership

The WHA Family Self-Sufficiency Program encourages and works with participants and tenants in developing a 5 year action plan that promotes self-sufficiency and homeownership. The FSS staff assists participants in establishing realistic goals with the ultimate goal of moving out of subsidized housing into the private rental market and eventually into homeownership. Each participant's situation is unique and the establishment of short term and long term attainable goals is necessary for the individual's success.

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

N/A

### **Discussion**

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

### **Introduction**

The City's plan to address homelessness strives to expand on the successful "housing-first" model which moves away from extensive and costly shelter stays to focus on homelessness prevention to stabilize individual adults, families, youth and young adults experiencing housing instability. The City's ultimate goal is to quickly stabilize those in our community who are homeless or at-risk of homelessness so they can ultimately obtain safe and affordable permanent housing. The City recognizes the need to develop units for individuals and families through innovative strategies, including rehabilitation of existing housing stock, furthering homelessness prevention efforts, and improving the delivery of comprehensive service strategies that address the health, employment and long term self-sufficiency skills targeted to specific populations struggling with homelessness and other special needs.

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

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

The City continues its current strategies of reaching out to shelter and unsheltered homeless people and assessing their individual needs. This actions is associated with the Action Plan Goal 8: Resolve Barriers to Housing for Homeless Persons. City ESG funds support the salary and fringe for an Outreach Case Manager to conduct assessment of individual needs and enable access to mainstream resources and housing referrals for households without children that are unsheltered. In one year it is expected that the Outreach Case Manager will engage with 100 literally homeless individuals and unsheltered couple households. The Outreach Worker, an employee of the City of Worcester's Department of Health & Human Services will work closely with the City of Worcester Quality of Life Task Force, the Worcester Police Department's Crisis Intervention Team and other local outreach players in collaboration with the Worcester City and County Continuum of Care Coordinated Entry System.

In addition to ESG Outreach, there are homeless outreach services in the City to identify and engage with such individuals/families that offer immediate and long-term assistance to unsheltered people by frequenting locations such as Union Station, the Public Library in the Downtown corridor, as well as parks, and roadways prone to panhandling and loitering, and daily stops at soup kitchens and food pantries. The goal is to engage with people over time and through presence through outreach to build a relationship, connect those who typically refuse services to resources such as housing case management, substance abuse treatment and benefit assistance. As the City continues engaging and supporting Outreach Worker, it also has the support of South Middlesex Opportunity Council (SMOC), which is the agency that operated the Triage & Assessment Center. The additional staff helps to facilitate referrals to the Triage & Assessment Center and ultimately, permanent housing solutions. Community outreach organizations engage with partners and stakeholders to create a holistic system of outreach, engaging with hospitals, law enforcement, detox centers and other services that commonly

encounter homeless individuals.

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

The City plans to continue addressing the needs of both emergency shelters and transitional shelters for the homeless, which are encompassed in Strategic Plan Goal 8: Resolve Barriers to Housing for Homeless Persons, and Goal 9: Housing Opportunities for People Living with HIV/AIDS. These actions will continue to be supported by both ESG and HOPWA funds through the following activities.

**Hotel Grace**, run by the Net of Compassions is a collaborative effort bringing outreach, counseling and assistance to homeless individuals in the streets of Worcester. Services are provided through three interrelated programs: Hotel Grace, Main Street Saturdays, and ongoing outreach and peer counseling. Hotel Grace is an emergency cold weather shelter with fifty (50) beds available on a first come basis each night that the weather dips below 32 degrees. In addition to a warm and safe place to sleep, Hotel Grace provides a warm meal, counseling, outreach and referral services, and volunteer legal services. In the course of a winter, Hotel Grace serves more than 400 individuals. During the COVID 19 Pandemic, Hotel Grace operated 3 additional sites within in the City making shelter and essential services available to all that needed services/shelter.

**(ESG) Emergency Solutions Grant** funds provides Emergency Shelter and Essential Services for unaccompanied homeless adults at the Triage & Assessment Center, Open Sky (formerly the Bridge of Central Mass) and Veterans Inc., through a veteran-specific emergency shelter project. During the COVID19 Pandemic additional ESG funding was awarded to these agencies in order for them to provide essential services above the normal grant award.

**(HOPWA) Housing Opportunities for People with Aids** funds provide supportive services that may assist individuals living with HIV/AIDS in connecting, as determined by individual needs, to emergency shelter and transitional housing through the Coordinated Entry and Access Systems in both Worcester County and Windham County, CT. During the COVID19 Pandemic additional HOPWA funds were given to AIDS Project Worcester, Montachusett Opportunity Council and Perceptions Program, Inc. in Windham CT to assist those affected by the pandemic with supportive services such as finding housing, assisting with first, last month's rent, utilities, food and supplies.

All of these activities help address the emergency shelter and transitional housing needs of homeless populations because of the crisis-intervention nature of the program support. The programs recognize that permanent housing is the ultimate goal, but some populations that are particularly at-risk may need enhanced stabilization and case management.

**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**

Helping homeless persons, including the chronically homeless, whether they be individuals, families with children, Veterans with families, or unaccompanied youth make the transition to permanent housing and independent living, and ensuring that households do not return to homelessness are priority needs identified in Goal 8: Resolve Barriers to Housing for Homeless Persons and Goal 9: Housing Opportunities for People Living with HIV/AIDS of the Strategic Plan. Addressing this area as a priority will allow focus on housing facility and supportive service needs to transition to permanent housing. Because of the expertise of sub-recipient agencies responsible for carrying out permanent housing placement and rapid re-housing activities. All of the assistance for housing that the City provides whether it be ESG or HOPWA ensures a supportive service match that leads households to self-sufficiency during the process of rapid re-housing. The Coordinated Entry & Assessment process through the Continuum of Care (CoC) ensures that housing placements are made with the appropriate supportive services using Continuum of Care and other mainstream resources targeted to disabled and/or chronically homeless households.

**ESG** - Rapid Re-Housing provides funding towards unaccompanied adults to support first and last months' rent and short-to-medium term rental assistance, depending on the individual needs. To support the housing needs of unaccompanied young adults, ESG Rapid Re-Housing funds support first and last months' rent, short-to-medium term rental assistance and other financial assistance related to rehousing young adults ages 18-24 years.

**HOPWA** - Funds focus on stabilization in the transition to permanent housing by providing supportive services through case management and permanent housing placement for rapid re-housing. HOPWA supports Tenant Based Rental Assistance (TBRA), which focuses on the attainment of permanent housing through mobile vouchers. Additional permanent housing is available through facility-based permanent supportive housing programs and Permanent Housing Placement rental start-up assistance.

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

Needs associated with preventing homelessness for populations City-wide are addressed through Strategic Plan Goal 7: Expand Resources for Homeless Prevention. This focus includes housing stabilization case management for some and actual cash assistance for limited utility and rent payments depending on specific household needs (or a combination of both, as assessed by housing providers). The commitment of the actions are supported by HOPWA Short-term Rent, Mortgage, and Utility assistance (STRMU) for over 75 low-income households with a family member or individual that is HIV positive. Housing stabilization needs include referrals, services for special needs and disabled households, skills training and planning for individuals discharged from publicly funded institutions.

These goals are accomplished through community partnerships between agencies and in collaboration with the City.

ESG funds for housing stabilization case management for homeless and formerly homeless individuals will accomplish the needs and goals identified, with institutional delivery of services that address housing, health, social services, employment, education, as well as youth needs are also facilitated through coordination and in coalition with the City department and initiatives.

## **Discussion**

The City of Worcester and the CoC also have a seat at the Community Roundtable on Youth Homelessness, which includes over 25 multi-sector children and youth-serving agencies. A key goal of the roundtable is to reduce youth homelessness by assuring appropriate discharges and transitional care for youth transitioning from the Massachusetts Foster Care System. The group also includes representation from the State Department of Children and Families and the Worcester Public Schools. The City Manager's Task Force for Sustaining Housing First Solutions has a stated goal to achieve and sustain "functional zero" of adult chronic homelessness in the City. The Task Force' recommendations that actions be outlined and resources be available necessary to sustain a long-term system of permanent supportive housing within the City of Worcester to end adult chronic homelessness. The 26 recommendations addressed the five components of the Housing First system:

- Crisis Response
- Housing Supply and Rental Assistance
- Supportive Services
- Housing Stabilization
- Data Driven Decision Making

The overarching recommendations were:

- Public, Nonprofit organizations, and private landlords work together to produce 103 housing units by December 30, 2019, and then continue to preserve and develop adequate units for those who become chronically homeless in the future.
- That all community housing entities and mainstream support service providers become part of the Worcester City & County Continuum of Care (CoC) Coordinated Entry System (CES) which provides housing subsidies with individualized support services prioritized for chronically homeless individuals.
- The City Manager established a "sustaining Housing First Solutions Coordinating Council" which ensures a coordinated community-wide system that acts with urgency and embodies the essential elements:

- 1) Actionable and measurable goals
- 2) Clear, accountable leadership
- 3) Prioritize access to housing with active case conferencing that respects confidentiality
- 4) Public commitment & transparent reporting
- 5) Funder education, alignment & sufficiency of resources

Rather than creating more shelters, the evidence-based Housing First approach provides people with permanent housing and supportive services, including access to primary and behavioral health services to improve physical health, foster mental health, and reduce alcohol and drug use.

These recommendations are born out of the thorough and thoughtful consideration of how to best serve our residents in need of permanent housing and supportive services.

Assessing and Addressing Acute Risk Behaviors: The City established the HUB initiative. The HUB is a strategic program that combines the efforts of more than 30 local and state organizations to assess and address acute risk behaviors and cases including drug and opioid abuse chronic homelessness, mental health issues, poverty and crime. The HUB is a coordinated mobilization of resources to address individuals or families facing acute levels of elevated risk. The purpose is to lower risk and connect individuals or families to services immediately. The HUB is overseen by a Systems Leader Group (SLG) that is updated by the HUB of any systemic issues that they are seeing. THE SLG looks in to the data, analyzes trends to identify opportunities for system change.

**AP-70 HOPWA Goals - 91.220 (I)(3)**

<b>One year goals for the number of households to be provided housing through the use of HOPWA for:</b>	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	70
Tenant-based rental assistance	10
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	10
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	35
<b>Total</b>	<b>125</b>

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

### **Introduction:**

As a response to the impediments found in the 2019 AI (summarized in Sections MA-40 and SP-55), there was also a list of recommendations on how to address the impediments found. This section describes the efforts to address those impediments.

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

### HOUSING POLICY

The City of Worcester has been doing a tremendous amount of work in relation to affordable and fair housing through multi-pronged initiatives and programs, including those supported by annual HUD entitlement funding. However, the City should also consider focusing on producing a comprehensive affordable housing strategy/policy. Participants in the AI process generally agreed that there is too little coordination between the work of various governmental and quasi-government agencies, nonprofits, and advocacy groups in Worcester. Bringing the myriad of stakeholders together under a coherent, city-wide policy could have a major, beneficial impact. Although not all parties may have the same goals regarding housing production, it may be useful to see what each stakeholder is looking to achieve, and how the efforts could complement each other toward achieving common overall goals in a city wide framework. Within each group there also may be an opportunity to increase coordination in how, where, and what type of affordable housing is produced.

### FAIR HOUSING TESTING AND REPORTING

Worcester needs a partner in its efforts to identify, understand, and address housing discrimination. Unfortunately, the development of this AI was severely hampered by the failure of the local testing program at Community Legal Aid to provide data. The City should consider directing its own funds toward improved testing and accountability, if necessary by securing a partner willing to report substantive and detailed data on a predictable schedule.

### AWARENESS, EDUCATION AND OUTREACH

Many people are unaware of their fair housing rights, and many property owners are unaware of their fair housing responsibilities. The City has housing organizations and advocates, but not everyone is working together or working toward commonly understood and agreed-upon outcomes. A City-sponsored and organized annual fair housing conference could go a long way toward building awareness and consensus and positioning the City to take a leadership role in

regional fair housing advocacy. The City of Worcester Office of Human rights seems to be the Department best suited to educate the public on Fair Housing Rights issues identified above. Additionally, through both the Human Rights Office, and non-profit partners, the City should coordinate strategic and grassroots outreach efforts to educate, empower, and raise awareness of Fair Housing rights, issues, and concerns. The outreach should have clear, transparent, and measureable annual goals. The items above should be reviewed and strategically incorporated into efforts regarding awareness of Fair Housing Rights.

## ZONING & REGULATORY REFORMS

- The City should consider allowing at least two-family density development in all residential districts in Worcester to maximize housing unit supply and opportunity.
- The City should continue efforts to reduce parking minimums and establish flexibility in parking requirements, particularly for multi-family housing and within mixed-use districts.
- The City should amend setback requirements to be more flexible and reflective of actual traditional building forms. For example, many triple decker buildings were historically constructed with little or no front set back, and side yards are often much smaller than what is required. Reducing or eliminating these could increase the value of those units and spur reinvestment opportunities.
- Evaluate whether height limitations are too restrictive, and propose changes as necessary: Many participants cited height restrictions as a key barrier to redeveloping triple-deckers in the city. Dimensional regulations should be reviewed to bring them more in line with the building stock the City actually has.
- The City should explore allowing multi-family development in additional areas of the city – particularly those areas with good transportation access or located in close proximity to mixed use or commercial zones. Comments from realtors and developers suggested that there are not enough areas of the City where new multi-family housing can be built. Additionally, changing the site dimensional requirements (setbacks, parking, etc.) to allow for the demolition and rebuilding of existing three-four family units in existing multi-family districts, would allow more parts of the City to experience multifamily re-development which might be more cost effective and attractive to the current and future market. These
- Existing City demographics, and citizen input, suggest the City should pursue strategies for increasing the availability of both smaller and larger unit sizes. There is significant market demand throughout the City for studio, one bedroom, micro-lofts and even SROs, as well as an under production, and need, for larger family-sized units, especially where public

transportation is available.

- The City should consider allowing expanded opportunities to create additional dwelling units within existing buildings in certain circumstances.
- The City should revisit the prohibition on unrelated occupants. Currently the City limits sharing of dwelling units to no more than three unrelated occupants. This policy is said to limit the ability of landlords to fully lease up some properties, especially near colleges. However, the City needs to be mindful of fair housing protections for people with disabilities, such as adults living in group homes or sober houses.
- As the City has experienced a reinvigorated interest by developers for new development projects in the past 5 – 7 years, it should explore the feasibility and potential benefits of implementing an inclusionary zoning requirements, as well as mandatory mixed –income unit requirements for larger scale new projects that utilize any City financial assistance through tax incentives or other local government funds.

#### ADDRESSING HOUSING QUALITY AND NEIGHBORHOOD DISINVESTMENT

Worcester has a high number of deteriorated and abandoned properties and many are in neighborhoods where a high proportion of minorities and lower-income residents live. These properties range from old industrial buildings that are fully or partially vacant to poorly maintained and abandoned housing units. The properties have a negative impact on the surrounding neighborhood by signaling disinvestment, presenting hazards to the neighborhood’s residents’ safety and health, and creating areas that may attract criminal activity. The existence of deteriorated and abandoned property in neighborhoods decreases property values and limits homeowners’ abilities to grow equity in their homes and threatens the health of residents who live in this housing stock.

- Since 2013, using in large part federal entitlement funds like CDBG, the City has experimented with a “targeted” and strategic approach to neighborhood revitalization that has meant significantly investing in the housing and infrastructure of specific neighborhood over a dedicated amount of time. In contrast to

more “scatter shot” approaches of investing in several projects and areas at the same time without any geographic or programmatic focus, this model has shown to be impactful and generate third party investment and cooperation by residents and institutional partners in the revitalization efforts, particularly as there is more certainty and resources brought to bear. A large component of these efforts has also involved improvements and upgrades to the community appearance and community safety. This approach has resulted in more transformative outcomes. The Union Hill neighborhood was the first area where this model

was implemented, and the City should continue to implement this model in other low-to moderate income neighborhoods using federal, local, and leveraged private funds.

- The City should study the landscape of options for incentivizing housing maintenance and upgrades. There should be more resources beyond CDBG for interior and exterior repairs, for instance the possibility of a Neighborhood Challenge Grant for owner-matched cosmetic improvements to enhance housing curb appeal, and improve neighborhood identity and image through signage, art, or aesthetic improvements.
- The City needs to reassess its approach to code enforcement. On one hand, strict enforcement may unduly penalize the most vulnerable renters in Worcester, but on the other hand, inconsistent or weak enforcement simply encourages irresponsible landlords to ignore health, safety, and quality-of-life problems faced by their tenants. The City should also consider re-positioning and empowering the Inspectional Services Department to better provide proactive code enforcement, including implementation of a “Rental/Landlord Registry” program that requires landlord owned units to pass inspection before approval for rental, and for re-inspection at least yearly. The program could and should also include a landlord training/educational component.
- The City administers a Chapter 139 process whereby dilapidated, abandoned, or unsafe properties that have been repeatedly cited by Code Enforcement become slated for receivership or demolition after the owners have been afforded an administrative hearing and appeal process. Too often properties become “stuck” in this process, with no tangible outcome or improvements expected or made within reasonable time frames. An audit or assessment of said program should be conducted to seek improvements to it, including but not limited to, potential funding pools to assist the owners in rehabbing and re-activating abandoned or unsafe residential units.

#### HOUSING COST BURDEN AND RACE

It is recommended this topic be added to the list of items requiring further study.

#### FORECLOSURE POLICY

It is recommended this topic be added to the list of items requiring further study.

#### LEAD PAINT ISSUES

The City of Worcester Housing Development Division manages a \$5.6 million HUD lead abatement grant. A requirement of this grant is community outreach to homeowners and landlords. The city has partnered with the Realtor association of Central Massachusetts and Masslandlords in order to improve the communication of the rights and responsibilities of

homeowners and landlords to follow both the Massachusetts lead law and well as federal fair housing and lead disclosure standards. Landlords are specifically made aware of their responsibility not to discriminate against tenant with children in order to skirt applicable lead laws. In addition, the program coordinates with both Worcester Headstart and Worcester Public School departments to ensure children under 6 receive lead testing prior to enrolling in school.

#### NEED FOR ACCESSIBLE UNITS

It is recommended this topic be added to the list of items requiring further study.

#### ADEQUATE PUBLIC TRANSIT

It would be a good time to re-vision the transit system and make sure it leverages all resources in the most needed areas. It is also recommended that there is further education and expansion of bicycle transit within the City. It is recommended this topic be added to the list of items requiring further study.

#### HIV/AIDS HOUSING OPTIONS

It is recommended an update to the 2011 HOPWA Needs Analysis is conducted to determine the current State of the needs so actions can be tailored to relevant data.

#### OTHER RECOMMENDATIONS

The City should reconsider adopting the Community Preservation Act (CPA) and establishing a Municipal Affordable Housing Trust Fund.

#### **Discussion:**

Recommendations can either be categorized as recommendations that can be considered or items that require further study to determine the best course of action.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

Challenges to meeting underserved needs in the coming year stem primarily from increasing demand for program activities combined with decreasing amounts of funding. In order to maximize efficiency and achieve a greater impact, the City proposes the following actions:

- Annually, EOED conducts funding overview and technical assistance workshops for parties interested in applying for HUD entitlement funds through CDBG, HOPWA, and ESG, (usually planned for November). The workshops are designed to focus and facilitate discussion with interested parties in order to define the key social service issues and community needs in Worcester, to identify gaps in service, and to brainstorm potential strategies to address needs and gaps. The workshops were also designed to foster dialogue among agencies/departments to enhance collaboration and the sharing of information.
- Continue to work to improving access to services by persons with limited English proficiency in order to reach underserved populations. According to recent U.S. Census American Community Survey data, 18 percent of the Worcester population speaks a language other than English and speaks English less than “very well.” It is therefore important to ensure that critical programs and services address language and cultural barriers that isolate households and impede successful utilization of community resources. This proposed action includes developing a Language Assistance Plan for HUD Entitlement Programs.

### **Actions planned to address obstacles to meeting underserved needs**

Challenges to meeting underserved needs in the coming year stem primarily from increasing demand for program activities combined with decreasing amounts of funding. In order to maximize efficiency and achieve a greater impact, the City proposes the following actions:

- Annually, EOED conducts funding overview and technical assistance workshops for parties interested in applying for HUD entitlement funds through CDBG, HOPWA, and ESG, (usually planned for December/January). The workshops are designed to focus and facilitate discussion with interested parties in order to define the key social service issues and community needs in Worcester, to identify gaps in service, and to brainstorm potential strategies to address needs and gaps. The workshops were also designed to foster dialogue among agencies/departments to enhance collaboration and the sharing of information.
- Continue to work to improving access to services by persons with limited English proficiency in order to reach underserved populations. According to recent U.S. Census American Community Survey data, 18 percent of the Worcester population speaks a language other than English and speaks English less than “very well.” It is therefore important to ensure that critical programs and services address language and cultural barriers that isolate households and impede successful utilization of community resources. This proposed action includes developing a Language Assistance Plan for HUD Entitlement Programs.

### **Actions planned to foster and maintain affordable housing**

The City will continue programs for the rehabilitation of both rental and owner housing units, as these

efforts keep people in affordable code compliant housing and may serve to prevent homelessness, especially for extremely low-income and elderly homeowners. In addition the creation of new rental housing will also be pursued. The City also prioritizes homeless activities, ranging from the provision of emergency shelter to supportive services that prevent homelessness. Affordable Housing funds will also be prioritized to address the recommendations of the Task Force for Sustaining Housing First Solutions. Overall, the City will focus on multiple efforts to maintain affordable housing, including rental assistance, rental acquisition and rehabilitation, new rental construction, owner occupied rehabilitation, and down payment assistance for first-time buyers.

### **Actions planned to reduce lead-based paint hazards**

The Worcester Lead Abatement Program (WLAP) was awarded a \$5.6 million Lead Hazard Reduction Grant from the HUD Office of Healthy Homes in 2019 to provide lead paint and soil abatement of low income and very low income housing units, as well as the provision of primary prevention services in the form of outreach and education to low- and moderate-income families with children under age six. Through HUD's Lead Hazard Reduction 2019 funds, the City of Worcester's Housing Division will remediate lead paint hazards in 250 moderate, low and very low income units of housing using \$5,000,000 in lead abatement funds, as well as further remediate 120 of those same units using \$600,000 in Healthy Homes supplemental funding over a 42 month period (01/02/2020 - 06/30/2023).

The City's Housing Development Division (HDD) administers the Worcester Lead Abatement program which can provide up to \$10,000 per unit to assist with lead abatement in approved properties with low-to moderate-income tenants. HDD also coordinates the Massachusetts "Get the Lead Out" loan program funded by MassHousing for additional abatement assistance over the \$10,000 per unit threshold. Additionally, this grant will be matched by \$603,121 in other public and private resources to further provide lead paint and soil abatement, as well as provide primary prevention services in the form of outreach and education to low and moderate income families with children under age six within the City of Worcester.

In addition, any CDBG funded housing rehabilitation project over \$25,000 will be delead in conjunction with the rehabilitation activities to take place. For projects between \$5,000 and \$24,999, a lead report will be obtained prior to rehabilitation work taking place. Any area of work that contains lead paint will be conducted using EPA RRP and Massachusetts Lead Safe Renovator standards.

The City's Worcester Lead Abatement Program anticipates applying for subsequent rounds of HUD Healthy Homes funding on a 3-year basis (2021 and 2023). The WLAP intends to request a total of \$625,000 in CDBG funding primarily for HUD Lead Hazard Reduction/Healthy Homes matching funding (\$125,000 per year for 5 years). It is estimated that during the 5-year period a total of 300 units of

housing will be made lead safe.

### **Actions planned to reduce the number of poverty-level families**

Given the high proportion of residents living in poverty, the City focuses on using its HUD entitlement program funds for initiatives and projects that provide the maximum benefit to very low, low and moderate income individuals and households. The City's anti-poverty strategy seeks to support programs that provide job and life skills training and other advancement opportunities, and is part of a coordinated effort to create jobs and improve the local economy. This two-pronged approach helps families achieve and maintain economic security and self-sufficiency. In addition, EOED will continue coordinating with the Central Massachusetts Workforce Investment Board (CMWIB) around programs and initiatives that support the City's goal of reducing poverty.

### **Actions planned to develop institutional structure**

Coordinated Entry for Homeless Persons is convened by the Central Massachusetts Housing Alliance, Inc. (CMHA), the lead agency for the Continuum of Care (CoC) in partnership with the City of Worcester and CoC agencies. The purpose of the Coordinated Entry system is to improve the quality of the CoC and greater Worcester's homeless housing and service system, and to improve outcomes for individuals and families in the continuum that are threatened with or experiencing homelessness. Two Work Groups convene bi-weekly to develop the coordinated entry policy, with one group focused on the needs of homeless families and the other on homeless individuals (including veterans and their families, and unaccompanied youth). The work groups implement processes that prioritize individuals and families with the greatest needs (especially chronically homeless households) for housing and service assistance, and attempt to minimize barriers to entry because of lack of employment or income, drug or alcohol use, or having a criminal record. The City and the CoC encourage a Housing First model, but recognize that some housing and service resources are required by funding agencies or providers to give preferences to certain populations including sub-groups determined by age, disability, gender, or community problem.

The Coordinated Entry system ensures appropriate access to housing based on individual needs and assessments, and promotes effective referrals and partnerships throughout the homeless services system.

Community partners at the heart of the overall institutional structure, including those that serve homeless and non-homeless populations, have cited gaps in the coordination, collaboration, and information sharing among organizations responsible for program delivery. In particular, the consultation process highlighted a need to increase awareness of existing resources amongst organizations. This gap impacts the referral system for clients, and consequently affects the ability of low- and moderate income residents to access other critical resources in the community. As a result, the City will support information and referral and direct case management services that help connect low- and moderate-income residents to much needed social and human services.

### **Actions planned to enhance coordination between public and private housing and social**

## **service agencies**

A number of local and regional agencies, non-profit organizations, and service providers engaged in the consultative process that informs this Action Plan. EOED will capitalize on these relationships to enhance coordination, as well as continue to work collaboratively with various municipal departments to maximize the use of limited resources to address the needs of low- and moderate-income residents. In addition, the City will continue to actively participate in ongoing efforts to enhance coordination with private industry, businesses, developers, and social service agencies in order to foster economic development. EOED, for example, plays a leadership role in the Worcester Business Resource Alliance (WBRA), a centralized network of business professionals, technical assistance providers, lenders, and community development organizations that collectively provide services to entrepreneurs and small business owners and managers.

### **Discussion:**

As outlined in this section, the City of Worcester has a number of plans designed to address priority needs in the community, including strategies to meet public service needs, foster and maintain affordable housing needs, mitigate lead-based paint hazards, create economic opportunities, and develop the institutional structure through coordination and collaboration between public and private entities.

## Program Specific Requirements

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

#### Introduction:

Community Development Block Grant (CDBG) allocations to fund First Year Action Plan (7/1/2020 - 6/30/2021) activities contained within this document include \$4,617,183 in U.S. Department of Housing and Urban Development (HUD) Fiscal Year 2020 CDBG Entitlement Funds for the City of Worcester (Grant # B-20-MC-25-0026), \$50,000 in CDBG anticipated program income generated from prior years activities, and \$2,051,862 in CDBG unexpended balances from prior year allocations. Thus a total of \$6,719,770 in CDBG funds will be available and has been allocated for First Year Action Plan Activities (7/1/2020 - 6/30/2021) as presented in Tables AP-20 (Annual Goals and Objectives) and AP-38 (Project Summary) of this document.

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

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	50,000
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>50,000</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	96.31%

**HOME Investment Partnership Program (HOME)**  
**Reference 24 CFR 91.220(l)(2)**

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

No other forms of investment are currently being used beyond those identified in Section 92.205

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

The City is not currently using HOME Investment Partnership Program funds for homebuyer assistance activities. In the event of resale of a property where there is not a direct subsidy to the homebuyer, the City uses a Resale Provision to preserve the remaining affordability period to ensure the housing is retained for occupancy for low-income households. The Resale Provision requires that if the owner of an income restricted property sells, conveys, or transfers his/her ownership interest in the property prior to the end of the minimum federally-required affordability period, the sale, conveyance, or transfer shall only be to an eligible, income-qualified purchaser. Other restrictions concerning notice of sale, maximum resale price, and marketing of affordable unit(s) shall apply and are fully detailed in the City's Resale Provision.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The purchaser must occupy the property as his/her principal residence throughout the period of affordability. For projects that are subject to a resale provision, the period of affordability is determined by the amount of the amount of direct subsidy (defined below) to the homebuyer, as follows:

5 years for individual projects receiving between \$1,000 and \$14,999 in Housing Fund assistance per unit; and

10 years for individual project receiving between \$15,000 and \$40,000 in Housing Fund assistance per unit; and

15 years for individual project receiving more than \$40,000 in Housing Fund assistance per unit.

While long-term affordability can be accomplished through either recapture or resale provisions, the City has elected to impose resale provisions on all HOME-assisted homeownership projects.

**HOME Resale Affordability Provisions**

The HOME resale requirements are established in the HOME rule at §92.254(a)(5)(i). Under HOME resale provisions, the City is required to ensure that, when a HOME-assisted homebuyer sells his or her property, either voluntarily or involuntarily, during the affordability period:

1. The property is sold to another HOME eligible low-income homebuyer who will use the property as his or her principal residence. Resale of the property during the affordability period and

qualification of subsequent buyers will be governed by the HOME covenant and land use restriction on the property;

2. The original homebuyer receives a fair return on investment, (i.e., the homebuyer's down payment plus capital improvements made to the house); and

3. The property is sold at a price that is "affordable to a reasonable range of low-income buyers".

This maximum limit would be set at the HOME Homeownership Value Limits published by HUD found here: <https://www.hudexchange.info/resource/2312/home-maximum-purchase-price-after-rehabvalue/>

Affordability Period:

Under resale, §92.254(a)(5)(i) of the HOME rule states that the period of affordability is based on the total amount of HOME funds invested in the housing. In other words, the total HOME funds expended for the unit determines the applicable affordability period. Any HOME program income used to assist the project is included when determining the period of affordability under a resale provision.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

The City of Worcester does not currently intend to use HOME funds to refinance existing debt currently secured with HOME funds.

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

1. Include written standards for providing ESG assistance (may include as attachment)

Written standards are provided as an attachment to this plan.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

Coordinated Entry for Homeless Persons is convened by the Central Massachusetts Housing Alliance, Inc. (CMHA), the lead agency for the Continuum of Care (CoC) in partnership with the City of Worcester and CoC agencies. The purpose of Coordinated Entry is to improve the quality of the CoC and greater Worcester's homeless housing and service system, and to improve outcomes for individuals and families in the continuum that are threatened with or experiencing homelessness.

Two Work Groups convene bi weekly to develop the coordinated entry policy, with one group focused on the needs of homeless families and the other on homeless individuals (including

Veterans and their families, and unaccompanied youth). The work groups implement processes that prioritize individuals and families with the greatest needs (especially chronically homeless households) for housing and service assistance, and attempt to identify and minimize barriers to entry including lack of employment or income, drug or alcohol use, or criminal record. The City and the CoC encourage a Housing First model, but recognize that some housing and service providers give preference to certain populations based upon age, disability status or gender, or community problem.

The Coordinated Entry system ensures appropriate access to housing based on individual needs and assessments, and promotes effective referrals and partnerships throughout the homeless services system.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

Please see attached the Fiscal Year 2019-2020 Emergency Solutions Grant Program Request for Proposals, which explains the process for making subawards and how funds are allocated to private nonprofit organizations. The City allocates and administers ESG funds to private nonprofit agencies via executed contracts, as recommended by the Emergency Solutions Grant Advisory Committee, the Continuum of Care, and as approved by the City Manager and City Council of Worcester.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The City has a homeless or formerly homeless person serving as a voting member on the Emergency Solutions Grant Advisory Committee. Additionally, members of the CoC Board and diverse funding partners with knowledge of existing needs and resources in the community, such as the United Way, contribute to recommendations for making subawards for ESG. This year, direct service providers also participated as committee members to share insight into how ESG funded projects are working on a practical level. In the past 5 years, ESG funds have been used for prevention, rapid rehousing, street outreach and emergency shelter operations to serve major sub populations represented in our community. The decision to allocate funds to these activities is greatly informed by the gaps and resources currently available through the federal HEARTH act in consultation with the CoC Board, and further informed by “on the ground” feedback in regards to how certain programs are filling service gaps in the community.

The CoC Board is staffed according to HUD's requirements, including: broad geographical representation, formerly homeless individuals, the City of Worcester as ESG recipient agency, veterans services, homeless assistance providers, mental health providers, social service providers, victims services providers, faith based organizations, hospitals, higher education, government, and

the public housing authority. The role of this entity is as follows:

- Identifies emerging or changing needs among homeless individuals and families and recommends new resources to best address those needs.
- Implements and supports policies that ensure the best use of available resources for the homeless population through a coordinated assessment and entry system
- Makes decisions on applications for new and/or renewed project funding based on a specific set of review criteria including monitoring and evaluation of specific program performance and documentation of an effective and transparent prioritization of resources to those with the greatest need.

The CoC Board's input, based on its characteristics highlighted above, is considered significantly in the ESG funding recommendation process.

Based on feedback, last year's funding recommendation process, the ESG grant administrator explained the scoring and ranking process to make it more intuitive and straightforward, encouraging participation by individuals and residents who don't have extensive experience reading through grant proposals, but have valuable insight into the service system in Worcester. There were also presentations by each applicant to let them explain what they do for the community in their own words. Voices of direct service providers this year have proven valuable to the process, and a simplification of the process will facilitate more representative input from the community.

#### 5. Describe performance standards for evaluating ESG.

As part of the process of allocating ESG funds through the City's RFP process, there are established performance standards to evaluate ESG program sub-recipients. Under the "Project Narrative & Description" section, subrecipients provide a method for tracking clients that can be measured through recording individual client or household level data. Sub-recipients predict the unduplicated number of families/persons that will benefit from the activity (output) and the cost to provide the service. Desk monitoring occurs with every payment request submission.

On a quarterly basis, ESG sub-recipients submit HMIS generated Performance Reports to measure progress alongside financial drawdowns for each project.

## Appendix - Alternate/Local Data Sources

<b>1</b>	<p><b>Data Source Name</b></p> <p>Worcester City and County CoC Data</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>Central Massachusetts Housing Alliance, Inc. (CMHA), lead agency for the Worcester City and County Continuum of Care, and HMIS Lead Agency provided the data for the number of persons experiencing homelessness on a given night, and number of persons experiencing homelessness each year.</p> <p>The data of race and ethnicity, and the estimated persons experiencing or exiting homelessness or becoming homeless over the course of the year is drawn from Annual Performance Report data of providers participating in the Homeless Management Information System (HMIS), as well as the Efforts to Outcomes (ETO) reporting system managed by the Massachusetts Department of Housing and Community Development (DHCD), which oversees a large percentage of shelters serving households with children across the state.</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>The data represents the most recent Housing Inventory Count (HIC) for the Worcester City and County Continuum of Care. It has been combined with additional HMIS data to includes both CoC-supported units/beds, and community-based units/beds that do not receive CoC funds.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>The purpose of developing this data set is to reference the nature and extent of unsheltered and sheltered homelessness in the geographic area served by the Worcester City and County Continuum of Care. The purpose of including County-wide data is to illustrate the regional nature of homelessness in Worcester County, highlighting how the needs of homeless persons extends within (and beyond) the City of Worcester ESG and HOPWA grantee jurisdiction.</p>
	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>The data represents the entire geographic area served by the Worcester City and County Continuum of Care, see MA-40 Homeless Needs Assessment Supplemental Map #1.</p> <p>The Worcester County and City CoC does not serve any rural homeless households, as defined by HUD (Section 491(k)(2) of the McKinney-Vento Act) due to the fact that all areas served in the Worcester City and County CoC are located within the Worcester eMSA, and no area served is within a rural county unto itself.</p> <p>The data collection is not concentrated among a certain population. It covers the number of persons on a given night by populations required in HUD's Annual Point in Time Count. However data estimating the number of persons who exit homelessness each year was only available for households with children, and adult households without children.</p>

	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>The data estimating number of persons experiencing homelessness on a given night is drawn from the Point in Time (PIT) count which occurred on January 29, 2014.</p> <p>The time period estimating the number of persons who experience homelessness each year, number of persons that exit homelessness each year, and number of days that persons experience homelessness, is drawn from HMIS data at the local and state level for individuals and families, respectively, from the period of January 1, 2014-December 31, 2014.</p> <p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>The data set is complete for the data available.</p> <p>Recognizing the lack of data for number of persons who lose their housing and become homeless each year, the City of Worcester and the CoC hope to explore the possibility of collecting this data in the future. Access to this data could potentially inform early warning systems and address gaps in homeless prevention efforts.</p>
2	<p><b>Data Source Name</b></p> <p>MA Special Commission Unaccompanied Youth Survey</p> <p><b>List the name of the organization or individual who originated the data set.</b></p> <p>&lt;p align="LEFT"&gt;Massachusetts Special Commission on Unaccompanied Homeless Youth&lt;/p&gt;</p> <p><b>Provide a brief summary of the data set.</b></p> <p>Beginning in 2104, the Massachusetts Interagency Council on Housing and Homelessness (ICHH) implements a state-wide survey on homeless youth via the local Continuum of Care in the state. The MA ICHH Youth Point-in-Time survey was modeled after best practices in the Compass Network's efforts to understand the extent of risk factors associated with young adult housing instability in Worcester.</p> <p><b>What was the purpose for developing this data set?</b></p> <p>The Fiscal Year 2014 state budget included \$150,000 at EOHHS to conduct a count in order to better understand the scope of homelessness among unaccompanied youth. The ultimate goal is to use information obtained from the count to effectively match housing and services to youth experiencing homelessness. Ideally, the Youth Count will act as a benchmark for monitoring progress towards ending youth homelessness in Massachusetts over the coming years.</p> <p><b>Provide the year (and optionally month, or month and day) for when the data was collected.</b></p> <p>The data was collected in 2014, for one week beginning on January 29, 2014.</p>

	<p><b>Briefly describe the methodology for the data collection.</b></p> <p>EOHHS to conducts a count in order to better understand the scope of homelessness among unaccompanied youth. The ultimate goal is to use information obtained from the count to effectively match housing and services to youth experiencing homelessness. Ideally, the Youth Count will act as a benchmark for monitoring progress towards ending youth homelessness in Massachusetts over the coming years.</p>
	<p><b>Describe the total population from which the sample was taken.</b></p> <p>The data was collected in 2014, for one week beginning on January 29, 2014.</p>
	<p><b>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</b></p> <p>The Fiscal Year 2014 state budget included \$150,000 at EOHHS to conduct a count in order to better understand the scope of homelessness among unaccompanied youth. The ultimate goal is to use information obtained from the count to effectively match housing and services to youth experiencing homelessness. Ideally, the Youth Count will act as a benchmark for monitoring progress towards ending youth homelessness in Massachusetts over the coming years.</p>
<p><b>3</b></p>	<p><b>Data Source Name</b></p> <p>Worcester City/County CoC Housing Inventory Count</p> <hr/> <p><b>List the name of the organization or individual who originated the data set.</b></p> <p>Worcester City and County Continuum of Care and HMIS Data Management team</p> <hr/> <p><b>Provide a brief summary of the data set.</b></p> <p>The data represents the most recent Housing Inventory Count (HIC) for the Worcester City and County Continuum of Care. It has been combined with additional HMIS data to includes both CoC-supported units/beds, and community-based units/beds that do not receive CoC funds.</p> <hr/> <p><b>What was the purpose for developing this data set?</b></p> <p>The Housing Inventory Count (HIC) is a point-in-time inventory of provider programs within a Continuum of Care that provide beds and units dedicated to serve persons who are homeless, categorized by five Program Types: Emergency Shelter; Transitional Housing; Rapid Re-housing; Safe Haven; and Permanent Supportive Housing. It is a requirement by HUD for all CoCs.</p> <hr/> <p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>The data is comprehensive of the entire geography served by the Worcester City and County Continuum of Care (see map attached).</p> <hr/> <p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>The HIC data represents the point-in-time inventory of 2014 units and beds.</p> <hr/> <p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>The data set is complete.</p>

4	<b>Data Source Name</b> 2009-2013 ACS (Workers)
	<b>List the name of the organization or individual who originated the data set.</b> U.S. Census Bureau 2009-2013 American Community Survey (ACS) data.
	<b>Provide a brief summary of the data set.</b> An Economic Development Market Analysis Business Activity table was developed and attached to MA-45 Non-Housing Community Development Assets section of the consolidated plan. The table provides number of workers, number of jobs, share of workers, share of jobs and job less workers for City of Worcester by Business Sectors. The table replaced the same table(from 2007-11 ACS data) that had been imbedded in the Econ Planning Suite for Worcester, MA, but which was found to be widely inaccurate based on analysis with U.S. Census on-line data.
	<b>What was the purpose for developing this data set?</b> As just described, the data originally prepopulated in the above table was incorrect. Data from the 2009-2013 American Community Survey (ACS) was used instead to determine the number and share of workers by sector. Unfortunately, Longitudinal Employer-Household Dynamics (LEHD) program is not yet producing public-use statistics for Massachusetts and thus the columns related to jobs could not be completed.
	<b>Provide the year (and optionally month, or month and day) for when the data was collected.</b> U.S. Census Bureau 2009-2013 American Community Survey (ACS) data.
	<b>Briefly describe the methodology for the data collection.</b> U.S. Census Bureau 2009-2013 American Community Survey (ACS) data.
	<b>Describe the total population from which the sample was taken.</b> U.S. Census Bureau 2009-2013 American Community Survey (ACS) data.
	<b>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</b> U.S. Census Bureau 2009-2013 American Community Survey (ACS) data.
	<b>Data Source Name</b> HUD HOME Rent Limits
<b>List the name of the organization or individual who originated the data set.</b> HUD	
<b>Provide a brief summary of the data set.</b> This is an updated data set of what is in the default data for this section in the plan.	
<b>What was the purpose for developing this data set?</b> This is for developers and owners of HOME funded projects.	

	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>This is for the City of Worcester</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>This data set is effective July 1, 2020 and usually is updated within 12 months.</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Complete.</p>

Edward M. Augustus, Jr.  
City Manager



CITY OF WORCESTER

October 23, 2020

Mr. Robert D. Shumeyko, Director  
U.S. Department of Housing and Urban Development  
Office of Community Development and Planning  
Massachusetts State Office, New England Area  
Thomas P. O'Neil Jr., Federal Building  
10 Causeway Street – Fifth Floor  
Boston, Massachusetts 02222-1092

Dear Mr. Shumeyko:

This letter serves to transmit to you a set of Application for Federal Assistance SF-424 forms and associated certifications with original signatures as required by HUD to complement the electronic submission of the City of Worcester 2020-2025 Consolidated Plan / First Year Annual Action Plan (July 1<sup>st</sup>, 2020 – June 30<sup>th</sup>, 2021) which includes one-year funding amounts for Community Development Block Grant, HOME, Housing Opportunities for Persons With AIDS, and Emergency Solutions Grant programs.

Sincerely,

Edward M. Augustus, Jr.  
City Manager



OFFICE OF THE CITY MANAGER, CITY HALL, WORCESTER, MA 01608  
TELEPHONE (508) 799-1175 | FAX (508) 799-1208  
EMAIL: [citymanager@worcesterma.gov](mailto:citymanager@worcesterma.gov)



**Application for Federal Assistance SF-424**

**\* 1. Type of Submission:**

- Preapplication
- Application
- Changed/Corrected Application

**\* 2. Type of Application:**

- New
- Continuation
- Revision

**\* If Revision, select appropriate letter(s):**

**\* Other (Specify):**

**\* 3. Date Received:**

10/26/2020

**4. Applicant Identifier:**

B-20-MC-25-0026

**5a. Federal Entity Identifier:**

MA252880 Worcester

**5b. Federal Award Identifier:**

**State Use Only:**

**6. Date Received by State:**

**7. State Application Identifier:**

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:**

Worcester, MA

**\* b. Employer/Taxpayer Identification Number (EIN/TIN):**

04-6001418

**\* c. Organizational DUNS:**

0657822575000

**d. Address:**

**\* Street1:**

455 Main Street

**Street2:**

4th Floor

**\* City:**

Worcester

**County/Parish:**

Worcester

**\* State:**

MA: Massachusetts

**Province:**

**\* Country:**

USA: UNITED STATES

**\* Zip / Postal Code:**

01608-1881

**e. Organizational Unit:**

**Department Name:**

Economic Development

**Division Name:**

Neighborhood Development

**f. Name and contact information of person to be contacted on matters involving this application:**

**Prefix:**

Mr.

**\* First Name:**

Gregory

**Middle Name:**

J.

**\* Last Name:**

Baker

**Suffix:**

**Title:**

Director, Neighborhood Development

**Organizational Affiliation:**

City Manager's Executive Office of Economic Development

**\* Telephone Number:**

508-799-1400 x31422

**Fax Number:**

508-799-1406

**\* Email:**

bakerg@worcesterma.gov

**Application for Federal Assistance SF-424**

**\* 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

**Type of Applicant 2: Select Applicant Type:**

**Type of Applicant 3: Select Applicant Type:**

**\* Other (specify):**

**\* 10. Name of Federal Agency:**

U. S. Department of Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**

14.218

**CFDA Title:**

Community Development Block Grants/Entitlement Grnts

**\* 12. Funding Opportunity Number:**

n/a

**\* Title:**

n/a

**13. Competition Identification Number:**

**Title:**

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

Add Attachment

Delete Attachment

View Attachment

**\* 15. Descriptive Title of Applicant's Project:**

First Year Action Plan (July 1st, 2020 - June 30th, 2021)

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="4,617,183.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value=""/>
* g. TOTAL	<input type="text" value="4,617,183.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

- Yes
- No

If "Yes", provide explanation and attach

21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

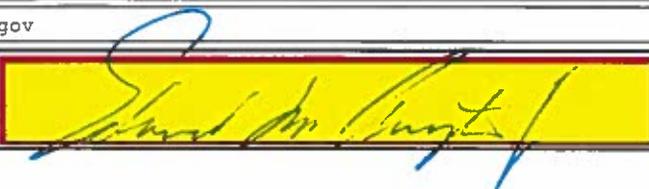
\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:   
Middle Name:   
\* Last Name:   
Suffix:   
\* Title:   
\* Telephone Number:  Fax Number:   
\* Email:

\* Signature of Authorized Representative:



\* Date Signed:

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE City Manager
APPLICANT ORGANIZATION Worcester, MA	DATE SUBMITTED 10/23/2020

**Application for Federal Assistance SF-424**

<b>* 1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	<b>* 2. Type of Application:</b> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	<b>* If Revision, select appropriate letter(s):</b> <input type="text"/> <b>* Other (Specify):</b> <input type="text"/>
---	---	--

<b>* 3. Date Received:</b> <input type="text" value="10/26/2020"/>	<b>4. Applicant Identifier:</b> <input type="text" value="B-20-MC-25-0026"/>
---	---

<b>5a. Federal Entity Identifier:</b> <input type="text" value="MA252880 Worcester"/>	<b>5b. Federal Award Identifier:</b> <input type="text"/>
--	--

**State Use Only:**

<b>6. Date Received by State:</b> <input type="text"/>	<b>7. State Application Identifier:</b> <input type="text"/>
--	--

**8. APPLICANT INFORMATION:**

<b>* a. Legal Name:</b> <input type="text" value="Worcester, MA"/>	
<b>* b. Employer/Taxpayer Identification Number (EIN/TIN):</b> <input type="text" value="04-6001418"/>	<b>* c. Organizational DUNS:</b> <input type="text" value="0657822575000"/>

**d. Address:**

<b>* Street1:</b>	<input type="text" value="455 Main Street"/>
<b>Street2:</b>	<input type="text" value="4th Floor"/>
<b>* City:</b>	<input type="text" value="Worcester"/>
<b>County/Parish:</b>	<input type="text" value="Worcester"/>
<b>* State:</b>	<input type="text" value="MA: Massachusetts"/>
<b>Province:</b>	<input type="text"/>
<b>* Country:</b>	<input type="text" value="USA: UNITED STATES"/>
<b>* Zip / Postal Code:</b>	<input type="text" value="01608-1881"/>

**e. Organizational Unit:**

<b>Department Name:</b> <input type="text" value="Economic Development"/>	<b>Division Name:</b> <input type="text" value="Neighborhood Development"/>
--	--

**f. Name and contact information of person to be contacted on matters involving this application:**

<b>Prefix:</b> <input type="text" value="Mr."/>	<b>* First Name:</b> <input type="text" value="Gregory"/>
<b>Middle Name:</b> <input type="text" value="J."/>	
<b>* Last Name:</b> <input type="text" value="Baker"/>	
<b>Suffix:</b> <input type="text"/>	
<b>Title:</b> <input type="text" value="Director, Neighborhood Development"/>	

**Organizational Affiliation:**

<b>* Telephone Number:</b> <input type="text" value="508-799-1400 x31422"/>	<b>Fax Number:</b> <input type="text" value="508-799-1406"/>
<b>* Email:</b> <input type="text" value="bakerg@worcesterma.gov"/>	

**Application for Federal Assistance SF-424**

**\* 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

**Type of Applicant 2: Select Applicant Type:**

**Type of Applicant 3: Select Applicant Type:**

**\* Other (specify):**

**\* 10. Name of Federal Agency:**

U. S. Department of Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**

14.218

**CFDA Title:**

Community Development Block Grants/Entitlement Grnts

**\* 12. Funding Opportunity Number:**

n/a

**\* Title:**

n/a

**13. Competition Identification Number:**

**Title:**

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

Add Attachment

Delete Attachment

View Attachment

**\* 15. Descriptive Title of Applicant's Project:**

First Year Action Plan (July 1st, 2020 - June 30th, 2021)

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="4,617,183.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
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- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
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**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes  No

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**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:   
Middle Name:   
\* Last Name:   
Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative: 

\* Date Signed:

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009

Expiration Date: 02/28/2022

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17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
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19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE City Manager
APPLICANT ORGANIZATION Worcester, MA	DATE SUBMITTED 10/23/2020

## Application for Federal Assistance SF-424

## \* 1. Type of Submission:

- Preapplication  
 Application  
 Changed/Corrected Application

## \* 2. Type of Application:

- New  
 Continuation  
 Revision

## \* If Revision, select appropriate letter(s):

## \* Other (Specify):

## \* 3. Date Received:

10/26/2020

## 4. Applicant Identifier:

E-20-MC-0014

## 5a. Federal Entity Identifier:

MA252880 Worcester

## 5b. Federal Award Identifier:

## State Use Only:

## 6. Date Received by State:

## 7. State Application Identifier:

## 8. APPLICANT INFORMATION:

## \* a. Legal Name: Worcester, MA

## \* b. Employer/Taxpayer Identification Number (EIN/TIN):

04-6001418

## \* c. Organizational DUNS:

0657822575000

## d. Address:

## \* Street1:

455 Main Street

## Street2:

4th Floor

## \* City:

Worcester

## County/Parish:

Worcester

## \* State:

MA: Massachusetts

## Province:

## \* Country:

USA: UNITED STATES

## \* Zip / Postal Code:

01608-1881

## e. Organizational Unit:

## Department Name:

Economic Development

## Division Name:

Neighborhood Development

## f. Name and contact information of person to be contacted on matters involving this application:

## Prefix:

Mr.

## \* First Name:

Gregory

## Middle Name:

J.

## \* Last Name:

Baker

## Suffix:

## Title:

Director, Neighborhood Development

## Organizational Affiliation:

City Manager's Executive Office of Economic Development

## \* Telephone Number:

508-799-1400 x31422

## Fax Number:

508-799-1406

## \* Email:

bakerg@worcesterma.gov

**Application for Federal Assistance SF-424**

**\* 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

**Type of Applicant 2: Select Applicant Type:**

**Type of Applicant 3: Select Applicant Type:**

**\* Other (specify):**

**\* 10. Name of Federal Agency:**

U. S. Department of Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**

14.231

**CFDA Title:**

Emergency Solutions Grant program

**\* 12. Funding Opportunity Number:**

n/a

**\* Title:**

n/a

**13. Competition Identification Number:**

**Title:**

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

Add Attachment

Delete Attachment

View Attachment

**\* 15. Descriptive Title of Applicant's Project:**

First Year Action Plan (July 1st, 2020 - June 30th, 2021)

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="385,068.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value=""/>
* g. TOTAL	<input type="text" value="385,068.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (if "Yes," provide explanation in attachment.)**

- Yes
- No

If "Yes", provide explanation and attach

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:   
Middle Name:   
\* Last Name:   
Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative: 

\* Date Signed:

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

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As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE City Manager
APPLICANT ORGANIZATION Worcester, MA	DATE SUBMITTED 10/23/2020

**Application for Federal Assistance SF-424**

<b>* 1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	<b>* 2. Type of Application:</b> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	<b>* If Revision, select appropriate letter(s):</b> _____ <b>* Other (Specify):</b> _____
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<b>* 3. Date Received:</b> 10/26/2020	<b>4. Applicant Identifier:</b> E-20-MC-0014
--	---

<b>5a. Federal Entity Identifier:</b> MA252880 Worcester	<b>5b. Federal Award Identifier:</b> _____
---	---

**State Use Only:**

<b>6. Date Received by State:</b> _____	<b>7. State Application Identifier:</b> _____
---	---

**8. APPLICANT INFORMATION:**

<b>* a. Legal Name:</b> Worcester, MA	
<b>* b. Employer/Taxpayer Identification Number (EIN/TIN):</b> 04-6001418	<b>* c. Organizational DUNS:</b> 0657822575000

**d. Address:**

<b>* Street1:</b>	455 Main Street
<b>Street2:</b>	4th Floor
<b>* City:</b>	Worcester
<b>County/Parish:</b>	Worcester
<b>* State:</b>	MA: Massachusetts
<b>Province:</b>	_____
<b>* Country:</b>	USA: UNITED STATES
<b>* Zip / Postal Code:</b>	01608-1881

**e. Organizational Unit:**

<b>Department Name:</b> Economic Development	<b>Division Name:</b> Neighborhood Development
---	---

**f. Name and contact information of person to be contacted on matters involving this application:**

<b>Prefix:</b> Mr.	<b>* First Name:</b> Gregory
<b>Middle Name:</b> J.	
<b>* Last Name:</b> Baker	
<b>Suffix:</b>	
<b>Title:</b> Director, Neighborhood Development	

<b>Organizational Affiliation:</b> City Manager's Executive Office of Economic Development
---

<b>* Telephone Number:</b> 508-799-1400 x31422	<b>Fax Number:</b> 508-799-1406
--	---------------------------------

<b>* Email:</b> bakerg@worcesterma.gov
--

**Application for Federal Assistance SF-424**

**\* 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

**Type of Applicant 2: Select Applicant Type:**

**Type of Applicant 3: Select Applicant Type:**

**\* Other (specify):**

**\* 10. Name of Federal Agency:**

U. S. Department of Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**

14.231

**CFDA Title:**

Emergency Solutions Grant program

**\* 12. Funding Opportunity Number:**

n/a

**\* Title:**

n/a

**13. Competition Identification Number:**

**Title:**

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

Add Attachment

Delete Attachment

View Attachment

**\* 15. Descriptive Title of Applicant's Project:**

First Year Action Plan (July 1st, 2020 - June 30th, 2021)

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**  
\* a. Applicant  \* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

**17. Proposed Project:**  
\* a. Start Date:  \* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="385,068.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value=""/>
* g. TOTAL	<input type="text" value="385,068.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**  
 a. This application was made available to the State under the Executive Order 12372 Process for review on .  
 b. Program is subject to E.O. 12372 but has not been selected by the State for review.  
 c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**  
 Yes  No  
If "Yes", provide explanation and attach

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**  
 \*\* I AGREE  
\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**  
Prefix:  \* First Name:   
Middle Name:   
\* Last Name:   
Suffix:   
\* Title:   
\* Telephone Number:  Fax Number:   
\* Email:

\* Signature of Authorized Representative:  \* Date Signed:

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
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18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE <input type="text" value="City Manager"/>
APPLICANT ORGANIZATION <input type="text" value="Worcester, MA"/>	DATE SUBMITTED <input type="text" value="10/23/2020"/>

**Application for Federal Assistance SF-424**

**\* 1. Type of Submission:**

- Preapplication
- Application
- Changed/Corrected Application

**\* 2. Type of Application:**

- New
- Continuation
- Revision

**\* If Revision, select appropriate letter(s):**

**\* Other (Specify):**

**\* 3. Date Received:**

10/26/2020

**4. Applicant Identifier:**

M-20-MC-25-0210

**5a. Federal Entity Identifier:**

MA252880 Worcester

**5b. Federal Award Identifier:**

**State Use Only:**

6. Date Received by State:

7. State Application Identifier:

**8. APPLICANT INFORMATION:**

\* a. Legal Name: Worcester, MA

\* b. Employer/Taxpayer Identification Number (EIN/TIN):  
04-6001418

\* c. Organizational DUNS:  
0657822575000

**d. Address:**

\* Street1: 455 Main Street

Street2: 4th Floor

\* City: Worcester

County/Parish: Worcester

\* State: MA: Massachusetts

Province:

\* Country: USA: UNITED STATES

\* Zip / Postal Code: 01608-1881

**e. Organizational Unit:**

Department Name:  
Economic Development

Division Name:  
Neighborhood Development

**f. Name and contact information of person to be contacted on matters involving this application:**

Prefix: Mr. \* First Name: Gregory

Middle Name: J.

\* Last Name: Baker

Suffix:

Title: Director, Neighborhood Development

Organizational Affiliation:  
City Manager's Executive Office of Economic Development

\* Telephone Number: 508-799-1400 x31422 Fax Number: 508-799-1406

\* Email: bakerg@worcesterma.gov

**Application for Federal Assistance SF-424**

**\* 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

**Type of Applicant 2: Select Applicant Type:**

**Type of Applicant 3: Select Applicant Type:**

**\* Other (specify):**

**\* 10. Name of Federal Agency:**

U. S. Department of Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**

14.239

**CFDA Title:**

Home Investment Partnership Program

**\* 12. Funding Opportunity Number:**

n/a

**\* Title:**

n/a

**13. Competition Identification Number:**

**Title:**

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

Add Attachment

Delete Attachment

View Attachment

**\* 15. Descriptive Title of Applicant's Project:**

First Year Action Plan (July 1st, 2020 - June 30th, 2021)

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="1,624,201.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value=""/>
* g. TOTAL	<input type="text" value="1,624,201.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

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- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
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- Yes
- No

If "Yes", provide explanation and attach

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:   
Middle Name:   
\* Last Name:   
Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative: 

\* Date Signed:

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

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13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE <input type="text" value="City Manager"/>
APPLICANT ORGANIZATION <input type="text" value="Worcester, MA"/>	DATE SUBMITTED <input type="text" value="10/23/2020"/>

**Application for Federal Assistance SF-424**

**\* 1. Type of Submission:**

- Preapplication
- Application
- Changed/Corrected Application

**\* 2. Type of Application:**

- New
- Continuation
- Revision

**\* If Revision, select appropriate letter(s):**

**\* Other (Specify):**

**\* 3. Date Received:**

10/26/2020

**4. Applicant Identifier:**

M-20-MC-25-0210

**5a. Federal Entity Identifier:**

MA252880 Worcester

**5b. Federal Award Identifier:**

**State Use Only:**

**6. Date Received by State:**

**7. State Application Identifier:**

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:**

Worcester, MA

**\* b. Employer/Taxpayer Identification Number (EIN/TIN):**

04-6001418

**\* c. Organizational DUNS:**

0657822575000

**d. Address:**

**\* Street1:**

455 Main Street

**Street2:**

4th Floor

**\* City:**

Worcester

**County/Parish:**

Worcester

**\* State:**

MA: Massachusetts

**Province:**

**\* Country:**

USA: UNITED STATES

**\* Zip / Postal Code:**

01608-1881

**e. Organizational Unit:**

**Department Name:**

Economic Development

**Division Name:**

Neighborhood Development

**f. Name and contact information of person to be contacted on matters involving this application:**

**Prefix:**

Mr.

**\* First Name:**

Gregory

**Middle Name:**

J.

**\* Last Name:**

Baker

**Suffix:**

**Title:**

Director, Neighborhood Development

**Organizational Affiliation:**

City Manager's Executive Office of Economic Development

**\* Telephone Number:**

508-799-1400 x31422

**Fax Number:**

508-799-1406

**\* Email:**

bakerg@worcesterma.gov

**Application for Federal Assistance SF-424**

**\* 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

**Type of Applicant 2: Select Applicant Type:**

**Type of Applicant 3: Select Applicant Type:**

**\* Other (specify):**

**\* 10. Name of Federal Agency:**

U. S. Department of Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**

14.239

**CFDA Title:**

Home Investment Partnership Program

**\* 12. Funding Opportunity Number:**

n/a

**\* Title:**

n/a

**13. Competition Identification Number:**

**Title:**

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

Add Attachment

Delete Attachment

View Attachment

**\* 15. Descriptive Title of Applicant's Project:**

First Year Action Plan (July 1st, 2020 - June 30th, 2021)

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="1,624,201.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value=""/>
* g. TOTAL	<input type="text" value="1,624,201.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

- Yes
- No

If "Yes", provide explanation and attach

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:   
Middle Name:   
\* Last Name:   
Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative: 

\* Date Signed:

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE City Manager
APPLICANT ORGANIZATION Worcester, MA	DATE SUBMITTED 10/23/2020

**Application for Federal Assistance SF-424**

**\* 1. Type of Submission:**

- Preapplication
- Application
- Changed/Corrected Application

**\* 2. Type of Application:**

- New
- Continuation
- Revision

**\* If Revision, select appropriate letter(s):**

**\* Other (Specify):**

**\* 3. Date Received:**

10/26/2020

**4. Applicant Identifier:**

MA-H-20-F004

**5a. Federal Entity Identifier:**

MA252880 Worcester

**5b. Federal Award Identifier:**

**State Use Only:**

**6. Date Received by State:**

**7. State Application Identifier:**

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:**

Worcester, MA

**\* b. Employer/Taxpayer Identification Number (EIN/TIN):**

04-6001418

**\* c. Organizational DUNS:**

0657822575000

**d. Address:**

**\* Street1:**

455 Main Street

**Street2:**

4th Floor

**\* City:**

Worcester

**County/Parish:**

Worcester

**\* State:**

MA: Massachusetts

**Province:**

**\* Country:**

USA: UNITED STATES

**\* Zip / Postal Code:**

01608-1881

**e. Organizational Unit:**

**Department Name:**

Economic Development

**Division Name:**

Neighborhood Development

**f. Name and contact information of person to be contacted on matters involving this application:**

**Prefix:**

Mr.

**\* First Name:**

Gregory

**Middle Name:**

J.

**\* Last Name:**

Baker

**Suffix:**

**Title:**

Director, Neighborhood Development

**Organizational Affiliation:**

City Manager's Executive Office of Economic Development

**\* Telephone Number:**

508-799-1400 x31422

**Fax Number:**

508-799-1406

**\* Email:**

bakerg@worcesterma.gov

**Application for Federal Assistance SF-424**

**\* 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

**Type of Applicant 2: Select Applicant Type:**

**Type of Applicant 3: Select Applicant Type:**

**\* Other (specify):**

**\* 10. Name of Federal Agency:**

U. S. Department of Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**

14.241

**CFDA Title:**

Housing Opportunities for Persons with AIDS

**\* 12. Funding Opportunity Number:**

n/a

**\* Title:**

n/a

**13. Competition Identification Number:**

**Title:**

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

Add Attachment

Delete Attachment

View Attachment

**\* 15. Descriptive Title of Applicant's Project:**

First Year Action Plan (July 1st, 2020 - June 30th, 2021)

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="651,256.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value=""/>
* g. TOTAL	<input type="text" value="651,256.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes  No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:   
Middle Name:   
\* Last Name:   
Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative: 

\* Date Signed:

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
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14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
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18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE City Manager
APPLICANT ORGANIZATION Worcester, MA	DATE SUBMITTED 10/23/2020

**Application for Federal Assistance SF-424**

<b>* 1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	<b>* 2. Type of Application:</b> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	<b>* If Revision, select appropriate letter(s):</b> <input type="text"/> <b>* Other (Specify):</b> <input type="text"/>
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<b>* 3. Date Received:</b> 10/26/2020	<b>4. Applicant Identifier:</b> MA-H-20-F004
--	---

<b>5a. Federal Entity Identifier:</b> MA252880 Worcester	<b>5b. Federal Award Identifier:</b> <input type="text"/>
---	--

**State Use Only:**

<b>6. Date Received by State:</b> <input type="text"/>	<b>7. State Application Identifier:</b> <input type="text"/>
--	--

**8. APPLICANT INFORMATION:**

<b>* a. Legal Name:</b> Worcester, MA	
<b>* b. Employer/Taxpayer Identification Number (EIN/TIN):</b> 04-6001418	<b>* c. Organizational DUNS:</b> 0657822575000

**d. Address:**

<b>* Street1:</b> 455 Main Street
<b>Street2:</b> 4th Floor
<b>* City:</b> Worcester
<b>County/Parish:</b> Worcester
<b>* State:</b> MA: Massachusetts
<b>Province:</b> <input type="text"/>
<b>* Country:</b> USA: UNITED STATES
<b>* Zip / Postal Code:</b> 01608-1881

**e. Organizational Unit:**

<b>Department Name:</b> Economic Development	<b>Division Name:</b> Neighborhood Development
--	--

**f. Name and contact information of person to be contacted on matters involving this application:**

<b>Prefix:</b> Mr.	<b>* First Name:</b> Gregory
<b>Middle Name:</b> J.	
<b>* Last Name:</b> Baker	
<b>Suffix:</b> <input type="text"/>	
<b>Title:</b> Director, Neighborhood Development	

**Organizational Affiliation:**  
City Manager's Executive Office of Economic Development

<b>* Telephone Number:</b> 508-799-1400 x31422	<b>Fax Number:</b> 508-799-1406
--	---------------------------------

<b>* Email:</b> bakerg@worcesterma.gov
--

**Application for Federal Assistance SF-424**

**\* 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

**Type of Applicant 2: Select Applicant Type:**

**Type of Applicant 3: Select Applicant Type:**

**\* Other (specify):**

**\* 10. Name of Federal Agency:**

U. S. Department of Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**

14.241

**CFDA Title:**

Housing Opportunities for Persons with AIDS

**\* 12. Funding Opportunity Number:**

n/a

**\* Title:**

n/a

**13. Competition Identification Number:**

**Title:**

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

Add Attachment

Delete Attachment

View Attachment

**\* 15. Descriptive Title of Applicant's Project:**

First Year Action Plan (July 1st, 2020 - June 30th, 2021)

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="651,256.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value=""/>
* g. TOTAL	<input type="text" value="651,256.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

- Yes
- No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:   
Middle Name:   
\* Last Name:   
Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative:



\* Date Signed:

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009

Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE City Manager
APPLICANT ORGANIZATION Worcester, MA	DATE SUBMITTED 10/23/2020

**CERTIFICATIONS**

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

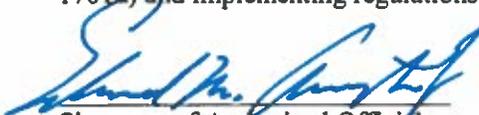
**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.

  
Signature of Authorized Official

10/27/20  
Date

City Manager  
Title

## Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

**Citizen Participation** -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan** -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

**Following a Plan** -- It is following a current consolidated plan that has been approved by HUD.

**Use of Funds** -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) \_\_\_\_\_ [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

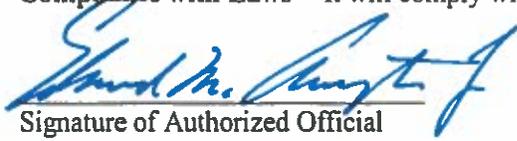
**Excessive Force** -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

**Compliance with Anti-discrimination laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

**Compliance with Laws** -- It will comply with applicable laws.

  
Signature of Authorized Official

10/27/20  
Date

City Manager  
Title

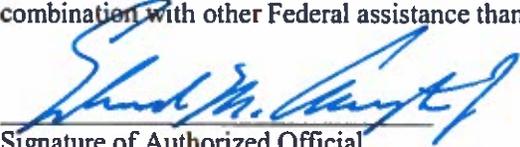
**Specific HOME Certifications**

The HOME participating jurisdiction certifies that:

**Tenant Based Rental Assistance** -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

**Eligible Activities and Costs** -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

**Subsidy layering** -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

  
Signature of Authorized Official

10/27/20  
Date

City Manager  
Title

## Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

**Major rehabilitation/conversion/renovation** – If an emergency shelter’s rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

**Essential Services and Operating Costs** – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

**Renovation** – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

**Supportive Services** – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for these individuals.

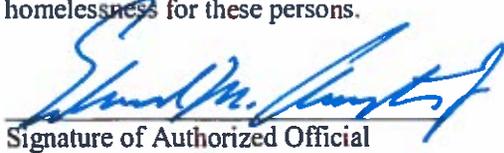
**Matching Funds** – The recipient will obtain matching amounts required under 24 CFR 576.201.

**Confidentiality** – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

**Homeless Persons Involvement** – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

**Consolidated Plan** – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

**Discharge Policy** – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

  
Signature of Authorized Official

10/27/20  
Date

City Manager  
Title

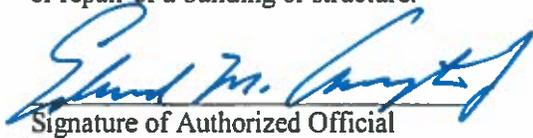
## Housing Opportunities for Persons With AIDS Certifications

The HOPWA grantee certifies that:

**Activities** -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

**Building** -- Any building or structure assisted under that program shall be operated for the purpose specified in the consolidated plan:

1. For a period of not less than 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For a period of not less than 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

  
Signature of Authorized Official

10/27/20  
Date

City Manager  
Title

## **APPENDIX TO CERTIFICATIONS**

### **INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:**

#### **Lobbying Certification**

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

**CERTIFICATIONS**

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;

2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and

3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701a) and implementing regulations at 24 CFR Part 135.

  
Signature of Authorized Official

10/27/20  
Date

City Manager  
Title

## Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

**Citizen Participation** -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan** -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

**Following a Plan** -- It is following a current consolidated plan that has been approved by HUD.

**Use of Funds** -- It has complied with the following criteria:

**1. Maximum Feasible Priority.** With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

**2. Overall Benefit.** The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) \_\_\_\_\_ [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

**3. Special Assessments.** It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

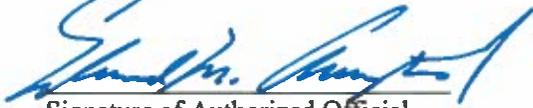
**Excessive Force** -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

**Compliance with Anti-discrimination laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

**Compliance with Laws** -- It will comply with applicable laws.



Signature of Authorized Official

10/27/20  
Date

City Manager  
Title

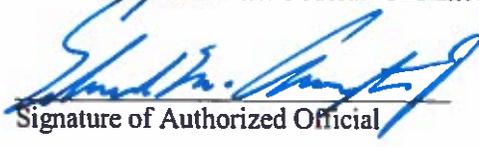
**Specific HOME Certifications**

The HOME participating jurisdiction certifies that:

**Tenant Based Rental Assistance** -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

**Eligible Activities and Costs** -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

**Subsidy layering** -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

  
Signature of Authorized Official

10/27/20  
Date

City Manager  
Title

## Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

**Major rehabilitation/conversion/renovation** – If an emergency shelter’s rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

**Essential Services and Operating Costs** – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

**Renovation** – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

**Supportive Services** – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for these individuals.

**Matching Funds** – The recipient will obtain matching amounts required under 24 CFR 576.201.

**Confidentiality** – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

**Homeless Persons Involvement** – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

**Consolidated Plan** – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

**Discharge Policy** – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

*Edward A. [Signature]*      *10/27/20*  
Signature of Authorized Official      Date

*City Manager*  
Title

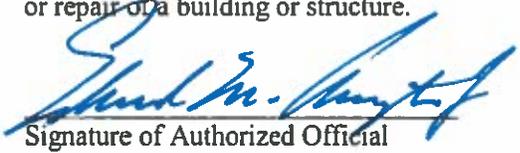
**Housing Opportunities for Persons With AIDS Certifications**

The HOPWA grantee certifies that:

**Activities** -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

**Building** -- Any building or structure assisted under that program shall be operated for the purpose specified in the consolidated plan:

1. For a period of not less than 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For a period of not less than 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

  
Signature of Authorized Official

10/27/20  
Date

City Manager  
Title

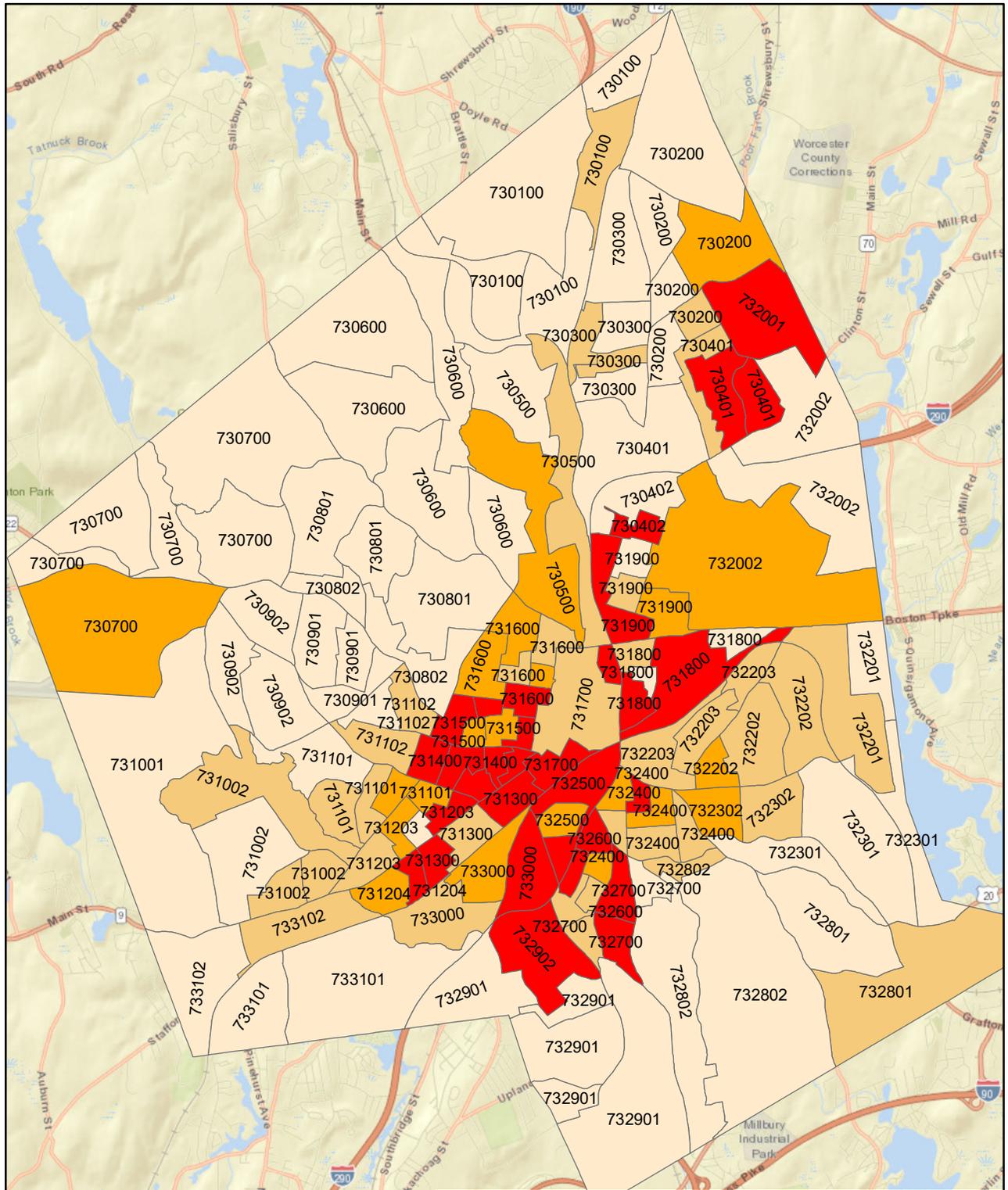
## **APPENDIX TO CERTIFICATIONS**

### **INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:**

#### **Lobbying Certification**

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

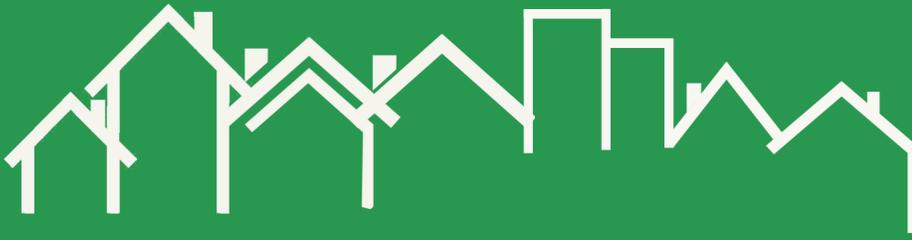
# 2015 Low-Mod Income Census Block Groups



**Legend**  
 gismapping.GISDATA.Basemap\_Census\_BlkGrp\_2010  
 Lowmod\_pct

	0% - 49.9%
	50.0% - 69.9%
	70.0% - 79.9%
	80.0% - 100%

The City of Worcester invites you to attend



## Five-Year Consolidated Plan 2020 -2025

# Community Input Meetings

Come provide input at a meeting in your area on  
the use of annual federal funds for:

- ◆ Assistance to Homeowners
- ◆ Youth & Senior Programming
- ◆ Homelessness Prevention
- ◆ Support for Persons w/ HIV or AIDS
- ◆ Improvements to Roads and Sidewalks
- ◆ Improvements to Community Centers
- ◆ Housing Improvements & New Construction
- ◆ Health Services
- ◆ Job Training
- ◆ Neighborhood Revitalization
- ◆ Social Services & Food Assistance

\*Light refreshments will be provided\*



For more information:

Visit: [worcesterma.gov](http://worcesterma.gov) | Call: 508-799-1400 | Email: [development@worcesterma.gov](mailto:development@worcesterma.gov)

Auxiliary aids and services, written materials in alternative formats, and reasonable modifications in policies and procedures to persons with disabilities will be provided upon advance request. Please call 508-799-1400 x31422 or e-mail the ADA Coordinator at [disabilities@worcesterma.gov](mailto:disabilities@worcesterma.gov) with any questions.

Thursday, June 20<sup>th</sup>, 2019

5:30 PM — 6:30 PM

Frances Perkins Library  
470 W. Boylston St.

Wednesday, July 10<sup>th</sup>, 2019

2:30 PM — 3:30 PM

Worcester Senior Center -  
Lunchroom  
128 Providence St. 

Wednesday, July 24<sup>th</sup>, 2019

6:00 PM — 7:00 PM

Grace Christian Center  
Banquet Hall  
126 Elm St.

Tuesday, August 6<sup>th</sup>, 2019

6:00 PM — 7:00 PM

Lincoln Park Towers - 1st Floor  
Community Room  
11 Lake Ave.

Tuesday, August 20<sup>th</sup>, 2019

5:30 PM — 6:30 PM

The Journey Church  
25 Belmont St.

Tuesday, September 3<sup>rd</sup>, 2019

5:30 PM — 6:30 PM

Great Brook Valley Community  
Center  
180 Constitution Ave.  

Monday September 16<sup>th</sup>, 2019

6:00 PM — 7:00 PM

Mill Swan Head Start - Gym  
337 Mill St. 

Tuesday, September 24<sup>th</sup>, 2019

5:30 PM — 6:30 PM

Gates Lane Elementary School  
Cafeteria  
1238 Main St. 

Wednesday October 9<sup>th</sup>, 2019

2:00 PM — 3:00 PM

Holy Cross College  
Hogan Center  
1 College St.

Thursday October 10<sup>th</sup>, 2019

6:00 PM — 7:00 PM

National Grid Sustainability Hub  
- Community Room  
912 Main St. 

 Child Friendly

 Se Habla Español



The City of  
**WORCESTER**

# Green Island Neighborhood

## Neighborhood Boundary



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, © OpenStreetMap contributors, and the GIS User Community

- Legend**
- Neighborhood Boundary
  - Interstate
  - U.S.
  - State
  - Streams and Brooks
  - Conservation Restriction
  - City of Worcester Parks
  - Other Open Space

Neighborhood Boundary

Produced by City of Worcester  
Executive Office of Economic Development  
Neighborhood Development Division

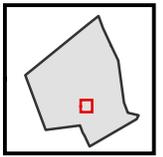
Considerable effort has been made to ensure the accuracy, correctness and timeliness of data presented, however, this information is only as accurate as its source and may not reflect the most current information. The City of Worcester assumes no liability for any errors, omissions or inaccuracies and makes no warranty, representation or guarantee of any kind as to the content of or any decisions made or actions taken as a result of the use of this information provided on this map.

April 2, 2019



**DATA SOURCES:**  
All data: City of Worcester Geographic Information System  
Original Data: Digitized at 1:400 scale (Data file resolution: 1 inch = 40 feet)  
Updated Data: Digitized from Photographs at 1:200 scale (1 inch = 100 feet)  
Further Updates: Using City of Worcester Information

**COORDINATE SYSTEM:**  
All map data is in the Massachusetts State Plane Coordinate system, North American Datum of 1983, Massachusetts Meridian Zone (11S). Units are measured in Feet.





# GREEN ISLAND INITIATIVE PUBLIC INPUT MEETING



**WEDNESDAY, JULY 31, 2019  
5:30 PM - 7:00 PM**



**The PNI Club - 290 Millbury Street**

Enter on Ashmont Avenue

**Do you live, work, or own property in the Green Island neighborhood?  
We want to hear from you!**

**Come and provide community input on federal funds that will go towards improving housing, streets, and other infrastructure in the Green Island neighborhood.**

**Light refreshments will be provided.**



**By Car:** Parking available at Millbury St. or Canton St. lots

**By Bus:** Route 4 bus to Harding St. + Crompton Park

**For more information:**

**Visit:** [www.worcesterma.gov](http://www.worcesterma.gov)

**Call:** (508) 799-1400

**Email:** [development@worcesterma.gov](mailto:development@worcesterma.gov)



The City of  
**WORCESTER**

# CITY OF WORCESTER

## Public Health and Human Services Committee Meeting

Wednesday, October 7, 2020

Levi Lincoln (North) Chamber

Convened: 5:30 P.M.

Adjourned: 5:57 P.M.

**Mayor**  
Joseph M. Petty



**Clerk of the City Council**  
Nikolin Vangjeli

**Committee Members**  
Chairperson Sarai Rivera  
Vice Chairperson George J Russell  
Councilor Gary Rosen

[www.worcesterma.gov](http://www.worcesterma.gov)

City Hall - 455 Main Street Worcester, Massachusetts

**Present Were:** Chairperson Councilor Sarai Rivera Councilor Gary Rosen

**Also:** Director of Neighborhood Development Gregory Baker Director of Housing Development James Brooks Deputy City Clerk Stephen A.J. Pottle, clerk

### 1. Approval of the Minutes

- 1a. Order- That the City Council Standing Committee of Public Health and Human Services hereby approves the minutes of the Public Health and Human Services Committee meeting on August 5, 2020.

[View Agenda](#)

Chairperson Councilor Rivera read the item and moved for a roll call vote to adopt the item. Order adopted on a roll call vote of 2 Yeas and 0 Nays (Russell recused).

### 2. Public Participation

- 2a. In order to ensure the continuation of active public engagement, the City of Worcester will now use a phone conference line for members of the public to participate in all public meetings. To participate during the public participation phase of City Council, you may call the direct line indicated: Levi Lincoln Chamber - 415-655-0001 (Access Code: 173 806 2123) or enter the below URL into your web browser. If you would like to raise your hand when in the meeting as a call-in user during public participation you may dial \*3. <https://covevents.webex.com/covevents/onstage/g.php?MTID=ed2527e3cdcd5893b52402c317e8729d6>

[Attachments](#)

Chairperson Councilor Rivera read the item and recognized the following speakers:

1. Ron Hayes, Open Sky Community Services, spoke in favor of item #3a
2. Linda Cavaoli, YWCA, spoke in favor of item #3a
3. Martha Sullivan, Family Health Center of Worcester, spoke in favor of item #3a
4. Anh Sawyer, Southeast Asian Coalition of Central MA, spoke in favor of item #3a
5. Daniel Sherman, Family Health Center of Worcester, spoke in favor of item #3a
6. Julie Nathan, Family Health Center of Worcester, spoke in favor of item #3a

### 3. Community Development Block Grant Item

- 3a. Communication of the City Manager recommend City of Worcester Fiscal Year 2021/Program Year 46 Funding Recommendations for U.S. Housing and Urban Development (HUD) Entitlement Programs – Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), HOME Investment Partnership Program (HOME), and Housing Opportunities for Persons with AIDS (HOPWA) # 9.4A CM September 22, 2020

[Attachments](#)

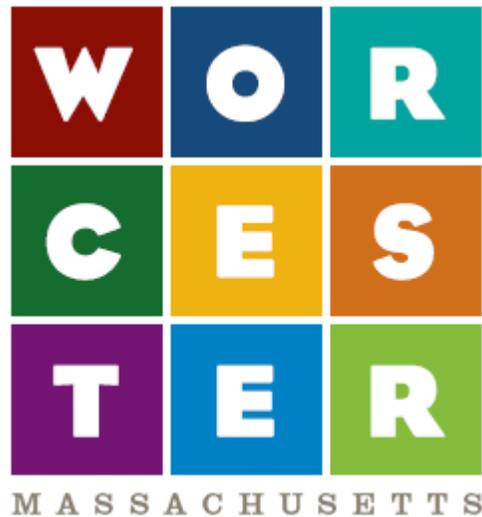
Chairperson Councilor Rivera read the item and recognized the Director of Neighborhood Development, who provided an overview of the item, including information relative to the changes in timing relating to the program due to COVID-19 and increased allocations to the program due to CARES Act funding.

Chairperson Councilor Rivera expressed gratitude for the Executive Office of Economic Development working through COVID-19 complications to provide funding for the organizations associated with complex issues within human services.

Chairperson Councilor Rivera recognized Councilor Rosen, who discussed the differences in funding that could have occurred if CDAC had been involved for selections associated with funding, more funds that may be allocated to some of the programs at a later time and oversight of the accounts to ensure the organizations were using the funds correctly with the Director of Neighborhood Development.

Chairperson Councilor Rivera moved for a roll call vote to recommend the item be approved. Recommend Approval on a roll call vote of 2 Yeas and 0 Nays (Russell recused).

# FISCAL YEAR 2021 EMERGENCY SOLUTIONS GRANT PROGRAM



## REQUEST FOR PROPOSALS

*The City of Worcester's Executive Office of Economic Development requests proposals for the Emergency Solutions Grant Program for the period of July 1, 2020 through June 30, 2021.*

## TABLE OF CONTENTS

- I. Request for Proposals (RFP) Summary
- II. Applicant Eligibility and Criteria Requirements
- III. Threshold Requirements for Proposal Submission
- IV. General Information for ESG Applicants
- V. Emergency Solutions Grant Program Overview
- VI. Eligible and Ineligible ESG Activities
- VII. City, State and Federal Requirements
- VIII. Fiscal Year 2021 ESG Application
  - a. Attachment A – Budget Guidelines
  - b. Attachment B – Budget Spreadsheets
- IX. Project Implementation Schedule
- X. Matching Funds Worksheet
- XI. Application Checklist

## I. REQUEST FOR PROPOSALS (RFP) SUMMARY

The City of Worcester is issuing a Request for Proposals (RFP) for funding consideration under the Emergency Solutions Grant (ESG) program for Fiscal Year July 1, 2020 through June 30, 2021. ESG funding from the U.S. Department of Housing and Urban Development has been made available to the City of Worcester in the estimated amount of \$486,468 to provide homelessness prevention, rapid re-housing, emergency shelter and street outreach programs for homeless individuals and families throughout the City of Worcester. All projects funded through the ESG program must adhere to federal regulations Part 576 – Emergency Solutions Grants Program (final rule). Please note that the City's program guidelines are under review and that this RFP is subject to change or re-release based on Federal, State and/or local determinations.

## II. APPLICANT ELIGIBILITY AND CRITERIA REQUIREMENTS

Applicants interested in applying for ESG funds must:

- Have a program that meets one of the ESG eligible activities and meets all activity criteria;
- Be eligible to participate in HUD and City-funded programs;
- Respond to the needs of the City of Worcester, as outlined in the City's Consolidated Action Plan.
- Have no part in the organization or agency's net earnings;
- Have a functioning accounting system that is operated in accordance with generally accepted accounting principles, or have designated an entity that will maintain such an accounting system; and
- Provide a current budget showing the applicant's capacity to execute the proposed project and the ability to secure additional funding necessary to operate the proposed project.

Questions regarding this process and ESG eligibility may be submitted to [development@worcesterma.gov](mailto:development@worcesterma.gov) for review and answers will be provided to all attendees at the **Technical Assistance workshop to be held on Monday, January 23, 2020 at 2:00 PM at Worcester City Hall, Levi Lincoln Room.** Staff may not answer any questions outside the ESG public review process.

**Executive Office of Economic Development**

Worcester City Hall ■ 455 Main Street ■ 4<sup>th</sup> Floor ■ Worcester, MA 01608 ■ (508) 799-1400

[www.worcesterma.gov](http://www.worcesterma.gov)

### III. THRESHOLD REQUIREMENTS FOR PROPOSAL SUBMISSIONS

All applicants and proposals must meet following minimum threshold requirements:

- Applicant and its affiliates or subsidiaries must be current in all financial obligations with the City of Worcester. The City of Worcester will not fund an organization or agency with outstanding disallowed costs, defaulted loans, tax arrearages, debarment actions or any other legal encumbrances, regardless of the merits of the submitted proposal;
- Applicant organization must certify that it complies with the Americans with Disabilities Act of 1990 (ADA), as amended (P.L. 110-325);
- Applicants must have its Board of Directors certify that it has a three (3) month cash flow reserve; and
- Applicant must certify that it has a Non-Discrimination Policy and provide copies of that policy.

**PLEASE NOTE:** Projects, programs or activities which fail to meet the applicable regulations and criteria **will not be considered for funding**. If the applicant fails to demonstrate that these requirements have been met, the proposal will not be reviewed.

### IV. GENERAL INFORMATION FOR ESG APPLICANTS

#### Proposal Format

- The application must be typed (not handwritten) with a legible typeface no smaller than 12-point type.
- All documents must be stapled or paper clipped with no binding.
- The original application should be signed in blue ink and the application package must include a total of **one hard copy** plus a PDF of the application and exhibits on a flash drive.
- **Applications are due to the City of Worcester's Executive Office of Economic Development by Monday February 10, 2020 at 4:30pm.** Incomplete applications or applications submitted after the deadline may not be considered. Once submitted, no proposal may be amended, unless the amendment has been requested by the City.

#### Funding Priorities

While the level of available funding for ESG resources are only able to supplement the range of services required to fulfill the City of Worcester overall homeless strategy, ESG-eligible activities that will be prioritized within this RFP are: *Financial assistance*

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*and service costs under the Homelessness Prevention component and Financial assistance and service costs under the Rapid Re-housing component*

Under Section VI of this RFP titled, “Eligible and Ineligible ESG Activities”, the activities noted with asterisks are considered priority funding activities for this RFP and will be scored highly advantageous over other proposed activities upon review by the ESG Review Committee.

Funding Priorities are derived from the City of Worcester Five-Year Consolidated Plan to HUD (2015-2020). The Review Committee, consisting of representatives from the Continuum of Care Advisory Board and City Departments, will consider the Homeless Needs Assessment and Homelessness Strategy from the Consolidated Plan in determining proposed activities’ alignment with the resource needs of the community. Applicants should reference these sections within the Consolidated Plan and 3<sup>rd</sup> Year Action Plan, when designing programs for which ESG funds will be used. The 5-Year Consolidated Plan can be found at the City of Worcester Neighborhood Development Document Center.

**Link:**

<http://www.worcesterma.gov/uploads/1a/09/1a090774559bee0ee9c7d58645f22bce/5-year-consolidated-plan.pdf>

### **Funding Decisions**

Funding decisions will be based on the highest rated proposals that address the RFP criteria. Evaluation and scoring will be performed by a review committee representing the City of Worcester. No applicant is eligible to serve on the committee. Based on recommendations provided by the committee, the City of Worcester reserves the right to adjust funding amounts requested based on availability of funds or as might be deemed necessary to achieve the best use of the funds. Receipt of an award letter is not a guarantee of funding. Prior funding awards do not guarantee continued or future funding. The City of Worcester, in its sole and absolute discretion, with or without cause, and without liability of any kind to any applicant, reserves the right to accept or reject any and/or all proposals either in whole or in part, waive any informalities or irregularities of any proposals, cancel this RFP at any time and/or take any action in the best interest of the City of Worcester. The City’s decisions in all matters regarding this RFP shall be final.

### **Incurred Expenses**

The City is not responsible for any expenses that applicant agencies may incur in the preparation and submittal of proposals requested by this RFP, including but not limited to, costs associated with travel, accommodations, interviews or presentations of proposals.

### **Contractual Agreements**

Agencies approved for funding will be required to sign an agreement with the City of Worcester in order to ensure compliance with ESG regulations. ESG funds may not be obligated until the funding authorization has been accepted and approved by the

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Worcester City Council, and a binding agreement executed by the appropriate signatories. Funding is disbursed on a reimbursement basis. Costs which will be allowable for reimbursement must be incurred between July 1, 2020 and June 30, 2021 and may only include items of expenditures allowed by HUD regulations governing the ESG program, as determined through negotiation of contract with the City of Worcester.

### **Matching Funds**

Participants must provide matching funds (which may include in-kind contributions) equal to the amount of the grant. Applicants must document the program's ability to match the ESG funding requested on a dollar for dollar basis by providing the sources of funds that are secured, amounts and how these funds will be used in the application. **The most advantageous proposals will provide additional matching funds beyond those required.**

### **Program Monitoring**

Applicants approved for funding will be required to maintain and submit adequate information necessary to monitor program accountability and progress in accordance with the terms and conditions of the agreement.

### **Reservation of Rights**

The City of Worcester reserves the right, at its sole discretion, to award all, a portion, or none of the available funding from this application, as well as reject any and all applications based on the quality and merits of the applications received, or when it is determined to be in the public interest to do so. Furthermore, the City of Worcester may extend deadlines and timeframes, as needed. The City of Worcester reserves the right to substantiate any proposers' qualifications, capability to perform, availability, past performance records and to verify that the applicant is current in its financial obligations to the City of Worcester. All materials and equipment used as well as all methods of installation shall comply at a minimum with any and all Federal, OSHA, State and/or local codes, including applicable municipal ordinances and regulations. The successful applicant shall agree to defend, indemnify and save the City of Worcester harmless from all losses, costs or damages caused by its acts or those of its agents, and, before signing the contract, will produce evidence satisfactory to the City of Worcester's Legal Counsel. Pursuant to City of Worcester procurement policy and ordinance, the City of Worcester is unable to contract with businesses or individuals who are delinquent in their financial obligations to the City of Worcester. These obligations may include but are not limited to real estate and personal property taxes and sewer user fees.

Applicants who are delinquent in their financial obligations to the City of Worcester must do one of the following: bring the obligation current, negotiate a payment plan with the City of Worcester's Treasury office, or agree to an offset which shall be established by the contract which shall be issued to the successful applicant. The City of Worcester, Massachusetts, reserves the right to waive any informality in applications, to accept any application or portion thereof, and, to reject any and all applications, should it be in the best in the best interest of the City of Worcester to do so.

It is the custom of the City of Worcester, Massachusetts to pay its bills 30 days following the receipt of correct invoices for all items covered by the approved application.

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## V. EMERGENCY SOLUTIONS GRANT PROGRAM OVERVIEW

### ESG Program Objectives

The Emergency Shelter Grants Program, originally established by the Homeless Housing Act of 1986 to address homelessness among individuals and families in the United States, was incorporated in 1987 into subtitles B of Title IV of the Stewart B. McKinney-Vento Homeless Assistance Act (42 U.S.C. 11371-11378).

On May 28, 2009, President Obama signed the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act, a bill that reauthorized the McKinney-Vento Homeless Assistance programs and substantially revised the Emergency Shelter Grants Program. In its revision, the Emergency Shelter Grants Program was renamed the Emergency Solutions Grant (ESG) Program.

ESG funds may be used to assist homeless persons and those at risk of becoming homeless. The ESG program provides funding to: (1) engage homeless individuals and families living on the street; (2) improve the number and quality of emergency shelters for homeless individuals and families; (3) help operate these shelters; (4) provide essential services to shelter residents; (5) rapidly re-house homeless individuals and families; and (6) prevent families and individuals from becoming homeless.

Prior to implementing an ESG program, all subrecipients of ESG funding must be familiar with and knowledgeable of the following regulations and program requirements:

- **ESG Regulations: 24 CFR Part 576** – The ESG Interim Rule
- **HEARTH Homeless Definition Final Rule: 24 CFR Parts 91.582 and 583** – The final rule, published in the Federal Register on December 5, 2011, provides the homeless definition which applies to the ESG program.

The ESG Interim Rule, published in the Federal Register on December 5, 2011, revises the regulations for the Emergency Shelter Grants program by establishing the regulations for the Emergency Solutions Grants program, which replaces the Emergency Shelter Grants program.

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act), enacted into law on May 20, 2009, consolidates three of the separate homeless assistance programs administered by HUD under the McKinney-Vento Homeless Assistance Act.

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The HEARTH Act also codifies into law the Continuum of Care planning process, a longstanding part of HUD's application process to assist homeless persons by providing greater coordination in responding to their needs.

ESG subrecipients are required, as much as possible, to coordinate ESG activities with other programs targeted toward homeless individuals and families, as well as mainstream housing, health, social services, employment, education and youth programs for which homeless and at-risk families and individuals may be eligible. Other agencies with which subrecipients shall coordinate may include, for example, but shall not be limited to, the CoC, HUD-VASH, Education for Homeless Children and Youth, Health Care for the Homeless, Runaway and Homeless Youth, Homeless Veterans Reintegration, Section 8, Public Housing, HOME Investment Partnership, the Workforce Investment Act, and TANF programs.

The change in the program's name, from Emergency Shelter Grants Program to Emergency Solutions Grant Program, reflects the change in the program's focus from addressing the needs of the homeless people in emergency shelters to assisting people to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness. The new ESG funds can be utilized for the following purposes:

- The rehabilitation or conversion of buildings for use as emergency shelter for the homeless;
- The payment of certain expenses related to operating emergency shelters;
- Essential services related to emergency shelters and street outreach for the homeless, which cannot exceed 60% of the City's total ESG allocation, per ; and
- Homelessness prevention and rapid re-housing assistance.

Only private non-profit organizations are qualified for funding. Each organization must have the capacity to provide matching funds (in-kind contributions) equal to the amount awarded, must involve, to the minimum extent practicable, homeless individuals and families in ESG activities, and must be able to provide written certification that they are a part of a Homeless Management Information System (HMIS).

## **VI. ELIGIBLE AND INELIGIBLE ACTIVITIES**

### **Eligible Activities**

Emergency Solutions Grant Funding can be used for five program activities: street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance, and HMIS. (The City of Worcester, as the grant recipient, is restricted from awarding any more than 60% of its allocation towards street outreach and emergency shelter activities combined, in accordance with federal regulations Part 576.1(b)).

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**\*\*Activities noted with asterisks are considered priority funding activities for this RFP and will be scored highly advantageous over other proposed activities**

### Street Outreach

Funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent non-facility based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing or an appropriate health facility.

Eligible Street Outreach Activities (in accordance with federal regulations Part 576 Emergency Solutions Grants Programs, Subpart B) include:

- Engagement
- Case Management
- Emergency Health Services
- Emergency Mental Health Services
- Transportation

### Emergency Shelter

Funds may be used for costs of providing essential services to families and individuals in emergency shelters, renovating buildings to be used as emergency shelters for homeless families and individuals, and operating emergency shelters.

Eligible Emergency Shelter activities (in accordance with federal regulations Part 576 Emergency Solutions Grants Programs, Subpart B) include:

- Essential Services:
  - Case management
  - Child care
  - Education services
  - Employment assistance and job training
  - Outpatient health services
  - Legal services
  - Life skills training
  - Mental health services
  - Substance abuse treatment services
  - Transportation.
- Renovation - Eligible costs include labor, materials, tools and other costs for renovation (including major rehabilitation or conversion of a building into an emergency shelter). The emergency shelter must be owned by a government entity or private nonprofit organization.
- Shelter Operations - Eligible costs are the costs of maintenance (including minor or routine repairs), rent, security, fuel, equipment, insurance, utilities, food,

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furnishings and supplies necessary for the operation of the emergency shelter. Where no appropriate emergency shelter is available for a homeless family or individual, eligible costs may also include hotel or motel vouchers for that family or individual.

### Homeless Prevention

Funds may be used to provide housing relocation and stabilization services and short- or medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter and prevent incidences of homelessness. Eligible Homelessness Prevention activities (in accordance with federal regulations Part 576 Emergency Solutions Grants Programs, Subpart B) include:

- \*\*Financial assistance costs:
  - Rental application fees
  - Security deposits equal to no more than 2 months' rent
  - Last month's rent
  - Utility deposits
  - Utility payments
  - Moving costs
  - Temporary storage fees for up to 3 months
  - Up to 6 months of utility payments in arrears per service
- \*\*Service costs:
  - Housing search and placement
  - Housing stability case management
  - Mediation
  - Legal services
  - Credit repair/Counseling Services
- Short-term and medium-term rental assistance (up to 24 months)
- Payment of rental arrears consists of a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears.

### Rapid Re-Housing

ESG funds may be used to provide housing relocation and stabilization services and short- or medium-term rental assistance necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing. Eligible Rapid Re-housing Assistance activities (in accordance with federal regulations Part 576 Emergency Solutions Grants Programs, Subpart B) include:

- \*\*Financial assistance costs:
  - Rental application fees
  - Security deposits equal to no more than 2 months' rent
  - Last month's rent
  - Utility deposits

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- Utility payments
- Moving costs
- Temporary storage fees for up to 3 months
- Up to 6 months of utility payments in arrears per service
- **\*\*Service costs:**
  - Housing search and placement
  - Housing stability case management
  - Mediation
  - Legal services
  - Credit repair/Counseling Services
- Short-term and medium-term rental assistance (up to 24 months)
- Payment of rental arrears consists of a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears.

### HMIS

ESG funds may be used to pay the costs of contributing data to the HMIS designated by the Continuum of Care for the area including the costs of purchasing hardware, software licenses or equipment, obtaining technical support, completing data entry and analysis, monitoring and reviewing data quality, training, reporting, and coordinating and integrating the system.

### **Ineligible Activities**

Ineligible costs include, but may not be limited to:

- Recruitment
- Depreciation
- Acquisition or new construction of an emergency shelter for the homeless
- Costs associated with the organization rather than the specific program renovation, rehabilitation, or conversion of structures used exclusively for religious purposes or which will otherwise promote religious interests except through the creation or utilization of a wholly secular entity
- Any costs associated with advertisements, pamphlets, surveys, etc.
- Staff training, entertainment, conferences or retreats
- Public relations or fundraising
- Recipient bad debts/late fees
- Program participant mortgage assistance/payments
- Recipient mortgage/debt service
- Indirect costs

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## VII. CITY, STATE AND FEDERAL REQUIREMENTS

The use of ESG funds are subject to applicable City and State laws and regulations in addition to HUD regulations. These laws include procurement policies and the State's Prevailing Wage rates. Other Federal, State and local requirements may apply, including but not limited to: Equal Employment Opportunity; anti-kickback rules; Davis-Bacon Act (prevailing wages for construction projects in excess of \$2,000 or housing of 8 units or more); accounting records; bonding and insurance; and environmental laws.

Non-profit organizations that receive ESG funding for ESG-eligible activities are also subject to 2 CFR 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, also referred to as the Super Circular. The Super Circular supersedes federal guidance and regulations formally found in OMB Circular A-122, Cost Principles, OMB Circular A-133, Audits, OMB Circular A-87, and OMB Circular A-110, Uniform Administrative Requirements.

No funding will be disbursed to an ESG grant sub-recipient unless there is a grant contract in place between the City of Worcester and the respective sub-recipient. Contracts will stipulate regular performance-based reporting requirements to include grant activity goals and metrics required before grant drawn down or reimbursement requests can be approved by the City of Worcester.

Grant sub-recipients are expected to be monitored by the City of Worcester during the grant funded activity's project term and grant sub-recipient monitoring expectations may vary based on pre-contract risk assessment analyses completed by the City of Worcester.

## VIII. FISCAL YEAR 2019 ESG APPLICATION

### SECTION I – AGENCY INFORMATION

Organization/Agency Name:		Employer Federal I.D. Number:	
Website:		DUNS Number:	
Mailing Address:	City:	State:	Zip:
Telephone:	Fax:		If yes, how much? \$_____
Has this agency received ESG funding in the Faith Based Organization?	<input type="checkbox"/> Yes <input type="checkbox"/> No		
		<input type="checkbox"/> Yes <input type="checkbox"/> No	

	Executive Director	Project Administrator	Finance Officer
Name:			
Title:			
Address:			
Phone:			
Fax:			
E-Mail:			

### SECTION II - PROJECT INFORMATION

Name of Project:		
Location of Project:		Census Tract(s):
Does this program use scattered site temporary housing?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Is this a confidential location?	Yes <input type="checkbox"/>	No <input type="checkbox"/>

<b>Program Type: (please note the application must be for only ONE of the following)</b>				
Homelessness Prevention <input type="checkbox"/>	Rapid Re-Housing <input type="checkbox"/>	Street Outreach <input type="checkbox"/>	Emergency Shelter (Services/Operations) <input type="checkbox"/>	HMIS <input type="checkbox"/>

**SECTION III - PROJECT FUNDING SUMMARY**

REQUESTED THIS APPLICATION	\$
OTHER FEDERAL FUNDS FOR PROJECT	\$
OTHER CITY FUNDS FOR PROJECT	\$
OTHER STATE FUNDS FOR PROJECT	\$
OTHER PRIVATE FUNDS FOR PROJECT	\$
<b>TOTAL</b>	\$
Will the program generate program income?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If so, please indicate the projected program income to be received.	\$ _____

**SECTION IV - ESG ELIGIBILITY**

<p><b>Does the agency have a 501 C 3 Status?</b></p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Pending</p> <p><b>Please check all that apply to the applicant?</b></p> <p><input type="checkbox"/> Current on 990 filings</p> <p><input type="checkbox"/> No findings on most recent agency financial audit</p> <p><input type="checkbox"/> No unresolved IRS finding</p> <p><input type="checkbox"/> No outstanding city findings</p>
---

**SECTION V – PROJECT FUNDING BREAKDOWN**

Please refer to Attachment A for Budget Form templates, Attachment B for Budget Guidelines, and sample completed budgets, all of which are available at:

<http://www.worcesterma.gov/e-services/document-center/neighborhood-development>.

Applications that do not include a completed budget will be deemed incomplete and therefore disqualified.

<b>Budget Explanation:</b>
<i>In this space provide an explanation of the ESG activity operation and ESG funds requested. Be sure to provide appropriate details including explanation of other expenses, details of staffing costs for the program and source and status of other funding. For example, if the request will include ESG for rent expenses please explain how rent is specifically used in the operation of the program. Note: a detailed current and proposed program budget (2018-2019) including all expenses and funding sources must be submitted with this application.</i>



**SECTION VII - PROJECT NARRATIVE & DESCRIPTION**

Please respond to the following questions. Please limit your responses to 200 words.

**1. Introduction.** Briefly state your organization's mission. List the services and programs that your organization provides, the number of individuals serviced by your agency and the geographic area you serve.

--

**2. Description of Program and Services.** Provide a general description of the proposed program or service for which ESG funds will be used, the population targeted as recipients of the services to be provided, and the estimated number of clients to be served by the project in a one-year period.

--

**3. Project Need/Demonstration of Need.** Please describe the local needs and service gaps this program seeks to fill or currently fills. Be sure to provide supporting evidence for this need. This should be specific to the proposed service area. Demonstrate how the proposal does not duplicate existing programs.

--

**4. Target Population.** Please describe the target population to be served by the proposed program. Document community outreach efforts including time spent with targeted populations both on-site and out in the neighborhoods, and specific actions taken to enhance outreach to underserved and isolated segments of the population that typically do not participate in your programs or services. List the total anticipated number of individuals and households to be served below.

Total number of individuals to be served:  
Total number of households to be served:

**5. Community Involvement/Collaboration.** Please describe the key collaborations (current and/or proposed) specific to this program. Submit memoranda of understanding, contacts or letters of support with other agencies that collaborate with this program in order to provide individuals with more comprehensive access and participation in services. Listing partners is not adequate.

**6. Organizational Capacity and Capability.** Describe your organization's qualifications for performing the proposed work. Describe the agency's past experience in administering programs to homeless and at-risk of homeless individuals and families. List your organizational Board Members, their places of employment, and a description of the Board's rule and duties.

**7. HMIS Current Capacity and Plans.** Describe in detail your agency's current and proposed levels of HMIS capacity.

**8. Fiscal Management Structure.** Describe the agency's fiscal management structure.

**9. Measureable Outcomes.** Provide a method for tracking clients. This will be done by recording data by individual client or household. Provide the unduplicated number of families/ persons that will benefit from the activity (output) and the cost to provide the service. Include an assessment of the outcomes for the ESG project, tracking, and follow-up services. The evaluation plan will measure the agency's progress in achieving the performance goal.

**10. Delivery.** Describe your service delivery plans, including your hours of operation, intake system, outreach and referral procedures, number of clients you expect to serve, and other major program features.

**11. Results and Evaluation.** Describe how the project will address the problem statement/demonstration of need described above. Include anticipated results and previous results if the program is ongoing. What proportion of the identified need will be addressed by the project and what measurable results will be achieved?

**12. Policy.** Describe the policies and procedures for termination of services to clients or graduation from program and/or subsequent referrals that reflect a continuum of care and that appropriate support services have been provided. See 24 CFR 574.310(e). Describe the organization's plan or ability to maintain this program if Emergency Solutions Grant funds are decreased or eliminated.

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**13. Sustainability.** Please use the space below to briefly describe your organization's sustainability plans. Be sure to address such strategies as fees for service, tenant contributions for rent (where applicable), annual fund campaigns, major gift programs, corporate sponsorships, etc.

**14. Consolidated Plan Consistency.** Describe how the proposed service will be integrated and/or reduce the gap or barriers in the City's Consolidated Plan (2015-2020). The Plan is available at <http://www.worcesterma.gov/uploads/1a/09/1a090774559bee0ee9c7d58645f22bce/5-year-consolidated-plan.pdf>. Applicants may reference consistencies between the proposed service and the strategies identified in the Consolidated Plan, including but limited to the following sections: NA-40 Homeless Needs Assessment; MA-30 Homeless Facilities and Services; SP-25 Priority Needs; and SP-60 Homelessness Strategy.

**15. Program Outcomes.** Describe the outcomes associated with the project and how you will measure them: **You need to measure your outcomes.**

<b>Common Outcome 1:</b>	
<b>Indicator:</b>	
<b>Target:</b>	
<b>Data Source:</b>	
<b>Data Collection Method:</b>	
<b>Common Outcome 2:</b>	
<b>Indicator:</b>	
<b>Target:</b>	
<b>Data Source:</b>	
<b>Data Collection Method:</b>	
<b>Common Outcome 3:</b>	
<b>Indicator:</b>	
<b>Target:</b>	
<b>Data Source:</b>	
<b>Data Collection Method:</b>	

**SECTION IX - STATEMENT OF APPLICANT**

The undersigned acknowledges the following:

1. That, to the best of its knowledge and belief, all factual information provided is true and correct and all estimates are reasonable.
2. That this request may be forwarded for consideration under other budget processes if it is determined that alternative sources may be appropriate.
3. That no revised proposals/applications may be made in connection with this application once the deadline for applications has passed.
4. That the City of Worcester may request or require changes in the information submitted, and may substitute its own figures which it deems reasonable for any or all figures provided. That the applicant will participate in required interview for project assessment and cooperatively assist in the review process.
5. That, even if the project(s) is recommended and approved by City Council, the City reserves the right to reduce and/or cancel the allocation if federal entitlements are cancelled, reduced, or rescinded.
6. The City of Worcester reserves the right not to fund any submittals received.
7. By submission of this application, the organization agrees to abide by the federal regulations applicable to this program.
8. That, if the project(s) is funded, the organization agrees to abide by the city's locally established policies and guidelines
9. That past program and financial performance will be considered in reviewing this application.
10. All program income (i.e., fees, repayments, foreclosures, etc.) must be remitted to the city.
11. That, if the project(s) is funded, the city or a designated agency may conduct an accounting system inspection to review internal controls, including procurement and uniform administrative procedures, prior to issuance of payments for projected expenditures.
12. That, if the project(s) is funded, the city will perform an environmental review prior to the obligation of funds.
13. That, if the project(s) is funded, a written agreement that includes a statement of work, records retention and reporting, program income procedures, local and federal requirements, circumstances that would trigger grant suspensions and terminations, and reversions of assets would be required between the organization and the city prior to any expenditure of funds.
14. That a project's funding does not guarantee its continuation in subsequent action plans.
15. That proof of insurance (general comprehensive public liability insurance with a company licensed to do business in Massachusetts, and in the aggregate naming the city, its employees and agents as additional insures) will be submitted to the city prior to receiving funds.
16. Agrees to comply with the following: Fair Housing Act, Section 504 of the Rehabilitation Act of 1973 and Title II of the Americans with Disabilities Act of 1990.
17. That, if the project(s) is funded, the organization will repay to the City any funds expended on costs consequently disallowed by the City or HUD due to ineligibility based on programs rules and regulations.

**PENALTY FOR FALSE OR FRAUDULENT STATEMENT**

U.S. Code Title 18, Section 1001, provides that a fine of up to \$10,000 or imprisonment for a period not to exceed five years, or both, shall be the penalty for willful misrepresentation and the making of false, fictitious statements, knowing same to be false.

By signature below, the applicant acknowledges the above on this \_\_\_\_ day of \_\_\_\_\_ 201\_.

**Certifying Representative  
Signature**

**Title**

**Organization**

*Note: "Certifying Representative," means the individual who may legally submit proposals for the agency and enter into agreements with the City of Worcester, i.e. the Chairman of the Board of a social service agency. You may identify a different "contact person."*

**Preparer's Signature**

**Title**

**Organization**

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**Table 2. Project Implementation Table**

Description of Activities as Per Table 1	1 <sup>st</sup> Quarter	2 <sup>nd</sup> Quarter	3 <sup>rd</sup> Quarter	4 <sup>th</sup> Quarter

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# X. MATCHING FUNDS WORKSHEET

## SOURCES OF LOCAL MATCH:

[Attach supporting documentation for available match. Documentation should reflect funding availability during the ESG contract year.]

### Other Federal (including pass-through funds, e.g., City CDBG, County FEMA, etc.)

_____	\$ _____
_____	\$ _____
_____	\$ _____
_____	\$ _____

### State/Local Government Funding

_____	\$ _____
_____	\$ _____
_____	\$ _____
_____	\$ _____

### Private (including recipient) Funding

Fund Raising/Cash	\$ _____
Loans	\$ _____
Building Value or Lease	\$ _____
Donated Goods	\$ _____
Donated Computers	\$ _____
New Staff Salaries	\$ _____
Volunteers (\$5/hr)	\$ _____
Volunteer Medical/Legal	\$ _____
Other (specify)	\$ _____

I certify that the match funds have been identified and committed to support the proposed ESG project and have not been used to match previous ESG awards (i.e. the value of a donated building used as match in a 2018 ESG award cannot be used as match in 2019). This form is a description of the sources and amounts of such match funds, which are not being used as match for any other federal program.

\_\_\_\_\_  
Signature/Title

\_\_\_\_\_  
Date

## XI. APPLICATION CHECKLIST

The following documents in compliance with City, State and Federal regulations must be submitted as part of your application package. Please use this checklist as a guide to complete your proposal. Place a checklist by the items included in the proposal. If you feel the item does not apply to your proposal, please indicate with "N/A" and provide additional justification within the comment section.

Description	YES	NO	COMMENTS
1. Application Completed & Signed including Budget Attachment	<input type="checkbox"/>	<input type="checkbox"/>	
2. Articles of Incorporation and Bylaws	<input type="checkbox"/>	<input type="checkbox"/>	
3. State and Federal Tax Exemption Determination Letters	<input type="checkbox"/>	<input type="checkbox"/>	
4. Federal Employment Identification Numbers	<input type="checkbox"/>	<input type="checkbox"/>	
5. DUNS (Dun and Bradstreet (D&B) 9-Digit Number & Certification	<input type="checkbox"/>	<input type="checkbox"/>	
6. List of Board of Directors, Titles and Contact Information	<input type="checkbox"/>	<input type="checkbox"/>	
7. Most Recent Organization Chart	<input type="checkbox"/>	<input type="checkbox"/>	
8. Job Description and Resume of Each ESG Program Salaried Position	<input type="checkbox"/>	<input type="checkbox"/>	
9. Resume of Chief Fiscal Officer	<input type="checkbox"/>	<input type="checkbox"/>	
10. Financial Statement and Most Recent Audit Report	<input type="checkbox"/>	<input type="checkbox"/>	
11. Matching Funds Commitments Documentation.	<input type="checkbox"/>	<input type="checkbox"/>	
12. List of Collaborative Partners and their role, including letters of support.	<input type="checkbox"/>	<input type="checkbox"/>	
13. 504 Self Evaluation Plan (Americans with Disabilities Act) <i>Agencies with 15 Employees or More</i>	<input type="checkbox"/>	<input type="checkbox"/>	
14. Employee Handbook	<input type="checkbox"/>	<input type="checkbox"/>	
15. Grievance Procedure/Policy (Clients)	<input type="checkbox"/>	<input type="checkbox"/>	
16. Project Implementation Timeline & Additional Outcome Objectives	<input type="checkbox"/>	<input type="checkbox"/>	
17. Program Income Plan	<input type="checkbox"/>	<input type="checkbox"/>	
18. Certificate of Authority <i>*To be submitted after funding is allocated &amp; attached to contract</i>	<input type="checkbox"/>	<input type="checkbox"/>	
19. Certificate of Insurance <i>*To be submitted after funding is allocated &amp; attached to contract</i>	<input type="checkbox"/>	<input type="checkbox"/>	
20. Tax Certification <i>*To be submitted after funding is allocated &amp; attached to contract</i>	<input type="checkbox"/>	<input type="checkbox"/>	
21. Anti-discrimination policy. Include hard copy.	<input type="checkbox"/>	<input type="checkbox"/>	

**\*\* ALL REQUIRED DOCUMENTS MUST BE SUBMITTED WITH YOUR APPLICATION.**



The City of  
**WORCESTER**



City Manager Edward M. Augustus, Jr.'s  
Executive Office of Economic Development

**Emergency Solutions Grant**

Program Guidelines

Revision Date June 26, 2018

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## Forms and Attachments

ESG Documentation Checklists: Eligibility; Financial Assistance

ESG "But For" Certification

ESG Income Eligibility Calculation Worksheet

ESG Verification of Income

ESG Self-Declaration of Income

ESG Self-Declaration of Housing Status

Notice of Ineligibility for ESG Homelessness Prevention Assistance

Rent Reasonableness Checklist and Certification

ESG Rapid Re-Housing Landlord Acknowledgement Form

ESG Housing Habitability Standards and Lead-Based Paint Inspection Checklist

ESG Quarterly Performance Report

HUD Entitlement Timesheet Form (Sample) Sample Time and Effort Logs

## 1. Introduction

1.1 In accordance with federal regulations set forth in 24 CFR 576, including but not limited to 24 CFR 576.400(e), the following ESG Program Guidelines (“Guidelines”) for the provision of Emergency Solutions Grant (“ESG”) assistance are adopted for all ESG funded contracts between the City of Worcester and its sub-recipient agencies. Notwithstanding any provision to the contrary, these Guidelines are intended solely for the convenience of the City’s sub-recipients, and not to limit or alter the requirements of applicable federal, state or local laws, regulations or ordinances (collectively “Law”). Additionally, these Guidelines do not limit or alter the requirements of any contract between the City and any sub-recipient. In all instances, the sub-recipient shall comply fully with the requirements of the applicable contract, as well as applicable Law and the grant agreement between HUD and the City (“Grant Agreement”). In the event of any conflict between these Guidelines and said Law or Grant Agreement requirements, the applicable Law and the requirements of the Grant Agreement shall prevail over these Guidelines.

1.2 The ESG program rules in 24 Code of Federal Regulation (CFR) Part 576 provide general standards for eligible housing activities such as client eligibility, housing quality standards, etc. Other applicable CFRs are:

- Lead-based paint poisoning notification requirements, 24 CFR Part 35, Lead- Based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846)
- Smoke alarm requirements, Section 31 of the Federal Fire Prevention and Control Act of 1974; and
- • Equal Access In Accordance With an Individual’s Gender Identity in Community Planning and Development Programs, 24 CFR Part 5
- 2 CFR Part 200

1.3 The ESG program provides funding to: (1) engage homeless individuals and families living on the street; (2) improve the number and quality of emergency shelters for homeless individuals and families; (3) help operate these shelters; (4) provide essential services to shelter residents; (5) rapidly re-house homeless individuals and families; and (6) prevent families and individuals from becoming homeless.

1.4 ESG sub-recipients are required, to the full extent possible, to coordinate ESG activities with other programs targeted towards homeless individuals and families, as well as mainstream housing, health, social services, employment, education and youth programs for which homeless and at-risk families and individuals may be eligible. Agencies with which Sub-recipients shall coordinate may include, for example, the Continuum of Care, HUD-Veteran Affairs Supportive Housing, Education for Homeless Children and Youth, Health Care for the Homeless, Runaway and Homeless Youth, Homeless Veterans

Reintegration, Section 8, Public Housing, HOME Investment Partnership, the Workforce Investment Act, and Temporary Assistance For Needy Families programs.

## **2. Minimum Program Eligibility Criteria**

2.1 The sub-recipient shall conduct an initial evaluation to determine the eligibility of each individual or family for ESG assistance and the types of assistance needed to regain stability in permanent housing.

2.2 ESG assistance is open to individuals and families from the City of Worcester who meet the definitions of either being homeless or at-risk of homelessness. All participants must meet the required income eligibility criteria as follows:

- For Rapid Re-Housing assistance, there is no income restriction for households at initial evaluation. However, at re-evaluation – not less than annually – household income must be below 30% AMI.
- For Homelessness Prevention assistance, households must have an income below 30% AMI at initial evaluation, and have no other housing options, financial resources, or support networks. At re-evaluation - not less than quarterly - the household must have an annual income below 30% AMI.
- The 30% AMI limit does not apply to program participants who are being served under the Emergency Shelter or Street Outreach components.

2.3 Prior to providing services with ESG funds, sub-recipients shall evaluate and clearly document each household's income. The sub-recipient shall determine the level of funding for each program participant through an initial intake assessment prior to providing services with ESG funds. Participants are not eligible if they are already receiving the same type of financial assistance (i.e., prevention, re-housing, or stabilization) during the same time period from another federal or state source. When the participant's income or other circumstances change (e.g. changes in household composition), the sub-recipient shall re-evaluate the participant's eligibility and the amount and types of assistance the participant needs.

2.4 The sub-recipient shall verify and document at the time of intake an individual's/family's homeless status. The priority for verification is as follows: third party documentation first, intake worker observations second, and certification from the person seeking assistance third. However, lack of third party documentation shall not prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by a victim service provider. Records contained in an HMIS or comparable database used by victim service or legal service providers and intake worker observations are acceptable evidence of third-party documentation if the database retains an auditable history of all entries, including the person who entered the data, the date of entry, changes made and if the database prevents overrides or changes of dates.

2.5 HMIS participation is a mandatory ESG requirement except for domestic violence and legal assistance providers as set forth in 24 CFR 576.107. All clients receiving ESG assistance must be reported in an approved HMIS system.

### **3. Limits of Funding Assistance**

3.1 For both prevention and rapid re-housing activities, sub-recipients shall provide participants with a fixed amount of financial assistance, up to a maximum of \$4,000 per household per 24 months. ESG sub-recipients may exercise reasonable discretion within this maximum and in accordance with other applicable regulations regarding the amount of rental and utilities assistance provided, as well as the share that participants are required to pay, based on the financial needs of the individual. Agencies may request a waiver to the \$4,000 maximum per household limit in writing to the City of Worcester under hardship circumstances only. Approval of this waiver is solely at the discretion of the City.

3.2 Within this limit and applying the criteria set forth above, sub-recipients may make the assistance available in various forms, including assistance for one-time costs such as first and last month's rent and/or security deposit or in the form of monthly rent supplements. Program participants receiving project-based rental assistance must have a lease for a period not less than one year, regardless of the length of the rental assistance.

3.3 Sub-recipients, depending on the resources available for prevention and applying the criteria set forth above, shall determine the extent and type of assistance that will best assist households maintain their tenancies. However, sub-recipients using ESG funds may not authorize any assistance to households other than immediate emergency shelter prior to obtaining all required documentation as specified in the HUD ESG Regulations located at 24 CFR 576.

3.4 Standards for determining the share of rent and utilities that each program participant must pay, if any, will be based on the following:

- Current Fair Market Rent (FMR) limits per 24 CFR 576.106 (d) when rental assistance is provided (only clients receiving security deposit assistance and/or assistance with rental arrears assistance are exempt from this requirement under homeless prevention contracts); and
- Rent reasonableness, which takes the neighborhood rental prices into account;

3.5 The Sub-recipient is also required to comply with the following when providing rental assistance:

- Minimum habitability standards;
- Visual lead paint inspections; and

- Rental assistance agreement and lease between property manager and tenants as well as owner of property and agency.

3.6 The sub-recipient is expressly prohibited from providing rental assistance to a client if that client is already receiving rental assistance from another public source for the same time period (with the exception of a one-time payment of up to 6 months of rental arrears).

#### 4. **Definitions of Selected Terms**

4.1 As set forth in 24 CFR 576.2, the McKinney-Vento Act defines “homeless” as :

(1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

(i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground; (ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or (iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;

(2) An individual or family who will imminently lose their primary nighttime residence, provided that:

(i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance; (ii) No subsequent residence has been identified; and (iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing;

(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

(i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e–2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)) or section 725 of the McKinney–Vento Homeless Assistance Act (42 U.S.C. 11434a); (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately

preceding the date of application for homeless assistance; (iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and (iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or

(4) Any individual or family who:

(i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence; (ii) Has no other residence; and (iii) Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

4.2 As set forth in 24 CFR 576.2, the term "At-Risk of Homelessness" is defined as:

(1) An individual or family who:

(i) Has an annual income below 30 percent of median family income for the area, as determined by HUD; and (ii) Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the "homeless" definition in this section; and (iii) Meets one of the following conditions:

(A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;

(B) Is living in the home of another because of economic hardship;

(C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;

(D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals

(E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;

(F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or

(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;

(2) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e–2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or

(3) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 725(2) of the McKinney–Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

## **5. Eligible Activities**

5.1 Emergency Solution Grant funding can be used for five program activities as set forth in 24 CFR 576.100(a): street outreach, emergency shelter, homelessness prevention, rapid re- housing assistance, and HMIS. These activities are further detailed in Sections 6 through 9, below.

## **6. Street Outreach**

6.1 Street outreach, as set forth in 24 CFR 576.101, consists of the costs of providing essential services necessary to reach out to unsheltered homeless people, connect them with emergency shelter, housing, or critical services, and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility.

6.2 Eligible Street Outreach Activities (in accordance with federal regulations Part 576 Emergency Solutions Grants Programs, Subpart B) include:

1. Engagement;
2. Emergency Health Services

3. Emergency Mental Health Services; and

4. Transportation

5. Services for Special Populations

## **7. Emergency Shelter**

7.1 The Emergency Shelter component of ESG, as set forth in 24 CFR 576.102, may be used to provide essential services to homeless families and individuals in emergency shelters, to renovate buildings to be used as emergency shelter for homeless families and individuals, and to operate emergency shelters.

7.2. Emergency Shelter Services are essential services to emergency shelter residents. These services may include case management, childcare, employment assistance, life skills, behavioral health services. Individuals and families must be verified as literally homeless or fleeing/attempting to flee domestic violence. There is no income threshold at intake for this activity. ESG funds may be used to provide essential services to homeless individuals and families residing in emergency shelters. An emergency shelter is any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements.

7.2.1 Emergency Shelter Services, in accordance with federal regulations Part 576 Emergency Solutions Grants Programs, Subpart B include:

1. Case management
2. Child care
3. Education services
4. Employment assistance and job training
5. Outpatient health services
6. Legal services
7. Life skills training
8. Mental health services
9. Substance abuse treatment services
10. Transportation.
11. Services for special populations

7.2.2 Where the recipient or sub-recipient uses ESG funds solely for essential services or shelter operations, the recipient or sub-recipient must provide services or shelter to homeless individuals and families at least for the period during which the ESG funds are provided. The recipient or sub-recipient does not need to limit these services or shelter to a particular site or structure, so long as the site or structure serves the same type of persons originally served with the assistance (e.g., families with

children, unaccompanied youth, disabled individuals, or victims of domestic violence) or serves homeless persons in the same area where the recipient or sub-recipient originally provided the services or shelter.

7.2.3 Sub-recipients must comply with all requirements contained within Attachment E, Shelter Support Recordkeeping and Reporting Requirements.

7.3 Shelter Rehabilitation, Renovation and Conversion, as set forth in 24 CFR 576.102(a)(2) includes labor, materials, tools, and other costs for renovation (including major rehabilitation of an emergency shelter or conversion of a building into an emergency shelter). The emergency shelter must be owned by a government entity or private nonprofit organization.

7.3.1 If such activity is included as an eligible cost in Attachments B and C of the particular contract between the ESG sub-recipient and the City, then ESG funds may be used for costs of renovating buildings to be used as emergency shelter for homeless families and individuals or to convert a building for use as an emergency shelter. Eligible costs include labor, materials, tools and other costs for renovation (including major rehabilitation of an emergency shelter or conversion of a building into an emergency shelter). The emergency shelter must be owned by a government or private nonprofit organization. For the purposes of this Section, the sub-recipient may also be referred to as "lessee". Sub-recipient may not use ESG funds for rehabilitation or renovation of structures that will be used for inherently religious activities. ESG funds may pay for rehabilitation of structures only to the extent that those structures are used for conducting eligible activities under the ESG program. Where a structure is used for both eligible and religious activities, the amount of ESG funds used may not exceed the cost of those portions of the rehabilitation that are attributable to eligible activities in accordance with the cost accounting requirements applicable to ESG funds. Sanctuaries, chapels, or other rooms used as a principal place of worship are ineligible for funded improvements paid by ESG. To the full extent applicable, sub-recipient shall further comply with any and all requirements particular to faith-based organizations, including but not limited to 24 CFR 5.109.

7.3.2 Each building renovated with ESG funds must be maintained as a shelter for homeless individuals and families for not less than a period of three (3) or ten (10) years ("minimum use period"), depending on the type of renovation and the value of the building. The minimum use period must begin on the date the building is first occupied by a homeless individual or family after the completed renovation. If the rehabilitation cost of the shelter exceeds 75% of the value of the building before rehabilitation (e.g. major rehabilitation) the minimum period of use is ten (10) years. If the cost to convert a building into an emergency shelter exceeds 75% of the value of the building after conversion, the minimum period of use is ten (10) years. In all other cases where ESG funds are used for renovation, the minimum period of use is three (3) years. The minimum period of use of ten (10) years, required for rehabilitation and conversion must be enforced by a recorded deed or use restriction.

7.3.3 Any building renovated, converted or rehabbed using ESG funds must meet local government regulations, including building code and sanitary code.

7.3.4 Grant amounts may not be used for acquisition or construction of an emergency shelter for the homeless.

7.4 Emergency Shelter Operations, as set forth in 24 CFR 576.102(a)(3), are the costs of maintenance (including minor or routine repairs), rent, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter. Where no appropriate emergency shelter is available for a homeless family or individual, eligible costs may also include a hotel or motel voucher for that family or individual. There is no income threshold at intake for this activity.

7.4.1 The age of a child under age 18 shall not be a basis for denying any family's admission to an emergency shelter that uses ESG funding or services and provides shelter to families with children under age 18.

7.4.2 Sub-recipients shall comply with all requirements Shelter Support Recordkeeping and Reporting Requirements, including as set forth in Attachment E.

7.4.3 Where the sub-recipient uses ESG funds solely for essential services or shelter operations, the sub-recipient shall provide services or shelter to homeless individuals and families at least for the period during which the ESG funds are provided. The sub-recipient does not need to limit these services or shelter to a particular site or structure, so long as the site or structure serves the same type of persons originally served with the assistance (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or serves homeless persons in the same area where the recipient or sub-recipient originally provided the services or shelter.

7.4.4 Shelter Support recipients shall comply with the Shelter Support Recordkeeping and Reporting Requirements including as set forth in Attachment F.

## **8. Homeless Prevention**

8.1 Homeless Prevention Assistance, as set forth in 24 CFR 576.103, may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter or another place described in paragraph (1) of the "homeless" definition in Section 576.2.

8.2 This assistance, referred to as "homelessness prevention", may be provided to individuals and families who meet the criteria under the "at risk of homelessness" definition, or who meet the criteria in paragraph (2), (3), or (4) of the "homeless" definition in 24 CFR Section 576.2 and have an annual income

below 30 percent of median family income for the area, as determined by HUD. At re-evaluation - not less than once every three months - the participant must have an annual income below 30% AMI.

8.3 The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant's current permanent housing or move into other permanent housing and achieve stability in that housing. Homelessness prevention must be provided in accordance with the housing relocation and stabilization services requirements in 24 CFR Section 576.105, the short-term and medium-term rental assistance requirements in 24 CFR Section 576.106, and the written standards and procedures established under 24 CFR Section 576.400.

8.4 Eligible Homelessness Prevention activities (in accordance with federal regulations Part 576 Emergency Solutions Grants Programs, Subpart B) include:

- Financial assistance costs
  - o Rental application fees
  - o Security deposits equal to no more than 2 months' rent
  - o Last month's rent
    - This assistance must not exceed one month's rent and must be included in calculating the program participant's total rental assistance, which cannot exceed 24 months during any 3-year period.
  - o Utility deposits
  - o Utility payments (up to 24 months including 6 months arrearage per service)
    - A partial payment of a utility bill counts as one month.
    - This assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments.
    - Eligible utility services are gas, electric, water, and sewage.
  - o Moving costs
  - o Temporary storage fees for up to 3 months (no storage fees in arrears)
  - o Note: Late payment penalties are NOT an eligible ESG expense. The recipient or sub-recipient is solely responsible for paying late payment penalties that it incurs with non-ESG funds.
- Service costs

o Housing search and placement

o Housing stability case management - See Section 10 for eligible activities and requirements

o Mediation *Must be between the program participant and the owner or person(s) with whom the program participant is living, provided the mediation is necessary to prevent the program participant from losing permanent housing in which the program participant currently resides.*

o Legal services *Must include landlord/tenant matters, and services must be necessary to resolve a legal problem that prohibits the program participant from obtaining permanent housing or will likely result in the program participant losing the permanent housing in which the program participant currently resides.*

o Credit repair/Counseling Services

- Short-term (3 months) and medium-term rental assistance (up to 24 months)
- Payment of rental arrears consists of a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears.

8.5 Housing/stabilization services must occur at least monthly for 12 months. Prevention assistance will be targeted to families at imminent risk of eviction. Sub-recipients will use standard intake/assessment forms intended to determine eligibility and also to highlight other strengths and/or challenges for the household. Prevention services may also be secondarily targeted toward housed individuals for the purposes of eviction prevention. These services would focus on intervention and/or financial assistance as needed to prevent an imminent episode of homelessness.

8.6 The amount of assistance should reflect the cost for the individual or family to stay in place, moves, or establish a new tenancy, up to a maximum of \$4,000 per household within 24 months during any three year period. Agencies may request a waiver to the \$4,000 maximum per household limit in writing to the City of Worcester under hardship circumstances only. Approval of this waiver is solely at the discretion of the City. This assistance may be in the form of short-term rental assistance, medium-term rental assistance, payment of rental arrears, or any combination of this assistance. Participants must not be receiving the same type of financial assistance (i.e. prevention, re-housing, or stabilization) during the same time period from another Federal or State source. Providers must re-evaluate participants' eligibility and the types and amounts of prevention assistance needed not less than once every three months. Except as provided for housing stability case management, no program participant may receive more than 24 months of assistance in a three-year period.

8.7 Sub-recipients must conduct an initial eligibility intake and assessment to determine eligibility and level of need. Re-evaluations of each program participants' eligibility as well as types and amounts of

assistance the program participant needs must be conducted on a QUARTERLY BASIS for participants receiving rapid re-housing assistance. At a minimum, the re-evaluation must establish that:

- The program participant does not have an annual income that exceeds 30 percent of median family income for the area, as determined by HUD; and
- The program participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance.

Additionally, when notified of a relevant change to the program participant's income or other circumstances that effect the participant's need for assistance under ESG, the recipient or sub-recipient must re-evaluate the program participant's eligibility and the amount and types of assistance the program participant needs.

8.8 All assisted units must be documented by a lease. Project-based rental assistance leases must have an initial term of not less than one year. Rental agreements between the sub-recipient and the property owner must set forth terms under which assistance will be provided by the sub-recipient to the owner on behalf of the participating household. The written lease must include the tenant's name, address of the unit, term of tenancy, and move in date, rent amount, who is responsible for the utilities and must be signed by both parties and dated. The Sub-recipient must have a copy of the signed lease prior to authorizing any payments to the property owner.

8.9 The lease is not the Rental Assistance Agreement (RA). The RA must be between the Sub-recipient and the property owner and must document the terms of assistance, including requirement the property owner submit to the sub-recipient a copy of any notice to the tenant that could lead to an eviction. The RA is required to be executed before any payment is made to the property owner.

8.10 Assisted units must be at or below Fair Market Rent (FMR) for area and unit size for rent and utilities.

8.11 The sub-recipient shall document "rent reasonableness" using the form in Attachment D. Rent reasonableness shows that the rent of the unit is reasonable in relation to comparable units and provides documented data for units comparable in size, location and rent amounts.

8.12 Sub-recipients must comply with all Homeless Prevention Recordkeeping and Reporting Requirements, including as set forth in Attachment D.

## 9. Rapid Re-Housing

9.1 Rapid Re-Housing Assistance, as set forth in 24 CFR 576.104, may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing.

9.2 This assistance, referred to as rapid re-housing assistance, may be provided to program participants who meet homeless definition. The rapid re-housing assistance must be provided in accordance with the housing relocation and stabilization services requirements in Section 576.105, the short- and medium-term rental assistance requirements in Section 576.106, and the written standards and procedures established under Section 576.400.

9.3 For Rapid Re-Housing, an income assessment is not required at initial evaluation. However, at annual re-evaluation, the client's income must be below 30% AMI.

9.4 Eligible Rapid Re-housing Assistance activities (in accordance with federal regulations

Part 576 Emergency Solutions Grants Programs, Subpart B) include:

- Financial assistance costs
  - o Rental application fees
  - o Security deposits equal to no more than 2 months' rent
  - o Last month's rent - This assistance must not exceed one month's rent and must be included in calculating the program participant's total rental assistance, which cannot exceed 24 months during any 3-year period.
  - o Utility deposits
  - o Utility payments (up to 24 months including 6 months arrearage per service)
    - A partial payment of a utility bill counts as one month.
    - This assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments.
    - Eligible utility services are gas, electric, water, and sewage.
  - o Moving costs
  - o Temporary storage fees for up to 3 months (no storage fees in arrears)

Note: Late payment penalties are NOT an eligible ESG expense. The recipient or sub-recipient is solely responsible for paying late payment penalties that it incurs with non-ESG funds.

- Service costs
  - o Housing search and placement
  - o Housing stability case management – See Section 10 for eligible activities and requirements
  - o Mediation - Must be between the program participant and the owner or person(s) with whom the program participant is living, provided the mediation is necessary to prevent the program participant from losing permanent housing in which the program participant currently resides.
  - o Legal services -Must include landlord/tenant matters, and services must be necessary to resolve a legal problem that prohibits the program participant from obtaining permanent housing or will likely result in the program participant losing the permanent housing in which the program participant currently resides.
  - o Credit repair/Counseling Services
  
- Short-term (3 months) and medium-term rental assistance (up to 24 months)
  
- Payment of rental arrears consists of a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears.

9.5 Rapid Re-Housing services can only be provided for 30 days and only while homeless. ESG funds may be used to provide housing relocation and stabilization services and short and/or medium term rental assistance as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing. This assistance may be provided to program participants who meet the criteria of the homeless definition and live in an emergency shelter or other place described in the homeless definition. Rapid Re- housing assistance will be targeted to persons living in an emergency shelter or a place not meant for human habitation, which:

- Does not include Transitional Shelter Programs or Transitional Housing;
- Is a shelter where the shelter guest does not have to meet specific criteria other than being homeless with no place else to go;
- Is a shelter where the guests do not have to sign an occupancy agreement or program participation agreement to access the shelter;

- Is a shelter where the average length of stay is less than 90 days.

9.6 The amount of assistance should reflect the cost for the individual or family to stay in place, moves, or establish a new tenancy, up to a maximum of \$4,000 per household within 24 months during any three year period. Agencies may request a waiver to the \$4,000 maximum per household limit in writing to the City of Worcester under hardship circumstances only. Approval of this waiver is solely at the discretion of the City. This assistance may be in the form of short-term rental assistance, medium-term rental assistance, payment of rental arrears, or any combination of this assistance. Participants must not be receiving the same type of financial assistance (i.e. prevention, re-housing, or stabilization) during the same time period from another Federal or State source. Providers must re-evaluate participants' eligibility and the types and amounts of prevention assistance needed not less than once every three months. Except as provided for housing stability case management, no program participant may receive more than 24 months of assistance in a three-year period.

9.7 Sub-recipients must conduct an initial eligibility intake and assessment to determine eligibility and level of need. Re-evaluations of each program participants' eligibility as well as types and amounts of assistance the program participant needs must be conducted not less than ANNUALLY for participants receiving rapid re-housing assistance. At a minimum, the re-evaluation must establish that:

- The program participant does not have an annual income that exceeds 30 percent of median family income for the area, as determined by HUD; and
- The program participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance.

Additionally, when notified of a relevant change to the program participant's income or other circumstances that affect the participant's need for assistance under ESG, the sub-recipient must re-evaluate the program participant's eligibility and the amount and types of assistance the program participant needs.

9.8 All assisted units must be documented by a lease. Project-based rental assistance leases must have an initial term of not less than one year. Rental agreements between the sub-recipient and the property owner must set forth terms under which assistance will be provided by the sub-recipient to the owner on behalf of the participating household. The written lease must include the tenant's name, address of the unit, term of tenancy, move in date, rent amount, who is responsible for the utilities and must be signed by both parties and dated. The Sub-recipient must have a copy of the signed lease prior to authorizing any payments to the property owner.

9.9 The lease is not the Rental Assistance Agreement (RA). The RA must be between the Sub-recipient and the property owner and must document the terms of assistance, including requirement that the

property owner submit to the Sub-recipient a copy of any notice to the tenant that could lead to an eviction. The RA is required to be executed before any payment is made to the property owner.

9.10 Assisted units must be at or below Fair Market Rent (FMR) for area and unit size for rent and utilities.

9.11 The sub-recipient shall document "rent reasonableness" using the form in Attachment D. Rent reasonableness shows that the unit rent is reasonable in relation to comparable units and provides documented data for units comparable in size, location and rent amounts.

9.12 Sub-recipients must comply with all Rapid Re-Housing Recordkeeping and Reporting Requirements, set forth in Attachment E.

## **10. Housing Stability Case Management**

10.1 ESG funds may be used to pay cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing. This assistance cannot exceed 30 days during the period the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing. Component services and activities consist of:

- a. Using the centralized or coordinated assessment system as required under § 576.400(d), to evaluate individuals and families applying for or receiving homelessness prevention or rapid re-housing assistance;
- b. Conducting the initial evaluation required under § 576.401(a), including verifying and documenting eligibility, for individuals and families applying for homelessness prevention or rapid re-housing assistance;
- c. Counseling;
- d. Developing, securing, and coordinating services and obtaining Federal, State, and local benefits;
- e. Monitoring and evaluating program participant progress;
- f. Providing information and referrals to other providers;
- g. Developing an individualized housing and service plan, including planning a path to permanent housing stability; and

h. Conducting re-evaluations required under § 576.401(b).

10.2 While providing homelessness prevention or rapid re-housing assistance to a program participant, the recipient or sub-recipient must:

- Require the program participant to meet with a case manager not less than once per month to assist the program participant in ensuring long-term housing stability; and
- Develop a plan to assist the program participant to retain permanent housing after the ESG assistance ends, taking into account all relevant considerations, such as the program participant's current or expected income and expenses; other public or private assistance for which the program participant will be eligible and likely to receive; and the relative affordability of available housing in the area.

10.3 The recipient or sub-recipient is exempt from the requirement under paragraph (e)(1)(i) of this section if the Violence Against Women Act of 1994 (42 U.S.C. 13701 et seq.) or the Family Violence Prevention and Services Act (42 U.S.C. 10401 et seq.) prohibits that recipient or sub-recipient from making its shelter or housing conditional on the participant's acceptance of services.

## **11. Housing Information Management System (HMIS)**

11.1 In accordance with regulations set forth at 576 CRF 107, the sub-recipient may use ESG funds to pay the costs of contributing data to the HMIS designated by the Continuum of Care for the area, including the costs of:

- Purchasing or leasing computer hardware
- Purchasing software or software licenses
- Purchasing or leasing equipment, including telephones, fax machines, and furniture
- Obtaining technical support
- Leasing office space
- Paying charges for electricity, gas, water, phone service, and high-speed data transmission necessary to operate or contribute data to the HMIS
- Paying salaries for operating HMIS, including:
  - o Completing data entry
  - o Monitoring and reviewing data quality
  - o Completing data analysis
  - o Reporting to the HMIS Lead
  - o Training staff on using the HMIS or comparable database
  - o Implementing and complying with HMIS requirements
- Cost of staff to travel to and attend HUD–sponsored and HUD–approved training on HMIS and programs authorized by Title IV of the McKinney–Vento Homeless Assistance Act
- Costs to conduct intake
- Participation fees charged by the HMIS Lead.

11.2 If the recipient is the HMIS lead agency, as designated by the Continuum of Care, it may also use ESG funds to pay the costs of:

- Hosting and maintaining HMIS software or data
- Backing up, recovering, or repairing HMIS software or data
- Upgrading, customizing, and enhancing the HMIS
- Integrating and warehousing data, including development of a data warehouse for use in aggregating data from sub-recipients using multiple software system
- Administering the system
- Reporting to providers, the Continuum of Care, and HUD
- Conducting training on using the system or a comparable database, including traveling to the training

11.3 If the sub-recipient is a victim services provider or a legal services provider, it may use ESG funds to establish and operate a comparable database that collects client-level data over time (i.e., longitudinal data) and generates unduplicated aggregate reports based on the data. Information entered into a comparable database must not be entered directly into or provided to an HMIS.

11.4 Activities funded under this section must comply with HUD's standards on participation, data collection, and reporting under a local HMIS.

## **12. Ineligible ESG Activities**

Ineligible costs include, but are not limited to:

- Assistance where other resources are available
- Recruitment or ongoing staff training
- Depreciation
- Costs associated with the organization rather than the facility (e.g. advertisements, pamphlets about the organization, surveys, etc.)
- Public relations
- Acquisition or new construction of an emergency shelter for the homeless
- Costs associated with the organization rather than the specific program renovation, rehabilitation, or conversion of structures used exclusively for religious purposes or which will otherwise promote religious interests except through the creation or utilization of a wholly secular entity
- Any costs associated with advertisements, pamphlets, surveys, etc.
- Staff training, entertainment, conferences or retreats
- Public relations or fundraising

- Recipient bad debts/late fees
- Program participant mortgage assistance/payments and any issues related to mortgages
- Recipient mortgage/debt service
- Indirect costs
- Legal services for immigration and citizenship matters
- Retainer fee arrangements and contingency fee arrangements
- Substance abuse treatments services for inpatient detoxification and other inpatient drug or alcohol treatment
- Payment of temporary storage fees in arrears
- Late payment penalties
- Purchase of office space
- Sub-recipient post due taxes or late fees
- Repayment of utility or security deposits to the sub-recipient not tracked as program income
- Construction or rehabilitation
- Credit card or other consumer debt
- Car repairs
- Program participant travel costs
- Medical or dental care and medicines
- Clothing and grooming
- Home furnishings
- Pet care
- Entertainment activities
- Work or education related materials
- Indirect costs
- Cash assistance to program participants
- Develop discharge planning programs in mainstream institutions such as hospitals, jails or prisons
- Funds issued directly to program participants
- Program fees
- Fees charged to the program applicant or participant

### **13. Case Management Requirements**

13.1 In accordance with 576 CRF 576.401(e), while providing homelessness prevention or rapid re-housing assistance to a program participant, the sub-recipient must:

- A. Require the program participant to meet with a case manager not less than once per month to assist the program participant in ensuring long-term housing stability; and
- B. Develop a plan to assist the program participant to retain permanent housing after the ESG assistance ends, taking into account all relevant considerations, such as the program participant's

current or expected income and expenses; other public or private assistance for which the program participant will be eligible and likely to receive; and the relative affordability of available housing in the area.

13.2 The sub-recipient is exempt from the requirement under paragraph (e)(1)(i) of this section if the Violence Against Women Act of 1994 (42 U.S.C. 13701 et seq.) or the Family Violence Prevention and Services Act (42 U.S.C. 10401 et seq.) prohibits that recipient or sub-recipient from making its shelter or housing conditional on the participant's acceptance of services.

13.3 Case managers shall help connect households with appropriate services and financial assistance through other public and private homeless assistance and mainstream programs. Case managers shall keep clear and concise case notes documenting the meetings including their goals and outcomes.

#### **14. Habitability Standards and Lead Based Paint Requirements**

14.1 In accordance with 24 CFR 576.403, all units in which program participants receiving assistance live must meet HUD Habitability Standards. Sub-recipients are required to complete the Emergency Solutions Grant Housing Shelter and Housing Standard Inspection Checklist (also known as the "Habitability Checklist") for all participants receiving financial assistance for their housing units. This checklist can be found in Attachment C. The only exception to this requirement is in cases where only security deposits assistance and/or rental arrearage assistance is being provided.

14.2 All assisted units must meet federal lead paint requirements if the unit was constructed before 1978 and if a child under 6 and/or a pregnant woman is or will be residing in the unit. Sub-recipients must document these inspections using the Habitability Checklist, which also addresses lead paint standards. The unit must meet ALL standards on the checklist or MAY NOT be used. The inspection must include, at a minimum:

- Verification of age of structure;
- Visual assessment and confirmation that paint surfaces are not chipping, cracking or peeling using the Habitability Checklist.; and
- Verification that the unit has been de-lead or paint encapsulated from a Massachusetts approved de-leading vendor.

14.3 Sub-recipients are highly encouraged to complete an online tutorial on completing lead based paint visual inspections which takes approximately 20 minutes to complete and is located at: <http://www.hud.gov/offices/lead/training/visualassessment/h00101.htm>. If any sub-recipients already

had a Habitability Checklist in place, they just need to make sure that the lead based paint assessment is included.

14.4 The habitability and visual lead inspections are not required to be completed by certified inspectors.

14.5 If a HUD approved inspection for Section 8 has been recently completed for the unit, a copy of that inspection report in the client's file is sufficient because the regulations governing Section 8 inspections are more stringent than those governing ESG inspections.

14.6 A lead-free certification for a unit can also be used to satisfy the lead paint requirement.

14.7 Many houses and apartments built before 1978 have paint that contains lead (called lead-based paint). Lead from paint, chips and dust can pose serious health hazards. HUD requires Project Sponsors to give all ESG clients the lead-based paint pamphlet entitled Protect Your Family from Lead in Your Home. The client's case file should include documentation that a copy of the pamphlet was given to the client. The pamphlet was developed by the Environmental Protection Agency in response to concern about lead-based paint hazards in the home. Copies of the pamphlet are available at the following website address:

English version: <http://www.epa.gov/lead/pubs/leadpdf.pdf>

Spanish version: <http://www.epa.gov/lead/pubs/pyfcameraspan.pdf>

## **15. Termination of Assistance**

15.1 In accordance with 24 CFR 576.402, if a program participant violates program requirements, the sub-recipient may terminate the assistance in accordance with a formal process established by the sub-recipient. That process must recognize the rights of individuals affected. The sub-recipient must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases. Sub-recipient may terminate assistance to a program participant if the rules of the program are violated. The termination must be preceded by a due process to include, at a minimum:

- Written notification and clear statement of reasons for termination from the program;
- Opportunity to appeal to a third party; and
- Prompt appeal response

Termination shall only happen in the most severe of cases and shall be clearly documented in the program participant's file.

15.2 With regard to program participants receiving rental assistance or housing relocation and stabilization services, to terminate such assistance or services, the required formal process, at a minimum, must consist of:

- (1) Written notice to the program participant containing a clear statement of the reasons for termination;
- (2) A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
- (3) Prompt written notice of the final decision to the program participant.

15.3 Termination under this section does not bar the sub-recipient from providing further assistance at a later date to the same family or individual.

## **16. General Recordkeeping and Reporting Requirements**

16.1 The sub-recipient must have policies and procedures in place to ensure that ESG funds are used in accordance with the regulatory requirements. In addition, sufficient records must be established and maintained to enable the City and HUD to determine whether ESG requirements are being met.

16.2 In general, all clients receiving ESG assistance must have the following documentation included, but not limited to, in their case file:

- (i) Documentation of Homeless or At-risk Homeless Status (additional details regarding this documentation are provided below);
- (ii) Documentation of income (third-party verification whenever possible, if not- self declaration of income forms will suffice);
- (iii) In the form of case notes, evidence of at least an initial in-person consultation with a case manager including a needs assessment and formulation of a long-term plan for housing stability;
- (iv) HMIS Intake form at program entry;
- (v) Quarterly or annual re-evaluations, depending on program component; and
- (vi) HMIS Exit form upon program completion.

16.3 All sub-recipients are required to use the forms included in Attachment C.

16.4 All clients provided with ESG assistance in the form of direct financial support (i.e., first last month's rent, security deposits, moving costs, rental arrearages, utility arrearages or medium-term rental subsidies) must also have the following documentation included in their case file:

- (i) Lease or Rental Agreement;
- (ii) Rent Reasonableness Checklist;
- (iii) Housing Habitability Standards Checklist; and

16.5 All program participants receiving Housing Relocation and Stabilization Services (i.e., General Case Management, Housing Search and Placement, Outreach and Engagement) must have case files with detailed case notes indicating the developments and progress made as a result of the ESG funded services, including clear documentation of the monthly stabilization meetings.

16.6 Sub-recipients administering Shelter Support, Homeless Prevention and Rapid Re-housing activities shall use the State Department of Housing and Community Development (DHCD) reporting and recordkeeping requirements contained in Attachments F, G and H respectively as a guide for maintaining client files.

## **17. Documentation of Homeless Status**

17.1 The sub-recipient must maintain and follow written intake procedures to ensure compliance with the homeless definition in § 576.2. The procedures must require documentation at intake of the evidence relied upon to establish and verify homeless status. The procedures must establish the order of priority for obtaining evidence as third-party documentation first, intake worker observations second, and certification from the person seeking assistance third. However, lack of third-party documentation must not prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by a victim service provider. Records contained in an HMIS or comparable database used by victim service or legal service providers are acceptable evidence of third-party documentation and intake worker observations if the HMIS retains an auditable history of all entries, including the person who entered the data, the date of entry, and the change made; and if the HMIS prevents overrides or changes of the dates on which entries are made.

17.2 If the individual or family qualifies as homeless under paragraph (1)(i) or (ii) of the homeless definition in § 576.2, acceptable evidence includes a written observation by an outreach worker of the conditions where the individual or family was living, a written referral by another housing or service provider, or a certification by the individual or head of household seeking assistance.

17.3 If the individual qualifies as homeless under paragraph (1)(iii) of the homeless definition in § 576.2, because he or she resided in an emergency shelter or place not meant for human habitation and is exiting an institution where he or she resided for 90 days or less, acceptable evidence includes the evidence described in paragraph (b)(1) of this section and one of the following:

- Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution. All oral statements must be recorded by the intake worker; or
- Where the evidence in paragraph (b)(2)(i) of this section is not obtainable, a written record of the intake worker's due diligence in attempting to obtain the evidence described in paragraph (b)(2)(i) and a certification by the individual seeking assistance that states he or she is exiting or has just exited an institution where he or she resided for 90 days or less.

17.4 If the individual or family qualifies as homeless under paragraph (2) of the homeless definition in § 576.2, because the individual or family will imminently lose their housing, the evidence must include:

- A court order resulting from an eviction action that requires the individual or family to leave their residence within 14 days after the date of their application for homeless assistance; or the equivalent notice under applicable state law, a Notice to Quit, or a Notice to Terminate issued under state law;
  - o For individuals and families whose primary nighttime residence is a hotel or motel room not paid for by charitable organizations or federal, state, or local government programs for low-income individuals, evidence that the individual or family lacks the resources necessary to reside there for more than 14 days after the date of application for homeless assistance; or
  - o An oral statement by the individual or head of household that the owner or renter of the housing in which they currently reside will not allow them to stay for more than 14 days after the date of application for homeless assistance. The intake worker must record the statement and certify that it was found credible. To be found credible, the oral statement must either: (I) be verified by the owner or renter of the housing in which the individual or family resides at the time of application for homeless assistance and documented by a written certification by the owner or renter or by the intake worker's recording of the owner or renter's oral statement; or (II) if the intake worker is unable to contact the owner or renter, be documented by a written certification by the intake worker of his or her due diligence in attempting to obtain the owner or renter's verification and the written certification by the individual or head of household seeking assistance that his or her statement was true and complete;

- Certification by the individual or head of household that no subsequent residence has been identified and
- Certification or other written documentation that the individual or family lacks the resources and support networks needed to obtain other permanent housing.

17.5 If the individual or family qualifies as homeless under paragraph (3) of the homeless definition in § 576.2, because the individual or family does not otherwise qualify as homeless under the homeless definition but is an unaccompanied youth under 25 years of age, or homeless family with one or more children or youth, and is defined as homeless under another Federal statute or section 725(2) of the McKinney–Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), the evidence must include:

- o For paragraph (3)(i) of the homeless definition in § 576.2, certification of homeless status by the local private nonprofit organization or state or local governmental entity responsible for administering assistance under the Runaway and Homeless Youth Act (42 U.S.C. 5701 et seq.), the Head Start Act (42 U.S.C. 9831 et seq.), subtitle N of the Violence Against Women Act of 1994 (42 U.S.C. 14043e et seq.), section 330 of the Public Health Service Act (42 U.S.C. 254b), the Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.), section 17 of the Child Nutrition Act of 1966 (42 U.S.C. 1786), or subtitle B of title VII of the McKinney–Vento Homeless Assistance Act (42 U.S.C. 11431 et seq.), as applicable;
- o For paragraph (3)(ii) of the homeless definition in § 576.2, referral by a housing or service provider, written observation by an outreach worker, or certification by the homeless individual or head of household seeking assistance;
- o For paragraph (3)(iii) of the homeless definition in § 576.2, certification by the individual or head of household and any available supporting documentation that the individual or family moved two or more times during the 60–day period immediately preceding the date of application for homeless assistance, including: recorded statements or records obtained from each owner or renter of housing, provider of shelter or housing, or social worker, case worker, or other appropriate official of a hospital or institution in which the individual or family resided; or, where these statements or records are unobtainable, a written record of the intake worker's due diligence in attempting to obtain these statements or records. Where a move was due to the individual or family fleeing domestic violence, dating violence, sexual assault, or stalking, then the intake worker may alternatively obtain a written certification from the individual or head of household seeking assistance that they were fleeing that situation and that they resided at that address; and

17.6 For paragraph (3)(iv) of the homeless definition in § 576.2, written diagnosis from a professional who is licensed by the state to diagnose and treat that condition (or intake staff-recorded observation of disability that within 45 days of date of the application for assistance is confirmed by a professional who

is licensed by the state to diagnose and treat that condition); employment records; department of corrections records; literacy, English proficiency tests; or other reasonable documentation of the conditions required under paragraph (3)(iv) of the homeless definition.

17.7 If the individual or family qualifies under paragraph (4) of the homeless definition in § 576.2, because the individual or family is fleeing domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions related to violence, then acceptable evidence includes an oral statement by the individual or head of household seeking assistance that they are fleeing that situation, that no subsequent residence has been identified and that they lack the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other housing. If the individual or family is receiving shelter or services provided by a victim service provider, the oral statement must be documented by either a certification by the individual or head of household; or a certification by the intake worker. Otherwise, the oral statement that the individual or head of household seeking assistance has not identified a subsequent residence and lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain housing must be documented by a certification by the individual or head of household that the oral statement is true and complete, and, where the safety of the individual or family would not be jeopardized, the domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening condition must be verified by a written observation by the intake worker or a written referral by a housing or service provider, social worker, legal assistance provider, health-care provider, law enforcement agency, legal assistance provider, pastoral counselor, or any other organization from whom the individual or head of household has sought assistance for domestic violence, dating violence, sexual assault, or stalking. The written referral or observation need only include the minimum amount of information necessary to document that the individual or family is fleeing, or attempting to flee domestic violence, dating violence, sexual assault, and stalking.

## **18. Documentation of At-Risk of Homelessness Status**

18.1 For each individual or family who receives Emergency Solutions Grant (ESG) homelessness prevention assistance, the records must include the evidence relied upon to establish and verify the individual or family's "at risk of homelessness" status. This evidence must include an intake and certification form that meets HUD specifications and is completed by the recipient or sub-recipient. The evidence must also include:

18.2 If the program participant meets the criteria under paragraph (1) of the "at risk of homelessness" definition in § 576.2:

- The documentation specified under this section for determining annual income;

- The program participant's certification on a form specified by HUD that the program participant has insufficient financial resources and support networks; e.g., family, friends, faith-based or other social networks, immediately available to attain housing stability and meets one or more of the conditions under paragraph (1)(iii) of the definition of “at risk of homelessness” in § 576.2;
- The most reliable evidence available to show that the program participant does not have sufficient resources or support networks; e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “homeless” definition. Acceptable evidence includes:
  - o Source documents (e.g., notice of termination from employment, unemployment compensation statement, bank statement, health-care bill showing arrears, utility bill showing arrears);
  - o To the extent that source documents are unobtainable, a written statement by the relevant third party (e.g., former employer, public administrator, relative) or the written certification by the recipient's or sub-recipient's intake staff of the oral verification by the relevant third party that the applicant meets one or both of the criteria under paragraph (1)(ii) of the definition of “at risk of homelessness” in § 576.2; or
  - o To the extent that source documents and third-party verification are unobtainable, a written statement by the recipient's or sub-recipient's intake staff describing the efforts taken to obtain the required evidence; and

The most reliable evidence available to show that the program participant meets one or more of the conditions under paragraph (1)(iii) of the definition of “at risk of homelessness” in § 576.2. Acceptable evidence includes:

- o Source documents that evidence one or more of the conditions under paragraph (1)(iii) of the definition (e.g., eviction notice, notice of termination from employment, bank statement);
- o To the extent that source documents are unobtainable, a written statement by the relevant third party (e.g., former employer, owner, primary leaseholder, public administrator, hotel or motel manager) or the written certification by the recipient's or sub-recipient's intake staff of the oral verification by the relevant third party that the applicant meets one or more of the criteria under paragraph (1)(iii) of the definition of “at risk of homelessness”; or

o To the extent that source documents and third-party verification are unobtainable, a written statement by the recipient's or sub-recipient's intake staff that the staff person has visited the applicant's residence and determined that the applicant meets one or more of the criteria under paragraph (1)(iii) of the definition or, if a visit is not practicable or relevant to the determination, a written statement by the recipient's or sub-recipient's intake staff describing the efforts taken to obtain the required evidence; or

18.3 If the program participant meets the criteria under paragraph (2) or (3) of the “at risk of homelessness” definition in § 576.2, certification of the child or youth's homeless status by the agency or organization responsible for administering assistance under the Runaway and Homeless Youth Act (42 U.S.C. 5701 et seq.), the Head Start Act (42 U.S.C. 9831 et seq.), subtitle N of the Violence Against Women Act of 1994 (42 U.S.C. 14043e et seq.), section 330 of the Public Health Service Act (42 U.S.C. 254b), the Food and Nutrition Act of 2008 (7 U.S.C.2011 et seq.), section 17 of the Child Nutrition Act of 1966 (42 U.S.C. 1786) or subtitle B of title VII of the McKinney–Vento Homeless Assistance Act (42 U.S.C. 11431 et seq.), as applicable.

## **19. Additional Recordkeeping Requirements**

19.1 In addition to evidence of homeless status or “at risk of homelessness” status, as applicable, records must be kept for each program participant that document:

- The services and assistance provided to that program participant, including, as applicable, the security deposit, rental assistance, and utility payments made on behalf of the program participant;
- Compliance with the applicable requirements for providing services and assistance to that program participant under the program components and eligible activities provisions at § 576.101 through § 576.106, the provision on determining eligibility and amount and type of assistance at § 576.401(a) and (b), and the provision on using appropriate assistance and services at § 576.401(d) and (e); and
- Where applicable, compliance with the termination of assistance requirement in § 576.402.

19.2 The sub-recipient must keep documentation evidencing the use of, and written intake procedures for, the centralized or coordinated assessment system(s) developed by the Continuum of Care(s) in accordance with the requirements established by HUD.

19.3 The records must include copies of all leases and rental assistance agreements for the provision of rental assistance, documentation of payments made to owners for the provision of rental assistance, and supporting documentation for these payments, including dates of occupancy by program participants.

19.4 The records must document the monthly allowance for utilities (excluding telephone) used to determine compliance with the rent restriction.

19.5 The records must include documentation of compliance with the shelter and housing standards in § 576.403, including habitability checklists.

19.6 The sub-recipient must keep records of the participation in HMIS or a comparable database by all projects of the recipient and its sub-recipients.

19.7 The sub-recipient must keep records of the source and use of contributions made to satisfy the matching requirement in § 576.201. The records must indicate the particular fiscal year grant for which each matching contribution is counted. The records must show how the value placed on third-party, noncash contributions was derived. To the extent feasible, volunteer services must be supported by the same methods that the organization uses to support the allocation of regular personnel costs.

19.8 The sub-recipient must document its compliance with the homeless participation requirements under § 576.405.

19.9 The sub-recipient must develop and implement written procedures to ensure:

- All records containing personally identifying information (as defined in HUD's standards for participation, data collection, and reporting in a local HMIS) of any individual or family who applies for and/or receives ESG assistance will be kept secure and confidential;
- The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under the ESG will not be made public, except with written authorization of the person responsible for the operation of the shelter; and
- The address or location of any housing of a program participant will not be made public, except as provided under a preexisting privacy policy of the recipient or sub-recipient and consistent with state and local laws regarding privacy and obligations of confidentiality.

19.10 The confidentiality procedures of the recipient and its sub-recipients must be in writing and must be maintained in accordance with this section.

## A. General Requirements

All information about the applicant/client is confidential. Disclose information only for the purpose of determining program eligibility, providing benefits, or investigating possible violation of federal, state and local regulation(s) associated with ESG delivery and never in a setting where members of the public can hear the conversation.

Sub-recipient must have policies and procedures that ensure all client information and records are secure and confidentially maintained. Sub-recipient' officers, employees and agents must be aware of and comply with sub-recipient' confidentiality policies and procedures.

## B. Electronic Confidentiality

Electronic collection of client information requires procedures for ensuring confidentiality. The following guidelines apply to the use of a computer:

- The computer terminal(s) used must be located in a secure location, limiting access to only those persons who have a legitimate interest in and are responsible in viewing client records.
- The computer monitor must be cleared (or a screen saver activated) immediately after accessing a client record.
- The computer terminal must be on a "locked" mode or turned off if the terminal is unattended.
- Access to the HMIS program shall be given to authorize staff persons and only insofar as access is necessary for performing the work required for the ESG program.

## C. Victims of Domestic Violence

Sub-recipient must implement procedures to ensure confidentiality of records pertaining to any individual who is provided family violence prevention or treatment services. Victim information cannot be disclosed to any third party without consent of the victim.

Victim service providers are prohibited from entering data in HMIS; however, they are required to maintain comparable databases of their own design which provide aggregate information and data consistent with HMIS data collection requirements. Projects serving survivors of domestic violence where the recipient is not a victim services provider are required to enter data in their HMIS.

Sub-recipient must instruct all staff that the address of a domestic violence provider's shelter location will not be made public without permission of the provider.

#### D. Release of Information

Client information (including identifying the person is a client) should not be released without written authorization from the client. A Release of Information form must be completed by the applicant at the time of intake.

Client refusal to provide such authorization cannot be the basis for denying program services to otherwise eligible clients.

Release forms must be time-limited and specific as to with whom and what information will be shared.

19.11 For each individual and family determined ineligible to receive Emergency Solutions Grant (ESG) assistance, the record must include documentation of the reason for that determination.

- Annual income. For each program participant who receives homelessness prevention assistance, or who receives rapid re-housing assistance longer than one year, the following documentation of annual income must be maintained:
  - o Income evaluation form containing the minimum requirements specified by HUD and completed by the recipient or sub-recipient; and
  - o Source documents for the assets held by the program participant and income received over the most recent period for which representative data is available before the date of the evaluation (e.g., wage statement, unemployment compensation statement, public benefits statement, bank statement);
  - o To the extent that source documents are unobtainable, a written statement by the relevant third party (e.g., employer, government benefits administrator) or the written certification by the recipient's or sub-recipient's intake staff of the oral verification by the relevant third party of the income the program participant received over the most recent period for which representative data is available; or
  - o To the extent that source documents and third party verification are unobtainable, the written certification by the program participant of the amount of income the program participant received for the most recent period representative of the income that the program participant is reasonably expected to receive over the 3– month period following the evaluation.

#### 20. Match Requirements

20.1 In accordance with 24 CFR 576.201, a sub-recipient is required to make matching contributions to supplement its ESG program in an amount that equals the amount of ESG funds provided by the City.

20.2 Matching contributions may be obtained from any source, including any Federal source other than the ESG program, as well as state, local, and private sources. However, the following requirements apply to matching contributions from a Federal source of funds:

(i) The sub-recipient must ensure the laws governing any funds to be used as matching contributions do not prohibit those funds from being used to match ESG funds.

(ii) If ESG funds are used to satisfy the matching requirements of another Federal program, then funding from that program may not be used to satisfy the matching requirements under this section.

20.3 In order to meet the matching requirement, the matching contributions must meet all requirements that apply to the ESG funds provided by HUD, except for the expenditure limits in Section 576.100.

20.4 The matching contributions must be provided after the date that HUD signs the grant agreement and must be expended within the expenditure deadline for the grant.

20.5 Contributions used to match a previous ESG grant may not be used to match a subsequent ESG grant.

20.6 Contributions that have been or will be counted as satisfying a matching requirement of another Federal grant or award may not count as satisfying the matching requirement of this section.

20.7 The matching requirement may be met by one or both of the following:

(i) Cash contributions. Cash expended for allowable costs, as defined in OMB Circulars A-87 (2 CFR part 225) and A-122 (2 CFR part 230), of the sub-recipient;

(ii) Noncash contributions. The value of any real property, equipment, goods, or services contributed to the sub-recipient's ESG program, provided that if the sub-recipient had to pay for them with grant funds, the costs would have been allowable. Noncash contributions may also include the purchase value of any donated building. To determine the value of any donated material or building, or of any lease, the recipient must use a method reasonably calculated to establish the fair market value. Services provided by individuals must be valued at rates consistent with those ordinarily paid for similar work in the recipient's or sub-recipient's organization. If the recipient or sub-recipient does not have employees performing similar work, the rates must be consistent with those ordinarily paid by other employers for similar work in the

same labor market. Some noncash contributions are real property, equipment, goods, or services that, if the recipient or sub-recipient had to pay for them with grant funds, the payments would have been indirect costs. Matching credit for these contributions must be given only if the recipient or sub-recipient has established, along with its regular indirect cost rate, a special rate for allocating to individual projects or programs the value of those contributions.

## **21. Monitoring/Administration**

### **21.1 Procurement**

- It is the policy of the City of Worcester to promote open and full competition in the solicitation of goods and services.
- The procurement plan shall be consistent with the original guidance from the funding source and affiliated oversight agencies responsible for the procurement, and other state and/or federal source(s) requirements.
- City of Worcester staff shall develop a procurement timeline. In determining procurement timelines, primary consideration is given to balancing the conflicting needs of delivering services as soon as possible, adequate time for proposal reviews, and fair proposal preparation time frames for bidders. City of Worcester staff will oversee procurement scheduling to ensure this balance is fair and reasonable.
- The City of Worcester shall make informed decisions for its ESG funding allocation with local input by an ESG Advisory Committee comprised of community experts in the field of housing/homelessness services. Applicants who apply for ESG grant funding are then scored based on their capacity to meet local community needs as well as:
  - adequate financial resources being available
  - ability to meet program outcomes and specifications at reasonable cost
  - technical skills necessary to perform the work
  - consumer convenience, preferences and demands
  - demographics of consumers to be served
  - satisfactory past performance; if past performance data is not available as in the case of new programming, satisfactory demonstration of the ability to meet program outcomes and specifications at a reasonable cost
- Each procurement process targets resources in accordance with the City of Worcester's Five Year Consolidated Plan (2015-2020), updated annually through the Annual Action Plan process. All precautions are taken to ensure the absence of conflict of interest, and that determinations of awards

are made impartially. Reviews are completed on all procurements for compliance with relevant federal and state laws, regulations and policies.

## 21.2 Project Sponsor Oversight

- The City of Worcester must comply with all applicable state and federal policies, standards, and guidelines as specified in the grant agreement between HUD and the City, and the contract between the City and Sub-Recipients; and is responsible for ensuring efficient, effective, and proper implementation of the ESG program in its geographic area of responsibility.
- The City of Worcester will ensure that Project Sponsors properly manage ESG funds in compliance with the monitoring standards established as part of the City of Worcester CDBG Policies and Procedures and HUD regulations. The City of Worcester must assure that Project Sponsors develop local ESG policies as needed. These local policies should not conflict with guidance provided by the City of Worcester or the ESG regulations (24 CFR Part 576) as developed and amended by HUD.

Organizational - The provision of any type or amount of ESG assistance may not be conditioned on an individual's or household's acceptance or occupancy of emergency shelter or housing owned by sub-recipient or an affiliated organization. A sub-recipient is prohibited from conducting a participant's intake assessment to determine program eligibility if the participant resides in housing where the sub-recipient has ownership interest. Sub-recipient would need to find another independent organization that is also an ESG grantee to do the intake assessment and ensure that all program participants are eligible even if the sub-recipient has a waiver of the conflict of interest requirements. Conflict of interest waivers regarding rent assistance and rental agreement requirements can only be approved by HUD. If a sub-recipient wishes to apply for a waiver, they should contact the sub-recipient homeless program coordinator or manager for guidance in submission of a waiver request which must be approved by City of Worcester who will then submit to HUD. See 24 CFR 576.404(a).

Sub-recipient must keep records to show compliance with ESG program organizational conflicts-of-interest requirements.

Individual - For the procurement of goods and services, sub-recipient must comply with the codes of conduct and conflict of interest requirements under 24 CFR 85.36 (for governments) or 24 CFR 84.42 (for private nonprofit organizations). Persons for whom the Conflict of Interest requirements apply include any person who is an employee, agent, consultant, officer, or elected or appointed official of the sub-recipient agency. No person who exercises or has exercised any functions or responsibilities with respect to activities assisted under the ESG program, or who is in

a position to participate in a decision-making process or gain inside information with regard to activities assisted under the Program, may obtain a financial interest or benefit from an assisted activity; have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity; or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has family or business ties, during his or her tenure or during the one year period following his or her tenure.

Upon the written request from the City of Worcester, HUD may grant an exception to the provisions of this paragraph on a case-by-case basis. Sub-recipients wishing an exception must submit requests to City of Worcester for review and forwarding to HUD. There is no guarantee that an exception will be approved.

- As the Responsible Entity for the jurisdiction served under ESG Grant funds, the City of Worcester is responsible for completing Environmental Reviews to assure compliance with the National Environmental Policies Act (NEPA) under 24 CFR Part 58.
- When monitoring sub-recipients, the City shall be reviewing, at a minimum, the following:
  - Proper policies and procedures for determining and documenting participant eligibility, administering financial assistance and providing services to participants.
    - Proper and consistent use of all required forms in Attachment C.
    - Proper documentation of participant eligibility including homeless/at risk of homelessness status and income eligibility.
    - Proper documentation of assessed need including proper intake assessments and proof of lack of other resources available to participants.
    - Activity-specific documentation including clear, detailed case notes that include referrals and services provided, rental documentation, utility records, writ of summary process and complaint, etc.
    - Data collection/HMIS data sets
    - Staff time records including detailed, signed ESG time tracked using time and effort logs.
    - Financial documentation including back-up documentation for all program expenditures that can be specifically tied to the ESG grant.
    - 100% of the award must be matched with documented cash or leveraged resources clearly tracked with appropriate back-up.
    - Lease documents, copies of checks paid to landlords and Habitability Checklists for all assisted units.

### 21.3 City of Worcester Staff

The City is responsible for managing the day-to-day operations of its Entitlement Programs and ensuring that entitlement funds are used in keeping with program requirements. Implementation of entitlement activities by sub-recipients will be monitored in accordance with the City of Worcester's CDBG Policies and Procedures Manual.

The ESG Program Coordinator for the City of Worcester's Executive Office of Economic Development is responsible for coordinating all ESG sub-recipient activities including but not limited to: the execution of grant agreements; intake and processing of reimbursement requests; desk and on-site monitoring; and general technical assistance.

The ESG Program Coordinator may be reached by phone or e-mail to answer questions relating to program oversight:

Direct Tel: 508-799-1400 x 31407

455 Main Street, 4th Floor

Worcester MA 01608

## ESG Financial Assistance & Housing Unit Documentation Checklist

ESG Participant(s) Name \_\_\_\_\_

In File (Always Applicable)	<i>Documentation</i>
<input type="checkbox"/>	<b>HOUSEHOLD MEMBER IDENTIFICATION</b> – Verification of each household member’s identity, per requirement/standard set by ESG grantee.
<input type="checkbox"/>	<b>ESG FINANCIAL ASSISTANCE NOT USED FOR SAME COST TYPE AND SAME PERIOD AS OTHER FEDERAL, STATE, LOCAL PROGRAM ASSISTANCE</b> – ESG staff assessment with participant to identify if other federal, state, local program is assisting with same cost type for same period.

Applicable	In File	<b>ESG FINANCIAL ASSISTANCE</b> – Documentation showing eligible use of ESG Financial Assistance. NOTE: indicate where documentation is kept if not in participant case file (e.g., “supporting documentation for expenses kept in accounts payable file”).
<input type="checkbox"/> YES  <input type="checkbox"/> NO	<input type="checkbox"/>	<b>RENTAL ASSISTANCE</b>  <input type="checkbox"/> Supporting documentation for expense (e.g., eviction letter, court documents, bill/invoice, etc.) <input type="checkbox"/> Rental arrears – supporting documentation <input type="checkbox"/> Current/ongoing rental assistance – supporting documentation <input type="checkbox"/> Rental application fees – supporting documentation <input type="checkbox"/> Other ESG eligible fees/penalties (see ESG guidance/FAQs) – supporting documentation -- <b>AND</b> – <input type="checkbox"/> Copy of rental lease or occupancy agreement for unit assisted with ESG <input type="checkbox"/> Rental arrears – copy of lease or occupancy agreement <input type="checkbox"/> Current/ongoing rental assistance – copy of lease or occupancy agreement -- <b>AND</b> – <input type="checkbox"/> Documentation indicating arrears assistance not greater than 6 months total -- <b>AND</b> – <input type="checkbox"/> Documentation indicating total assistance (including arrears) not greater than 18 months total
<input type="checkbox"/> YES  <input type="checkbox"/> NO	<input type="checkbox"/>	<b>UTILITY PAYMENT</b>  <input type="checkbox"/> Supporting documentation for expense (e.g., shut-off notice, print-out from utility company, bill/invoice, etc.) <input type="checkbox"/> Utility arrears – supporting documentation <input type="checkbox"/> Current/ongoing utility assistance – supporting documentation <input type="checkbox"/> Other ESG eligible fees/penalties (see ESG guidance/FAQs) – supporting documentation -- <b>AND</b> – <input type="checkbox"/> If utility not in ESG participant name, other documentation indicating ESG participant responsibility for utility -- <b>AND</b> – <input type="checkbox"/> Documentation indicating arrears assistance not greater than 6 months total -- <b>AND</b> –

Applicable	In File	<b>ESG FINANCIAL ASSISTANCE</b> – Documentation showing eligible use of ESG Financial Assistance. NOTE: indicate where documentation is kept if not in participant case file (e.g., “supporting documentation for expenses kept in accounts payable file”).
		<input type="checkbox"/> Documentation indicating total assistance (including arrears) not greater than 18 months total
<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/>	<b>SECURITY DEPOSIT</b> <input type="checkbox"/> Supporting documentation for expense (e.g., current lease, letter from landlord, bill/invoice, etc.)
<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/>	<b>MOVING COSTS</b> <input type="checkbox"/> Supporting documentation for expense (e.g., bill/invoice, etc.) -- AND -- <input type="checkbox"/> Supporting documentation that vendor had best/most reasonable cost (e.g., newspaper ads, quotes, etc.) -- AND (for storage costs)-- <input type="checkbox"/> Documentation indicating assistance not greater than three months or until participant is in housing, which ever occurs sooner
<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/>	<b>HOUSING VOUCHER</b> <input type="checkbox"/> Supporting documentation for expense (e.g., bill/invoice, etc.) -- AND -- <input type="checkbox"/> Supporting documentation that vendor had best/most reasonable cost (e.g., newspaper ads, quotes, etc.) -- AND -- <input type="checkbox"/> Documentation indicating no appropriate shelter bed(s) available (e.g., ESG staff description of attempt to secure placement in emergency shelter and lack of available, appropriate bed(s))
<b>Notes:</b>		

Applicable	In File	<b>HOUSING UNIT</b> - Documentation showing ESG assistance used for eligible housing unit.
<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/>	<b>RENT REASONABLENESS</b> – If receiving ESG Financial Assistance (current/ongoing rent or security deposit) AND staying in current unit or moving to new housing unit. <input type="checkbox"/> Documentation indicating rent charged for unit is comparable with unassisted units with similar amenities.
<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/>	<b>HABITABILITY STANDARDS INSPECTION</b> – If receiving ESG Financial Assistance (any type) AND moving to new housing unit. <input type="checkbox"/> Documentation indicating unit meets HUD Habitability Standards for ESG (or higher standard if set by grantee, e.g. Housing Quality Standards (HQS)).
<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/>	<b>LEAD-BASED PAINT INSPECTION</b> – If receiving ESG Financial Assistance (any type) AND staying in current housing unit or moving to new housing unit AND unit built before 1978 AND child under 6 years old or pregnant woman in household. <input type="checkbox"/> Documentation indicating unit passed lead-based paint inspection.
<b>Notes:</b>		

Applicable	In File	<b>HOUSING UNIT</b> - Documentation showing ESG assistance used for eligible housing unit.

# ESG Housing Options and Resources Eligibility

## “But For” Certification

Applicant Name:

This document is to certify that the above named applicant or household has explored all re-housing options and all available resources. The case manager also certifies that a comprehensive assessment was completed and that the findings are such that the above named applicant or household would remain homeless **but** for ESG RRH assistance. (See attached assessment)

---

### Client Certification

Under penalty of perjury I, \_\_\_\_\_ affirm the following statements to be true.

- a. I affirm that I have explored all housing options, (family, friends, public housing, and private housing), and that I have not been able to secure housing.
- b. I affirm that I have accurately reported my family composition and total family income.
- c. I affirm that my household lacks the financial resources and support networks needed to obtain immediate housing (i.e. startup costs, etc.).
- d. I affirm that I am not receiving financial assistance for the same reason that I am applying for ESG funds.
- e. I affirm that I would re-main homeless **but** for ESG assistance.

\_\_\_\_\_  
Applicant’s Signature

\_\_\_\_\_  
Date:

---

### Case Manager Certification

Under penalty of perjury I, \_\_\_\_\_ affirm the following statements to be true.

- a. Upon completion of assessment, I affirm that the above named applicant has proven that they have explored all housing options and have not been successful with securing housing.
- b. Upon completion of assessment, I affirm that the above named applicant/household lacks the financial resources and support networks needed to obtain immediate housing.
- c. I certify that I have completed a thorough assessment, including alternative housing options, income and asset verifications and homeless verifications, and believe that the above named applicant or household would re-main homeless **but** the ESG assistance.

\_\_\_\_\_  
Case Manager’s Signature

\_\_\_\_\_  
Date:

### ESG Income Eligibility Calculation Worksheet

To be eligible for ESG Homelessness Prevention, households must be at or below 30% of the Area Median Income (and meet other ESG eligibility requirements, as outlined in the Notice). Households receiving Rapid Re-housing services must be at or below 30% of the Area Median Income(AMI) at recertification. A copy of this worksheet must be kept in the client's file.

Household Member Number	Household Member Name		Age of Household Member		
1	Jane Smith		50		
2	Bob Smith		16		
3	Joe Smith		19		
4					
5					
6					
7					
8					
9					
10					
11					
<b>Total Household Members (Household size)</b>			<b>3</b>		
<b>30% of Area Median Income (AMI) for Household Size</b>			<b>\$ 26,450</b>		
Household Member Number/Name	Sources of Household Income	Gross Documented Current Income Amount	Frequency of Income	Number of Payments per Year	Annual Gross Income (gross income amount X # of payments per year)
1/Jane Smith	Earned Income (for ADULT household members only)	\$ 120	Weekly	52	\$ 6,240
3/Joe Smith	Earned Income (for ADULT household members only)	\$ 400	Bi-Weekly	26	\$ 10,400
	Earned Income (for ADULT household members only)	\$ -			\$ -
	Self-employment/business income	\$ -			\$ -
	Self-employment/business income	\$ -			\$ -
	Interest & Dividend Income	\$ -			\$ -
	Interest & Dividend Income	\$ -			\$ -
	Pension/Retirement Income	\$ -			\$ -
	Pension/Retirement Income	\$ -			\$ -
	Unemployment & Disability Income	\$ -			\$ -
	Unemployment & Disability Income	\$ -			\$ -
	TANF/Public Assistance	\$ -			\$ -
	TANF/Public Assistance	\$ -			\$ -
1/Jane Smith	Alimony, Child Support and Foster Care Income	\$ 250	Monthly	12	\$ 3,000
	Alimony, Child Support and Foster Care Income	\$ -			\$ -
	Armed Forces Income	\$ -			\$ -
	Armed Forces Income	\$ -			\$ -
	Other (specify):	\$ -			\$ -
	Other (specify):	\$ -			\$ -
<b>Total Annual Gross Income from all Sources</b>					<b>\$ 19,640</b>
<b>30% of Area Median Income for Household Size:</b>					<b>\$ 26,450</b>
<b>Variance (If income less than AMI, then household is income eligible)</b>					<b>\$ (6,810)</b>
<b>Is the household at or below 30% Area Median Income?</b>					<b>YES-Income Eligible</b>

# Emergency Solutions Grants Program (ESG)

## VERIFICATION OF INCOME

ESG Applicant(s) Name: \_\_\_\_\_

**Instructions for Employer/Payment Source Representative:** This is to certify the income received by the above named individual for purposes of participating in the ESG program. This information will be used only to determine the eligibility status and level of benefit of the household. **Complete only the selected section below that includes an authorization to release information.**

**Please return this form to:**

Name & Title: \_\_\_\_\_ Phone: \_\_\_\_\_  
Address: \_\_\_\_\_ Fax: \_\_\_\_\_  
Email: \_\_\_\_\_

---

Employment Income

**ESG Applicant Release: I hereby authorize the release of the following employment information.**

ESG Applicant Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**Employer representative to complete this section:**

The person named above is employed by \_\_\_\_\_ since \_\_\_\_\_. He/she is paid \$ \_\_\_\_\_ on a \_\_\_\_\_ basis and is currently working an average of \_\_\_\_\_ hours per \_\_\_\_\_.

Additional compensation please specify (if any): \_\_\_\_\_

Probability of continued employment: \_\_\_\_\_

Authorized Employer Representative Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Name, Title: \_\_\_\_\_

Address and Phone: \_\_\_\_\_

---

Payments and/or Benefit Income (complete one form for each distinct source of income for person named above)

**CIRCLE ONE:** Social Security/SSI      Pension/Retirement      TANF  
Public Assistance      Unemployment Compensation      Workers Compensation  
Alimony Payments      Foster Care Payments      Child Support Payments  
Armed Forces Income

Other (pls. specify): \_\_\_\_\_

**ESG Applicant Release: I hereby authorize the release of the following payment and/or benefit information.**

ESG Applicant Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**Payment source representative to complete this section:**

Payments or benefits in the amount of \$ \_\_\_\_\_ are paid on a \_\_\_\_\_ basis. The expected duration of the payments or benefits is \_\_\_\_\_.

Authorized Payment Source Representative Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Name, Title: \_\_\_\_\_

Address and Phone: \_\_\_\_\_

# SELF-DECLARATION OF INCOME

Applicant Name: \_\_\_\_\_

**\*This form should only be used if third party verification of income is unavailable. ESG providers are expected to have exhausted all alternative options for verifying income prior to use of a self-declaration of income.**

This is to certify the income status for the above named individual. Income includes but is not limited to:

- The full amount of gross income earned before taxes and deductions.
- The net income earned from the operation of a business, i.e., total revenue minus business operating expenses. This also includes any withdrawals of cash from the business or profession for your personal use.
- Monthly interest and dividend income credited to an applicant's bank account and available for use.
- The monthly payment amount received from Social Security, annuities, retirement funds, pensions, disability and other similar types of periodic payments.
- Any monthly payments in lieu of earnings, such as unemployment, disability compensation, SSI, SSDI, and worker's compensation.
- Monthly income from government agencies excluding amounts designated for shelter, and utilities, WIC, food stamps, and childcare.
- Alimony, child support and foster care payments received from organizations or from persons not residing in the dwelling.
- All basic pay, special day and allowances of a member of the Armed Forces excluding special pay for exposure to hostile fire.

## Check only one box and complete only that section

I  certify, under penalty of perjury, that I currently receive the following income:

Source: \_\_\_\_\_ Amount: \_\_\_\_\_ Frequency: \_\_\_\_\_  
Source: \_\_\_\_\_ Amount: \_\_\_\_\_ Frequency: \_\_\_\_\_  
Source: \_\_\_\_\_ Amount: \_\_\_\_\_ Frequency: \_\_\_\_\_

Applicant Signature: \_\_\_\_\_ Date: \_\_\_\_\_

I  certify, under penalty of perjury, that I do not have any income from any source at this time.

Applicant Signature: \_\_\_\_\_ Date: \_\_\_\_\_

## Staff Verification

I understand that third-party verification is the preferred method of certifying income for HPRP assistance. I understand self declaration is only permitted when I have attempted to but cannot obtain third party verification.

*Documentation of attempt made for third-party verification:*

\_\_\_\_\_  
\_\_\_\_\_

Staff Signature: \_\_\_\_\_ Date: \_\_\_\_\_

# EMERGENCY SOLUTIONS GRANTS (ESG) PROGRAM

## SELF-DECLARATION OF HOUSING STATUS

ESG Applicant Name: \_\_\_\_\_

Household without dependent children (complete one form for each adult in the household)

Household with dependent children (complete one form for household)

Number of persons in the household: \_\_\_\_\_

**This is to certify that the above named individual or head of household is currently homeless or at-risk of homelessness, based on the following and other indicated information and the signed declaration by the applicant.**

---

### Check only one:

I  [and my children] am/are currently homeless and living on the street (i.e. a car, park, abandoned building, bus station, airport, or camp ground).

I  [and my children] am/are the victim(s) of domestic violence and am/are fleeing from abuse.

I  [and my children] am/are being evicted from the housing we are presently staying in and must leave this housing within the next \_\_\_\_\_ days.

I  [and my children] am/are at risk of being evicted from the housing we are presently staying in.

**I certify that the information above and any other information I have provided in applying for ESG assistance is true, accurate and complete.**

ESG Applicant Signature: \_\_\_\_\_ Date: \_\_\_\_\_

---

### ESG Staff Certification

I understand that third-party verification is the preferred method of certifying homelessness or risk for homelessness for an individual who is applying for ESG assistance. I understand self declaration is only permitted when I have attempted to but cannot obtain third party verification.

*Documentation of attempt made for third-party verification:*

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ESG Staff Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**Notice of Ineligibility for ESG Homelessness Prevention Assistance**

Date: \_\_\_\_\_ Name: \_\_\_\_\_

Address, City and Zip: \_\_\_\_\_

Your household does not meet the minimum eligibility or qualification standards for ESG assistance for the reason(s) stated below. If you disagree with this decision, you have the right to an informal review (See below).

**Incomplete Documentation;** household failed to provide all required supporting documentation. Missing documentation was \_\_\_\_\_

**Over Income;** total household income exceeds program eligibility income limits. Maximum household income for your household is \$\_\_\_\_\_ and your income is \$\_\_\_\_\_

**Does not meet ESG guidelines for at risk of homelessness;** household does not have a writ of summary process and complaint

**No members of the household meet the additional criteria for ESG services;** history of homelessness, history of domestic violence, household member with disability

**Property Owner not willing to Participate;** household's landlord refused to accept RAFT payments offered by Agency on behalf of the household.

**Receiving other benefits;** household is receiving other benefits of the same type at the same time

**Does not have sufficient financial resources to maintain the housing based on current income.**

**Other;** \_\_\_\_\_

---

**Administrative Review:** If you disagree with this decision, you have the right to request a review.

To request a review, you must send a written request **specifically** stating why you believe our determination is incorrect. This **written request** must be mailed or hand delivered within 10 calendar days of the notice of ineligibility and addressed to: *ESG Agency address*.

You may submit additional documentation or written arguments with your request for review. Reviews will be performed by a supervisor who is familiar with the program but unfamiliar with your particular case. Administrative Review is different from a hearing, no testimony will be taken so you must submit any additional documentation (i.e. increased income, etc.), and the explanation of your circumstance or legal argument with your request to have this information included in this review.

A written ESG review will be conducted within 15 calendar days of your request for a review. You will be notified at the address you provided and a written finding will be placed in your file. There is no appeal to the City of Worcester pending this finding.

**RENT REASONABLENESS CHECKLIST AND CERTIFICATION**

	Proposed Unit	Unit #1	Unit #2	Unit #3
Address				
Number of Bedrooms				
Square Feet				
Type of Unit/Construction				
Housing Condition				
Location/Accessibility				
Amenities Unit: Site: Neighborhood:				
Age in Years				
Utilities (type)				
Unit Rent Utility Allowance Gross Rent				
Handicap Accessible?				

**CERTIFICATION:**

**A. Compliance with Payment Standard**

\_\_\_\_\_ + \_\_\_\_\_ = \_\_\_\_\_  
Proposed Contract Rent      Utility Allowance      Proposed Gross Rent

Approved rent does not exceed applicable Payment Standard of

\$\_\_\_\_\_.

**B. Rent Reasonableness**

Based upon a comparison with rents for comparable units, I have determined that the proposed rent for the unit [ ] is [ ] is not reasonable.

Name:	Signature:	Date:
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**ESG-RRHLLANDLORD ACKNOWLEDGEMENT FORM**

Date: \_\_\_\_\_

This is to confirm that \_\_\_\_\_ will rent an  
(Tenant's Name)

apartment from me at \_\_\_\_\_

\_\_\_\_\_ for a monthly rent amount of:

\$ \_\_\_\_\_. The start date for this tenancy will be: \_\_\_\_\_.

Number of Bedrooms \_\_\_\_\_ Year Constructed \_\_\_\_\_, (Prior to 1978)  attached De-Lead Certification

Square Feet \_\_\_\_\_ Handicap Accessible  Yes  No

Type of House/Apartment:  Elevator/High-Rise

Single Family Detached  Semi Detached/Row House  Manufactured Home  Garden Walkup

Who is responsible for Utilities and Appliances? (Please Check One).

Utility	Landlord will pay	Tenant will pay
Heating		
Hot Water		
Gas		
Trash		
Electric		
Stove		
Refrigerator		

Rent Reasonable: Under Funding regulations, the program required that the landlord certify that the rent charged to the above named tenant is not more than the rent charged for other unassisted comparable units.

Address and Unit Number	Square Feet	# of Bedrooms	Handicap Accessible	Year Constructed	Date Rented	Rental Amount
			Y N			\$
			Y N			\$
			Y N			\$

**Shallow Subsidy:** If the tenant will be receiving short-term help towards his or her rent, I acknowledge receipt of the attached Shallow Subsidy Agreement. I understand a copy of this agreement is being provided to me for informational purposes only. It is not a guarantee of a subsidy. If a subsidy is put into place, it will be effective for up to 12 months. I understand that if the tenancy should end before the 12 months is up; the subsidy will also end at that time. I also understand that the subsidy is contingent upon the tenant's compliance with the program. I understand that this agreement is also contingent upon the unit's compliance with HUD habitability standards. I do agree to notify the case manager/contact identified below if tenant fails to remit rental payment within five (5) days of due date.

Landlord Contact Information: Address \_\_\_\_\_

Phone: \_\_\_\_\_ Fax: \_\_\_\_\_

Check Payable To: \_\_\_\_\_

Sincerely,

Signature \_\_\_\_\_ Date \_\_\_\_\_

(Landlord Signature)

## *ESG Housing Habitability Standards and Lead-Based Paint Inspection Checklist*

The new ESG Shelter and Housing Standards are described in Section 576.403 of the ESG Interim Rule. These habitability standards **apply any time ESG funds are used to assist an ESG participant retain or move into a housing unit.** Inspections must be conducted upon initial assistance and then on an annual basis for the term of ESG assistance. In contrast to the Housing Quality Standards (HQS), the habitability standards **do not require a certified inspector.** This checklist also addresses the ESG requirement on determining that a unit is in compliance with federal laws regarding lead based paint if the unit where an ESG participant household is residing/intends to reside was constructed prior to 1978 **and** the household includes a pregnant woman or a child under the age of 6. The ESG grantee must conduct the inspections using this form to document compliance.

**Instructions: Mark each statement as 'A' for approved or 'D' for deficient. The property must meet all standards before ESG funds are authorized. The checklist must be kept in the ESG Participant's record.**

Approved or Deficient	Element
	1. <i>Structure and materials:</i> The structures must be structurally sound so as not to pose any threat to the health and safety of the occupants and so as to protect the residents from hazards.
	2. <i>Access:</i> Structures must provide alternate means of egress in case of fire.
	3. <i>Space and security:</i> Each resident must be afforded adequate space and security for themselves and their belongings. Each resident must be provided with an acceptable place to sleep.
	4. <i>Interior air quality:</i> Every room or space must be provided with natural or mechanical ventilation. Structures must be free of pollutants in the air at levels that threaten the health of residents.
	5. <i>Water Supply:</i> The water supply must be free from contamination.
	6. <i>Sanitary Facilities:</i> Residents must have access to sufficient sanitary facilities that are in proper operating condition, may be used in privacy, and are adequate for personal cleanliness and the disposal of human waste.
	7. <i>Thermal environment:</i> The housing must have adequate heating and/or cooling facilities in proper operating condition.
	8. <i>Illumination and electricity:</i> The housing must have adequate natural or artificial illumination to permit normal indoor activities and to support the health and safety of residents. Sufficient electrical sources must be provided to permit use of essential electrical appliances while assuring safety from fire.

	9. <i>Food preparation and refuse disposal:</i> All food preparation areas must contain suitable space and equipment to store, prepare, and serve food in a sanitary manner.
	10. <i>Sanitary condition:</i> The housing and any equipment must be maintained in sanitary condition.
	<p>11. <i>Fire safety:</i> Both conditions below must be met to meet this standard.</p> <p>b. Each unit must include at least one battery-operated or hard-wired smoke detector, in proper working condition, on each occupied level of the unit. Smoke detectors must be located, to the extent practicable, in a hallway adjacent to a bedroom. If the unit is occupied by hearing-impaired persons, smoke detectors must have an alarm system designed for hearing-impaired persons in each bedroom occupied by a hearing-impaired person.</p> <p>a. The public areas of all housing must be equipped with a sufficient number, but not less than one for each area, of battery-operated or hard-wired smoke detectors. Public areas include, but are not limited to, laundry rooms, day care centers, hallways, stairwells, and other common areas.</p>
	<p><b>12. Required in buildings constructed prior to 1978 and where an ESG participant household intends to reside and the household includes a child under the age of 6.</b></p> <p>Visual assessment means looking for, as applicable: (1) Deteriorated paint (chipping, loose, crumbling); (2) Visible surface paint dust, debris and residue as part of a risk assessment or clearance examination; and (3) The completion or failure of a hazard reduction measure.</p> <p>The <input type="checkbox"/> unit or non DHCD funded shelter has no observable loose, chipping, or deteriorated paint; <b>or</b></p> <p>The landlord presented a report from a licensed inspector showing the site is lead free, or the lead has been <input type="checkbox"/> removed or encapsulated as required under MA state law. <b>(If so, check this box )</b></p>

**CERTIFICATION STATEMENT**

I certify that I am not a HUD certified inspector and I have evaluated the property located at the address below to the best of my ability and find the following:

Property meets all of the above standards.

Property does not meet all of the above standards.

Therefore, I make the following determination:

Property is approved.

Property is not approved.

ESG Participant Head of Household Name: Street

Address:

Apartment:

City:

State:

Zip:

Evaluator's Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Please Print Evaluator Name: \_\_\_\_\_

Exec. Dir. Initials: \_\_\_\_\_

DRAFT

# Emergency Solutions Grants (ESG) Performance Report

<b>Project Sponsor:</b>	<b>Project Name:</b>
<b>Sponsor Address: City: State: Zip Code</b>	
<b>Contact Person:</b> <b>Email</b>	<b>Telephone #</b>
<b>Report for Period Ending:</b> <input type="checkbox"/> June 30 <sup>th</sup> due July 15 <sup>th</sup> <input type="checkbox"/> September 30 <sup>th</sup> due October 15 <sup>th</sup>	
<input type="checkbox"/> December 30 <sup>th</sup> due January 15 <sup>th</sup> <input type="checkbox"/> March 31 <sup>st</sup> due April 15 <sup>th</sup>	

ESG Activity: Emergency

Shelter

Street Outreach

Homeless Prevention

Rapid Re-Housing

HMIS

ES

Day Shelter

Health Care Provider

Substance Abuse Program

Housing Search Program

Scattered Site

Legal Services

Mediation Services

Employment Services

HIV/AIDS Services

Child Care Services

Hotel/Motel/SRO/Group Home

Domestic Violence Services

Other \_\_\_\_\_

**Accomplishment Narrative: Describe your ESG funded program's accomplishment for the year. (No more than 250 words)**

**Number Served:**

<b>A. Number Proposed to be Served on Scope of Work.</b>	Number of singles not in families	Number of adults in families	Number of children in families	Number of families
Annually				
<b>B. Number Served for the Program Year.</b>	Number of singles not in families	Number of adults in families	Number of children in families	Number of families
Annually				

	Number of individuals	Number of families
C. Number on the first day of the program year.		

D. Number entering program during the program year.		
E. Number who exited the program during the program year.		

F. Number of Single Individuals Served	Male	Female	Total
Unaccompanied under 18			
Adults 18 to 25			
Adults over 25			
<b>Total</b>			

G. Families Served	Total
Two parent households with children	
Family households with no children	
Single parent household with children	
Households with all children	
<b>Total</b>	

**Population Served: (total persons served)**

**A. Race:**

(Please indicate if this person is of Hispanic/Latino origin)

Hispanic

American Indian/Alaskan Native		
Asian		
Black/African American		
Native Hawaiian/Other Pacific Islander		
White		
American Indian/Alaskan Native & White		
Asian & White		
Black/African American & White		
American Indian/Alaskan Native & Black/African American		
Other Multi-Racial		

**B. Subpopulations Served: (only one category per persons served)**

Chronically Homeless (emergency shelter only)	
Severely Mentally ill	
Chronic Substance Abuse	
Other Disability	
Persons with HIV/AIDS and related diseases	
Veterans	
Elderly	
Domestic violence	
Other (please specify)	

**Reasons for service request (households served –includes individuals not in families and families served)**

Eviction proceedings	
Loss of or sudden reduction in family income	

Divorce	
Change in Family Composition	
Unable to pay/rent/mortgage/utilities	
Argument with family /friends	
Family Violence	
Prison/Jail	
Welfare time Limits	
Physical/Mental Disability	
Alcohol/Drug Abuse	
Other :	

**V. Destination at Exit: (households served –includes individuals not in families and families served)**

Transitional housing	
Permanent housing	
Emergency shelter	
Institution (hospital, inpatient substance abuse treatment facility, jail/prison)	
Retained Tenancy/Housing	
Other (please specify)	
Unknown/disappeared	

**VI. Services Provided (total served):**

**A. Homeless Assistance: (Please indicate total number served for the program year)**

	Adults	Children
Outreach		
Life Skills		
Needs Assessments		
Child Care		
Transportation		
Job Training		
Assistance in obtaining income support		
Legal Services		
Food Pantry		
Case Management		
Client Advocacy		
Nutritional Services		
Alcohol/Drug Abuse Treatment		
Job Placement		
Housing Search		
Rapid Re-Housing		
Day Services		
Medical/Mental Health Services		
Other (please indicate)		

**B. Homeless Prevention: (Please indicate total number served for the program year)**

	Adults	Children
Rental Assistance		
Short Term Subsidies to defray rent and utility arrearages		
Security deposits or first month rent to enable them to move into permanent housing		
Utility Assistance		
Mediation Services for landlord/tenant disputes		
Legal services in eviction proceedings		
Diversion from Shelter		
Stabilization Services		
Tenancy Preservation		
Other (please indicate)		

**Outcomes: (Using the projected numbers on the Scope of Work document, please indicate the progress for each goal achieved during the program year)**

**Outcomes:**

**A. Rapid-Re-Housing/Emergency Shelter: (households served –includes individuals not in families and families served during the contract period)**

	%	#
Reduction of the number of households in shelter		
Reduction in average length of shelter stay		
Rapidly Re-Housed those entering the shelter system		
Placed into permanent affordable housing		
Provided stabilization services for those exiting shelter to permanent Housing		
Linked program participants to asset development resources that resulted in an increase in income (education, job training, employment, mainstream resources)		

**B. Street Outreach (households served –includes individuals not in families and families served during the contract period)**

	%	#
Reduced the Number of Unsheltered single adults in the Boston CoC		
Placed Unsheltered single adults into any type of housing		
Unsheltered Adults received a service for an identified physical or mental health condition for which they were not receiving services at program entry		

**C. Homeless Prevention: (households served –includes individuals not in families and families served during the contract period)**

	%	#
Diverted from Shelter		
Tenancies preserved		
Evictions prevented		
Provided stabilization Services for households at imminent risk of becoming homeless		
Linked program participants to asset development resources that resulted in an increase in income (education, job training, employment, mainstream resources)		
Provided Landlord-Tenant mediation		
Provided Financial Assistance		

**VIII. Financial:**  
**ESG Expenditures – By Component Type**

<b>Component Type</b>	<b>ESG Funds</b>	<b>Match</b>	<b>Match Source</b>	<b>Total Expenditures</b>
Street Outreach				
Emergency Shelter				
Rapid Re-Housing				
Homelessness Prevention				
<b>Total</b>				

**ESG Expenditures – By Service Type**

<b>Expenditure Type</b>	<b>ESG Funds</b>	<b>Match</b>	<b>Match Source</b>	<b>Total Expenditures</b>
Emergency Shelter				
Day Shelter				
Health Care				
Substance Abuse Program				
Housing Search				
Street Outreach				
Meal Services				
Mental Health Services				
Employment Search				
Homeless Prevention				
Rapid Re-Housing				
Vouchers for Shelter				
Rental Assistance				
HIV/AIDS Services				
Child Care				
Financial Assistance				
Stabilization Services				
Moving Costs				
<b>Total</b>				

**SUB-RECIPIENT MONTHLY/ QUARTERLY TIMESHEET**

Please Select:	FISCAL YEAR 2016	<input type="checkbox"/>	FISCAL YEAR 2017	<input type="checkbox"/>	FISCAL YEAR 2018	<input type="checkbox"/>
Please Select:	CDBG Program	<input type="checkbox"/>	HOME Program	<input type="checkbox"/>	ESG Program	<input type="checkbox"/>
ORGANIZATION NAME:					HOPWA	<input type="checkbox"/>
PROGRAM NAME:					CoC Program	<input type="checkbox"/>
REQUEST PERIOD:	TO:				PERCENTAGE RATE: (According to Application)	0.00%

**Sub-Recipient / Employee Time Sheet for Program Personnel**

EMPLOYEE NAME	ACTIVITY	DATE	PAY RATE	Day of Week (Week 1)							Total Number of Hours	Total Program Hours Worked	PROGRAM REIMBURSEABLE PAY
				M	T	Wed.	Th.	Fri.	Sa.	Su.			
\$0.00				<input type="checkbox"/>	0	0	\$0.00						
\$0.00				<input type="checkbox"/>	0	0	\$0.00						
\$0.00				<input type="checkbox"/>	0	0	\$0.00						
\$0.00				<input type="checkbox"/>	0	0	\$0.00						
\$0.00				<input type="checkbox"/>	0	0	\$0.00						
\$0.00				<input type="checkbox"/>	0	0	\$0.00						
\$0.00				<input type="checkbox"/>	0	0	\$0.00						
\$0.00				<input type="checkbox"/>	0	0	\$0.00						
<b>Total Number of Hours Worked -</b>											<b>0.0</b>	<b>0.0</b>	<b>\$0.00</b>

Total Number of Hours	0.0
Total Number of Program Hours	0.0
Rate of Pay Per Hour	\$0.00
Percentage Rate - According to Application	0.0%
Total Pay Period 1 Amount	\$0.00

**Sub-Recipient / Employee Time Sheet for Program Personnel**

EMPLOYEE NAME	ACTIVITY	DATE	PAY RATE	Day of Week (Week 2)							Total Number of Hours	Total Program Hours Worked	PROGRAM REIMBURSEABLE PAY
				M	T	Wed.	Th.	Fri.	Sa.	Su.			
\$0.00				<input type="checkbox"/>	0	0	\$0.00						
\$0.00				<input type="checkbox"/>	0	0	\$0.00						
\$0.00				<input type="checkbox"/>	0	0	\$0.00						
\$0.00				<input type="checkbox"/>	0	0	\$0.00						
\$0.00				<input type="checkbox"/>	0	0	\$0.00						
\$0.00				<input type="checkbox"/>	0	0	\$0.00						
\$0.00				<input type="checkbox"/>	0	0	\$0.00						
\$0.00				<input type="checkbox"/>	0	0	\$0.00						
<b>Total Number of Hours Worked -</b>											<b>0.0</b>	<b>0.0</b>	<b>\$0.00</b>

Total Number of Hours	0.0
Total Number of Program Hours	0.0
Rate of Pay Per Hour	\$0.00
Percentage Rate - According to Application	0.0%
Total Pay Period 2 Amount	\$0.00

Date & Signature of Staff Personnel	Signature: _____	Date: _____
-------------------------------------	------------------	-------------

Date & Signature of Staff Supervisor	Signature: _____	Date: _____
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\*Note: Please be sure to attach the approved timesheets and pay stub together when submitting program reimbursements to the Executive Office of Economic Development for CDBG, HOME, ESG and/or HOPWA programs.

# TIME AND EFFORT LOG

Employee's Name \_\_\_\_\_

Social Security # or Employee # \_\_\_\_\_ Pay Period Dates \_\_\_\_\_

	Funding Source 1	Funding Source 2	Funding Source 3	Funding Source 4	TOTALS
DAY					
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					
29					
30					
31					
TOTALS					
%					

Employee's Signature/Date: \_\_\_\_\_

Supervisor's Signature/Date: \_\_\_\_\_



The City of  
**WORCESTER**

**Match Certification Emergency Solutions Grant Program**

**PROGRAM TYPE (check all that apply):**

Emergency Shelter  Street Outreach  Homeless Prevention  Rapid Re-Housing  HMIS  Administration

Sub-recipient Name \_\_\_\_\_ Project Name... \_\_\_\_\_

TOTAL GRANT AWARD: \_\_\_\_\_

**Match Documentation**

Match Source	Match Amount	Documentation Description

The undersigned individuals do, by their respective oaths solemnly swear and affirm as follows:

- That the Staff Member completing this Match Certification has verified the eligibility of the match item(s) to which this certification relates;
- That the Staff Member has reviewed the Federal Guidelines regarding the match requirement listed on page two of ESG-229 from the HUD ESG Interim Rule; and,
- That the Staff Member has verified that the funds used to Match the ESG Program are not being used to match any other grant;
- That the Staff Member has collected valid documentation of Match for which this certification relates; and,
- That the Executive Director has reviewed the Match documentation to which this Match Certification relates, and has verified that all the representations made by the Staff Member in this Match Certification are true and correct.

The undersigned individuals affirm, by penalty of perjury, that all the statements made herein are true and correct.

\_\_\_\_\_  
Staff Signature \_\_\_\_\_ Date \_\_\_\_\_

Staff Print Name \_\_\_\_\_

Executive Director Signature \_\_\_\_\_ Date \_\_\_\_\_

Executive Director Print Name \_\_\_\_\_

**§576.201 Matching requirement.**

(a) The recipient must make matching contributions to supplement the recipient's ESG program in an amount that equals the recipient's fiscal year grant for ESG. This amount may include contributions to any project under the recipient's ESG program, including any subrecipient's ESG project, if the requirements in this section are met. The first \$100,000 of a State's fiscal year grant is not required to be matched, but the benefit of this exception must pass to the state's subrecipients that are least capable of providing matching contributions. The match requirements under this section do not apply if the recipient is a territory.

(b) To be recognized as match for ESG, each contribution must meet the requirements under 2 CFR 200.306, except that:

(1) Notwithstanding 2 CFR 200.306(b)(4), matching contributions are not subject to the expenditure limits in §576.100; and

(2) Notwithstanding 2 CFR 200.306(b)(5), the recipient may use funds from another Federal program as match for ESG, unless doing so would violate a specific statutory prohibition or the recipient or subrecipient counts ESG funds as match for that program.

(c) The recipient may count as match the value specified in 2 CFR 200.306(d) for any building the recipient or subrecipient donates for long-term use in the recipient's ESG program, provided that depreciation on the building is not counted as match or charged to any Federal award. If a third party donates a building to the recipient or subrecipient, the recipient may count as match either depreciation of the building and fair rental charges for the land for each year the building is used for the recipient's ESG program or, if the building is donated for long-term use in the recipient's ESG program, the fair market value of the capital assets, as specified in 2 CFR 200.306(h)(2), (i), and (j). To qualify as a donation for long-term use, the donation must be evidenced by a recorded deed or use restriction that is effective for at least 10 years after the donation date. If the donated building is renovated with ESG funds, the minimum period of use under §576.102(c) may increase the period for which the building must be used in the recipient's ESG program.

(d) *Eligible types of matching contributions.* The matching requirement may be met by one or both of the following:

(1) *Cash contributions.* Cash expended for allowable costs, as defined in OMB Circulars A-87 (2 CFR part 225) and A-122 (2 CFR part 230), of the recipient or subrecipient.

(2) *Noncash contributions.* The value of any real property, equipment, goods, or services contributed to the recipient's or subrecipient's ESG program, provided that if the recipient or subrecipient had to pay for them with grant funds, the costs would have been allowable. Noncash contributions may also include the purchase value of any donated building.

(e) *Calculating the amount of noncash contributions.* (1) To determine the value of any donated material or building, or of any lease, the recipient must use a method reasonably calculated to establish the fair market value.

(2) Services provided by individuals must be valued at rates consistent with those ordinarily paid for similar work in the recipient's or subrecipient's organization. If the recipient or subrecipient does not have employees performing similar work, the rates must be consistent with those ordinarily paid by other employers for similar work in the same labor market.

(3) Some noncash contributions are real property, equipment, goods, or services that, if the recipient or subrecipient had to pay for them with grant funds, the payments would have been indirect costs. Matching credit for these contributions must be given only if the recipient or subrecipient has established, along with its regular indirect cost rate, a special rate for allocating to individual projects or programs the value of those contributions.

(f) *Costs paid by program income.* Costs paid by program income shall count toward meeting the recipient's matching requirements, provided the costs are eligible ESG costs that supplement the recipient's ESG program.

[76 FR 75974, Dec. 5, 2011, as amended at 80 FR 75939, Dec. 7, 2015]

Please also refer to: 24 CFR Parts 91 and 576 [Docket No. FR-5474-I-01] RIN 2506-AC29

Homeless Emergency Assistance and Rapid Transition to Housing: Emergency Solutions Grants Program and Consolidated Plan Conforming Amendments

# Electronic Code of Federal Regulations

## e-CFR data is current as of June 26, 2018

[Title 24](#) → [Subtitle B](#) → [Chapter V](#) → [Subchapter C](#) → [Part 576](#)

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Title 24: Housing and Urban Development

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### **PART 576—EMERGENCY SOLUTIONS GRANTS PROGRAM**

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AUTHORITY: 12 U.S.C. 1701x, 1701 x-1; 42 U.S.C. 11371 *et seq.*, 42 U.S.C. 3535(d).

SOURCE: 76 FR 75974, Dec. 5, 2011, unless otherwise noted.

## Subpart A—General Provisions

### §576.1 Applicability and purpose.

This part implements the Emergency Solutions Grants (ESG) program authorized by subtitle B of title IV of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11371-11378). The program authorizes the Department of Housing and Urban Development (HUD) to make grants to States, units of general purpose local government, and territories for the rehabilitation or conversion of buildings for use as emergency shelter for the homeless, for the payment of certain expenses related to operating emergency shelters, for essential services related to emergency shelters and street outreach for the homeless, and for homelessness prevention and rapid re-housing assistance.

### §576.2 Definitions.

*At risk of homelessness* means: (1) An individual or family who:

(i) Has an annual income below 30 percent of median family income for the area, as determined by HUD;

(ii) Does not have sufficient resources or support networks, *e.g.*, family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “homeless” definition in this section; and

(iii) Meets one of the following conditions:

(A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;

(B) Is living in the home of another because of economic hardship;

(C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;

(D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;

(E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;

(F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or

(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;

(2) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or

(3) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

*Consolidated plan* means a plan prepared in accordance with 24 CFR part 91. An *approved consolidated plan* means a consolidated plan that has been approved by HUD in accordance with 24 CFR part 91.

*Continuum of Care* means the group composed of representatives of relevant organizations, which generally includes nonprofit homeless providers; victim service providers; faith-based organizations; governments; businesses; advocates; public housing agencies; school districts; social service providers; mental health agencies; hospitals; universities; affordable housing developers; law enforcement; organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons that are organized to plan for and provide, as necessary, a system of outreach, engagement, and assessment; emergency shelter; rapid re-housing; transitional housing; permanent housing; and prevention strategies to address the various needs of homeless persons and persons at risk of homelessness for a specific geographic area.

*Emergency shelter* means any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements. Any project funded as an emergency shelter under a Fiscal Year 2010 Emergency Solutions grant may continue to be funded under ESG.

*Homeless* means:

(1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

(i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;

(ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or

(iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;

(2) An individual or family who will imminently lose their primary nighttime residence, provided that:

(i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;

(ii) No subsequent residence has been identified; and

(iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing;

(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

(i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)) or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);

(ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;

(iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and

(iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or

(4) Any individual or family who:

(i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;

(ii) Has no other residence; and

(iii) Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

*Homeless Management Information System (HMIS)* means the information system designated by the Continuum of Care to comply with the HUD's data collection, management, and reporting standards and used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at-risk of homelessness.

*Metropolitan city* means a city that was classified as a metropolitan city under 42 U.S.C. 5302(a) for the fiscal year immediately preceding the fiscal year for which ESG funds are made available. This term includes the District of Columbia.

*Private nonprofit organization* means a private nonprofit organization that is a secular or religious organization described in section 501(c) of the Internal Revenue Code of 1986 and which is exempt from taxation under subtitle A of the Code, has an accounting system and a voluntary board, and practices nondiscrimination in the provision of assistance. A private nonprofit organization does not include a governmental organization, such as a public housing agency or housing finance agency.

*Program income* shall have the meaning provided in 2 CFR 200.80. Program income includes any amount of a security or utility deposit returned to the recipient or subrecipient.

*Program participant* means an individual or family who is assisted under ESG program.

*Program year* means the consolidated program year established by the recipient under 24 CFR part 91.

*Recipient* means any State, territory, metropolitan city, or urban county, or in the case of reallocation, any unit of general purpose local government that is approved by HUD to assume financial responsibility and enters into a grant agreement with HUD to administer assistance under this part.

*State* means each of the several States and the Commonwealth of Puerto Rico.

*Subrecipient* means a unit of general purpose local government or private nonprofit organization to which a recipient makes available ESG funds.

*Territory* means each of the following: the Virgin Islands, Guam, American Samoa, and the Northern Mariana Islands.

*Unit of general purpose local government* means any city, county, town, township, parish, village, or other general purpose political subdivision of a State.

*Urban county* means a county that was classified as an urban county under 42 U.S.C. 5302(a) for the fiscal year immediately preceding the fiscal year for which ESG funds are made available.

*Victim service provider* means a private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. This term includes rape crisis centers, battered women's shelters, domestic violence transitional housing programs, and other programs.

[76 FR 75974, Dec. 5, 2011, as amended at 80 FR 75939, Dec. 7, 2015]

### **§576.3 Allocation of funding.**

(a) *Territories.* HUD will set aside for allocation to the territories up to 0.2 percent, but not less than 0.1 percent, of the total amount of each appropriation under this part in any fiscal year. HUD will allocate this set-aside amount to each territory based on its proportionate share of the total population of all territories and its rate of compliance with the most recent expenditure deadline under §576.203.

(b) *States, metropolitan cities, and urban counties.* HUD will allocate the amounts that remain after the set-aside to territories under paragraph (a) of this section to States, metropolitan cities, and urban counties, as follows:

(1) HUD will provide that the percentage of the total amount available for allocation to each State, metropolitan city, or urban county is equal to the percentage of the total amount available under section 106 of the Housing and Community Development Act of 1974 for the prior fiscal year that was allocated to that State, metropolitan city, or urban county.

(2) Except as otherwise provided by law, if the amount a metropolitan city or urban county would be allocated under paragraph (b)(1) is less than 0.05 percent of the total fiscal year appropriation for ESG, that amount will be added to the allocation for the State in which the city or county is located.

(c) *Notification of allocation amount.* HUD will notify each State, metropolitan city, urban county, and territory that is eligible to receive an allocation under this section of the amount of its allocation.

## **Subpart B—Program Components and Eligible Activities**

### **§576.100 General provisions and expenditure limits.**

(a) ESG funds may be used for five program components: street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance, and HMIS; as well as administrative activities. The five program components and the eligible activities that may be funded under each are set forth in §576.101 through §576.107. Eligible administrative activities are set forth in §576.108.

(b) The total amount of the recipient's fiscal year grant that may be used for street outreach and emergency shelter activities cannot exceed the greater of:

- (1) 60 percent of the recipient's fiscal year grant; or
- (2) The amount of Fiscal Year 2010 grant funds committed for homeless assistance activities.

(c) The total amount of ESG funds that may be used for administrative activities cannot exceed 7.5 percent of the recipient's fiscal year grant.

(d) Subject to the cost principles in 2 CFR part 200, subpart E, and other requirements in this part, employee compensation and other overhead costs directly related to carrying out street outreach, emergency shelter, homelessness prevention, rapid re-housing, and HMIS are eligible costs of those program components. These costs are not subject to the expenditure limit in paragraph (c) of this section.

[76 FR 75974, Dec. 5, 2011, as amended at 80 FR 75939, Dec. 7, 2015]

### **§576.101 Street outreach component.**

(a) *Eligible costs.* Subject to the expenditure limit in §576.100(b), ESG funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, nonfacility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. For the purposes of this section, the term “unsheltered homeless people” means individuals and families who qualify as homeless under paragraph (1)(i) of the “homeless” definition under §576.2. The eligible costs and requirements for essential services consist of:

(1) *Engagement.* The costs of activities to locate, identify, and build relationships with unsheltered homeless people and engage them for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs. These activities consist of making an initial assessment of needs and eligibility; providing crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; and actively connecting and providing information and referrals to programs targeted to homeless people and mainstream social services and housing programs, including emergency shelter, transitional housing, community-based services, permanent supportive housing, and rapid re-housing programs. Eligible costs include the cell phone costs of outreach workers during the performance of these activities.

(2) *Case management.* The cost of assessing housing and service needs, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant. Eligible services and activities are as follows: using the centralized or coordinated assessment system as required under §576.400(d); conducting the initial evaluation required under §576.401(a), including

verifying and documenting eligibility; counseling; developing, securing and coordinating services; obtaining Federal, State, and local benefits; monitoring and evaluating program participant progress; providing information and referrals to other providers; and developing an individualized housing and service plan, including planning a path to permanent housing stability.

(3) *Emergency health services.* (i) Eligible costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals operating in community-based settings, including streets, parks, and other places where unsheltered homeless people are living.

(ii) ESG funds may be used only for these services to the extent that other appropriate health services are inaccessible or unavailable within the area.

(iii) Eligible treatment consists of assessing a program participant's health problems and developing a treatment plan; assisting program participants to understand their health needs; providing directly or assisting program participants to obtain appropriate emergency medical treatment; and providing medication and follow-up services.

(4) *Emergency mental health services.* (i) Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions operating in community-based settings, including streets, parks, and other places where unsheltered people are living.

(ii) ESG funds may be used only for these services to the extent that other appropriate mental health services are inaccessible or unavailable within the community.

(iii) Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the problem or improved individual or family functioning or circumstances.

(iv) Eligible treatment consists of crisis interventions, the prescription of psychotropic medications, explanation about the use and management of medications, and combinations of therapeutic approaches to address multiple problems.

(5) *Transportation.* The transportation costs of travel by outreach workers, social workers, medical professionals, or other service providers are eligible, provided that this travel takes place during the provision of services eligible under this section. The costs of transporting unsheltered people to emergency shelters or other service facilities are also eligible. These costs include the following:

(i) The cost of a program participant's travel on public transportation;

(ii) If service workers use their own vehicles, mileage allowance for service workers to visit program participants;

(iii) The cost of purchasing or leasing a vehicle for the recipient or subrecipient in which staff transports program participants and/or staff serving program participants, and the cost of gas, insurance, taxes and maintenance for the vehicle; and

(iv) The travel costs of recipient or subrecipient staff to accompany or assist program participants to use public transportation.

(6) *Services for special populations.* ESG funds may be used to provide services for homeless youth, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible under paragraphs (a)(1) through (a)(5) of this section. The term *victim services* means services that assist program participants who are victims of domestic violence, dating violence,

sexual assault, or stalking, including services offered by rape crisis centers and domestic violence shelters, and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault, or stalking.

(b) *Minimum period of use.* The recipient or subrecipient must provide services to homeless individuals and families for at least the period during which ESG funds are provided.

(c) *Maintenance of effort.* (1) If the recipient or subrecipient is a unit of general purpose local government, its ESG funds cannot be used to replace funds the local government provided for street outreach and emergency shelter services during the immediately preceding 12-month period, unless HUD determines that the unit of general purpose local government is in a severe financial deficit.

(2) Upon the recipient's request, HUD will determine whether the unit of general purpose local government is in a severe financial deficit, based on the recipient's demonstration of each of the following:

(i) The average poverty rate in the unit of general purpose local government's jurisdiction was equal to or greater than 125 percent of the average national poverty rate, during the calendar year for which the most recent data are available, as determined according to information from the U.S. Census Bureau.

(ii) The average per-capita income in the unit of general purpose local government's jurisdiction was less than 75 percent of the average national per-capita income, during the calendar year for which the most recent data are available, as determined according to information from the Census Bureau.

(iii) The unit of general purpose local government has a current annual budget deficit that requires a reduction in funding for services for homeless people.

(iv) The unit of general purpose local government has taken all reasonable steps to prevent a reduction in funding of services for homeless people. Reasonable steps may include steps to increase revenue generation, steps to maximize cost savings, or steps to reduce expenditures in areas other than services for homeless people.

#### **§576.102 Emergency shelter component.**

(a) *General.* Subject to the expenditure limit in §576.100(b), ESG funds may be used for costs of providing essential services to homeless families and individuals in emergency shelters, renovating buildings to be used as emergency shelter for homeless families and individuals, and operating emergency shelters.

(1) *Essential services.* ESG funds may be used to provide essential services to individuals and families who are in an emergency shelter, as follows:

(i) *Case management.* The cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant is eligible. Component services and activities consist of:

(A) Using the centralized or coordinated assessment system as required under §576.400(d);

(B) Conducting the initial evaluation required under §576.401(a), including verifying and documenting eligibility;

(C) Counseling;

(D) Developing, securing, and coordinating services and obtaining Federal, State, and local benefits;

(E) Monitoring and evaluating program participant progress;

(F) Providing information and referrals to other providers;

(G) Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and

(H) Developing an individualized housing and service plan, including planning a path to permanent housing stability.

(ii) *Child care.* The costs of child care for program participants, including providing meals and snacks, and comprehensive and coordinated sets of appropriate developmental activities, are eligible. The children must be under the age of 13, unless they are disabled. Disabled children must be under the age of 18. The child-care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.

(iii) *Education services.* When necessary for the program participant to obtain and maintain housing, the costs of improving knowledge and basic educational skills are eligible. Services include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED). Component services or activities are screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies and instructional material; counseling; and referral to community resources.

(iv) *Employment assistance and job training.* The costs of employment assistance and job training programs are eligible, including classroom, online, and/or computer instruction; on-the-job instruction; and services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. The cost of providing reasonable stipends to program participants in employment assistance and job training programs is an eligible cost. Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates. Services that assist individuals in securing employment consist of employment screening, assessment, or testing; structured job skills and job-seeking skills; special training and tutoring, including literacy training and prevocational training; books and instructional material; counseling or job coaching; and referral to community resources.

(v) *Outpatient health services.* Eligible costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals. Emergency Solutions Grant (ESG) funds may be used only for these services to the extent that other appropriate health services are unavailable within the community. Eligible treatment consists of assessing a program participant's health problems and developing a treatment plan; assisting program participants to understand their health needs; providing directly or assisting program participants to obtain appropriate medical treatment, preventive medical care, and health maintenance services, including emergency medical services; providing medication and follow-up services; and providing preventive and noncosmetic dental care.

(vi) *Legal services.* (A) Eligible costs are the hourly fees for legal advice and representation by attorneys licensed and in good standing with the bar association of the State in which the services are provided, and by person(s) under the supervision of the licensed attorney, regarding matters that interfere with the program participant's ability to obtain and retain housing.

(B) Emergency Solutions Grant (ESG) funds may be used only for these services to the extent that other appropriate legal services are unavailable or inaccessible within the community.

(C) Eligible subject matters are child support, guardianship, paternity, emancipation, and legal separation, orders of protection and other civil remedies for victims of domestic violence, dating violence,

sexual assault, and stalking, appeal of veterans and public benefit claim denials, and the resolution of outstanding criminal warrants.

(D) Component services or activities may include client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling.

(E) Fees based on the actual service performed (*i.e.*, fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the subrecipient's employees' salaries and other costs necessary to perform the services.

(F) Legal services for immigration and citizenship matters and issues relating to mortgages are ineligible costs. Retainer fee arrangements and contingency fee arrangements are ineligible costs.

(vii) *Life skills training.* The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance use, and homelessness are eligible costs. These services must be necessary to assist the program participant to function independently in the community. Component life skills training are budgeting resources, managing money, managing a household, resolving conflict, shopping for food and needed items, improving nutrition, using public transportation, and parenting.

(viii) *Mental health services.* (A) Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions.

(B) ESG funds may only be used for these services to the extent that other appropriate mental health services are unavailable or inaccessible within the community.

(C) Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the problem or improved individual or family functioning or circumstances. Problem areas may include family and marital relationships, parent-child problems, or symptom management.

(D) Eligible treatment consists of crisis interventions; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.

(ix) *Substance abuse treatment services.* (A) Eligible substance abuse treatment services are designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors and are provided by licensed or certified professionals.

(B) ESG funds may only be used for these services to the extent that other appropriate substance abuse treatment services are unavailable or inaccessible within the community.

(C) Eligible treatment consists of client intake and assessment, and outpatient treatment for up to 30 days. Group and individual counseling and drug testing are eligible costs. Inpatient detoxification and other inpatient drug or alcohol treatment are not eligible costs.

(x) *Transportation.* Eligible costs consist of the transportation costs of a program participant's travel to and from medical care, employment, child care, or other eligible essential services facilities. These costs include the following:

(A) The cost of a program participant's travel on public transportation;

(B) If service workers use their own vehicles, mileage allowance for service workers to visit program participants;

(C) The cost of purchasing or leasing a vehicle for the recipient or subrecipient in which staff transports program participants and/or staff serving program participants, and the cost of gas, insurance, taxes, and maintenance for the vehicle; and

(D) The travel costs of recipient or subrecipient staff to accompany or assist program participants to use public transportation.

(xi) *Services for special populations.* ESG funds may be used to provide services for homeless youth, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible under paragraphs (a)(1)(i) through (a)(1)(x) of this section. The term *victim services* means services that assist program participants who are victims of domestic violence, dating violence, sexual assault, or stalking, including services offered by rape crisis centers and domestic violence shelters, and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault, or stalking.

(2) *Renovation.* Eligible costs include labor, materials, tools, and other costs for renovation (including major rehabilitation of an emergency shelter or conversion of a building into an emergency shelter). The emergency shelter must be owned by a government entity or private nonprofit organization.

(3) *Shelter operations.* Eligible costs are the costs of maintenance (including minor or routine repairs), rent, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter. Where no appropriate emergency shelter is available for a homeless family or individual, eligible costs may also include a hotel or motel voucher for that family or individual.

(4) *Assistance required under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA).* Eligible costs are the costs of providing URA assistance under §576.408, including relocation payments and other assistance to persons displaced by a project assisted with ESG funds. Persons that receive URA assistance are not considered “program participants” for the purposes of this part, and relocation payments and other URA assistance are not considered “rental assistance” or “housing relocation and stabilization services” for the purposes of this part.

(b) *Prohibition against involuntary family separation.* The age, of a child under age 18 must not be used as a basis for denying any family’s admission to an emergency shelter that uses Emergency Solutions Grant (ESG) funding or services and provides shelter to families with children under age 18.

(c) *Minimum period of use.* (1) *Renovated buildings.* Each building renovated with ESG funds must be maintained as a shelter for homeless individuals and families for not less than a period of 3 or 10 years, depending on the type of renovation and the value of the building. The “value of the building” is the reasonable monetary value assigned to the building, such as the value assigned by an independent real estate appraiser. The minimum use period must begin on the date the building is first occupied by a homeless individual or family after the completed renovation. A minimum period of use of 10 years, required for major rehabilitation and conversion, must be enforced by a recorded deed or use restriction.

(i) *Major rehabilitation.* If the rehabilitation cost of an emergency shelter exceeds 75 percent of the value of the building before rehabilitation, the minimum period of use is 10 years.

(ii) *Conversion.* If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the minimum period of use is 10 years.

(iii) *Renovation other than major rehabilitation or conversion.* In all other cases where ESG funds are used for renovation, the minimum period of use is 3 years.

(2) *Essential services and shelter operations.* Where the recipient or subrecipient uses ESG funds solely for essential services or shelter operations, the recipient or subrecipient must provide services or shelter to homeless individuals and families at least for the period during which the ESG funds are provided. The recipient or subrecipient does not need to limit these services or shelter to a particular site or structure, so long as the site or structure serves the same type of persons originally served with the assistance (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or serves homeless persons in the same area where the recipient or subrecipient originally provided the services or shelter.

(d) *Maintenance of effort.* The maintenance of effort requirements under §576.101(c), which apply to the use of ESG funds for essential services related to street outreach, also apply for the use of such funds for essential services related to emergency shelter.

#### **§576.103 Homelessness prevention component.**

ESG funds may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter or another place described in paragraph (1) of the “homeless” definition in §576.2. This assistance, referred to as homelessness prevention, may be provided to individuals and families who meet the criteria under the “at risk of homelessness” definition, or who meet the criteria in paragraph (2), (3), or (4) of the “homeless” definition in §576.2 and have an annual income below 30 percent of median family income for the area, as determined by HUD. The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant’s current permanent housing or move into other permanent housing and achieve stability in that housing. Homelessness prevention must be provided in accordance with the housing relocation and stabilization services requirements in §576.105, the short-term and medium-term rental assistance requirements in §576.106, and the written standards and procedures established under §576.400.

#### **§576.104 Rapid re-housing assistance component.**

ESG funds may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing. This assistance, referred to as rapid re-housing assistance, may be provided to program participants who meet the criteria under paragraph (1) of the “homeless” definition in §576.2 or who meet the criteria under paragraph (4) of the “homeless” definition and live in an emergency shelter or other place described in paragraph (1) of the “homeless” definition. The rapid re-housing assistance must be provided in accordance with the housing relocation and stabilization services requirements in §576.105, the short- and medium-term rental assistance requirements in §576.106, and the written standards and procedures established under §576.400.

#### **§576.105 Housing relocation and stabilization services.**

(a) *Financial assistance costs.* Subject to the general conditions under §576.103 and §576.104, ESG funds may be used to pay housing owners, utility companies, and other third parties for the following costs:

(1) *Rental application fees.* ESG funds may pay for the rental housing application fee that is charged by the owner to all applicants.

(2) *Security deposits.* ESG funds may pay for a security deposit that is equal to no more than 2 months' rent.

(3) *Last month's rent.* If necessary to obtain housing for a program participant, the last month's rent may be paid from ESG funds to the owner of that housing at the time the owner is paid the security deposit and the first month's rent. This assistance must not exceed one month's rent and must be included in calculating the program participant's total rental assistance, which cannot exceed 24 months during any 3-year period.

(4) *Utility deposits.* ESG funds may pay for a standard utility deposit required by the utility company for all customers for the utilities listed in paragraph (5) of this section.

(5) *Utility payments.* ESG funds may pay for up to 24 months of utility payments per program participant, per service, including up to 6 months of utility payments in arrears, per service. A partial payment of a utility bill counts as one month. This assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments. Eligible utility services are gas, electric, water, and sewage. No program participant shall receive more than 24 months of utility assistance within any 3-year period.

(6) *Moving costs.* ESG funds may pay for moving costs, such as truck rental or hiring a moving company. This assistance may include payment of temporary storage fees for up to 3 months, provided that the fees are accrued after the date the program participant begins receiving assistance under paragraph (b) of this section and before the program participant moves into permanent housing. Payment of temporary storage fees in arrears is not eligible.

(7) If a program participant receiving short- or medium-term rental assistance under §576.106 meets the conditions for an emergency transfer under 24 CFR 5.2005(e), ESG funds may be used to pay amounts owed for breaking a lease to effect an emergency transfer. These costs are not subject to the 24-month limit on rental assistance under §576.106.

(b) *Services costs.* Subject to the general restrictions under §576.103 and §576.104, ESG funds may be used to pay the costs of providing the following services:

(1) *Housing search and placement.* Services or activities necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing, include the following:

(i) Assessment of housing barriers, needs, and preferences;

(ii) Development of an action plan for locating housing;

(iii) Housing search;

(iv) Outreach to and negotiation with owners;

(v) Assistance with submitting rental applications and understanding leases;

(vi) Assessment of housing for compliance with Emergency Solutions Grant (ESG) requirements for habitability, lead-based paint, and rent reasonableness;

(vii) Assistance with obtaining utilities and making moving arrangements; and

(viii) Tenant counseling.

(2) *Housing stability case management.* ESG funds may be used to pay cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing. This assistance cannot exceed 30 days during the period the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing. Component services and activities consist of:

(A) Using the centralized or coordinated assessment system as required under §576.400(d), to evaluate individuals and families applying for or receiving homelessness prevention or rapid re-housing assistance;

(B) Conducting the initial evaluation required under §576.401(a), including verifying and documenting eligibility, for individuals and families applying for homelessness prevention or rapid re-housing assistance;

(C) Counseling;

(D) Developing, securing, and coordinating services and obtaining Federal, State, and local benefits;

(E) Monitoring and evaluating program participant progress;

(F) Providing information and referrals to other providers;

(G) Developing an individualized housing and service plan, including planning a path to permanent housing stability; and

(H) Conducting re-evaluations required under §576.401(b).

(3) *Mediation.* ESG funds may pay for mediation between the program participant and the owner or person(s) with whom the program participant is living, provided that the mediation is necessary to prevent the program participant from losing permanent housing in which the program participant currently resides.

(4) *Legal services.* ESG funds may pay for legal services, as set forth in §576.102(a)(1)(vi), except that the eligible subject matters also include landlord/tenant matters, and the services must be necessary to resolve a legal problem that prohibits the program participant from obtaining permanent housing or will likely result in the program participant losing the permanent housing in which the program participant currently resides.

(5) *Credit repair.* ESG funds may pay for credit counseling and other services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. This assistance does not include the payment or modification of a debt.

(c) *Maximum amounts and periods of assistance.* The recipient may set a maximum dollar amount that a program participant may receive for each type of financial assistance under paragraph (a) of this section. The recipient may also set a maximum period for which a program participant may receive any of the types of assistance or services under this section. However, except for housing stability case management, the total period for which any program participant may receive the services under paragraph (b) of this section must not exceed 24 months during any 3-year period. The limits on the assistance under this section apply to the total assistance an individual receives, either as an individual or as part of a family.

(d) *Use with other subsidies.* Financial assistance under paragraph (a) of this section cannot be provided to a program participant who is receiving the same type of assistance through other public sources or to a program participant who has been provided with replacement housing payments under the URA, during the period of time covered by the URA payments.

(e) *Housing counseling.* Housing counseling, as defined in §5.100, that is funded with or provided in connection with ESG funds must be carried out in accordance with §5.111. When recipients or subrecipients provide housing services to eligible persons that are incidental to a larger set of holistic case management services, these services do not meet the definition of housing counseling, as defined in §5.100, and therefore are not required to be carried out in accordance with the certification requirements of §5.111

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#### **§576.106 Short-term and medium-term rental assistance.**

(a) *General provisions.* Subject to the general conditions under §576.103 and §576.104, the recipient or subrecipient may provide a program participant with up to 24 months of rental assistance during any 3-year period. This assistance may be short-term rental assistance, medium-term rental assistance, payment of rental arrears, or any combination of this assistance.

(1) Short-term rental assistance is assistance for up to 3 months of rent.

(2) Medium-term rental assistance is assistance for more than 3 months but not more than 24 months of rent.

(3) Payment of rental arrears consists of a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears.

(4) Rental assistance may be tenant-based or project-based, as set forth in paragraphs (h) and (i) of this section.

(b) *Discretion to set caps and conditions.* Subject to the requirements of this section, the recipient may set a maximum amount or percentage of rental assistance that a program participant may receive, a maximum number of months that a program participant may receive rental assistance, or a maximum number of times that a program participant may receive rental assistance. The recipient may also require program participants to share in the costs of rent.

(c) *Use with other subsidies.* Except for a one-time payment of rental arrears on the tenant's portion of the rental payment, rental assistance cannot be provided to a program participant who is receiving tenant-based rental assistance, or living in a housing unit receiving project-based rental assistance or operating assistance, through other public sources. Rental assistance may not be provided to a program participant who has been provided with replacement housing payments under the URA during the period of time covered by the URA payments.

(d) *Rent restrictions.* (1) Rental assistance cannot be provided unless the rent does not exceed the Fair Market Rent established by HUD, as provided under 24 CFR part 888, and complies with HUD's standard of rent reasonableness, as established under 24 CFR 982.507.

(2) For purposes of calculating rent under this section, the rent shall equal the sum of the total monthly rent for the unit, any fees required for occupancy under the lease (other than late fees and pet fees) and, if the tenant pays separately for utilities, the monthly allowance for utilities (excluding telephone) established by the public housing authority for the area in which the housing is located.

(e) *Rental assistance agreement.* The recipient or subrecipient may make rental assistance payments only to an owner with whom the recipient or subrecipient has entered into a rental assistance agreement. The rental assistance agreement must set forth the terms under which rental assistance will be provided, including the requirements that apply under this section. The rental assistance agreement must provide that, during the term of the agreement, the owner must give the recipient or subrecipient a copy of any notice to the program participant to vacate the housing unit or any complaint used under State or local law to commence an eviction action against the program participant. Each rental assistance agreement that is executed or renewed on or after *December 16, 2016* must include all protections that apply to tenants and applicants under 24 CFR part 5, subpart L, as supplemented by §576.409, except for the emergency transfer plan requirements under 24 CFR 5.2005(e) and 576.409(d). If the housing is not assisted under another “covered housing program”, as defined in 24 CFR 5.2003, the agreement may provide that the owner's obligations under 24 CFR part 5, subpart L (Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), expire at the end of the rental assistance period.

(f) *Late payments.* The recipient or subrecipient must make timely payments to each owner in accordance with the rental assistance agreement. The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant's lease. The recipient or subrecipient is solely responsible for paying late payment penalties that it incurs with non-ESG funds.

(g) *Lease.* Each program participant receiving rental assistance must have a legally binding, written lease for the rental unit, unless the assistance is solely for rental arrears. The lease must be between the owner and the program participant. Where the assistance is solely for rental arrears, an oral agreement may be accepted in place of a written lease, if the agreement gives the program participant an enforceable leasehold interest under state law and the agreement and rent owed are sufficiently documented by the owner's financial records, rent ledgers, or canceled checks. For program participants living in housing with project-based rental assistance under paragraph (i) of this section, the lease must have an initial term of 1 year. Each lease executed on or after *December 16, 2016* must include a lease provision or incorporate a lease addendum that includes all requirements that apply to tenants, the owner or lease under 24 CFR part 5, subpart L (Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), as supplemented by 24 CFR 576.409, including the prohibited bases for eviction and restrictions on construing lease terms under 24 CFR 5.2005(b) and (c). If the housing is not assisted under another “covered housing program,” as defined in 24 CFR 5.2003, the lease provision or lease addendum may be written to expire at the end of the rental assistance period.

(h) *Tenant-based rental assistance.* (1) A program participant who receives tenant-based rental assistance may select a housing unit in which to live and may move to another unit or building and continue to receive rental assistance, as long as the program participant continues to meet the program requirements.

(2) The recipient may require that all program participants live within a particular area for the period in which the rental assistance is provided.

(3) The rental assistance agreement with the owner must terminate and no further rental assistance payments under that agreement may be made if:

(i) The program participant moves out of the housing unit for which the program participant has a lease;

(ii) The lease terminates and is not renewed; or

(iii) The program participant becomes ineligible to receive ESG rental assistance.

(i) *Project-based rental assistance.* If the recipient or subrecipient identifies a permanent housing unit that meets ESG requirements and becomes available before a program participant is identified to lease the unit, the recipient or subrecipient may enter into a rental assistance agreement with the owner to reserve the unit and subsidize its rent in accordance with the following requirements:

(1) The rental assistance agreement may cover one or more permanent housing units in the same building. Each unit covered by the rental assistance agreement ("assisted unit") may only be occupied by program participants, except as provided under paragraph (i)(4) of this section.

(2) The recipient or subrecipient may pay up to 100 percent of the first month's rent, provided that a program participant signs a lease and moves into the unit before the end of the month for which the first month's rent is paid. The rent paid before a program participant moves into the unit must not exceed the rent to be charged under the program participant's lease and must be included when determining that program participant's total rental assistance.

(3) The recipient or subrecipient may make monthly rental assistance payments only for each whole or partial month an assisted unit is leased to a program participant. When a program participant moves out of an assisted unit, the recipient or subrecipient may pay the next month's rent, *i.e.*, the first month's rent for a new program participant, as provided in paragraph (i)(2) of this section.

(4) The program participant's lease must not condition the term of occupancy to the provision of rental assistance payments. If the program participant is determined ineligible or reaches the maximum number of months over which rental assistance can be provided, the recipient or subrecipient must suspend or terminate the rental assistance payments for the unit. If the payments are suspended, the individual or family may remain in the assisted unit as permitted under the lease, and the recipient or subrecipient may resume payments if the individual or family again becomes eligible and needs further rental assistance. If the payments are terminated, the rental assistance may be transferred to another available unit in the same building, provided that the other unit meets all ESG requirements.

(5) The rental assistance agreement must have an initial term of one year. When a new program participant moves into an assisted unit, the term of the rental assistance agreement may be extended to cover the initial term of the program participant's lease. If the program participant's lease is renewed, the rental assistance agreement may be renewed or extended, as needed, up to the maximum number of months for which the program participant remains eligible. However, under no circumstances may the recipient or subrecipient commit ESG funds to be expended beyond the expenditure deadline in §576.203 or commit funds for a future ESG grant before the grant is awarded.

(j) *Changes in household composition.* The limits on the assistance under this section apply to the total assistance an individual receives, either as an individual or as part of a family.

[76 FR 75974, Dec. 5, 2011., as amended at 81 FR 80808, Nov. 16, 2016]

#### **§576.107 HMIS component.**

(a) *Eligible costs.* (1) The recipient or subrecipient may use ESG funds to pay the costs of contributing data to the HMIS designated by the Continuum of Care for the area, including the costs of:

(i) Purchasing or leasing computer hardware;

(ii) Purchasing software or software licenses;

(iii) Purchasing or leasing equipment, including telephones, fax machines, and furniture;

(iv) Obtaining technical support;

(v) Leasing office space;

(vi) Paying charges for electricity, gas, water, phone service, and high-speed data transmission necessary to operate or contribute data to the HMIS;

(vii) Paying salaries for operating HMIS, including:

(A) Completing data entry;

(B) Monitoring and reviewing data quality;

(C) Completing data analysis;

(D) Reporting to the HMIS Lead;

(F) Training staff on using the HMIS or comparable database; and

(G) Implementing and complying with HMIS requirements;

(viii) Paying costs of staff to travel to and attend HUD-sponsored and HUD-approved training on HMIS and programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act;

(ix) Paying staff travel costs to conduct intake; and

(x) Paying participation fees charged by the HMIS Lead, if the recipient or subrecipient is not the HMIS Lead. The HMIS Lead is the entity designated by the Continuum of Care to operate the area's HMIS.

(2) If the recipient is the HMIS lead agency, as designated by the Continuum of Care in the most recent fiscal year Continuum of Care Homeless Assistance Grants Competition, it may also use ESG funds to pay the costs of:

(i) Hosting and maintaining HMIS software or data;

(ii) Backing up, recovering, or repairing HMIS software or data;

(iii) Upgrading, customizing, and enhancing the HMIS;

(iv) Integrating and warehousing data, including development of a data warehouse for use in aggregating data from subrecipients using multiple software systems;

(v) Administering the system;

(vi) Reporting to providers, the Continuum of Care, and HUD; and

(vii) Conducting training on using the system or a comparable database, including traveling to the training.

(3) If the subrecipient is a victim services provider or a legal services provider, it may use ESG funds to establish and operate a comparable database that collects client-level data over time (*i.e.*, longitudinal data) and generates unduplicated aggregate reports based on the data. Information entered into a comparable database must not be entered directly into or provided to an HMIS.

(b) *General restrictions.* Activities funded under this section must comply with HUD's standards on participation, data collection, and reporting under a local HMIS.

#### **§576.108 Administrative activities.**

(a) *Eligible costs.* The recipient may use up to 7.5 percent of its ESG grant for the payment of administrative costs related to the planning and execution of ESG activities. This does not include staff and overhead costs directly related to carrying out activities eligible under §576.101 through §576.107, because those costs are eligible as part of those activities. Eligible administrative costs include:

(1) *General management, oversight and coordination.* Costs of overall program management, coordination, monitoring, and evaluation. These costs include, but are not limited to, necessary expenditures for the following:

(i) Salaries, wages, and related costs of the recipient's staff, the staff of subrecipients, or other staff engaged in program administration. In charging costs to this category, the recipient may either include the entire salary, wages, and related costs allocable to the program of each person whose *primary* responsibilities with regard to the program involve program administration assignments, or the pro rata share of the salary, wages, and related costs of each person whose job includes *any* program administration assignments. The recipient may use only one of these methods for each fiscal year grant. Program administration assignments include the following:

- (A) Preparing program budgets and schedules, and amendments to those budgets and schedules;
- (B) Developing systems for assuring compliance with program requirements;
- (C) Developing interagency agreements and agreements with subrecipients and contractors to carry out program activities;
- (D) Monitoring program activities for progress and compliance with program requirements;
- (E) Preparing reports and other documents directly related to the program for submission to HUD;
- (F) Coordinating the resolution of audit and monitoring findings;
- (G) Evaluating program results against stated objectives; and
- (H) Managing or supervising persons whose primary responsibilities with regard to the program include such assignments as those described in paragraph (a)(1)(i)(A) through (G) of this section.

(ii) Travel costs incurred for monitoring of subrecipients;

(iii) Administrative services performed under third-party contracts or agreements, including general legal services, accounting services, and audit services; and

(iv) Other costs for goods and services required for administration of the program, including rental or purchase of equipment, insurance, utilities, office supplies, and rental and maintenance (but not purchase) of office space.

(2) *Training on ESG requirements.* Costs of providing training on ESG requirements and attending HUD-sponsored ESG trainings.

(3) *Consolidated plan.* Costs of preparing and amending the ESG and homelessness-related sections of the consolidated plan in accordance with ESG requirements and 24 CFR part 91.

(4) *Environmental review.* Costs of carrying out the environmental review responsibilities under §576.407.

(b) *Sharing requirement.* (1) *States.* If the recipient is a State, the recipient must share its funds for administrative costs with its subrecipients that are units of general purpose local government. The amount shared must be reasonable under the circumstances. The recipient may share its funds for administrative costs with its subrecipients that are private nonprofit organizations.

(2) *Territories, metropolitan cities, and urban counties.* If the recipient is a territory, metropolitan city, or urban county, the recipient may share its funds for administrative costs with its subrecipients.

#### **§576.109 Indirect costs.**

(a) *In general.* ESG grant funds may be used to pay indirect costs in accordance with 2 CFR part 200, subpart E.

(b) *Allocation.* Indirect costs may be allocated to each eligible activity under §576.101 through §576.108, so long as that allocation is consistent with 2 CFR part 200, subpart E.

(c) *Expenditure limits.* The indirect costs charged to an activity subject to an expenditure limit under §576.100 must be added to the direct costs charged for that activity when determining the total costs subject to the expenditure limit.

[76 FR 75974, Dec. 5, 2011, as amended at 80 FR 75939, Dec. 7, 2015]

## **Subpart C—Award and Use of Funds**

#### **§576.200 Submission requirements and grant approval.**

(a) *Application submission and approval.* In addition to meeting the application submission requirements in 24 CFR part 5, subpart K, each State, urban county, or metropolitan city must submit and obtain HUD approval of a consolidated plan in accordance with the requirements in 24 CFR part 91, and each territory must submit and obtain HUD approval of a consolidated plan in accordance with the requirements that apply to local governments under 24 CFR part 91. As provided under 2 CFR 200.207, HUD may impose special conditions or restrictions on a grant, if the recipient is determined to be high risk.

(b) *Amendments.* The recipient must amend its approved consolidated plan in order to make a change in its allocation priorities; make a change in its method of distributing funds; carry out an activity not previously described in the plan; or change the purpose, scope, location, or beneficiaries of an activity. The amendment must be completed and submitted to HUD in accordance with the requirements under 24 CFR 91.505.

**§576.201 Matching requirement.**

(a) The recipient must make matching contributions to supplement the recipient's ESG program in an amount that equals the recipient's fiscal year grant for ESG. This amount may include contributions to any project under the recipient's ESG program, including any subrecipient's ESG project, if the requirements in this section are met. The first \$100,000 of a State's fiscal year grant is not required to be matched, but the benefit of this exception must pass to the state's subrecipients that are least capable of providing matching contributions. The match requirements under this section do not apply if the recipient is a territory.

(b) To be recognized as match for ESG, each contribution must meet the requirements under 2 CFR 200.306, except that:

(1) Notwithstanding 2 CFR 200.306(b)(4), matching contributions are not subject to the expenditure limits in §576.100; and

(2) Notwithstanding 2 CFR 200.306(b)(5), the recipient may use funds from another Federal program as match for ESG, unless doing so would violate a specific statutory prohibition or the recipient or subrecipient counts ESG funds as match for that program.

(c) The recipient may count as match the value specified in 2 CFR 200.306(d) for any building the recipient or subrecipient donates for long-term use in the recipient's ESG program, provided that depreciation on the building is not counted as match or charged to any Federal award. If a third party donates a building to the recipient or subrecipient, the recipient may count as match either depreciation of the building and fair rental charges for the land for each year the building is used for the recipient's ESG program or, if the building is donated for long-term use in the recipient's ESG program, the fair market value of the capital assets, as specified in 2 CFR 200.306(h)(2), (i), and (j). To qualify as a donation for long-term use, the donation must be evidenced by a recorded deed or use restriction that is effective for at least 10 years after the donation date. If the donated building is renovated with ESG funds, the minimum period of use under §576.102(c) may increase the period for which the building must be used in the recipient's ESG program.

(d) *Eligible types of matching contributions.* The matching requirement may be met by one or both of the following:

(1) *Cash contributions.* Cash expended for allowable costs, as defined in OMB Circulars A-87 (2 CFR part 225) and A-122 (2 CFR part 230), of the recipient or subrecipient.

(2) *Noncash contributions.* The value of any real property, equipment, goods, or services contributed to the recipient's or subrecipient's ESG program, provided that if the recipient or subrecipient had to pay for them with grant funds, the costs would have been allowable. Noncash contributions may also include the purchase value of any donated building.

(e) *Calculating the amount of noncash contributions.* (1) To determine the value of any donated material or building, or of any lease, the recipient must use a method reasonably calculated to establish the fair market value.

(2) Services provided by individuals must be valued at rates consistent with those ordinarily paid for similar work in the recipient's or subrecipient's organization. If the recipient or subrecipient does not have employees performing similar work, the rates must be consistent with those ordinarily paid by other employers for similar work in the same labor market.

(3) Some noncash contributions are real property, equipment, goods, or services that, if the recipient or subrecipient had to pay for them with grant funds, the payments would have been indirect costs. Matching credit for these contributions must be given only if the recipient or subrecipient has established, along with its regular indirect cost rate, a special rate for allocating to individual projects or programs the value of those contributions.

(f) *Costs paid by program income.* Costs paid by program income shall count toward meeting the recipient's matching requirements, provided the costs are eligible ESG costs that supplement the recipient's ESG program.

[76 FR 75974, Dec. 5, 2011, as amended at 80 FR 75939, Dec. 7, 2015]

#### **§576.202 Means of carrying out grant activities.**

(a) *States.* If the recipient is a State, the recipient may use an amount consistent with the restrictions in §576.100 and §576.108 to carry out administrative activities through its employees or procurement contracts. If the recipient is a State, and has been identified as the HMIS lead by the Continuum of Care, the State may use funds to carry out HMIS activities set forth in §576.107(a)(2). The recipient must subgrant the remaining funds in its fiscal year grant to:

(1) Units of general purpose local government in the State, which may include metropolitan cities and urban counties that receive ESG funds directly from HUD; or

(2) Private nonprofit organizations, provided that for emergency shelter activities the recipient obtains a certification of approval from the unit of general purpose local government for the geographic area in which those activities are to be carried out.

(b) *Recipients other than States; subrecipients.* The recipient, if it is not a State, and all subrecipients may carry out all eligible activities through their employees, procurement contracts, or subgrants to private nonprofit organizations. If the recipient is an urban county, it may carry out activities through any of its member governments, so long as the county applies to its members the same requirements that are applicable to local government subrecipients under this part.

#### **§576.203 Obligation, expenditure, and payment requirements.**

(a) *Obligation of funds.* (1) *Funds allocated to States.* (i) Within 60 days from the date that HUD signs the grant agreement with the State (or grant amendment for reallocated funds), the recipient must obligate the entire grant, except the amount for its administrative costs. This requirement is met by a subgrant agreement with, or a letter of award requiring payment from the grant to, a subrecipient.

(ii) Within 120 days after the date that the State obligates its funds to a unit of general purpose local government, the subrecipient must obligate all of those funds by a subgrant agreement with, or a letter of award requiring payment to, a private nonprofit organization; a procurement contract; or the written designation of a department within the government of the subrecipient to directly carry out an eligible activity.

(2) *Funds allocated to metropolitan cities, urban counties, and territories.* Within 180 days after the date that HUD signs the grant agreement (or a grant amendment for reallocation of funds) with the metropolitan city, urban county, or territory, the recipient must obligate all the grant amount, except the amount for its administrative costs. This requirement is met by an agreement with, or a letter of award requiring payment to, a subrecipient; a procurement contract; or a written designation of a department within the government of the recipient to directly carry out an eligible activity. If the recipient is an urban county, this requirement may also be met with an agreement with, or letter of award requiring payment to, a member government, which has designated a department to directly carry out an eligible activity.

(b) *Expenditures.* The recipient must draw down and expend funds from each year's grant not less than once during each quarter of the recipient's program year. All of the recipient's grant must be expended for eligible activity costs within 24 months after the date HUD signs the grant agreement with the recipient. For the purposes of this paragraph, expenditure means either an actual cash disbursement for a direct charge for a good or service or an indirect cost or the accrual of a direct charge for a good or service or an indirect cost.

(c) *Payments to subrecipients.* The recipient must pay each subrecipient for allowable costs within 30 days after receiving the subrecipient's complete payment request. This requirement also applies to each subrecipient that is a unit of general purpose local government.

## **Subpart D—Reallocations**

### **§576.300 In general.**

(1) Funds not awarded by HUD due to failure by the recipient to submit and obtain HUD approval of a consolidated plan will be reallocated in accordance with §§576.301 through 576.303.

(2) Recaptured funds will be awarded by formula. In October and April each year, HUD will determine if the amount of recaptured funds is at least 30 percent of the most recent fiscal year appropriation. If so, HUD will amend all existing grants and reallocate the funds. If the amount is less than 30 percent of the most recent fiscal year appropriation, the funds will be reallocated in conjunction with the next fiscal year's allocation of funding.

### **§576.301 Metropolitan cities and urban counties.**

Grant funds returned by a metropolitan city or urban county will be reallocated as follows:

(a) *Eligible recipient.* HUD will make the funds available to the State in which the city or county is located.

(b) *Notification of availability.* HUD will promptly notify the State of the availability of the amounts to be reallocated.

(c) *Application requirement.* Within 45 days after the date of notification, the State must submit to HUD a substantial amendment to its consolidated plan in accordance with 24 CFR part 91.

(d) *Restrictions that apply to reallocated amounts.* The same requirements that apply to grant funds allocated under §576.3 apply to grant funds reallocated under this section, except that the State must distribute the reallocated funds:

(1) To private nonprofit organizations and units of general purpose local government in the geographic area in which the metropolitan city or urban county is located;

(2) If funds remain, to private nonprofit organizations and units of general purpose local government located throughout the State.

### **§576.302 States.**

Grant funds returned by a State will be reallocated as follows:

(a) *Eligible recipients.* HUD will make the funds available:

(1) To metropolitan cities and urban counties in the State that were not allocated funds under §576.3 because the amount they would have been allocated did not meet the minimum requirement under §576.3(b)(2);

(2) If funds remain, to county governments in the State other than urban counties;

(3) Then, if funds remain, to metropolitan cities and urban counties in the State that were allocated funds under §576.3.

(b) *Notification of availability.* HUD will notify eligible recipients of the availability of the funds by a notification letter or FEDERAL REGISTER notice, which will specify how the awards of funds will be made.

(c) *Application requirements.* Within 45 days after the date of notification, the eligible recipient must submit to HUD:

(1) A substantial amendment to its approved consolidated plan in accordance with 24 CFR part 91; or

(2) If the eligible recipient does not have an approved consolidated plan, an abbreviated consolidated plan that meets the requirements in the FEDERAL REGISTER notice or notification letter from HUD.

(d) *Restrictions that apply to reallocated amounts.* The same requirements that apply to grant funds allocated under §576.3 apply to grant funds reallocated under this section.

### **§576.303 Territories.**

(a) *General.* Grant funds returned by a territory will be reallocated to other territories, then if funds remain, to States.

(b) *Allocation method.* The funds will be allocated as follows:

(1) For territories, the funds will be allocated among the territories in direct proportion with each territory's share of the total population of all of the eligible territories. If HUD determines that a territory failed to spend its funds in accordance with ESG requirements, then HUD may exclude the territory from the allocation of reallocation amounts under this section.

(2) For States, the funds will be allocated to each State in direct proportion with each State's share of the total amount of funds allocated to States under §576.3.

(c) *Notification of availability.* HUD will notify eligible recipients of the availability of the fund by a letter or FEDERAL REGISTER notice, which will specify how the awards of funds will be made.

(d) *Application requirements.* Within 45 days after the date of notification, the eligible recipient must submit to HUD a substantial amendment to its consolidated plan in accordance with 24 CFR part 91.

(e) *Restrictions that apply to reallocated amounts.* The same requirements that apply to grant funds allocated under §576.3 apply to grant funds reallocated under this section.

## **Subpart E—Program Requirements**

### **§576.400 Area-wide systems coordination requirements.**

(a) *Consultation with Continuums of Care.* The recipient must consult with each Continuum of Care that serves the recipient's jurisdiction in determining how to allocate ESG funds each program year; developing the performance standards for, and evaluating the outcomes of, projects and activities assisted by ESG funds; and developing funding, policies, and procedures for the administration and operation of the HMIS.

(b) *Coordination with other targeted homeless services.* The recipient and its subrecipients must coordinate and integrate, to the maximum extent practicable, ESG-funded activities with other programs targeted to homeless people in the area covered by the Continuum of Care or area over which the services are coordinated to provide a strategic, community-wide system to prevent and end homelessness for that area. These programs include:

- (1) Shelter Plus Care Program (24 CFR part 582);
- (2) Supportive Housing Program (24 CFR part 583);
- (3) Section 8 Moderate Rehabilitation Program for Single Room Occupancy Program for Homeless Individuals (24 CFR part 882);
- (4) HUD—Veterans Affairs Supportive Housing (HUD-VASH) (division K, title II, Consolidated Appropriations Act, 2008, Pub. L. 110-161 (2007), 73 FR 25026 (May 6, 2008));
- (5) Education for Homeless Children and Youth Grants for State and Local Activities (title VII-B of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 *et seq.*));
- (6) Grants for the Benefit of Homeless Individuals (section 506 of the Public Health Services Act (42 U.S.C. 290aa-5));
- (7) Healthcare for the Homeless (42 CFR part 51c);
- (8) Programs for Runaway and Homeless Youth (Runaway and Homeless Youth Act (42 U.S.C. 5701 *et seq.*));
- (9) Projects for Assistance in Transition from Homelessness (part C of title V of the Public Health Service Act (42 U.S.C. 290cc-21 *et seq.*));
- (10) Services in Supportive Housing Grants (section 520A of the Public Health Service Act);
- (11) Emergency Food and Shelter Program (title III of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11331 *et seq.*));
- (12) Transitional Housing Assistance Grants for Victims of Sexual Assault, Domestic Violence, Dating Violence, and Stalking Program (section 40299 of the Violent Crime Control and Law Enforcement Act (42 U.S.C. 13975));
- (13) Homeless Veterans Reintegration Program (section 5(a)(1)) of the Homeless Veterans Comprehensive Assistance Act (38 U.S.C. 2021);
- (14) Domiciliary Care for Homeless Veterans Program (38 U.S.C. 2043);
- (15) VA Homeless Providers Grant and Per Diem Program (38 CFR part 61);

- (16) Health Care for Homeless Veterans Program (38 U.S.C. 2031);
- (17) Homeless Veterans Dental Program (38 U.S.C. 2062);
- (18) Supportive Services for Veteran Families Program (38 CFR part 62); and
- (19) Veteran Justice Outreach Initiative (38 U.S.C. 2031).

(c) *System and program coordination with mainstream resources.* The recipient and its subrecipients must coordinate and integrate, to the maximum extent practicable, ESG-funded activities with mainstream housing, health, social services, employment, education, and youth programs for which families and individuals at risk of homelessness and homeless individuals and families may be eligible. Examples of these programs include:

- (1) Public housing programs assisted under section 9 of the U.S. Housing Act of 1937 (42 U.S.C. 1437g) (24 CFR parts 905, 968, and 990);
- (2) Housing programs receiving tenant-based or project-based assistance under section 8 of the U.S. Housing Act of 1937 (42 U.S.C. 1437f) (respectively 24 CFR parts 982 and 983);
- (3) Supportive Housing for Persons with Disabilities (Section 811) (24 CFR part 891);
- (4) HOME Investment Partnerships Program (24 CFR part 92);
- (5) Temporary Assistance for Needy Families (TANF) (45 CFR parts 260-265);
- (6) Health Center Program (42 CFR part 51c);
- (7) State Children's Health Insurance Program (42 CFR part 457);
- (8) Head Start (45 CFR chapter XIII, subchapter B);
- (9) Mental Health and Substance Abuse Block Grants (45 CFR part 96); and
- (10) Services funded under the Workforce Investment Act (29 U.S.C. 2801 *et seq.*).

(d) *Centralized or coordinated assessment.* Once the Continuum of Care has developed a centralized assessment system or a coordinated assessment system in accordance with requirements to be established by HUD, each ESG-funded program or project within the Continuum of Care's area must use that assessment system. The recipient and subrecipient must work with the Continuum of Care to ensure the screening, assessment and referral of program participants are consistent with the written standards required by paragraph (e) of this section. A victim service provider may choose not to use the Continuum of Care's centralized or coordinated assessment system.

(e) *Written standards for providing ESG assistance.* (1) If the recipient is a metropolitan city, urban county, or territory, the recipient must have written standards for providing Emergency Solutions Grant (ESG) assistance and must consistently apply those standards for all program participants. The recipient must describe these standards in its consolidated plan.

- (2) If the recipient is a state:

(i) The recipient must establish and consistently apply, or require that its subrecipients establish and consistently apply, written standards for providing ESG assistance. If the written standards are established by the subrecipients, the recipient may require these written standards to be:

(A) Established for each area covered by a Continuum of Care or area over which the services are coordinated and followed by each subrecipient providing assistance in that area; or

(B) Established by each subrecipient and applied consistently within the subrecipient's program.

(ii) Written standards developed by the state must be included in the state's Consolidated Plan. If the written standards are developed by its subrecipients, the recipient must describe its requirements for the establishment and implementation of these standards in the state's Consolidated Plan.

(3) At a minimum these written standards must include:

(i) Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under Emergency Solutions Grant (ESG);

(ii) Standards for targeting and providing essential services related to street outreach;

(iii) Policies and procedures for admission, diversion, referral, and discharge by emergency shelters assisted under ESG, including standards regarding length of stay, if any, and safeguards to meet the safety and shelter needs of special populations, *e.g.*, victims of domestic violence, dating violence, sexual assault, and stalking; and individuals and families who have the highest barriers to housing and are likely to be homeless the longest;

(iv) Policies and procedures for assessing, prioritizing, and reassessing individuals' and families' needs for essential services related to emergency shelter;

(v) Policies and procedures for coordination among emergency shelter providers, essential services providers, homelessness prevention, and rapid re-housing assistance providers; other homeless assistance providers; and mainstream service and housing providers (see §576.400(b) and (c) for a list of programs with which ESG-funded activities must be coordinated and integrated to the maximum extent practicable);

(vi) Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance (these policies must include the emergency transfer priority required under §576.409);

(vii) Standards for determining what percentage or amount of rent and utilities costs each program participant must pay while receiving homelessness prevention or rapid re-housing assistance;

(viii) Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time; and

(ix) Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide to a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participant receive assistance; or the maximum number of times the program participant may receive assistance.

(f) *Participation in HMIS.* The recipient must ensure that data on all persons served and all activities assisted under ESG are entered into the applicable community-wide HMIS in the area in which those persons and activities are located, or a comparable database, in accordance with HUD's standards on participation, data collection, and reporting under a local HMIS. If the subrecipient is a victim service provider or a legal services provider, it may use a comparable database that collects client-level data over time (*i.e.*, longitudinal data) and generates unduplicated aggregate reports based on the data. Information entered into a comparable database must not be entered directly into or provided to an HMIS.

[76 FR 75974, Dec. 5, 2011, as amended at 81 FR 80808, Nov. 16, 2016]

#### **§576.401 Evaluation of program participant eligibility and needs.**

(a) *Evaluations.* The recipient or its subrecipient must conduct an initial evaluation to determine the eligibility of each individual or family's eligibility for ESG assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing. These evaluations must be conducted in accordance with the centralized or coordinated assessment requirements set forth under §576.400(d) and the written standards established under §576.400(e).

(b) *Re-evaluations for homelessness prevention and rapid re-housing assistance.* (1) The recipient or subrecipient must re-evaluate the program participant's eligibility and the types and amounts of assistance the program participant needs not less than once every 3 months for program participants receiving homelessness prevention assistance, and not less than once annually for program participants receiving rapid re-housing assistance. At a minimum, each re-evaluation of eligibility must establish that:

(i) The program participant does not have an annual income that exceeds 30 percent of median family income for the area, as determined by HUD; and

(ii) The program participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance.

(2) The recipient or subrecipient may require each program participant receiving homelessness prevention or rapid re-housing assistance to notify the recipient or subrecipient regarding changes in the program participant's income or other circumstances (*e.g.*, changes in household composition) that affect the program participant's need for assistance under ESG. When notified of a relevant change, the recipient or subrecipient must re-evaluate the program participant's eligibility and the amount and types of assistance the program participant needs.

(c) *Annual income.* When determining the annual income of an individual or family, the recipient or subrecipient must use the standard for calculating annual income under 24 CFR 5.609.

(d) *Connecting program participants to mainstream and other resources.* The recipient and its subrecipients must assist each program participant, as needed, to obtain:

(1) Appropriate supportive services, including assistance in obtaining permanent housing, medical health treatment, mental health treatment, counseling, supervision, and other services essential for achieving independent living; and

(2) Other Federal, State, local, and private assistance available to assist the program participant in obtaining housing stability, including:

(i) Medicaid (42 CFR chapter IV, subchapter C):

(ii) Supplemental Nutrition Assistance Program (7 CFR parts 271-283);

(iii) Women, Infants and Children (WIC) (7 CFR part 246);

(iv) Federal-State Unemployment Insurance Program (20 CFR parts 601-603, 606, 609, 614-617, 625, 640, 650);

(v) Social Security Disability Insurance (SSDI) (20 CFR part 404);

(vi) Supplemental Security Income (SSI) (20 CFR part 416);

(vii) Child and Adult Care Food Program (42 U.S.C. 1766(t) (7 CFR part 226));

(viii) Other assistance available under the programs listed in §576.400(c).

(e) *Housing stability case management.* (1) While providing homelessness prevention or rapid re-housing assistance to a program participant, the recipient or subrecipient must:

(i) Require the program participant to meet with a case manager not less than once per month to assist the program participant in ensuring long-term housing stability; and

(ii) Develop a plan to assist the program participant to retain permanent housing after the ESG assistance ends, taking into account all relevant considerations, such as the program participant's current or expected income and expenses; other public or private assistance for which the program participant will be eligible and likely to receive; and the relative affordability of available housing in the area.

(2) The recipient or subrecipient is exempt from the requirement under paragraph (e)(1)(i) of this section if the Violence Against Women Act of 1994 (42 U.S.C. 13701 *et seq.*) or the Family Violence Prevention and Services Act (42 U.S.C. 10401 *et seq.*) prohibits that recipient or subrecipient from making its shelter or housing conditional on the participant's acceptance of services.

#### **§576.402 Terminating assistance.**

(a) *In general.* If a program participant violates program requirements, the recipient or subrecipient may terminate the assistance in accordance with a formal process established by the recipient or subrecipient that recognizes the rights of individuals affected. The recipient or subrecipient must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases.

(b) *Program participants receiving rental assistance or housing relocation and stabilization services.* To terminate rental assistance or housing relocation and stabilization services to a program participant, the required formal process, at a minimum, must consist of:

(1) Written notice to the program participant containing a clear statement of the reasons for termination;

(2) A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and

(3) Prompt written notice of the final decision to the program participant.

(c) *Ability to provide further assistance.* Termination under this section does not bar the recipient or subrecipient from providing further assistance at a later date to the same family or individual.

### **§576.403 Shelter and housing standards.**

(a) *Lead-based paint remediation and disclosure.* The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851-4856), and implementing regulations in 24 CFR part 35, subparts A, B, H, J, K, M, and R apply to all shelters assisted under ESG program and all housing occupied by program participants.

(b) *Minimum standards for emergency shelters.* Any building for which Emergency Solutions Grant (ESG) funds are used for conversion, major rehabilitation, or other renovation, must meet state or local government safety and sanitation standards, as applicable, and the following minimum safety, sanitation, and privacy standards. Any emergency shelter that receives assistance for shelter operations must also meet the following minimum safety, sanitation, and privacy standards. The recipient may also establish standards that exceed or add to these minimum standards.

(1) *Structure and materials.* The shelter building must be structurally sound to protect residents from the elements and not pose any threat to health and safety of the residents. Any renovation (including major rehabilitation and conversion) carried out with ESG assistance must use Energy Star and WaterSense products and appliances.

(2) *Access.* The shelter must be accessible in accordance with Section 504 of the Rehabilitation Act (29 U.S.C. 794) and implementing regulations at 24 CFR part 8; the Fair Housing Act (42 U.S.C. 3601 *et seq.*) and implementing regulations at 24 CFR part 100; and Title II of the Americans with Disabilities Act (42 U.S.C. 12131 *et seq.*) and 28 CFR part 35; where applicable.

(3) *Space and security.* Except where the shelter is intended for day use only, the shelter must provide each program participant in the shelter with an acceptable place to sleep and adequate space and security for themselves and their belongings.

(4) *Interior air quality.* Each room or space within the shelter must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.

(5) *Water supply.* The shelter's water supply must be free of contamination.

(6) *Sanitary facilities.* Each program participant in the shelter must have access to sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.

(7) *Thermal environment.* The shelter must have any necessary heating/cooling facilities in proper operating condition.

(8) *Illumination and electricity.* The shelter must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the shelter.

(9) *Food preparation.* Food preparation areas, if any, must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.

(10) *Sanitary conditions.* The shelter must be maintained in a sanitary condition.

(11) *Fire safety.* There must be at least one working smoke detector in each occupied unit of the shelter. Where possible, smoke detectors must be located near sleeping areas. The fire alarm system must be designed for hearing-impaired residents. All public areas of the shelter must have at least one

working smoke detector. There must also be a second means of exiting the building in the event of fire or other emergency.

(c) *Minimum standards for permanent housing.* The recipient or subrecipient cannot use ESG funds to help a program participant remain or move into housing that does not meet the minimum habitability standards provided in this paragraph (c). The recipient may also establish standards that exceed or add to these minimum standards.

(1) *Structure and materials.* The structures must be structurally sound to protect residents from the elements and not pose any threat to the health and safety of the residents.

(2) *Space and security.* Each resident must be provided adequate space and security for themselves and their belongings. Each resident must be provided an acceptable place to sleep.

(3) *Interior air quality.* Each room or space must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.

(4) *Water supply.* The water supply must be free from contamination.

(5) *Sanitary facilities.* Residents must have access to sufficient sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.

(6) *Thermal environment.* The housing must have any necessary heating/cooling facilities in proper operating condition.

(7) *Illumination and electricity.* The structure must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the structure.

(8) *Food preparation.* All food preparation areas must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.

(9) *Sanitary conditions.* The housing must be maintained in a sanitary condition.

(10) *Fire safety.* (i) There must be a second means of exiting the building in the event of fire or other emergency.

(ii) Each unit must include at least one battery-operated or hard-wired smoke detector, in proper working condition, on each occupied level of the unit. Smoke detectors must be located, to the extent practicable, in a hallway adjacent to a bedroom. If the unit is occupied by hearing impaired persons, smoke detectors must have an alarm system designed for hearing-impaired persons in each bedroom occupied by a hearing-impaired person.

(iii) The public areas of all housing must be equipped with a sufficient number, but not less than one for each area, of battery-operated or hard-wired smoke detectors. Public areas include, but are not limited to, laundry rooms, community rooms, day care centers, hallways, stairwells, and other common areas.

#### **§576.404 Conflicts of interest.**

(a) *Organizational conflicts of interest.* The provision of any type or amount of ESG assistance may not be conditioned on an individual's or family's acceptance or occupancy of emergency shelter or housing owned by the recipient, the subrecipient, or a parent or subsidiary of the subrecipient. No

subrecipient may, with respect to individuals or families occupying housing owned by the subrecipient, or any parent or subsidiary of the subrecipient, carry out the initial evaluation required under §576.401 or administer homelessness prevention assistance under §576.103. Recipients and subrecipients must also maintain written standards of conduct covering organizational conflicts of interest required under 2 CFR 200.318.

(b) *Individual conflicts of interest.* For the procurement of goods and services, the recipient and its subrecipients must comply with 2 CFR 200.317 and 200.318. For all other transactions and activities, the following restrictions apply:

(1) *Conflicts prohibited.* No person described in paragraph (b)(2) of this section who exercises or has exercised any functions or responsibilities with respect to activities assisted under the ESG program, or who is in a position to participate in a decision-making process or gain inside information with regard to activities assisted under the program, may obtain a financial interest or benefit from an assisted activity; have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity; or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has family or business ties, during his or her tenure or during the one-year period following his or her tenure.

(2) *Persons covered.* The conflict-of-interest provisions of paragraph (b)(1) of this section apply to any person who is an employee, agent, consultant, officer, or elected or appointed official of the recipient or its subrecipients.

(3) *Exceptions.* Upon the written request of the recipient, HUD may grant an exception to the provisions of this subsection on a case-by-case basis, taking into account the cumulative effects of the criteria in paragraph (b)(3)(ii) of this section, provided that the recipient has satisfactorily met the threshold requirements of paragraph (b)(3)(i) of this section.

(i) *Threshold requirements.* HUD will consider an exception only after the recipient has provided the following documentation:

(A) If the recipient or subrecipient is a government, disclosure of the nature of the conflict, accompanied by an assurance that there has been public disclosure of the conflict and a description of how the public disclosure was made; and

(B) An opinion of the recipient's attorney that the interest for which the exception is sought would not violate state or local law.

(ii) *Factors to be considered for exceptions.* In determining whether to grant a requested exception after the recipient has satisfactorily met the threshold requirements under paragraph (b)(3)(i) of this section, HUD must conclude that the exception will serve to further the purposes of the ESG program and the effective and efficient administration of the recipient's or subrecipient's program or project, taking into account the cumulative effect of the following factors, as applicable:

(A) Whether the exception would provide a significant cost benefit or an essential degree of expertise to the program or project that would otherwise not be available;

(B) Whether an opportunity was provided for open competitive bidding or negotiation;

(C) Whether the affected person has withdrawn from his or her functions, responsibilities or the decision-making process with respect to the specific activity in question;

(D) Whether the interest or benefit was present before the affected person was in the position described in paragraph (b)(1) of this section;

(E) Whether undue hardship results to the recipient, the subrecipient, or the person affected, when weighed against the public interest served by avoiding the prohibited conflict; and

(F) Any other relevant considerations.

(c) *Contractors.* All contractors of the recipient or subrecipient must comply with the same requirements that apply to subrecipients under this section.

[76 FR 75974, Dec. 5, 2011, as amended at 80 FR 75939, Dec. 7, 2015]

#### **§576.405 Homeless participation.**

(a) Unless the recipient is a State, the recipient must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policy-making entity of the recipient, to the extent that the entity considers and makes policies and decisions regarding any facilities, services, or other assistance that receive funding under Emergency Solutions Grant (ESG).

(b) If the recipient is unable to meet requirement under paragraph (a), it must instead develop and implement a plan to consult with homeless or formerly homeless individuals in considering and making policies and decisions regarding any facilities, services, or other assistance that receive funding under Emergency Solutions Grant (ESG). The plan must be included in the annual action plan required under 24 CFR 91.220.

(c) To the maximum extent practicable, the recipient or subrecipient must involve homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under ESG, in providing services assisted under ESG, and in providing services for occupants of facilities assisted under ESG. This involvement may include employment or volunteer services.

#### **§576.406 Equal participation of faith-based organizations.**

The HUD program requirements in §5.109 of this title apply to the ESG program, including the requirements regarding disposition and change in use of real property by a faith-based organization.

[81 FR 19418, Apr. 4, 2016]

#### **§576.407 Other Federal requirements.**

(a) *General.* The requirements in 24 CFR part 5, subpart A are applicable, including the nondiscrimination and equal opportunity requirements at 24 CFR 5.105(a) and the housing counseling requirements at 24 CFR 5.111. Section 3 of the Housing and Urban Development Act of 1968, 12 U.S.C. 1701u, and implementing regulations at 24 CFR part 135 apply, except that homeless individuals have priority over other Section 3 residents in accordance with §576.405(c).

(b) *Affirmative outreach.* The recipient or subrecipient must make known that use of the facilities, assistance, and services are available to all on a nondiscriminatory basis. If it is unlikely that the procedures that the recipient or subrecipient intends to use to make known the availability of the facilities, assistance, and services will reach persons of any particular race, color, religion, sex, age, national origin, familial status, or disability who may qualify for those facilities and services, the recipient or subrecipient must establish additional procedures that ensure that those persons are made aware of the

facilities, assistance, and services. The recipient and its subrecipients must take appropriate steps to ensure effective communication with persons with disabilities including, but not limited to, adopting procedures that will make available to interested persons information concerning the location of assistance, services, and facilities that are accessible to persons with disabilities. Consistent with Title VI and Executive Order 13166, recipients and subrecipients are also required to take reasonable steps to ensure meaningful access to programs and activities for limited English proficiency (LEP) persons.

(c) *Uniform requirements.* The requirements of 2 CFR part 200 apply to the recipient and subrecipients, and:

(1) Program income may be used as matching contributions, subject to the requirements in §576.201;

(2) The disposition of real property for which ESG funds are used for major rehabilitation, conversion, or other renovation under §576.102 is governed by the minimum period of use requirements under §576.102(c).

(d) *Environmental review responsibilities.* (1) Activities under this part are subject to environmental review by HUD under 24 CFR part 50. The recipient shall supply all available, relevant information necessary for HUD to perform for each property any environmental review required by 24 CFR part 50. The recipient also shall carry out mitigating measures required by HUD or select alternate eligible property. HUD may eliminate from consideration any application that would require an Environmental Impact Statement (EIS).

(2) The recipient or subrecipient, or any contractor of the recipient or subrecipient, may not acquire, rehabilitate, convert, lease, repair, dispose of, demolish, or construct property for a project under this part, or commit or expend HUD or local funds for eligible activities under this part, until HUD has performed an environmental review under 24 CFR part 50 and the recipient has received HUD approval of the property.

(e) *Davis-Bacon Act.* The provisions of the Davis-Bacon Act (40 U.S.C. 276a to 276a-5) do not apply to the ESG program.

(f) *Procurement of Recovered Materials.* The recipient and its contractors must comply with Section 6002 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act. The requirements of Section 6002 include procuring only items designated in guidelines of the Environmental Protection Agency (EPA) at 40 CFR part 247 that contain the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition, where the purchase price of the item exceeds \$10,000 or the value of the quantity acquired by the preceding fiscal year exceeded \$10,000; procuring solid waste management services in a manner that maximizes energy and resource recovery; and establishing an affirmative procurement program for procurement of recovered materials identified in the EPA guidelines.

[76 FR 75974, Dec. 5, 2011, as amended at 80 FR 75939, Dec. 7, 2015; 81 FR 90660, Dec. 14, 2016]

#### **§576.408 Displacement, relocation, and acquisition.**

(a) *Minimizing displacement.* Consistent with the other goals and objectives of Emergency Solutions Grant (ESG), the recipient and its subrecipients must assure that they have taken all reasonable steps to minimize the displacement of persons (families, individuals, businesses, nonprofit organizations, and farms) as a result of a project assisted under Emergency Solutions Grant (ESG).

(b) *Temporary relocation not permitted.* No tenant-occupant of housing (a dwelling unit) that is converted into an emergency shelter may be required to relocate temporarily for a project assisted with ESG funds, or be required to move to another unit in the same building/complex. When a tenant moves

for a project assisted with ESG funds under conditions that trigger the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), 42 U.S.C. 4601-4655, as described in paragraph (c) of this section, the tenant should be treated as permanently displaced and offered relocation assistance and payments consistent with that paragraph.

(c) *Relocation assistance for displaced persons.* (1) *In general.* A displaced person (defined in paragraph (c)(2) of this section) must be provided relocation assistance at the levels described in, and in accordance with, the URA and 49 CFR part 24. A displaced person must be advised of his or her rights under the Fair Housing Act (42 U.S.C. 3601 *et seq.*). Whenever possible, minority persons shall be given reasonable opportunities to relocate to comparable and suitable decent, safe, and sanitary replacement dwellings, not located in an area of minority concentration, that are within their financial means. This policy, however, does not require providing a person a larger payment than is necessary to enable a person to relocate to a comparable replacement dwelling. (See 49 CFR 24.205(c)(2)(ii)(D).) As required by Section 504 of the Rehabilitation Act (29 U.S.C. 794) and 49 CFR part 24, replacement dwellings must also contain the accessibility features needed by displaced persons with disabilities.

(2) *Displaced Person.* (i) For purposes of paragraph (c) of this section, the term “displaced person” means any person (family, individual, business, nonprofit organization, or farm, including any corporation, partnership, or association) that moves from real property, or moves personal property from real property, permanently, as a direct result of acquisition, rehabilitation, or demolition for a project assisted under the ESG program. This includes any permanent, involuntary move for an assisted project, including any permanent move from the real property that is made:

(A) After the owner (or person in control of the site) issues a notice to move permanently from the property or refuses to renew an expiring lease, if the move occurs on or after:

(I) The date of the submission by the recipient (or subrecipient, as applicable) of an application for assistance to HUD (or the recipient, as applicable) that is later approved and funded if the recipient (or subrecipient, as applicable) has site control as evidenced by a deed, sales contract, or option contract to acquire the property; or

(II) The date on which the recipient (or subrecipient, as applicable) selects the applicable site, if the recipient (or subrecipient, as applicable) does not have site control at the time of the application, provided that the recipient (or subrecipient, as applicable) eventually obtains control over the site;

(B) Before the date described in paragraph (c)(2)(i)(A) of this section, if the recipient or HUD determines that the displacement resulted directly from acquisition, rehabilitation, or demolition for the project; or

(C) By a tenant-occupant of a dwelling unit and the tenant moves after execution of the agreement covering the acquisition, rehabilitation, or demolition of the property for the project.

(ii) Notwithstanding paragraph (c)(2)(i) of this section, a person does not qualify as a displaced person if:

(A) The person has been evicted for cause based upon a serious or repeated violation of the terms and conditions of the lease or occupancy agreement; violation of applicable Federal, State or local law, or other good cause; and the recipient determines that the eviction was not undertaken for the purpose of evading the obligation to provide relocation assistance.

(B) The person moved into the property after the submission of the application but, before signing a lease and commencing occupancy, was provided written notice of the project, its possible impact on the person (*e.g.*, the person may be displaced), and the fact that the person would not qualify as a “displaced person” (or for any assistance under this section) as a result of the project;

(C) The person is ineligible under 49 CFR 24.2(a)(9)(ii); or

(D) HUD determines that the person was not displaced as a direct result of acquisition, rehabilitation, or demolition for the project.

(iii) The recipient or subrecipient may, at any time, request that HUD to determine whether a displacement is or would be covered by this rule.

(3) *Initiation of negotiations.* For purposes of determining the type of replacement housing payment assistance to be provided to a displaced person pursuant to this section:

(i) If the displacement is the direct result of privately undertaken rehabilitation, demolition, or acquisition of the real property, "initiation of negotiations" means the execution of the agreement between the recipient and the subrecipient or the agreement between the recipient (or subrecipient, as applicable) and the person owning or controlling the property;

(ii) If site control is only evidenced by an option contract to acquire the property, the "initiation of negotiations" does not become effective until the execution of a written agreement that creates a legally enforceable commitment to proceed with the purchase, such as a sales contract.

(d) *Real property acquisition requirements.* The acquisition of real property, whether funded privately or publicly, for a project assisted with Emergency Solutions Grant (ESG) funds is subject to the URA and Federal governmentwide regulations at 49 CFR part 24, subpart B.

(e) *Appeals.* A person who disagrees with the recipient's (or subrecipient's, if applicable) determination concerning whether the person qualifies as a displaced person, or the amount of relocation assistance for which the person may be eligible, may file a written appeal of that determination with the recipient under 49 CFR 24.10. A low-income person who disagrees with the recipient's determination may submit a written request for review of that determination by the appropriate HUD field office.

#### **§576.409 Protection for victims of domestic violence, dating violence, sexual assault, or stalking.**

(a) *Applicability of VAWA protections.* The core statutory protections of VAWA that prohibit denial or termination of assistance or eviction solely because an applicant or tenant is a victim of domestic violence, dating violence, sexual assault, or stalking applied upon enactment of VAWA 2013 on March 7, 2013. The VAWA regulatory requirements under 24 CFR part 5, subpart L, as supplemented by this section, apply to all eligibility and termination decisions that are made with respect to ESG rental assistance on or after *December 16, 2016*. The recipient must ensure that the requirements under 24 CFR part 5, subpart L, are included or incorporated into rental assistance agreements and leases as provided in §576.106(e) and (g).

(b) *Covered housing provider.* For the ESG program, "covered housing provider," as such term is used in HUD's regulations in 24 CFR part 5, subpart L, refers to:

(1) The recipient or subrecipient that administers the rental assistance for the purposes of 24 CFR 5.2005(e);

(2) The housing owner for the purposes of 24 CFR 5.2005(d)(1), (d)(3), and (d)(4) and 5.2009(a);

(3) The housing owner and the recipient or subrecipient that administers the rental assistance for the purposes of 24 CFR 5.2005(d)(2); and

(4) The housing owner and the recipient or subrecipient that administers the rental assistance for the purposes of 24 CFR 5.2007. However, the recipient or subrecipient may limit documentation requests under 24 CFR 5.2007 to only the recipient or subrecipient, provided that:

(i) This limitation is made clear in both the notice described under 24 CFR 5.2005(a)(1) and the rental assistance agreement;

(ii) The entity designated to receive documentation requests determines whether the program participant is entitled to protection under VAWA and immediately advise the program participant of the determination; and

(iii) If the program participant is entitled to protection, the entity designated to receive documentation requests must notify the owner in writing that the program participant is entitled to protection under VAWA and work with the owner on the program participant's behalf. Any further sharing or disclosure of the program participant's information will be subject to the requirements in 24 CFR 5.2007.

(c) *Notification.* As provided under 24 CFR 5.2005(a) each recipient or subrecipient that determines eligibility for or administers ESG rental assistance is responsible for ensuring that the notice and certification form described under 24 CFR 5.2005(a)(1) is provided to each applicant for ESG rental assistance and each program participant receiving ESG rental assistance at each of the following times:

(1) When an individual or family is denied ESG rental assistance;

(2) When an individual or family's application for a unit receiving project-based rental assistance is denied;

(3) When a program participant begins receiving ESG rental assistance;

(4) When a program participant is notified of termination of ESG rental assistance; and

(5) When a program participant receives notification of eviction.

(d) *Emergency transfer plan.* (1) The recipient must develop the emergency transfer plan under 24 CFR 5.2005(e) or, if the recipient is a state, require its subrecipients that administer ESG rental assistance to develop the emergency transfer plan(s) required under 24 CFR 5.2005(e). If the state's subrecipients are required to develop the plan(s), the recipient must specify whether an emergency transfer plan is to be developed for:

(i) The state as a whole;

(ii) Each area within the state that is covered by a Continuum of Care; or

(iii) Each subrecipient that administers ESG rental assistance.

(2) Once the applicable plan is developed in accordance with this section, the recipient and each subrecipient that administers ESG rental assistance must implement the plan in accordance with 24 CFR 5.2005(e).

(3) Each emergency transfer plan must meet the requirements in 24 CFR 5.2005(e) and include the following program requirements:

(i) For families living in units receiving project-based rental assistance (assisted units), the required policies must provide that if a program participant qualifies for an emergency transfer, but a safe unit is not immediately available for an internal emergency transfer, that program participant shall have priority over all other applicants for tenant-based rental assistance, utility assistance, and units for which project-based rental assistance is provided.

(ii) For families receiving tenant-based rental assistance, the required policies must specify what will happen with respect to the non-transferring family member(s), if the family separates in order to effect an emergency transfer.

(e) *Bifurcation*. For the purposes of this part, the following requirements shall apply in place of the requirements at 24 CFR 5.2009(b):

(1) When a family receiving tenant-based rental assistance separates under 24 CFR 5.2009(a), the family's tenant-based rental assistance and utility assistance, if any, shall continue for the family member(s) who are not evicted or removed.

(2) If a family living in a unit receiving project-based rental assistance separates under 24 CFR 5.2009(a), the family member(s) who are not evicted or removed can remain in the assisted unit without interruption to the rental assistance or utility assistance provided for the unit.

(f) *Emergency shelters*. The following requirements apply to emergency shelters funded under §576.102:

(1) No individual or family may be denied admission to or removed from the emergency shelter on the basis or as a direct result of the fact that the individual or family is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, if the individual or family otherwise qualifies for admission or occupancy.

(2) The terms "affiliated individual," "dating violence," "domestic violence," "sexual assault," and "stalking" are defined in 24 CFR 5.2003.

[81 FR 80808, Nov. 16, 2016]

## **Subpart F—Grant Administration**

### **§576.500 Recordkeeping and reporting requirements.**

(a) *In general*. The recipient must have policies and procedures to ensure the requirements of this part are met, including those required by 2 CFR part 200. The policies and procedures must be established in writing and implemented by the recipient and its subrecipients to ensure that ESG funds are used in accordance with the requirements. In addition, sufficient records must be established and maintained to enable the recipient and HUD to determine whether ESG requirements are being met.

(b) *Homeless status*. The recipient must maintain and follow written intake procedures to ensure compliance with the homeless definition in §576.2. The procedures must require documentation at intake of the evidence relied upon to establish and verify homeless status. The procedures must establish the order of priority for obtaining evidence as third-party documentation first, intake worker observations second, and certification from the person seeking assistance third. However, lack of third-party documentation must not prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by a victim service provider. Records contained in an HMIS or comparable database used by victim service or legal service providers are acceptable evidence of third-party documentation and intake

worker observations if the HMIS retains an auditable history of all entries, including the person who entered the data, the date of entry, and the change made; and if the HMIS prevents overrides or changes of the dates on which entries are made.

(1) If the individual or family qualifies as homeless under paragraph (1)(i) or (ii) of the homeless definition in §576.2, acceptable evidence includes a written observation by an outreach worker of the conditions where the individual or family was living, a written referral by another housing or service provider, or a certification by the individual or head of household seeking assistance.

(2) If the individual qualifies as homeless under paragraph (1)(iii) of the homeless definition in §576.2, because he or she resided in an emergency shelter or place not meant for human habitation and is exiting an institution where he or she resided for 90 days or less, acceptable evidence includes the evidence described in paragraph (b)(1) of this section and one of the following:

(i) Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution. All oral statements must be recorded by the intake worker; or

(ii) Where the evidence in paragraph (b)(2)(i) of this section is not obtainable, a written record of the intake worker's due diligence in attempting to obtain the evidence described in paragraph (b)(2)(i) and a certification by the individual seeking assistance that states he or she is exiting or has just exited an institution where he or she resided for 90 days or less.

(3) If the individual or family qualifies as homeless under paragraph (2) of the homeless definition in §576.2, because the individual or family will imminently lose their housing, the evidence must include:

(i)(A) A court order resulting from an eviction action that requires the individual or family to leave their residence within 14 days after the date of their application for homeless assistance; or the equivalent notice under applicable state law, a Notice to Quit, or a Notice to Terminate issued under state law;

(B) For individuals and families whose primary nighttime residence is a hotel or motel room not paid for by charitable organizations or federal, state, or local government programs for low-income individuals, evidence that the individual or family lacks the resources necessary to reside there for more than 14 days after the date of application for homeless assistance; or

(C) An oral statement by the individual or head of household that the owner or renter of the housing in which they currently reside will not allow them to stay for more than 14 days after the date of application for homeless assistance. The intake worker must record the statement and certify that it was found credible. To be found credible, the oral statement must either: (I) be verified by the owner or renter of the housing in which the individual or family resides at the time of application for homeless assistance and documented by a written certification by the owner or renter or by the intake worker's recording of the owner or renter's oral statement; or (II) if the intake worker is unable to contact the owner or renter, be documented by a written certification by the intake worker of his or her due diligence in attempting to obtain the owner or renter's verification and the written certification by the individual or head of household seeking assistance that his or her statement was true and complete;

(ii) Certification by the individual or head of household that no subsequent residence has been identified; and

(iii) Certification or other written documentation that the individual or family lacks the resources and support networks needed to obtain other permanent housing.

(4) If the individual or family qualifies as homeless under paragraph (3) of the homeless definition in §576.2, because the individual or family does not otherwise qualify as homeless under the homeless definition but is an unaccompanied youth under 25 years of age, or homeless family with one or more children or youth, and is defined as homeless under another Federal statute or section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), the evidence must include:

(i) For paragraph (3)(i) of the homeless definition in §576.2, certification of homeless status by the local private nonprofit organization or state or local governmental entity responsible for administering assistance under the Runaway and Homeless Youth Act (42 U.S.C. 5701 *et seq.*), the Head Start Act (42 U.S.C. 9831 *et seq.*), subtitle N of the Violence Against Women Act of 1994 (42 U.S.C. 14043e *et seq.*), section 330 of the Public Health Service Act (42 U.S.C. 254b), the Food and Nutrition Act of 2008 (7 U.S.C. 2011 *et seq.*), section 17 of the Child Nutrition Act of 1966 (42 U.S.C. 1786), or subtitle B of title VII of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 *et seq.*), as applicable;

(ii) For paragraph (3)(ii) of the homeless definition in §576.2, referral by a housing or service provider, written observation by an outreach worker, or certification by the homeless individual or head of household seeking assistance;

(iii) For paragraph (3)(iii) of the homeless definition in §576.2, certification by the individual or head of household and any available supporting documentation that the individual or family moved two or more times during the 60-day period immediately preceding the date of application for homeless assistance, including: recorded statements or records obtained from each owner or renter of housing, provider of shelter or housing, or social worker, case worker, or other appropriate official of a hospital or institution in which the individual or family resided; or, where these statements or records are unobtainable, a written record of the intake worker's due diligence in attempting to obtain these statements or records. Where a move was due to the individual or family fleeing domestic violence, dating violence, sexual assault, or stalking, then the intake worker may alternatively obtain a written certification from the individual or head of household seeking assistance that they were fleeing that situation and that they resided at that address; and

(iv) For paragraph (3)(iv) of the homeless definition in §576.2, written diagnosis from a professional who is licensed by the state to diagnose and treat that condition (or intake staff-recorded observation of disability that within 45 days of date of the application for assistance is confirmed by a professional who is licensed by the state to diagnose and treat that condition); employment records; department of corrections records; literacy, English proficiency tests; or other reasonable documentation of the conditions required under paragraph (3)(iv) of the homeless definition.

(5) If the individual or family qualifies under paragraph (4) of the homeless definition in §576.2, because the individual or family is fleeing domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions related to violence, then acceptable evidence includes an oral statement by the individual or head of household seeking assistance that they are fleeing that situation, that no subsequent residence has been identified and that they lack the resources or support networks, *e.g.*, family, friends, faith-based or other social networks, needed to obtain other housing. If the individual or family is receiving shelter or services provided by a victim service provider, the oral statement must be documented by either a certification by the individual or head of household; or a certification by the intake worker. Otherwise, the oral statement that the individual or head of household seeking assistance has not identified a subsequent residence and lacks the resources or support networks, *e.g.*, family, friends, faith-based or other social networks, needed to obtain housing must be documented by a certification by the individual or head of household that the oral statement is true and complete, and, where the safety of the individual or family would not be jeopardized, the domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening condition must be verified by a written observation by the intake worker or a written referral by a housing or service provider, social worker, legal assistance provider, health-care provider, law enforcement agency, legal assistance provider, pastoral counselor, or any other organization from whom the individual or head of household has sought assistance for domestic violence, dating violence, sexual assault, or stalking. The

written referral or observation need only include the minimum amount of information necessary to document that the individual or family is fleeing, or attempting to flee domestic violence, dating violence, sexual assault, and stalking.

(c) *At risk of homelessness status.* For each individual or family who receives Emergency Solutions Grant (ESG) homelessness prevention assistance, the records must include the evidence relied upon to establish and verify the individual or family's "at risk of homelessness" status. This evidence must include an intake and certification form that meets HUD specifications and is completed by the recipient or subrecipient. The evidence must also include:

(1) If the program participant meets the criteria under paragraph (1) of the "at risk of homelessness" definition in §576.2:

(i) The documentation specified under this section for determining annual income;

(ii) The program participant's certification on a form specified by HUD that the program participant has insufficient financial resources and support networks; *e.g.*, family, friends, faith-based or other social networks, immediately available to attain housing stability and meets one or more of the conditions under paragraph (1)(iii) of the definition of "at risk of homelessness" in §576.2;

(iii) The most reliable evidence available to show that the program participant does not have sufficient resources or support networks; *e.g.*, family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the "homeless" definition. Acceptable evidence includes:

(A) Source documents (*e.g.*, notice of termination from employment, unemployment compensation statement, bank statement, health-care bill showing arrears, utility bill showing arrears);

(B) To the extent that source documents are unobtainable, a written statement by the relevant third party (*e.g.*, former employer, public administrator, relative) or the written certification by the recipient's or subrecipient's intake staff of the oral verification by the relevant third party that the applicant meets one or both of the criteria under paragraph (1)(ii) of the definition of "at risk of homelessness" in §576.2; or

(C) To the extent that source documents and third-party verification are unobtainable, a written statement by the recipient's or subrecipient's intake staff describing the efforts taken to obtain the required evidence; and

(iv) The most reliable evidence available to show that the program participant meets one or more of the conditions under paragraph (1)(iii) of the definition of "at risk of homelessness" in §576.2. Acceptable evidence includes:

(A) Source documents that evidence one or more of the conditions under paragraph (1)(iii) of the definition (*e.g.*, eviction notice, notice of termination from employment, bank statement);

(B) To the extent that source documents are unobtainable, a written statement by the relevant third party (*e.g.*, former employer, owner, primary leaseholder, public administrator, hotel or motel manager) or the written certification by the recipient's or subrecipient's intake staff of the oral verification by the relevant third party that the applicant meets one or more of the criteria under paragraph (1)(iii) of the definition of "at risk of homelessness"; or

(C) To the extent that source documents and third-party verification are unobtainable, a written statement by the recipient's or subrecipient's intake staff that the staff person has visited the applicant's residence and determined that the applicant meets one or more of the criteria under paragraph (1)(iii) of

the definition or, if a visit is not practicable or relevant to the determination, a written statement by the recipient's or subrecipient's intake staff describing the efforts taken to obtain the required evidence; or

(2) If the program participant meets the criteria under paragraph (2) or (3) of the "at risk of homelessness" definition in §576.2, certification of the child or youth's homeless status by the agency or organization responsible for administering assistance under the Runaway and Homeless Youth Act (42 U.S.C. 5701 *et seq.*), the Head Start Act (42 U.S.C. 9831 *et seq.*), subtitle N of the Violence Against Women Act of 1994 (42 U.S.C. 14043e *et seq.*), section 330 of the Public Health Service Act (42 U.S.C. 254b), the Food and Nutrition Act of 2008 (7 U.S.C. 2011 *et seq.*), section 17 of the Child Nutrition Act of 1966 (42 U.S.C. 1786) or subtitle B of title VII of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 *et seq.*), as applicable.

(d) *Determinations of ineligibility.* For each individual and family determined ineligible to receive Emergency Solutions Grant (ESG) assistance, the record must include documentation of the reason for that determination.

(e) *Annual income.* For each program participant who receives homelessness prevention assistance, or who receives rapid re-housing assistance longer than one year, the following documentation of annual income must be maintained:

(1) Income evaluation form containing the minimum requirements specified by HUD and completed by the recipient or subrecipient; and

(2) Source documents for the assets held by the program participant and income received over the most recent period for which representative data is available before the date of the evaluation (*e.g.*, wage statement, unemployment compensation statement, public benefits statement, bank statement);

(3) To the extent that source documents are unobtainable, a written statement by the relevant third party (*e.g.*, employer, government benefits administrator) or the written certification by the recipient's or subrecipient's intake staff of the oral verification by the relevant third party of the income the program participant received over the most recent period for which representative data is available; or

(4) To the extent that source documents and third party verification are unobtainable, the written certification by the program participant of the amount of income the program participant received for the most recent period representative of the income that the program participant is reasonably expected to receive over the 3-month period following the evaluation.

(f) *Program participant records.* In addition to evidence of homeless status or "at risk of homelessness" status, as applicable, records must be kept for each program participant that document:

(1) The services and assistance provided to that program participant, including, as applicable, the security deposit, rental assistance, and utility payments made on behalf of the program participant;

(2) Compliance with the applicable requirements for providing services and assistance to that program participant under the program components and eligible activities provisions at §576.101 through §576.106, the provision on determining eligibility and amount and type of assistance at §576.401(a) and (b), and the provision on using appropriate assistance and services at §576.401(d) and (e); and

(3) Where applicable, compliance with the termination of assistance requirement in §576.402.

(g) *Centralized or coordinated assessment systems and procedures.* The recipient and its subrecipients must keep documentation evidencing the use of, and written intake procedures for, the

centralized or coordinated assessment system(s) developed by the Continuum of Care(s) in accordance with the requirements established by HUD.

(h) *Rental assistance agreements and payments.* The records must include copies of all leases and rental assistance agreements for the provision of rental assistance, documentation of payments made to owners for the provision of rental assistance, and supporting documentation for these payments, including dates of occupancy by program participants.

(i) *Utility allowance.* The records must document the monthly allowance for utilities (excluding telephone) used to determine compliance with the rent restriction.

(j) *Shelter and housing standards.* The records must include documentation of compliance with the shelter and housing standards in §576.403, including inspection reports.

(k) *Emergency shelter facilities.* The recipient must keep records of the emergency shelters assisted under the ESG program, including the amount and type of assistance provided to each emergency shelter. As applicable, the recipient's records must also include documentation of the value of the building before the rehabilitation of an existing emergency shelter or after the conversion of a building into an emergency shelter and copies of the recorded deed or use restrictions.

(l) *Services and assistance provided.* The recipient must keep records of the types of essential services, rental assistance, and housing stabilization and relocation services provided under the recipient's program and the amounts spent on these services and assistance. The recipient and its subrecipients that are units of general purpose local government must keep records to demonstrate compliance with the maintenance of effort requirement, including records of the unit of the general purpose local government's annual budgets and sources of funding for street outreach and emergency shelter services.

(m) *Coordination with Continuum(s) of Care and other programs.* The recipient and its subrecipients must document their compliance with the requirements of §576.400 for consulting with the Continuum(s) of Care and coordinating and integrating ESG assistance with programs targeted toward homeless people and mainstream service and assistance programs.

(n) *HMIS.* The recipient must keep records of the participation in HMIS or a comparable database by all projects of the recipient and its subrecipients.

(o) *Matching.* The recipient must keep records of the source and use of contributions made to satisfy the matching requirement in §576.201. The records must indicate the particular fiscal year grant for which each matching contribution is counted. The records must show how the value placed on third-party, noncash contributions was derived. To the extent feasible, volunteer services must be supported by the same methods that the organization uses to support the allocation of regular personnel costs.

(p) *Conflicts of interest.* The recipient and its subrecipients must keep records to show compliance with the organizational conflicts-of-interest requirements in §576.404(a), a copy of the personal conflicts of interest policy or codes of conduct developed and implemented to comply with the requirements in §576.404(b), and records supporting exceptions to the personal conflicts of interest prohibitions.

(q) *Homeless participation.* The recipient must document its compliance with the homeless participation requirements under §576.405.

(r) *Faith-based activities.* The recipient and its subrecipients must document their compliance with the faith-based activities requirements under §576.406.

(s) *Other Federal requirements.* The recipient and its subrecipients must document their compliance with the Federal requirements in §576.407 and §576.409, as applicable, including:

(1) Records demonstrating compliance with the nondiscrimination and equal opportunity requirements under §576.407(a) and the affirmative outreach requirements in §576.407(b), including:

(i) Data concerning race, ethnicity, disability status, sex, and family characteristics of persons and households who are applicants for, or program participants in, any program or activity funded in whole or in part with ESG funds; and

(ii) Documentation required under 24 CFR 5.168 in regard to the recipient's Assessment of Fair Housing and the certification that the recipient will affirmatively further fair housing.

(2) Records demonstrating compliance with the uniform administrative requirements in 2 CFR part 200.

(3) Records demonstrating compliance with the environmental review requirements, including flood insurance requirements.

(4) Certifications and disclosure forms required under the lobbying and disclosure requirements in 24 CFR part 87.

(5) Data on emergency transfers requested under §576.409, pertaining to victims of domestic violence, dating violence, sexual assault, or stalking, including data on the outcomes of such requests.

(t) *Relocation.* The records must include documentation of compliance with the displacement, relocation, and acquisition requirements in §576.408.

(u) *Financial records.* (1) The recipient must retain supporting documentation for all costs charged to the ESG grant.

(2) The recipient and its subrecipients must keep documentation showing that ESG grant funds were spent on allowable costs in accordance with the requirements for eligible activities under §§576.101 through 576.109, financial management in 2 CFR 200.302, and the cost principles in 2 CFR part 200, subpart E.

(3) The recipient and its subrecipients must retain records of the receipt and use of program income.

(4) The recipient must keep documentation of compliance with the expenditure limits in §576.100 and the expenditure deadline in §576.203.

(v) *Subrecipients and contractors.* (1) The recipient must retain copies of all solicitations of and agreements with subrecipients, records of all payment requests by and dates of payments made to subrecipients, and documentation of all monitoring and sanctions of subrecipients, as applicable. If the recipient is a State, the recipient must keep records of each recapture and distribution of recaptured funds under §576.501.

(2) The recipient and its subrecipients must retain copies of all procurement contracts and documentation of compliance with the procurement requirements in 2 CFR part 200, subpart D.

(3) The recipient must ensure that its subrecipients comply with the recordkeeping requirements specified by the recipient and HUD notice or regulations.

(w) *Other records specified by HUD.* The recipient must keep other records specified by HUD.

(x) *Confidentiality.* (1) The recipient and its subrecipients must develop and implement written procedures to ensure:

(i) All records containing personally identifying information (as defined in HUD's standards for participation, data collection, and reporting in a local HMIS) of any individual or family who applies for and/or receives ESG assistance will be kept secure and confidential;

(ii) The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under the ESG will not be made public, except with written authorization of the person responsible for the operation of the shelter; and

(iii) The address or location of any housing of a program participant will not be made public, except as provided under a preexisting privacy policy of the recipient or subrecipient and consistent with state and local laws regarding privacy and obligations of confidentiality.

(2) The confidentiality procedures of the recipient and its subrecipients must be in writing and must be maintained in accordance with this section.

(y) *Period of record retention.* All records pertaining to each fiscal year of ESG funds must be retained for the greater of 5 years or the period specified below. Copies made by microfilming, photocopying, or similar methods may be substituted for the original records.

(1) Documentation of each program participant's qualification as a family or individual at risk of homelessness or as a homeless family or individual and other program participant records must be retained for 5 years after the expenditure of all funds from the grant under which the program participant was served;

(2) Where ESG funds are used for the renovation of an emergency shelter involves costs charged to the ESG grant that exceed 75 percent of the value of the building before renovation, records must be retained until 10 years after the date that ESG funds are first obligated for the renovation; and

(3) Where ESG funds are used to convert a building into an emergency shelter and the costs charged to the ESG grant for the conversion exceed 75 percent of the value of the building after conversion, records must be retained until 10 years after the date that ESG funds are first obligated for the conversion.

(z) *Access to records.* (1) *Federal Government rights.* Notwithstanding the confidentiality procedures established under paragraph (x) of this section, the recipient and its subrecipients must comply with the requirements for access to records in 2 CFR 200.336.

(2) *Public rights.* The recipient must provide citizens, public agencies, and other interested parties with reasonable access (consistent with state and local laws regarding privacy and obligations of confidentiality and the confidentiality requirements in this part) to records regarding any uses of ESG funds the recipient received during the preceding 5 years.

(aa) *Reports.* The recipient must collect and report data on its use of ESG funds in the Integrated Disbursement and Information System (IDIS) and other reporting systems, as specified by HUD. The recipient must also comply with the reporting requirements in 2 CFR part 200 and 24 CFR part 91 and the reporting requirements under the Federal Funding Accountability and Transparency Act of 2006, (31 U.S.C. 6101 note), which are set forth in appendix A to 2 CFR part 170.

### **§576.501 Enforcement.**

(a) *Performance reviews.* (1) HUD will review the performance of each recipient in carrying out its responsibilities under this part whenever determined necessary by HUD, but at least annually. In conducting performance reviews, HUD will rely primarily on information obtained from the records and reports from the recipient and, when appropriate, its subrecipients, as well as information from onsite monitoring, audit reports, and information from IDIS and HMIS. Where applicable, HUD may also consider relevant information pertaining to the recipient's performance gained from other sources, including citizen comments, complaint determinations, and litigation. Reviews to determine compliance with specific requirements of this part will be conducted as necessary, with or without prior notice to the recipient.

(2) If HUD determines preliminarily that the recipient or one of its subrecipients has not complied with an ESG program requirement, HUD will give the recipient notice of this determination and an opportunity to demonstrate, within the time prescribed by HUD and on the basis of substantial facts and data, that the recipient has complied with Emergency Solutions Grant (ESG) requirements. HUD may change the method of payment to require the recipient to obtain HUD's prior approval each time the recipient draws down Emergency Solutions Grant (ESG) funds. To obtain prior approval, the recipient may be required to manually submit its payment requests and supporting documentation to HUD in order to show that the funds to be drawn down will be expended on eligible activities in accordance with all ESG program requirements.

(3) If the recipient fails to demonstrate to HUD's satisfaction that the activities were carried out in compliance with ESG program requirements, HUD will take one or more of the remedial actions or sanctions specified in paragraph (b) of this section.

(b) *Remedial actions and sanctions.* Remedial actions and sanctions for a failure to meet an ESG program requirement will be designed to prevent a continuation of the deficiency; mitigate, to the extent possible, its adverse effects or consequences; and prevent its recurrence.

(1) HUD may instruct the recipient to submit and comply with proposals for action to correct, mitigate, and prevent noncompliance with ESG requirements, including:

(i) Preparing and following a schedule of actions for carrying out activities affected by the noncompliance, including schedules, timetables, and milestones necessary to implement the affected activities;

(ii) Establishing and following a management plan that assigns responsibilities for carrying out the remedial actions;

(iii) Canceling or revising activities likely to be affected by the noncompliance, before expending ESG funds for the activities;

(iv) Reprogramming ESG funds that have not yet been expended from affected activities to other eligible activities;

(v) Suspending disbursement of ESG funds for some or all activities;

(vi) Reducing or terminating the remaining grant of a subrecipient and reallocating those funds to other subrecipients; and

(vii) Making matching contributions before or as draws are made from the recipient's ESG grant.

(2) HUD may change the method of payment to a reimbursement basis.

(3) HUD may suspend payments to the extent HUD deems it necessary to preclude the further expenditure of funds for affected activities.

(4) HUD may remove the recipient from participation in reallocations of funds under subpart D of this part.

(5) HUD may deny matching credit for all or part of the cost of the affected activities and require the recipient to make further matching contributions to make up for the contribution determined to be ineligible.

(6) HUD may require the recipient to reimburse its line of credit in an amount equal to the funds used for the affected activities.

(7) HUD may reduce or terminate the remaining grant of a recipient and reallocate those funds to other recipients in accordance with subpart D of this part.

(8) HUD may condition a future grant.

(9) HUD may take other remedies that are legally available.

(c) *Recipient sanctions.* If the recipient determines that a subrecipient is not complying with an ESG program requirement or its subgrant agreement, the recipient must take appropriate actions, as prescribed for HUD in paragraphs (a) and (b) of this section. If the recipient is a State and funds become available as a result of an action under this section, the recipient must reallocate those funds to other subrecipients as soon as practicable. If the recipient is a unit of general purpose local government of territory, it must either reallocate those funds to other subrecipients or reprogram the funds for other activities to be carried out by the recipient as soon as practicable. The recipient must amend its Consolidated Plan in accordance with its citizenship participation plan if funds become available and are reallocated or reprogrammed under this section. The reallocated or reprogrammed funds must be used by the expenditure deadline in §576.203.

<https://www.hudexchange.info/programs/esg/>

The screenshot shows a web browser window with the URL <https://www.hudexchange.info/programs/esg/>. The browser's address bar shows the page title as "ESG: Emergency Solutions Gr...". The website header includes the HUD Exchange logo and the name of the Secretary, Ben Carson. A navigation menu contains links for "My HUD Exchange", "Programs", "Resources", "Trainings", "Program Support", "Grantees", and "News". A "NEED HOUSING ASSISTANCE?" button is also visible. The main content area is titled "Emergency Solutions Grants Program" and includes a detailed description of the program's history and regulations. A list of links provides access to various resources, including requirements, laws, and program information. Two sidebars offer additional navigation: one for "Learn About Homelessness Assistance Programs" with links to a mailing list, contact information, FAQs, questions, awards, and reports; the other for "Planning and Reporting for ESG" with links to various systems and reports. A third sidebar lists "ESG Program Limits" and "ESG Income Limits". The page concludes with "ESG News & Announcements" featuring several recent updates with their respective dates.

Home > Programs > ESG: Emergency Solutions Grants Program

## Emergency Solutions Grants Program

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) amended the McKinney-Vento Homeless Assistance Act, revising the Emergency Shelter Grants Program in significant ways and renaming it the Emergency Solutions Grants (ESG) program. The ESG Interim Rule took effect on January 4, 2012. The second allocation of FY 2011 ESG funding and future years are all subject to the ESG regulations. The first allocation of FY 2011 ESG funding and prior years are subject to the Emergency Shelter Grants Program regulations. [View HUD Secretary Donovan's video introducing the Emergency Solutions Grants \(ESG\) program.](#)

- [Learn about ESG Requirements](#)
- [View ESG Law, Regulations, and Notices](#)
- [View the SNAPS Weekly Focus](#)
- [View SNAPS-Shots](#)
- [View Other ESG Program Information](#)

### ESG Program Guides, Tools, and Webinars

Guides, tools, webinars, and other resources are provided to assist grantees and program partners in designing and implementing their programs.

[View ESG Program Guides, Tools, and Webinars](#)

[View ESG Peer to Peer Resources](#)

### ESG News & Announcements

[HUD Conducting Survey of All RRH Programs](#)  
Date Posted: June 26, 2018

[Save the Date: Rapid Re-Housing Institutes - October 2-3, 2018 and October 16-17, 2018](#)  
Date Posted: June 22, 2018

[Register Today: Best Practices for Setting Up and Completing the CAPER in the eCon Planning Suite - July 26, 2018 - 1:00 PM EDT](#)  
Date Posted: June 22, 2018

[The FY 2018 CoC Program Competition is Now Open](#)  
Date Posted: June 20, 2018

[From Our Partners: CDC Releases Official Health Advisory Related to Hepatitis A Outbreaks among Persons Experiencing Homelessness](#)  
Date Posted: June 20, 2018

[2018 NHSDC Fall Conference - Portland, Oregon - October 17-18, 2018](#)  
Date Posted: June 19, 2018

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**Planning and Reporting for ESG**

[IDIS: Integrated Disbursement and Information System](#)

[Consolidated Plan, Action Plan, and CAPER](#)

[ESG CAPER Guides, Tools, and Webinars](#)

[HMIS: Homeless Management Information System](#)

[Housing Inventory Count \(HIC\)/Point-In-Time \(PIT\) Count](#)

[Annual Homeless Assessment Report \(AHAR\)](#)

**ESG Program Limits**

[ESG Income Limits](#)