
CITY OF NEW BEDFORD, MASSACHUSETTS

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COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM
■
HOME INVESTMENT PARTNERSHIP PROGRAM
■
EMERGENCY SOLUTIONS GRANT PROGRAM



DRAFT FISCAL YEAR 2017 CAPER

CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT

JULY 1, 2017 – JUNE 30, 2018

CAPER

TABLE OF CONTENTS

Introduction.....

CR-05 - Goals and Outcomes

CR-10 – Racial and Ethnic Composition of Families Assisted

CR-15 - Resources and Investments 91.520(a)

CR-20 - Affordable Housing 91.520(b)

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

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

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

CR-40 - Monitoring 91.220 and 91.230

CR-45 - CDBG 91.520(c)

CR-50 - HOME 91.520(d)

CR-55 - HOPWA 91.520(e)

CR-60 - ESG 91.520(g) (ESG Recipients only)

CR-65 - Persons Assisted

CR-70 – ESG 91.520(g) - Assistance Provided and Outcomes

CR-75 – Expenditures

Appendix

Introduction

This Consolidated Annual Performance and Evaluation Report (CAPER) has been prepared in accordance with guidance provided by the U.S. Department of Housing and Urban Development (HUD) for annual performance reporting. This report summarizes the performance of the City of New Bedford in administering Fiscal Year 2017 Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), and Emergency Solutions Grant (ESG) Programs.

Summary data based upon reports generated by the Integrated Disbursement and Information System (IDIS) are attached to the final version of this CAPER. The IDIS summary reports provide precise financial and beneficiary detail that supplements the narrative presented herein.

In June 2017, the City's Department of Planning, Housing and Community Development (DPHCD) planned, prepared, and submitted to the U.S. Department of Housing and Urban Development (HUD) its Fiscal Year 2017 Annual Action Plan for the CDBG, HOME, and ESG Programs. This annual plan adheres to the priorities articulated in the five-year Consolidated Plan 2015-2019 and describes recommendations for specific projects and services to address housing, community and economic development, emergency shelter and homelessness needs identified through the citizen participation process. The five-year Consolidated Plan covers the period from July 1, 2015 through June 30, 2020.

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan.

91.520(a)

The City of New Bedford is an Entitlement Community that received funds from the U.S. Department of Housing and Urban Development (HUD) to invest in local solutions to address housing and community development needs. These funds included the Community Development Block Grant (CDBG), the HOME Investment Partnership Program (HOME), and the Emergency Solutions Grant (ESG).

All programs and activities identified in the Actual Outcomes and Measures table below have come to fruition as the result of an active public process, community input, careful planning, and a significant commitment of financial resources while providing tremendous opportunities for low and moderate-income individuals and families, both young and old, throughout the City of New Bedford.

In evaluating the effectiveness of serving low and moderate-income residents, the City of New Bedford is pleased to report that 90.87% of the \$2,477,106 of CDBG funds were expended on activities benefiting low and moderate-income residents, well in excess of the required 70%.

During FY17, the city made significant progress in response to the priorities, strategic objectives, and performance measurements identified in the FY17 Action Plan and the 2015-2019 Consolidated Plan. Those accomplishments are summarized using the Actual Outcomes and Measures table below that is divided into (3) main categories: Housing Priorities, Non-Housing Priorities, and Planning & Administration.

In terms of housing and non-housing priorities, the city directed significant resources into targeted neighborhoods, directing resources and initiatives that met the prioritized needs of these neighborhoods and residents. A total of \$1,902,205 of CDBG and HOME funds were expended on housing related projects and activities that benefited 56 housing units. Many of these activities stand out as having an exceptionally positive impact on improving the quality of life for the city's low and moderate-income residents.

Regarding non-housing projects such as infrastructure, Public Facilities and Parks projects, a total of \$658,313 in CDBG funds were expended in low-to-moderate income census tracts of the city that impacted approximately 25,293 residents. The city also expended \$648,514 in Economic Development funds to assist in the creation or retention of jobs as well as commercial storefront improvements. Finally, a total of \$287,188 of CDBG funds were used to fund twenty-one (21) public service programs that provided program and services to 10,125 low-to-moderate income person and families.

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

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

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Expand Economic Development opportunities	Non-Housing Community Development	CDBG: \$25,314	Facade treatment/business building rehabilitation	Business	20	31	155.00%	10	15	150.00%
Expand Economic Development opportunities	Non-Housing Community Development	CDBG: \$623,200	Jobs created/retained	Jobs	65	54	83.07%	15	15	100.00%
Expand Economic Development opportunities	Non-Housing Community Development	CDBG: \$623,200 (see above)	Businesses assisted	Businesses Assisted	20	30	150.00%	10	19	190.00%
Homebuyer Assistance	Affordable Housing	HOME: \$190,515	Direct Financial Assistance to Homebuyers	Households Assisted	18	26	144.44%	12	10	83.33%
Homeless Services	Homeless	ESG: \$58,465	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	150	87	58.00%	15	164	1093.33%
Homeless Services	Homeless	ESG: \$172,267	Homeless Person Overnight Shelter	Persons Assisted	3750	1584	42.24%	250	555	222.00%
Homeless Services	Homeless	ESG: \$49,641	Homelessness Prevention	Persons Assisted	250	261	104.04%	15	124	826.66%

Improve Public Infrastructure	Non-Housing Community Development	CDBG: \$139,572	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	500	39,980	7,995.99%	10,500	21,680	206.47%
Improve the condition of Housing-Rehabilitation	Affordable Housing Non-Homeless Special Needs	CDBG: \$	Facade treatment/business building rehabilitation	Business	0	0	0.00%	0	0	0.00%
Improve the condition of Housing-Rehabilitation	Affordable Housing Non-Homeless Special Needs	CDBG: \$71,362	Rental units rehabilitated	Household Housing Unit	30	22	73.33%	12	6	50%
Improve the condition of Housing-Rehabilitation	Affordable Housing Non-Homeless Special Needs	CDBG: \$	Rental units rehabilitated	Household Housing Unit	0	0	0.00%	0	0	0.00%
Improve the condition of Housing-Rehabilitation	Affordable Housing Non-Homeless Special Needs	CDBG: \$123,213	Homeowner Housing Rehabilitated	Household Housing Unit	60	93	155.00%	20	36	135.00%
Improve the condition of Housing-Rehabilitation	Affordable Housing Non-Homeless Special Needs	CDBG: \$	Businesses assisted	Businesses Assisted	0	0	0.00%	0	0	0.00%
Improve the condition of Housing-Rehabilitation	Affordable Housing Non-Homeless Special Needs	CDBG: \$	Housing for Homeless added	Household Housing Unit	0	0	0.00%	0	0	0.00%
Improve the condition of Housing-Rehabilitation	Affordable Housing Non-Homeless Special Needs	CDBG: \$	Housing for People with HIV/AIDS added	Household Housing Unit	0	0	0.00%	0	0	0.00%

Increase the Inventory of safe, Affordable Housing	Affordable Housing	HOME: \$1,087,774	Rental units rehabilitated	Household Housing Unit	30	28	93.33%	20	18	90%
Increase the Inventory of safe, Affordable Housing	Affordable Housing	HOME: \$165,513.	Homeowner Housing Added	Household Housing Unit	18	12	66.67%	10	4	40%
Neighborhood Stabilization	Non-Housing Community Development	CDBG: \$69,221	Buildings Demolished	Buildings	3	7	200.00%	2	1	50.00%
Neighborhood Stabilization	Non-Housing Community Development	CDBG: \$	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	0	0	0.00%	0	0	0.00%
Planning and Administration	Planning and Administration	CDBG: \$431,304 / HOME: \$90,098 / ESG: \$29,630	Other	Other	1	1	100.00%	1	1	100.00%
Provide essential Public Services	Non-Homeless Special Needs	CDBG: \$287,187	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1000	36,932	3,693.20%	1,500	10,125	675.00%
Public Facilities and Parks	Non-Housing Community Development	CDBG: \$449,519	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	500	14,534	2,9068.00%	10,000	3,613	36.13%

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

In the third program year of the 2015-2019 Consolidated Plan, the city continued to make progress on its identified goals and objectives set forth in the five year plan. Below is the city’s priority listing for programs and activities.

Priority	Objectives
1	Increase the inventory of safe, Affordable Housing
2	Improve the condition of Housing through Rehabilitation
3	Increase rate of homeownership through the provision of Homebuyer Assistance
4	Expand Economic Development opportunities through business assistance
5	Provide essential Public Services
6	Improve availability and access to Public Facilities and Parks
7	Improve Public Infrastructure
8	Increase the quality of life through Neighborhood Stabilization efforts
9	Decrease the incidence of Homelessness
10	Planning and Administration

The following are some examples of how the city’s used CDBG funds to address specific high priority needs in the city.

Public Facilities and Parks

The city continued to make tremendous progress in creating new recreational opportunities and preserving public facilities that directly benefit low and moderate income residents. The following Parks Projects were completed in FY2017.

In FY17, the city completed the new Hayden McFadden Elementary School Playground. This project included a new playground that is also accessible to handicapped children, a new swing set, benches and tables, a new stone dust walking/running path, new fencing, a renovated basketball court, and additional trees. The city worked with school administration and teachers and the Parent Teacher Association to devise a plan for the space.

Also in FY17, the city started two additional Public Facilities projects: the First Baptist Church Steeple Restoration and Buttonwood Senior Center projects. The First Baptist Church project included the complete historic restoration of the Steeple. This former historic church will be used by a non-profit group “Your Theater” for various theatrical performances that are open to the public. The Buttonwood Senior Center project included a variety of exterior and interior restoration. CDBG funds will be used for the exterior portion of the project that includes replacing the existing roof, gutter system, lighting, re-pointing of mortar, and replacement of doors and window. Both projects commenced at the end of FY17 and will be completed in the fall of 2018.

In FY17, the city also identified three public parks (Beauregard-Pina, Baby Kenny and West End Playgrounds) that will undergo significant revitalization efforts in FY18. In order to identify the specific needs of the community, the city held separate public input sessions for each individual park within their neighborhoods. The purpose of the input sessions is to directly involve or engage community members using these neighborhood parks in the designed process. Community members are asked what specific elements of the park they enjoy and what changes are needed. For example, upgrading substandard playground equipment, improving walking paths, amenities (benches & trash receptacles), trees, lighting, fencing, signs and basketball courts. Construction on the West End Playground is scheduled to commence in August 2018 while the final design of Beauregard-Pina and Baby Kenny will be presented to the public in the fall of 2018 and tentative construction in the spring of 2019.

Neighborhood Revitalization through the creation of Homeownership Opportunities:

The City of New Bedford has sought out new and innovative ways to address distressed properties, erase blight and reverse the destructive influence these properties have on neighborhoods. Targeted investment in strategic neighborhoods identified distressed and vacant properties and created homeownership opportunities for New Bedford residents. The City's DPHCD coordinates monthly meetings with the Attorney General's Office, City representatives from the Building and Health Departments and includes representatives from the City's Housing Task force and local non-profit developers that have been designated "Receivers" through the Attorney General's "Receivership" Program to identify problem properties and also discuss the proper mechanism to address these blighted properties. The City has utilized the Attorney General's Receivership Program to address problem properties, where a designated "Receiver" is appointed by the Housing Court to gain control of a problem property and address its health and safety violations.

The City's DPHCD also holds monthly meetings with the Fall River-New Bedford Housing Partnership that is made up of local lenders and social service agencies as well as MassHousing. The DPHCD Deputy Director is the co-chair of the Housing Partnership. Lenders of the Housing Partnership coordinate the pre-approvals for eligible first time home buyers interested in purchasing lottery properties and also participates with the City to hold workshop for potential buyers.

HOME Investment Partnership Funds (HOME) were utilized to rehabilitate rental housing, directly assist homebuyers, and produce and/or preserve affordable housing citywide.

CR-10 - Racial and Ethnic composition of families assisted

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

91.520(a)

	CDBG	HOME	ESG
White	7,873	20	606
Black or African American	1,285	4	218
Asian	34	0	1
American Indian or American Native	21	0	9
Native Hawaiian or Other Pacific Islander	3	0	9
Total	9,216	24	843
Hispanic	930	7	205
Not Hispanic	8,286	17	638

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

Narrative

In FY17, the city funded activities that assisted a diverse population of low and moderate income households and extremely low income households throughout the city's challenged neighborhoods. Approximately fifteen (15%) percent of persons assisted were non-white and twelve (12%) percent were Hispanic during the fiscal year. Of the families assisted, 99% were low –to-moderate income. The city also took great efforts to provide outreach to non English speaking populations to ensure that programs and public services were specifically targeted and made available to persons speaking multiple languages. Public notices were translated into three languages; English, Portuguese and Spanish. Also, the city provided interpretation services as needed. NOTE – Additional ESG data will be made available in CR-00 as part of the ecart.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	Federal - Public	\$5,206,696	\$2,477,106
HOME	Federal - Public	\$3,850,931	\$1,534,433
ESG	Federal - Public	\$404,897	\$339,285

Table 1 - Resources Made Available

Narrative

The table above lists all federal grants and Program Income received/reprogrammed from the Department of Housing and Urban Development (HUD) for the three (3) formula grant programs. For the program year (July 1, 2017 - June 30, 2018), the city received \$2,455,530 in CDBG funds, \$664,227 in HOME funds, and \$395,072 in ESG funds in new funding. In addition, the city received \$453,834 in CDBG Program Income and \$614,564 in HOME Program Income. The city also had available reprogrammed funds from prior years including \$2,327,332 CDBG, \$2,572,141 HOME and \$9,825 ESG.

Funds expended during the program year include reprogrammed prior year funds and funds awarded to activities in prior years as well as Program Income that were not spent until the 2017-18 program year.

There were several large scale HOME projects that included multiple funding sources, such as LIHTC and historic tax credit financing in their development budgets and funds were not expended on those projects in that fiscal year. As a result, funds expended do not equal funds received.

Identify the geographic distribution and location of investments

The city continued to direct federal resources, to the greatest extent possible, to areas with the greatest concentrations of low and moderate income populations. As part of the 5-Year Consolidated Planning needs analysis process, the city determined the basis for allocations and geographic distribution of federal resources. The Annual Action Plan goals and objectives are predicated upon this comprehensive analysis, needs assessment and extensive public outreach which in turns identifies priority categories and geographic preferences / distribution of resources to meet the priority needs of the community.

In FY17, the city completed a variety of public infrastructure and facilities projects either directly benefited low-to-moderate income persons and families and/or had an area wide benefit within the census track. Because of the HUD's national objective to benefit low-to-moderate income residents, funds were specifically targeted to areas and neighborhoods that were the most economically and physically distressed in the city. Through the city's neighborhood infrastructure improvements program, the city planted 110 street trees and installed 8 lamp heads and posts. Also, the city was able to perform some significant street and sidewalk repairs or improvements on County, Beetle and Bentley Streets. All projects were located in a low-to-moderate income census tracks that ultimately helped improve both the physical and economic condition of the neighborhood. A number of census tracts that were targeted for funding have low and moderate income populations in excess of 70% of the general population.

The city also funded twenty-one (21) public service programs that provided a variety of services to area youth, seniors and disadvantaged population. Most programs were located in areas of the city that have the highest concentrations of low and moderate income persons. Approximately 10,125 low-to-moderate income city residents benefited from these programs and services.

Many of the city’s housing and homeless projects are city-wide because they are targeted to meet the needs of low- and moderate-income households and persons throughout the city.

Leveraging

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

In accordance with the priorities of the Consolidated Plan, the city of New Bedford effectively leveraged CDBG funds with additional resources. Non-entitlement funds that were utilized as leverage include:

Source	Amount	Description
City General Funds	\$3,500,000	The annual city budget commits resources for the priority activities including Public Parks, Facilities, and Infrastructure, and the Health Department.
State Affordable Housing Resources	\$1,577,653	MHP “One” Program, MassHousing, DHCD Affordable Housing Programs and Attorney Generals’ Office Abandoned Housing Initiative Funds.
Federal Affordable Housing Resources	\$225,000	Low Income Tax Credits, NSP.
Federal/State Historic Tax Credits	\$1,265,583	Historic Tax Credits for Affordable Housing Projects.
YouthBuild New Bedford	\$500,000	Department of Commerce award for Youth Build activities.
Philanthropy	\$510,000	Private funding from the Marion Institute, the Community Foundation and the United Way, as well as other Foundation funds.
Section 8 Funds	\$14,793,826	Section 8 is administered by the New Bedford Housing Authority and provides rental subsidies.
MRVP	\$480,510	Massachusetts Rental Voucher Program.
TOTAL	\$21,910,555	

City activities funded with CDBG, HOME and ESG received financial assistance from other sources including other federal and state programs. The tables above describe leveraged resources for the FY17.

The ESG program matching requirements were met through non-federal resources secured by individual program providers that met or exceeded the 1:1 HUD mandated ESG match requirement. All ESG funded programs committed or surpassed the dollar for dollar match contribution on their awards. The ESG match this year totaled \$1,001,564.

The HOME statute provides for a reduction of the matching contribution for qualified communities. New Bedford in FY17, had 23.4% of families living in poverty and had an average of per capita income of \$21,665. New Bedford met both conditions to receive a 50% match reduction. The city's FY17 Home Match Report shows a \$11,227,818 match that far exceeded our match liability requirement for FY17.

The city complied with federal matching requirements for HOME through Massachusetts Rental Voucher Program managed by the New Bedford Housing Authority.

Fiscal Year Summary – HOME Match	
1. Excess Match from prior Federal fiscal year	\$9,337,915
2. Match contributed during current Federal fiscal year	\$2,058,163
3. Total match available for current Federal fiscal year	\$11,396,078
4. Match liability for current Federal fiscal year	\$168,260
5. Excess match carried over to next Federal fiscal year	\$11,227,818

Table 2 – Fiscal Year Summary – HOME Match Report

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match
MVRP	7/1/2017	\$480,510	\$0	\$0	\$0	\$0	\$0	\$480,510
DPHCD-FTHB Scatter	7/1/2017	\$1,577,653	\$0	\$0	\$0	\$0	\$0	\$1,577,653

Table 2 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at beginning of reporting period	Amount received during reporting period	Total amount expended during reporting period	Amount expended for TBRA	Balance on hand at end of reporting period
\$	\$	\$	\$	\$
\$1,168,555.33	\$614,563.72	\$103,858.70	\$0	\$1,679,260.35

Table 3 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period

	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Number	7	0	0	1	0	6
Dollar Amount	\$8,297,016			\$3,956,287		\$4,340,729
Sub-Contracts						
Number	83	0	0	13	2	68
Dollar Amount	\$			\$1,560,896	\$112,900	\$
	Total	Women Business Enterprises	Male			
Contracts						
Number	7	0	7			
Dollar Amount	\$8,297,016		\$8,297,016			
Sub-Contracts						
Number	83	6	77			
Dollar Amount	\$	\$115,934	\$			

Table 4 – Minority Business and Women Business Enterprises

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	1	0	0	1	0	0
Dollar Amount	\$250,000					

Table 5 – Minority Owners of Rental Property

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
Parcels Acquired						
Businesses Displaced						
Nonprofit Organizations Displaced						
Households Temporarily Relocated, not Displaced						
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	\$0					

Table 6 – Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of special-needs households to be provided affordable housing units	10	0
Total	10	0

Table 1 – Number of Households

	One-Year Goal	Actual
Number of households supported through the production of new units	10	0
Number of households supported through the rehab of existing units	10	69
Number of households supported through the acquisition of existing units	5	14
Total	25	83

Table 2 – Number of Households Supported

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

The above table describes a one year goal of 10 units of special needs housing with an actual goal of 0. We have conditionally committed HOME funding to several large special-needs housing developments that are also seeking State HOME and LITECH funding. These projects are subject to state funding being committed. While the number of special needs housing units was not met this year, we feel with projects in the pipeline the anticipated amount of units will increase during the term of the overall five year plan

The one year goal of rehabilitation of existing units was exceeded by 0% resulting in a total of 69 units that were rehabbed. The number of households supported through Acquisition of Existing Units was 8. The city also exceeded the goal in the acquisition of existing units this year by assisting a total of 14 households.

Discuss how these outcomes will impact future annual action plans.

Also, in reviewing potential multi-year projects, the outcomes will impact our future annual action plans in that this Office will need to review our future projects carefully and determine the feasibility of those projects proceeding in the current fiscal year, including the likelihood of those being funded with outside sources and the likelihood of projects being completed during the current Fiscal Year.

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

Number of Persons Served	CDBG Actual	HOME Actual
Extremely Low-income	18	0
Low-income	13	0
Moderate-income	35	1
Total	66	1

Table 3 – Number of Persons Served

The city’s programs are made available to all households that meet the HUD established income guidelines defined as those families that are of moderate income, low and extremely low income. Outreach to those households is completed in a number of ways, including traditional marketing efforts, as well as through many of our non-profit social service partners and in working with the realtor and lender community partners.

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CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)
Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

The City of New Bedford continues to demonstrate measurable progress in providing outreach to homeless persons, especially those living on the streets and in other places not meant for human habitation. On a monthly basis, the city holds public meetings with 50+ homeless service providers that comprise the local Continuum of Care (CoC) known as the Homeless Service Providers Network (HSPN). During its monthly meetings, the city discussed strategies for ending homelessness and developing strategic action steps.

As a method of outreach to the homeless, the city also continues to use its annual publication of the Street Sheet and NBHSPN website. The Street Sheet is a critical resource and referral tool for folks on the street in need of support services and housing assistance. It is updated annually and was released in conjunction with the Point-in-time Count in January. The Street Sheet can be found throughout the city in all libraries, city hall, public services programs for those experiencing homelessness and in recreational facilities.

Another important outreach tool is the NBHSPN website (www.nbhspn.com) that was launched in 2014 and significantly updated in FY2016. The easy-to navigate NBHSPN website focuses specifically on homeless issues in New Bedford and serves as both an informational tool and an important resource center for a number of different audiences including those experiencing homelessness, area service providers, residents, businesses and the community as a whole. The website is updated regularly and includes access to materials that are relevant for those in the midst of a housing crisis—such as the annually published “StreetSheet” as well as timely demographic information like the annual Point In Time (PIT) count.

The New Bedford CoC's Coordinated Entry system is also an important outreach and assessment tool used to understand the needs of those experiencing or on the precipice of homeless. On December 1, 2015, the city officially implemented the new Coordinated Entry system known as “The CALL” in conjunction with the two other CoCs within Bristol County, thus favoring a strong regional approach to coordinated assessment..

All New Bedford CoC and ESG funded programs work cooperatively with the New Bedford CoC's Coordinated Entry system toward ensuring a single point of intake and initial assessment. This methodology assists those within the continuum by meeting their housing needs with more efficiency. The CALL complies with the goals and regulations of the Emergency Solutions Grant (ESG) and the HEARTH (Homeless Emergency Assistance and Rapid Transition to Housing) Act and, through operational standards adopted by the New Bedford CoC and updated in May of 2018, complies with the HUD Coordinated Entry Notice of the CoC Program interim rule 24 CFR 578.7(a)8.

Referrals to housing, services and providers are completed through coordinated entry implemented through a program of Catholic Social Services (CSS) known as “The CALL” or “Coordinated Access to Local Links.” CSS is responsible for the operation of The CALL which is the initial source for intake and initial assessment and serves as this continuum’s coordinated entry. All agencies receiving CoC and/or Emergency Solutions Grant (ESG) funding are required to participate.

The coordinated entry system (CES) is considered a single point of entry which is accessed through a toll-free number (1-800-HOMELESS from local area codes 508 or 774) or in person at the ADA compliant CALL center located at 238 Bonney Street, New Bedford. All clients in need of housing assistance, regardless of whether they’ve physically arrived at or called an ESG or CoC agency or a mainstream provider, will immediately be referred to the CALL’s 1-800-HOMELESS number. Once CALL staff is connected with the caller, an initial client assessment is conducted and basic information is recorded and logged. All clients are served on a case by case basis with the goal being the location of appropriate resources for the client. Regardless of the operational hours of the CALL and the coordinated entry system, individuals are able to access emergency services such as emergency shelter, independent of the operating hours of the system’s intake and assessment processes by contacting the emergency shelter, directly. Once someone has entered emergency shelter, shelter staff works one-on-one with the individual in ensuring their direct access to the CALL and the coordinated system’s intake and assessment process as soon as it becomes available. Families, victims of domestic violence, stalking , sexual assault, trafficking or dating violence, veterans and those living on the streets shall be served at all access points for which they qualify.

The CoC applies one standardized assessment tool—the VI SPDAT (Prioritization Decision Assessment Tool) in the operation of its coordinated entry system in order to ensure consistency throughout the CoC toward achieving fair, equitable and equal access to housing and services within the City of New Bedford. A VI-SPDAT is completed for all clients going onto a waiting list for permanent supportive housing. In this way, the New Bedford CoC has aligned with HUD’s goals in shifting from a system that is agency-centered to one that is client-centered, directly focusing on individual needs.

In FY15, the City’s DPHCD began the process of initiating a strategic planning effort to assess and improve housing and service delivery within the CoC, analyzing systemic and programmatic gaps that may exist and strategically articulating the actions steps needed to ensure that the city’s vision for ending homelessness comes to fruition. The city selected the Technical Assistance Center (TAC) out of Boston to provide assistance to the CoC in the development of a two year strategic plan that now informs and guides actions and outreach that allows the CoC to more effectively implement strategies and goals to end homelessness in the city. The resulting strategic plan was adopted and published in August 2017.

Addressing the emergency shelter and transitional housing needs of homeless persons.

The City of New Bedford CoC, dedicates both Emergency Solutions Grant resources and Continuum of Care programmatic funding to address the Emergency Shelter and Transitional Housing needs of homeless persons. In FY2017 the city funded two (2) primary Shelter Programs with ESG funds:

- 1) Southeast Regional Network – Harbour House Family Shelter. ESG funding - \$13,000
This program is an integral component in the New Bedford Continuum of Care strategy and played a significant role in meeting the needs of homeless families. The program provided transitional emergency shelter services to families experiencing homelessness, which includes case management, housing search and placement assistance to aid families through the crisis of homelessness. Maintaining basic needs such as shelter, food and utilities, ensures that other services can be provided to these families to enable them to transition into a more permanent, stable and secure living environment consistent with the priority needs identified. This project provided shelter to 196 unduplicated people during FY2017.

- 2) Catholic Social Services of Fall River, Inc. – Sr. Rose House Network. ESG funding - \$19,500.
The Sister Rose House Network provides the only shelters for individual men and individual women in New Bedford. Here, shelter, meals and social services that prepare guests for independent living are provided. The \$2 million dollar Sister Rose House opened at the former Saint Hedwigs Church located at 73 Division Street in the South End of the city. The 20,050 square foot campus is divided into two buildings: the main building provides housing for men and the Grace House, or former convent building, houses women. The main building is handicap accessible and has 25 beds for men on the main floor and a job training center and commercial grade kitchen on the lower level. During inclement weather, the lower level space also serves as an emergency cold weather overflow shelter for the city. The Grace House located next to the main building in the former convent functions as the women’s shelter and provides 11 available beds for single women experiencing homelessness.

This year’s ESG funds assisted the Sister Rose House with general operational costs. During fiscal year 2017, 296 unduplicated homeless individuals were assisted with ESG funds through the Sister Rose House Shelter Program.

In FY2017, the city, through the Continuum of Care Program, funded a total of seven (7) projects that provided Rapid Re-Housing (1), Permanent Supportive Housing (5) and Supportive Services Only (1) programming (coordinated entry system). In addition to these grants, the CoC also had a dedicated grant specifically for HMIS services.

Ultimately, the city finds that the main barrier to providing homeless services exists at the intersection of an increasing opioid epidemic, unmanaged mental health issues, diminishing resources and the system changes needed to accommodate shifting HUD priorities. The demand for programs and services continues to increase while resources have decreased or remained level. From 2016 to 2017, HUD’s annual CoC allocation amount was reduced from FY16 \$1,944,951 to FY17 \$1,684,939, a loss of \$260,012. In the City of New Bedford’s FY17 CoC allocation amount, the CoC was level-funded and its Annual Renewal Demand (ARD) amount remained at \$1,684,939. Additionally, HUD’s shift toward prioritizing Rapid Rehousing (RRH) and Permanent Supportive Housing (PSH) programs over transitional housing has resulted in the defunding of two transitional housing programs within the local CoC.

The New Bedford CoC coordinates the annual point-in-time count and the housing inventory count (shelter/housing inventory). In addition, the New Bedford CoC generates system performance measures

that, in FY17, demonstrated that although more people were returning to homelessness after exiting shelter and permanent supportive housing than had in the two years prior, people were experiencing homelessness for shorter periods of time in New Bedford.

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

The New Bedford CoC continued its discharge planning work throughout FY2017 coordinating numerous stakeholders dedicated to improving discharge outcomes and assisting low-income individuals and families rapidly return to housing. The New Bedford CoC has carefully worked to educate and improve outcomes specific to health care facilities, mental health facilities, foster care, other youth facility discharge policies. One particular example of the success of effective discharge policies is manifested through the local health care system: both the Greater New Bedford Community Health Center and the Southcoast Hospital Group coordinate discharge efforts with the New Bedford CoC. The hospital recently joined the effort by creating a new Health Promotion Advocate (HPA) position within the hospital. The purpose of this position is to work specifically with hard-to-serve patients, many of whom are homeless substance abusers. The HPA has been effectively connecting these individuals with services throughout the community in partnership with CoC.

The implementation of such programs as well as rapid rehousing and housing first initiatives increases the ability of the CoC to quickly and effectively serve the most vulnerable in the community. Similar coordinated efforts exist within the foster care system. Catholic Social Services operates an "aging out" home for youths between the ages of 17-24 years of age. The program offers an important transition from foster care to independent living in an apartment with supportive services.

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.

New Bedford is an Emergency Solutions Grant [ESG] entitlement community that received funds to support rapid re-housing and homelessness prevention/housing relocation efforts. In FY2017, ESG-funded programs also participated in the Coordinated Entry System and made relevant changes to their respective program policies and operations to help reduce the length of time someone experiences homelessness.

The New Bedford CoC continues to make progress in transitioning individuals and families who are experiencing homelessness into permanent affordable housing, especially those individuals and families considered to be “chronically homeless,” as well as those within particular cohorts including families with children, veterans (and their families) unaccompanied youth as well as survivors of domestic violence, sexual assault and trafficking. The New Bedford CoC continued to identify the needs of chronically homeless persons throughout FY2017, defined as unaccompanied homeless individuals with a disabling condition who are residing on the streets or in other locations not fit for human habitation or having multiple episodes of homelessness.

ESG funding was used for prevention to minimize and reduce the number of people who were at risk of homelessness in FY2017. Both Catholic Social Services and PACE received prevention dollars that were used to assist individual and family households stabilize and prevent homelessness and the CoC’s coordinated entry system strategically employed diversion techniques to reduce the incidence of homelessness.

Finally, as a result of proactive planning, the CoC additionally undertook two critical strategies to help those experiencing homelessness transition quickly into permanent housing in FY17. First, all PSH programs agreed to dedicate 100% of their beds to serve chronically homeless persons and/or families and each program identified as having DedicatedPLUS beds to this end. This represents a continuation of FY16’s efforts in substantially increasing the number of beds so dedicated (as compared with FY15 rates where only 50% of beds were dedicated to serve the chronically homeless). Secondly, the New Bedford CoC adopted a Two Year Strategic Plan in August of 2017 that set forth clear implementation strategies and action steps over a two year calendar period intended to help those experiencing homelessness rapidly rehouse in a way that ensures long term stability.

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

Actions taken to address the needs of public housing

1. **Handicapped Accessibility:** The New Bedford Housing Authority (NBHA) has successfully completed its goal of sixty-three (63) UFAS compliant handicapped units. The NBHA continues to convert smaller efficiency units (which are difficult to rent) into one bedroom units utilizing universal design principals. In 2019 the NBHA will complete the HCP conversion of its remaining property offices.
2. **Energy Efficiency:** The Housing Authority is refinancing its Energy Performance Contract (EPC) to include the developments that were added to the federal portfolio, and developments that had expired EPCs. The cost of purchasing and installing the energy conservation measures will be paid by the savings generated. Work will include new heating systems, new toilets, aerators, electrical fixtures and new appliances. The Department of Housing and Community Development has allowed us to use our Net Metering Credits to replace heating systems in two (2) buildings at Parkdale. The Authority also received Sustainability Funds from the Department of Housing and Community Development for new heating systems for two (2) additional buildings at Parkdale.
3. Through funding from its Capital Fund Program, the NBHA will continue to undertake major capital improvements such as new roofs at Ben Rose, Chaffee/Fairfield and DeMedeiros, site improvements, bathroom fans, and electrical upgrades at Hillside Court I and DeMedeiros.

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

1. **Employment & Training:** The New Bedford Housing Authority through its Resident Services Program and Section 3 Program work with the local workforce investment board, career center and community employers to provide access to employment and training opportunities for all eligible residents. The New Bedford Housing Authority through its Resident Services Programs is actively working with residents to provide access to Financial Coaching and Money Management Programs. We are also engaged with the Office of Housing and Community Development as a part of the First Time Home Ownership program.
2. The New Bedford Housing Authority continues to have a resident as a part of the Grievance Hearings Panel. This will ensure that this process has a voice from the resident perspective.
3. The New Bedford Housing Authority continues to actively participate with the New Bedford School Department to provide after school learning programs within the family developments. Our Resident Service Coordinators work directly with the schools and families to facilitate positive home/school engagement opportunities.

4. The New Bedford Housing Authority has partnered with the New Bedford Public Library to distribute new books to all of the birth to 3rd grade children throughout our family developments. These books distribution events are supported by our community partners who offer families activities and supportive services.

Actions taken to provide assistance to troubled PHAs

The New Bedford Housing Authority is not a troubled housing authority. The NBHA is identified by the U.S.Department of Housing and Urban Development as a “High Performer” under its Public Housing Program and Section 8 Program.

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

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

The city does not have policy barriers to affordable housing, and in fact has affordable housing units in every neighborhood of the city. The city, during the program year, promoted affordable housing through the utilization of tax taking and receivership properties for affordable housing development sites, through the provision of funding to address environmental hazards (lead paint), and the structuring of HOME funds to maximize affordable housing development. Also, funds were used to provide down payment and closing cost assistance to enable low and moderate income buyers to achieve homeownership. The city also utilized the Attorney Generals Receivership Program to address blighted properties and create homeownership opportunities. Ultimately, all programs and activities proposed in the city's FY2017 Action Plan to address barriers to affordable housing were undertaken.

The Department of Planning, Housing and Community Development continued to work with private developers, non-profit developers and community groups in developing initiatives for new affordable housing including utilizing the Low Income Housing Tax Credit (LIHTC) program and other available programs whenever possible, throughout the city.

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

The primary obstacle to meeting underserved needs in New Bedford is limited availability of local, state, and federal funding. In fact, the annual allocation amounts for all three (3) HUD Programs (CDBG, ESG and HOME) have been slowly reduced for the past decade and as a result, impacted the city's ability to adequately plan and address growing obstacles.

The objectives in the Consolidated Plan and Action Plan identified several other obstacles to meeting under-served needs in the community. The objectives in the Consolidated Plan 2015-2019 and the activities in the FY17 Action Plan are intended to help overcome these obstacles.

In FY2017, the city continued the following objectives:

- Expanded the availability of decent, affordable rental housing units on the market;
- Encouraged new homeownership and housing rehabilitation initiatives;
- Supported improvements and investments to public infrastructure, facilities and parks project in low and moderate income neighborhoods;
- Provided assistance to nonprofit agencies and private partners to enable them to compete for government and private funds;
- Provided advocacy to state administration and local legislative delegation members to increase state support for priority city projects and initiatives; and

- Continued funding for economic development initiatives that created or retained low and moderate income jobs.

All programs and activities proposed in the city's FY2017 Action Plan to address obstacles to underserved needs were undertaken.

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

The city continues to be aggressive in addressing the hazards of lead based paint for residents of housing units that contain lead based paint and for buyers of housing units that may contain lead based paint.

Through DPHCD, the city has been proactive in assessing the potential hazards of lead based paint. The mandatory inspection of properties, especially multi-family structures, has identified potential hazards prior to posing a health and safety risk. Through the utilization of CDBG, HOME, and the MassHousing "Get The Lead Out Program," the city provided numerous grant and loan programs to effectively address the hazards of lead based paint. The city requires that all homes with children under the age of six (6) years receiving assistance through our programs be delead. The city conducts mandatory pre-rehabilitation lead testing including soil samples for all HOME-funded homeownership and multi-family rehabilitation programs.

In FY17, the city assisted in the deleading of eight (8) units of housing utilizing \$78,495 of Federal and State funding through programs administered by the DPHCD as follows:

- Provided two (2) grants totaling \$10,000 for lead paint abatement of four (4) housing units;
- The Massachusetts Housing Finance Agency "Get the Lead Out" Program provided another funding option to those wishing to delead their properties. The DPHCD is an approved Local Rehabilitation Agency (LRA) and processes applications on behalf of MassHousing that meets their criteria. In FY17, four (4) units were provided a "Get the Lead Out" loan through MassHousing totaling \$68,495.

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

The City of New Bedford's period of economic expansion over much of the decade has had a positive effect on creating employment opportunities and increasing wage levels throughout the work force. However, despite these efforts, New Bedford maintained a very high poverty rate at twenty-three (23)% in 2017, with a per capita income level of \$21,056 ranking with one of the highest poverty rates in the state.

In FY17, the city continued to focus efforts to help reduce the number of poverty level families in several key categories including: increasing job training and employment opportunities, developing educational programs and literacy initiatives focused on the limited english speaking populations, and increasing economic opportunities, specifically for very low income families.

New Directions, the job training provider for the city, continued to provide extensive job training programs which offered employment counseling, job referral services, special assistance to veterans, youth, and persons with disabilities. Special emphasis included a manufacturing job-training center. In addition, New Directions provided Welfare-to-Work and School-to-Work Programs.

The New Bedford Economic Development Council (NBEDC) administered the city's economic development activities for the DPHCD. The city's economic development strategy includes the retention of existing jobs, through loan programs, direct technical assistance, and to increase employment opportunities for low and moderate individuals. In addition, the NBEDC promoted job creation activities by aggressively marketing the city as an important economic opportunity area. In FY17, NBEDC issued three (3) loans to new and existing businesses resulting in a total of seventeen (17) low-to-moderate income jobs to be created within a two year period. Further a total of fifteen (15) jobs were created or retained in FY17. In terms of Section 3, a total of twenty-one (21) workers were classified according to HUD's Section 3 category through the HOME Program. However, in FY17 no businesses were specifically identified as being Section 3.

In FY17, the city continued to utilize CDBG and HOME funds for the following programs and initiatives to reduce poverty among families:

- HOME funds supported education, employment and job training opportunities for at-risk persons in the PACE New Bedford Youthbuild Program.
- CDBG funds for several programs that promoted literacy for non-english residents including, Immigrants Assistance, a non-profit that provided educational assistance that served over 1,633 residents in 2017.
- HOME funds created homeownership opportunities through, down-payment assistance program to build economic opportunities for families through equity building.

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

The City of New Bedford's DPHCD is responsible for the overall administration of three entitlement grants: CDBG, HOME, and ESG Programs.

Through a competitive public process; public agencies, and not for profits, contracted with the DPHCD, through sub-recipient agreements and third party contracts, for the operation of eligible, economic development, housing, homeless, and public service activities which principally benefited low and moderate income individuals. An assessment of the system revealed a strong coordinated effort and partnership between public/private groups. The current delivery system that is in operation functioned well, and there are no identifiable gaps.

In addition to the overall administration of these entitlement programs, during FY2017, New Bedford also continued/initiated a number of strategic planning efforts throughout the city geared toward developing the municipality's institutional structure, eliminate barriers to growth and incentivize innovative development. These measures included, in FY17:

- **Continued work on developing a hybrid form-based zoning code** in three specific city areas: its downtown, the Acushnet Avenue Area in the city's north end and the Goulart Square area in the city's south end. The information gathered over the course of months has gone into the development of a draft hybrid form-based zoning code amendment currently under internal review.
- **The adoption of a Waterfront Master Plan** which includes recommendations for two areas of urban renewal designed to strategically enhance utilization of the waterfront as an economic and tourist destination.
- **The initiation of Transit Oriented Development zoning overlay district (TOD) language** designed to accommodate new residential/mixed use activities in anticipation of the forthcoming SouthCoast Rail to New Bedford.
- **The Commonwealth of Massachusetts' designation of multiple New Bedford census tracts as "Opportunity Zones"** during FY17 created a new incentive for investing in low income communities in New Bedford through a qualified "opportunity fund."
- **Exploration of an "Innovation District"** to stimulate entrepreneurial investment within the city.

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

During the program year, the city continued to strengthen and expand its network of New Bedford-based providers as well as a network of regional housing and human services providers. The city has always been and continues to be an active member of the Regional Workforce initiatives and the Fall River/ New Bedford Housing Partnership. Also, the city administratively supports the Homeless Service Provide Network (HSPN) that constitutes the Continuum of Care (CoC) and is represented by a number of key agencies and organizations that provided housing and homeless / prevention services in New Bedford. The HSPN is comprised of more than seventy (70) participants including, private agencies, relevant city departments, the New Bedford Housing Authority, and state agencies with the responsibility for the creation or production of affordable housing and a variety of homeless services. HSPN members continued to meet on a monthly basis to discuss relevant homeless and housing related issues.

In FY17, New Bedford continued to actively pursue economic development opportunities that capitalize on its strategic location and reflect market opportunities in the current economy. Further, the city continued to support housing programs, capital investments, and human services programs that improve the quality of life for all New Bedford residents.

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

In FY17, DPHCD continued to provide fair housing materials to the public, in English and Spanish, and displayed fair housing posters to inform residents of their fair housing rights. Further, the city undertook a number of educational opportunities that promoted access to housing and fair housing choice including first time home buyer classes, home buyer fairs, and credit workshops.

The city also funded the SouthCoast Fair Housing Center, a non-profit that promotes fair housing, eliminate prejudice and discrimination, and ensure fair and affordable housing opportunities for all and accepts housing complaints and provides legal services surrounding fair housing issues.

The city articulates specific actions that could be taken to further fair housing and alleviate identified impediments. The following are identified impediments and actions steps / accomplishments made by the city during FY17:

<i>Impediment</i>	<i>Action Steps</i>
<p>Poverty The prevalence of poverty in the City of New Bedford affects the entire community and disproportionately affects minority populations.</p>	<ul style="list-style-type: none"> ▪ The DPHCD promoted economic development opportunities and employment strategies that help people in poverty to attain self-sufficiency. This was accomplished through direct assistance to businesses to provide incentives to employ New Bedford workers who are low and moderate income. In addition, CDBG funds assisted with community based construction projects that employed dozens of New Bedford residents who were low and moderate income. This was accomplished through the enforcement of the Section 3 requirements. Direct assistance to micro-enterprises ensured that low and moderate income entrepreneurship opportunities were created for qualified micro-enterprises. ▪ The DPHCD coordinated new initiatives, including a regional approach to address homelessness, through its Continuum of Care process. The Homeless Service Provider’s Network helped develop housing strategies and resources that helped those in poverty move into self-sufficiency, accomplished through new Supportive Housing Programs. DPHCD continued the development of safe, decent and affordable housing for low and very low income residents.
<p>Qualifying for Financing There is an inability of families and individuals to qualify for mortgages.</p>	<ul style="list-style-type: none"> ▪ The DPHCD continued its very successful First Time Homebuyer Education Seminars to educate potential homebuyers with the resources necessary to achieve homeownership – Five seminars were conducted this past year, with approximately 175 individuals participating in the classes. ▪ The DPHCD added Online Education, as part of the First Time Home Buyer Education offered in the city in which approximately 24 individuals participated in. ▪ The DPHCD collaborated with an agency to provide “Post Purchase” Education Seminars to help homeowners remain successful homeowners after their home purchase. ▪ The DPHCD participated in local Home Buyer fairs and Credit Workshops in conjunction with MassHousing and the Fall River/ New Bedford Housing Partnership, aimed at helping to educate buyers about the importance of credit and how to improve your credit scores. ▪ The DPHCD also assisted individuals and families faced with foreclosure with referrals for foreclosure prevention counseling, including workshops held by Fannie Mae and NeighborWorks in the City.

<i>Impediment</i>	<i>Action Steps</i>
<p>Locational Discrimination Although minorities live throughout the City of New Bedford, Census data indicates that these populations tend to be concentrated within census tracts that are characterized by lower incomes and higher crime rates.</p>	<ul style="list-style-type: none"> ▪ Required and promoted Fair Housing choices in all federally funded housing initiatives. ▪ Conducted direct outreach to minority households and census tracts to promote housing programs to increase affordability and access to affordable rental units and homeownership opportunities. The DPHCD promoted homeownership opportunities to minority households and those least likely to apply, throughout the city. ▪ Continued targeting of the South Central, Cove Street, Acushnet Heights, North End and other distressed, blighted, highly concentrated minority neighborhoods in an effort to build awareness and develop substantive policy that would revitalize and stabilize these neighborhoods. ▪ Continued participating in the New Bedford Housing Authority's Resident Opportunity and Self Sufficiency (ROSS) Partner's meetings and the United Way's Working Cities Challenge to identify areas of Collaboration.
<p>Discrimination and Private Sector Actions Loan origination rates for minority applicants are far below community averages.</p>	<ul style="list-style-type: none"> ▪ The DPHCD continued to provide education about fair housing rights to potential applicants seeking home purchase loans, refinancing/ equity loans or second mortgage loans as well as potential tenants. The DPHCD, through participation with the Greater New Bedford Association of Realtors Programs Committee and the Fall River/ New Bedford Housing Partnership provided education to private sector mortgage lenders, realtors, etc. by reinforcing professional standards and fair housing education through new and existing programs.
<p>Public Sector Actions and Inactions Public policy and regulatory actions—or the lack thereof—can often impede access to fair housing by diminishing opportunities for affordable housing/rental development and retention.</p>	<ul style="list-style-type: none"> ▪ The DPHCD reviewed City policies to promote housing affordability. ▪ Educated the community, stakeholders and policy makers through seminars and public meetings as to the value of encouraging and retaining affordable housing in New Bedford. ▪ The DPHCD actively promotes potential housing development opportunities to developers to encourage mixed-use development within the downtown business district, adaptation of mills into affordable housing, and creative homeownership opportunities through tax title disposition and the Attorney General's "Receivership Program."

<i>Impediment</i>	<i>Action Steps</i>
<p>Minority Representation on City boards There is a lack of minority representation on the City of New Bedford's boards, particularly its Planning and Zoning Boards.</p>	<ul style="list-style-type: none"> ▪ The city has retained minority participation on City boards, such as the Human Rights Commission, and New Bedford Housing Authority.
<p>Lead Paint Because such a large percentage of the City of New Bedford's housing stock was built prior to 1950 the incidence of lead-based paint is very high.</p>	<ul style="list-style-type: none"> ▪ Increase public awareness of the DPHCD's Lead Paint Reimbursement Program and the MHFA's "Get the Lead Out Program" for lead paint abatement through brochures, cable notices and advertisements. ▪ Continue to collaborate with South Coast Counties Legal Services and the New Bedford Health Department to increase availability of these programs and help educate people about lead paint hazards and leverage additional funding whenever possible.
<p>Blighted, Abandoned or Vacant Properties There are abandoned buildings and vacant lots in blighted City neighborhoods disproportionately affecting areas with higher concentrations of minority residents.</p>	<ul style="list-style-type: none"> ▪ The DPHCD continues efforts with the Vacant Lots and Abandoned Buildings Strategy for the City of New Bedford. ▪ The DPHCD continues to target vacant lots in low income neighborhoods with the goal of creating pocket parks, passive recreation areas, and place making spaces. ▪ DPHCD maintains an inventory and monitors properties Citywide that could fall either within the abandoned buildings category or that has ongoing, unaddressed building code violations. ▪ The DPHCD collaborates with the Attorney General's Office in the combined effort to engage in the Receivership Program, thereby creating the means for the provision of an appointment of receivers by the courts of the state to undertake and oversee the rehabilitation of residential properties with persistent, unremedied code violations. ▪ The DPHCD maintains a database of tax title and foreclosed properties. ▪ The DPHCD works with non-profit organizations to identify properties to purchase and rehabilitate utilizing federal, State or other available funding in identified target areas.

<i>Impediment</i>	<i>Action Steps</i>
<p>Limited Public Awareness and Education Based on survey results tabulated as part of the Analysis of Impediments to Fair Housing, there exists a significant gap in the general public's understanding of Fair Housing regulations and of the financing options and assistance available.</p>	<ul style="list-style-type: none"> ▪ The DPHCD participates on the Greater New Bedford Association of Realtors Programs Committee as a resource person/technical assistance liaison for the real estate community to provide ongoing literature and information about housing programs available to the community. ▪ The DPHCD provides Fair Housing and financial housing program assistance materials to individuals and families moving through the Continuum of Care through Homeless Service Providers Network meetings and resource materials maintained by the DPHCD.
<p>Banking Outreach to Minorities There has been a failure of some banks to market their lending services to minorities, thus compromising the banking industry's ability to adequately reach these groups.</p>	<ul style="list-style-type: none"> ▪ The DPHCD, through Lender trainings regarding City programs encourages local banks to undertake strategies for reaching minority applicants. In addition, working with lender co-sponsors for the first time home buyer seminars and credit workshops helps build partnerships with local lenders. ▪ Consider meetings with those banks that are not investing in certain New Bedford census tracts (that correlate with high minority and low income populations) to solicit a commitment from them to reinvest in these targeted neighborhoods. ▪ The DPHCD has formed partnerships with several local banks to reinvest in underserved neighborhoods and areas of high minority concentration.
<p>Landlord Issues At times, potential tenants, as well as service providers placing individuals and families who are moving through the City's Continuum of Care, have experienced difficulty obtaining permanent rental housing because of landlord resistance to accept the tenancy.</p>	<ul style="list-style-type: none"> ▪ The DPHCD continues to work with service providers in the Homeless Service Providers Network and landlords of federally funded units in addressing how clients with poor CORI checks can secure safe, affordable housing. ▪ The DPHCD collaborates with a non-profit agency to provide rental housing workshops in New Bedford.

CR-40 - Monitoring 91.220 and 91.230

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

The City of New Bedford's Department of Planning, Housing and Community Development (DPHCD) closely monitored all activities funded under the Community Development Block Grant (CDBG) Program, the HOME Investment Partnership Program (HOME), the Emergency Solutions Grant (ESG) Program, and the homeless Continuum of Care. During the course of the year, programs were monitored on an ongoing basis to assess their performance. Our goal in monitoring is to determine compliance, prevent/identify deficiencies, and design corrective actions to improve or reinforce program performance.

Each CDBG and ESG funded public service program was required to enter into a Subrecipient Agreement that establishes their annual goals, performance measurements and budget for the program year. In order to determine if they are in compliance with the terms and conditions of their Subrecipient Agreement, each program was required to submit a DPHCD approved quarterly report that contained both a narrative component and statistical data on their actual accomplishments for the quarter and year-to-date. DPHCD staff then review the quarterly reports and compare their stated accomplishments against their goals and objectives in the Agreement. If necessary, subrecipients were notified if their performance was below recommended levels and further evaluated during the course of the program year. In terms of expenditures, subrecipients were required to submit a Request for Reimbursement either monthly or quarterly. Subrecipients who failed to submit at least quarterly were notified immediately that funds were not being drawn down in a timely manner. Each reimbursement was evaluated by both the Grants Compliance Coordinator and Financial Manager to determine eligibility and against the approved budget. Ultimately, the Quarterly Report and Reimbursement Request forms are basis for compliance with programmatic and financial requirements.

In FY17, DPHCD conducted its annual Risk Analysis to determine which CDBG, ESG or CoC programs will be selected for formal monitoring, and an on-site visit to ensure performance and that all records are maintained in accordance with HUD guidelines. Programs selected for monitoring were issued a formal letter describing the reason for the monitoring visit, date of the visit and a copy of the monitoring tool. Upon completion, a formal monitoring report is issued by DPHCD that describes any monitoring concerns or findings that must be addressed by the subrecipient.

In terms of construction, all construction contracts were monitored for Section 3 compliance, MBE and WBE goals and compliance with the Davis-Bacon Act and the Massachusetts and Federal Prevailing Wage Laws. All contractors participating in CDBG funded projects continued to be required to fulfill all required Contracting and Procurement regulations.

In compliance with HOME regulations, DPHCD performed inspections of rental housing projects as required to ensure compliance with housing quality standards. To ensure compliance with rent and income restriction requirements of the HOME program, the DPHCD, on the anniversary date of each HOME-assisted rental housing project, required the property owner to submit a HOME Rent and Income

Occupancy Survey. In addition, the city reviewed and approved rents for HOME-assisted rental projects. For HOME rental projects with ten (10) or more HOME units, the city reviewed the financial condition of projects and took appropriate action if a problem was identified. The annual review of housing condition, income of occupants, and rents was completed during the contracted Period of Affordability.

For HOME-funded Homeownership units, DPHCD monitored to ensure that the Assisted Household is occupying the property as its principal place of residence.

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

In accordance with HUD regulations, a draft of the CAPER was made available to the public for a fifteen (15) day review and comment period prior to its submission to HUD. A notice for the draft CAPER was printed in the Standard-Times on September 10, 2018 and draft copies of the CAPER document were placed in five (5) public locations within the City of New Bedford.

Those locations were: the Department of Planning, Housing & Community Development, 608 Pleasant Street; the City Clerk's Office (City Hall), 133 William Street; the Main Branch of the New Bedford Free Public Library, 613 Pleasant Street; the Wilks Library (North End), 1911 Acushnet Avenue; and the Howland Green Library (South End), 3 Rodney French Boulevard.

Also, the Draft CAPER was made available for review on the City of New Bedford's website at: <http://www.newbedford-ma.gov/>

The draft version of this FY17 CAPER was placed for review (at the same designated locations) during the fifteen (15) day public comment/review period beginning September 10, 2018 and ending on September 25, 2018.

CR-45 - CDBG 91.520(c)

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

In 2017, there were no significant changes to the City's CDBG program objectives.

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

None Applicable – The City has not received a BEDI grant.

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CR-50 - HOME 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

The City of New Bedford conducted on-site monitoring of HOME projects in accordance with the schedule in 92.504(d). Property owners and managers were notified in writing in advance that their property is due for inspection. On site inspections were made of each unit to verify compliance with Minimum Housing Quality Standards. All non-compliant units were notified in writing and repaired by the owner and follow up inspections were made as repairs are completed. Below is a listing of all housing developments inspected during FY17.

Agencies Inspected 2017

Acushnet Commons

59 Linden St.

Better Community Living

23 Shirley St.

Bisca Club

159 Acushnet Ave.

CABH

18 Allen St.

1162-1168 Acushnet Ave.

59 Rockland St.

63 Ruth St.

67 Ruth St.

116 Ruth St.

1465 Pleasant St.

617 Summer St

Cliftus Lofts

194 Riverside Ave.

Grinnell Mansion

379 County St.

Halkeen Mgt.

Austin St. & Hazard Ct.

198-202 State St.

496-514 Pleasant St.

194-202 Union St.

185-187 Union St.

741-769 Purchase St.

Melville Towers

850 Pleasant St.

Regency Towers

800 Pleaasant St.

SEMCOA

81 Austin St.

74 Penniman St.

Steppingstone

977-979 Pleasant St.

Temple Landing

285 Ash St.

Whaler's Place

90 Riverside Ave.

114 Riverside Ave.

Women's Institute

80 Rivet St.

S.E.M.A. Veterans Housing Program

717 County St.

No violations or concerns were identified at any of the projects.

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units.

92.351(b)

The city has adopted and enforces affirmative marketing procedures and requirements according to 24 CFR Part §92.351 to provide information and to attract persons from all racial, ethnic, and gender groups in the housing market which is assisted with HOME Program funding.

The city placed public notices in the local newspaper, advising the availability of the various programs to be undertaken. All correspondence, notices, advertisements, press releases, and solicitations for owners and tenants contained either the Equal Housing Opportunity logo type or slogan.

Recipients of HOME Program dollars were required to use affirmative fair marketing practices to inform the public, owners and potential tenants about the federal fair housing laws. All HOME-assisted housing must comply with HUD procedures for the applicable period of affordability.

The DPHCD advertised the HOME Program and its objectives in the local news media, including all ethnic local publications and organizations and social media.

Information on affirmative marketing and its requirements are stated on each program application for assistance. All property owners participating in the HOME Program agreed to affirmatively market all assisted units. The City of New Bedford fulfilled this procedure by having an affirmative marketing clause within the Mortgage Agreement that is signed by all participating property owners. The DPHCD annually issues Tenant Information Surveys to monitor program projects with HOME Program funds.

The city assessed the affirmative marketing efforts of the owners receiving HOME funds during rent-up and marketing of the units by the use of a compliance certification and/or personal monitoring visit to the project as required by regulations. If the owner fails to follow the affirmative marketing requirements as required by the provisions of the HOME loan agreement with the city, they were notified in writing to take immediate corrective measures to maintain compliance.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics.

The City of New Bedford earned \$614,563.72 in program income for FY17 and expended \$103,858.70 for the following HOME projects. Below is a table of the FY17 HOME projects, owners and tenant

characteristics.

OWNER	ADDRESS	TOTAL UNITS	HOME UNITS	INCOME	ETHNICITY	RACE	FHH
ADMIN	N/A						
NM							
LA-SD	78 Willis St	1	1	50-80%	H	W	N
WR	226 Mill St.	1	1	50-80%	H	W	N
MM	368-370 Mill St.	2	1	50-80%	H	W	Y
JG	284 Cottage St	1	1	50-80%	H	W	Y
BG-HG	118 Parker St	1	1	50-80%	NH	W	N
DR	154 Ash St	1	1	50-80%	H	B	Y
Howland House	38 S 6 th St	7	5	< 50%	NH	W	Y
				<50%	H	W	Y

Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)

N/A

CR-55 – HOPWA

Not Applicable

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CR-60 - ESG 91.520(g) (ESG Recipients only)

ESG Supplement to the CAPER in *e-snaps*

For Paperwork Reduction Act

1. Recipient Information—All Recipients Complete

Basic Grant Information

Recipient Name	NEW BEDFORD
Organizational DUNS Number	075719187
EIN/TIN Number	046001402
Identify the Field Office	BOSTON
Identify CoC(s) in which the recipient or subrecipient(s) will provide ESG assistance	

ESG Contact Name

Prefix
First Name
Middle Name
Last Name
Suffix
Title

ESG Contact Address

Street Address 1
Street Address 2
City
State
ZIP Code
Phone Number
Extension
Fax Number
Email Address

ESG Secondary Contact

Prefix
First Name
Last Name
Suffix
Title
Phone Number
Extension
Email Address

2. Reporting Period—All Recipients Complete

Program Year Start Date 07/01/2017
Program Year End Date 06/30/2018

Subrecipient or Contractor Name: PACE

City: New Bedford

State: MA

Zip Code: 02740, 6022

DUNS Number: 130836356

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 32000

Subrecipient or Contractor Name: CATHOLIC SOCIAL SERVICES

City: New Bedford

State: MA

Zip Code: 02744, 1002

DUNS Number: 144117389

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 140500

Subrecipient or Contractor Name: SE MASS VETERANS HOUSING PROGRAM

City: New Bedford

State: MA

Zip Code: 02740, 6745

DUNS Number: 783956154

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 30000

Subrecipient or Contractor Name: NEW BEDFORD WOMEN'S CENTER

City: New Bedford

State: MA

Zip Code: 02740, 4935

DUNS Number: 080818040

Is subrecipient a victim services provider: Y

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 36500

Subrecipient or Contractor Name: STEPPINGSTONE

City: New Bedford

State: MA

Zip Code: 02740, 6625

DUNS Number: 147819460

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 30000

Subrecipient or Contractor Name: SEMCOA

City: New Bedford

State: MA

Zip Code: 02740, 4757

DUNS Number: 089346613

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 56767

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CR-65 - Persons Assisted

4. Persons Served

4a. Complete for Homelessness Prevention Activities

Number of Persons in Households	Total
Adults	72
Children	52
Don't Know/Refused/Other	0
Missing Information	0
Total	124

Table 1 – Household Information for Homeless Prevention Activities

4b. Complete for Rapid Re-Housing Activities

Number of Persons in Households	Total
Adults	153
Children	11
Don't Know/Refused/Other	0
Missing Information	0
Total	164

Table 2 – Household Information for Rapid Re-Housing Activities

4c. Complete for Shelter

Number of Persons in Households	Total
Adults	444
Children	111
Don't Know/Refused/Other	0
Missing Information	0
Total	555

Table 3 – Shelter Information

4d. Street Outreach

Number of Persons in Households	Total
Adults	0
Children	0
Don't Know/Refused/Other	0
Missing Information	0
Total	0

Table 4 – Household Information for Street Outreach

4e. Totals for all Persons Served with ESG

Number of Persons in Households	Total
Adults	669
Children	174
Don't Know/Refused/Other	0
Missing Information	0
Total	843

Table 5 – Household Information for Persons Served with ESG

5. Gender—Complete for All Activities

	Total
Male	418
Female	425
Transgender	0
Don't Know/Refused/Other	0
Missing Information	0
Total	843

Table 6 – Gender Information

6. Age—Complete for All Activities

	Total
Under 18	174
18-24	76
25 and over	593
Don't Know/Refused/Other	0
Missing Information	0
Total	843

Table 7 – Age Information

7. Special Populations Served—Complete for All Activities

Number of Persons in Households

Subpopulation	Total	Total Persons Served – Prevention	Total Persons Served – RRH	Total Persons Served in Emergency Shelters
Veterans	73	2	1	70
Victims of Domestic Violence	168	5	8	155
Elderly	37	5	4	28
HIV/AIDS	4	0	0	4
Chronically Homeless	125	2	4	119
Persons with Disabilities:				
Severely Mentally Ill	433	36	17	380
Chronic Substance Abuse	373	5	7	361
Other Disability	218	24	16	178
Total (Unduplicated if possible)	1431	79	57	1295

Table 8 – Special Population Served

CR-70 – ESG 91.520(g) - Assistance Provided and Outcomes

10. Shelter Utilization

Number of New Units - Rehabbed	0
Number of New Units - Conversion	0
Total Number of bed-nights available	120,815
Total Number of bed-nights provided	99,280
Capacity Utilization	82%

Table 1 – Shelter Capacity

11. Project Outcomes Data measured under the performance standards developed in consultation with the CoC(s).

In FY16, the city formally adopted CoC & ESG Grant Performance Standards that subrecipients were required to comply. In terms of ESG funded agencies, they were required to provide qualitative and quantitative measures to DPHCD to aid in the evaluation and to monitor their progress during the program year. Agencies were required to provide four (4) quarterly HMIS Reports and an approved DPHCD narrative report during the course of the program year. In order to access their performance; DPHCD used four (4) main categories and goals / Performance Standards: 1. Housing Stability (Goal 85%), 2. Increase Total Income (Goal 54%), 3. Exit to Permanent Housing (Goal 20%) and 4. Utilization Rate (Goal 90%). Below is the ESG Goals and Performance Standards table.

New Bedford has also established a Performance Review Committee that monitored CoC and ESG programs. The Performance Review Committee (PRC) is comprised of Homeless Service Provider Network (HSPN) members who are knowledgeable about homelessness and housing in the New Bedford CoC and who are broadly representative of the relevant sectors, subpopulations, and geographic areas. The PRC is also comprised of members that have no financial or interest in a CoC or ESG funded programs. This PRC and DPHCD will continue to monitor and evaluate CoC and ESG program performance according to the Performance Standards guidelines and Quarterly / Annual Performance Reports submitted by subrecipients. Ultimately, outcome performance will be considered in all future funding rounds for CoC and ESG programs.

All performance related to ESG activities will be reported in the ESG ecart in section CR-00.

GOALS	PERFORMANCE STANDARD	%	POINTS	SCORE
1. Housing Stability - Households exit shelter timely. Goal 85%	% of persons who's length of stay is no longer than 40 days.		≥85%= 10 60%-84% = 7 40%- 59%= 5 25%-39%= 3 ≤24%= 0	
2. Increase Total Income - Persons will maintain or increase earned and unearned income. Goal 54% <i>(Includes wages and mainstream resources)</i>	The % of persons age 18 and older who increased their total Income (from all sources) as of the end of the operating year or program exit.		≥30%= 10 21%-29%= 7 11%-20%= 3 ≤10%= 0	
3. Exit to Permanent Housing Goal 20%	The % of persons age 18-61 who exit to permanent housing as of the end of the operating year or program exit.		≥20%= 10 10%-19%= 6 5%-9%= 3 ≤5%= 0	
4. Utilization Rate - Program operates at full capacity, with low vacancy rate, and quickly fills vacancies. Goal 90%	Average daily utilization rate during the operating year.		≥90%= 10 70%-89%= 8 51%-69%= 5 ≤50%= 0	
5. HMIS - Program maintains adequate data quality in HMIS.	See Data Quality Report	N/A	A - to A =10 B to B+ = 5 < B- = 0	

CR-75 – Expenditures

11. Expenditures

11a. ESG Expenditures for Homelessness Prevention

	Dollar Amount of Expenditures in Program Year		
	2015	2016	2017
Expenditures for Rental Assistance	48,727	63,547	49,641
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	0	0	0
Expenditures for Housing Relocation & Stabilization Services - Services	0		
Expenditures for Homeless Prevention under Emergency Shelter Grants Program	0	0	0
Subtotal Homelessness Prevention	48,727	63,547	49,641

Table 1 – ESG Expenditures for Homelessness Prevention

11b. ESG Expenditures for Rapid Re-Housing

	Dollar Amount of Expenditures in Program Year		
	2015	2016	2017
Expenditures for Rental Assistance	45,498	29,242	57,050
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	0	0	
Expenditures for Housing Relocation & Stabilization Services - Services	5,172	4,000	1,415
Expenditures for Homeless Assistance under Emergency Shelter Grants Program	0	0	
Subtotal Rapid Re-Housing	50,670	33,242	58,465

Table 2 – ESG Expenditures for Rapid Re-Housing

11c. ESG Expenditures for Emergency Shelter

	Dollar Amount of Expenditures in Program Year		
	2015	2016	2017
Essential Services	0	0	0
Operations	114,639	112,000	172,267
Renovation	0	0	0
Major Rehab	0	0	0
Conversion	0	0	0
Subtotal Emergency Shelter	114,639	112,000	172,267

Table 3 – ESG Expenditures for Emergency Shelter

11d. Other Grant Expenditures

	Dollar Amount of Expenditures in Program Year		
	2015	2016	2017
HMIS	0	0	12,661
Administration	17,046	16,807	29,630
Street Outreach	0	0	16,621

Table 4 - Other Grant Expenditures

11e. Total ESG Grant Funds

Total ESG Funds Expended	2015	2016	2017
	231,082	225,596	339,285

Table 5 - Total ESG Funds Expended

11f. Match Source

	2015	2016	2017
Other Non-ESG HUD Funds	0	0	0
Other Federal Funds	717,075	22,500	0
State Government	1,026,280	1,692,597	949,033
Local Government	0	0	0
Private Funds	243,864	216,765	89,250
Other	1,595	109,095	25,150
Fees	16,577	35,895	
Program Income	0	0	0
Total Match Amount	2,005,391	2,076,852	1,063,433

Table 6 - Other Funds Expended on Eligible ESG Activities

11g. Total

Total Amount of Funds Expended on ESG Activities	2015	2016	2017
	2,236,473	2,302,448	1,402,718

Table 7 - Total Amount of Funds Expended on ESG Activities