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

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

This Action Plan (HUD Program Year 2021/Local FY 2022) represents the second year of the City of Nashua's 2020-2025 Consolidated Plan. There were many achievements and challenges during this second year of the Consolidated Plan. As the COVID-19 pandemic continued, the City's Urban Programs staff worked both remotely and from the office. The Urban Programs Manager position became vacant early in the program year and was not filled until late in the program year, June 2022. The remaining Urban Programs staff members did an admirable job in continuing the vital work under the Community Development Block Grant (CDBG) and Home Investment Partnerships (HOME) programs during this period.

The City of Nashua allocated its third round of CDBG CARES Act funds and supported two local businesses negatively impacted by the pandemic in PY 2021. The City also carried out the majority of its planned regular CDBG and HOME activities. A total of 305 low to moderate income families were served through CDBG public service agencies funding. More homeless families were served (a total of 29 actual families vs. 27 anticipated families) through public facility activities involving homeless shelters. Under the HOME program, work was completed for the Greater Nashua Habitat for Humanity's project at 10 Paxton Terrace. This project involved new construction of a two-family building that was purchased by two separate veteran families. Under the City's lead hazard remediation program, 28 housing units occupied by low to moderate income families were remediated for lead-based paint hazards.

Under Improvements to Youth Facilities, the underperformance is the result of the cancellation of the planned fire safety improvements project for the Nashua Police Athletic League building. The project was put out to bid multiple times, but no contractors bid on the project. The Urban Programs staff is discussing why the project was not attractive to contractors and will evaluate future projects to determine if they are likely to receive contractor interest. Other challenges include a request from the City of Nashua's Department of Public Works to transfer its CDBG allocation from the Labine Park project to the Sandy Pond Park and delays in the Girls Inc. roof rehabilitation project. The Nashua Soup Kitchen & Shelter asbestos remediation project is anticipated to reach completion in early PY 22. Finally, the ongoing HOME-funded Bronstein redevelopment project, once completed, will result in the creation of 216 new rental units.

### **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
Business Assistance	Non-Housing Community Development	CDBG: \$48,555.69	Businesses assisted	Businesses Assisted	25	17	68.00%	10	2	20.00%
Homeowner Rehab	Affordable Housing	CDBG: \$83,557.75	Homeowner Housing Rehabilitated	Household Housing Unit	50	20	40.00%	4	4	100.00%
Homeownership	Affordable Housing	HOME: \$377,360.09	Homeowner Housing Added	Household Housing Unit	5	2	40.00%	5	2	40.00%
Improvements to Youth Facilities	Non-Housing Community Development	CDBG: \$20,000.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1250	541	43.28%	452	12	2.65%

Lead Paint Remediation	Affordable Housing	HUD-OHHLHC: \$61,963.00 / Property Owners: \$96,540.00	Rental units rehabilitated	Household Housing Unit	350	58	16.57%	28	28	100.00 %
Parks/Trails/GreenSpace	Non-Housing Community Development	CDBG: \$0.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	7500	0	0.00%	16070	0	0.00%
Public Facility Improvements - Homeless	Homeless	CDBG: \$96,000	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	150	29	19.33%	27	29	107.41 %
Public Services - Homeless/Transitional Hsg	Homeless	CDBG: \$27,500.00	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	90	84	93.33%	48	40	83.33%

Public Services - Special Needs Pop	Non-Housing Community Development	CDBG: \$5,000.00	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	625	37	5.92%	87	14	16.09%
Public Services - Youth	Non-Housing Community Development	CDBG: \$66,651.00	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5000	845	16.90%	539	322	59.74%
Rental Housing	Affordable Housing	HOME: \$430,000.00	Rental units constructed	Household Housing Unit	25	10	40.00%	6	0	0.00%
Rental Rehab	Affordable Housing	CDBG: \$35,000.00/ Landlords: \$0.00	Rental units rehabilitated	Household Housing Unit	75	12	16.00%	20	2	10.00%
Special Needs Facility Improvements	Non-Homeless Special Needs	CDBG: \$41,275.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	125	83	66.40%	340	43	12.65%

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

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

Priorities identified as “high priority” in the current Consolidated Plan include production of affordable rental housing, rehabilitation of existing rental units, public facilities improvements, public services, and homelessness. Based on these priorities, CDBG funding was allocated to a number of different public services and public facilities projects focused on serving homeless residents. Other projects constructed new affordable housing or rehabilitated existing affordable housing.

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

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

91.520(a)

	CDBG	HOME
White	258	9
Black or African American	35	0
Asian	9	0
American Indian or American Native	1	0
Native Hawaiian or Other Pacific Islander	2	0
<b>Total</b>	<b>305</b>	<b>9</b>
Hispanic	85	0
Not Hispanic	220	9

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

### Narrative

For PY 21, 72.9% of families assisted were white, non-Hispanic residents. According to 2020 Census data, the City of Nashua overall is about 81.7% white and non-Hispanic. Of note, while approximately 12.5% of Nashua residents are Hispanic, 27% of the families served through CDBG and HOME funds in PY 21 were Hispanic.

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

### Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	1,064,865	\$184,621.01
HOME	public - federal	1,064,731	\$101,158.73
Other	private	17,932,290	\$825,170.00
Other	public - federal	17,932,290	\$825,170.00
Other	public - local	17,932,290	\$825,170.00
Other	public - state	17,932,290	\$825,170.00

**Table 3 - Resources Made Available**

### Narrative

The table above provides a comparison between the expected amount of funds available from each resource to the amount actually expended in the program year. The resources made available are generated by the IDIS system based on information entered in the Consolidated Plan and Annual Action Plan. The CDBG and HOME expenditure data is generated by the system based on drawdowns completed during the program year.

The CDBG-CV funds made available to the City of Nashua during PY 21 were \$482,813. The CDBG-CV funds expended during PY 21 were \$482,813. HOME matching funds are derived from projects, using eligible sources. These sources are predominately developer cash. The City verifies match according to policy guidance CPD-97-03.

### Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Census Tracts 104-109	N/A	N/A	N/A

**Table 4 – Identify the geographic distribution and location of investments**

### Narrative

N/A.

### 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.**

Funds awarded through the Consolidate Plan leverage additional private, state and local funds. Many of the non-profits apply private funds toward the cost of their public facility

improvements (to close the funding gap). CDBG funds also help the entities leverage other grants and awards by showing the City's commitment to their programs. The City allocated \$621,151 to public service type activities from its available municipal funds.

The total match amount for the HOME-funded Bronstein redevelopment project for PY 21 was \$3,326,532.45.

<b>Fiscal Year Summary – HOME Match</b>	
1. Excess match from prior Federal fiscal year	\$2,579,205.05
2. Match contributed during current Federal fiscal year	\$3,326,532.45
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	\$5,905,737.50
4. Match liability for current Federal fiscal year	\$111,755.75
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	\$5,793,981.75

**Table 5 – Fiscal Year Summary - HOME Match Report**

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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
2072 – Bronstein Redevelopment	12/1/2021-1/20/2022	\$3,326,532.45	\$0	\$0	\$0	\$0	\$0	\$3,326,532.45

Table 6 – 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 \$
\$0	\$0	\$0	\$0	\$0

Table 7 – Program Income

<b>Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period</b>						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
<b>Contracts</b>						
Number	0					
Dollar Amount	N/A					
<b>Sub-Contracts</b>						
Number	0					
Dollar Amount	N/A					
	Total	Women Business Enterprises	Male			
<b>Contracts</b>						
Number	0					
Dollar Amount	N/A					
<b>Sub-Contracts</b>						
Number	0					
Dollar Amount	N/A					

**Table 8 - Minority Business and Women Business Enterprises**

<b>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</b>						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0					
Dollar Amount	N/A					

**Table 9 – Minority Owners of Rental Property**

<b>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</b>		
Parcels Acquired	0	
Businesses Displaced	0	

Nonprofit Organizations Displaced	0	
Households Temporarily Relocated, not Displaced	0	

Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0					
Cost	0					

Table 10 – Relocation and Real Property Acquisition

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

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

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	6	2
Number of Special-Needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>6</b>	<b>2</b>

**Table 11 – Number of Households**

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	2	2
Number of households supported through Rehab of Existing Units	4	4
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>6</b>	<b>6</b>

**Table 12 – Number of Households Supported**

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

Under the HOME program, work was completed for the Greater Nashua Habitat for Humanity's project at 10 Paxton Terrace. This project involved new construction of a two-family building that was purchased by two separate veteran families. The ongoing HOME-funded Bronstein redevelopment project, once completed, will result in the creation of 216 new rental units.

Under the City's lead hazard remediation program, 28 housing units occupied by low to moderate income families were remediated for lead-based paint hazards.

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

The Bronstein project is a large, multi-year project that will result in the creation of 216 new rental units. Future annual action plans will likely build in the assumption that many HOME-funded projects will not be completed within a single program year, especially given current labor market conditions and construction material shortages.

**Include the number of extremely low-income, low-income, and moderate-income persons**

served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	1	0
Low-income	2	0
Moderate-income	1	0
<b>Total</b>	<b>4</b>	<b>0</b>

Table 13 – Number of Households Served

### Narrative Information

Income data for the two families who will be occupying 10 Paxton Terrace is still pending.

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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 Greater Nashua Continuum of Care (GNCOC) is the coordinated group that addresses homelessness within the City of Nashua. The City works in partnership with the GNCOC on the needs of homeless individuals. The City is represented at the GNCOC by the Manager of the Welfare Department, a department within the City of Nashua's Division of Public Health & Community Services (DPHCS), and by the Urban Programs Manager. The Welfare Officer is a member of the GNCOC Executive Board and also chairs the GNCOC Ending Homelessness sub-committee. The Urban Programs Manager attends GNCOC meetings as a general member. The City's DPHCS also provides outreach to homeless and at-risk members of the community through health activities through its Outreach Van.

During PY 2021, the GNCOC conducted an informal Point in Time (PIT) count during the summer months to obtain supplemental data that might not be reflected in the official PIT count that occurs in January. The 2021 official PIT count showed a total of 20 unsheltered homeless individuals in the greater Nashua area, while the informal PIT count showed a total of 44 unsheltered homeless individuals. This data strongly suggests that unsheltered homelessness in the Nashua region is cyclical—people experiencing homelessness will find shelter during the winter months but return to unsheltered homelessness in the warmer months of the year.

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

In PY 2021, CDBG funding was allocated to Marguerite's Place, the Front Door Agency, and the Nashua Soup Kitchen & Shelter. The funding for Marguerite's Place supports its program that provides transitional housing to homeless women with children. The funding for the Front Door Agency was used to rehabilitate the agency's transitional housing for homeless persons. The funding for the Nashua Soup Kitchen & Shelter was used to continue the ongoing redevelopment project at 35 Spring Street, which will provide a mix of emergency and transitional housing.

In addition, the GNCOC member agencies regularly discuss what services they provide to ensure case managers understand which programs to refer clients. Weekly reports are based on need/vulnerability of the clients and provide referrals. The GNCOC's coordinated entry system is intended to increase and streamline access to housing and services for the homeless, match appropriate levels based on need, and prioritize persons with severe service needs for the most intensive interventions. Two of Nashua's emergency homeless shelters receive Emergency Solutions Grant (ESG) funds, as well as several agencies with transitional housing programs.

### **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**

In PY 2021, CDBG funding was allocated to Marguerite's Place and the Nashua Children's Home. The funding for Marguerite's Place supports its program that provides transitional housing to homeless women with children. This includes continuing case management that ensures program clients who have obtained permanent housing are able to maintain that housing. The Nashua Children's Home provides housing and supportive services to foster youth and former foster youth. This includes a transitional living program that was developed to assist low-income young adults in transitioning into self-sufficiency and prevent long term dependency on the social service system. Housing is provided at a nominal rent, along with continuing staff support and guidance for young adults that have exited the child-protective or juvenile justice systems.

The Greater Nashua Continuum of Care also continues to work to improve and streamline their Coordinated Entry process. There are three emergency shelters operating in Nashua, two of which receive ESG funds, as well as several other agencies with transitional housing programs. The shelter programs have relationships with the two local hospitals to provide support for individuals seeking services from the Emergency Department for behavioral health issues, and the shelters provide emergency shelter once these individuals are discharged from the hospital.

**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**

A key factor in making the transition to permanent housing is increasing the household's income. The City of Nashua provided CDBG funding to the Nashua Adult Learning Center in PY 2021 to provide child care tuition subsidies for low to moderate income families. This allows these families to have more income available for rent or mortgage payments. CDBG funding was also allocated to Marguerite's Place and the Nashua Children's Home. The funding for Marguerite's Place supports its program that provides transitional housing to homeless women with children. This includes continuing case management that ensures program clients who have obtained permanent housing are able to maintain that housing. The Nashua Children's Home provides housing and supportive services to foster youth and former foster youth. This includes a transitional living program that was developed to assist low-income young adults in transitioning into self-sufficiency and prevent long term dependency on the social service system. Housing is provided at a nominal rent, along with continuing staff support and guidance

for young adults that have exited the child-protective or juvenile justice systems.

In addition, all GNCOC participating agencies have programs established for the purpose of providing emergency or transitional housing. Under the ESG program, the GNCOC has a goal that 70% of participating households will achieve housing stability for six months following the end of rental assistance and that 50% of participants will maintain or have increased their income at program exit, demonstrating sufficient income to maintain housing. Families are prioritized based upon their complex, co-occurring issues that are likely to affect housing stability. This approach involves quickly connecting homeless families within 30 days to permanent housing without preconditions and barriers to entry by performing intake, assessment, prioritization, housing location, move-in, case management, and on-going follow-up. Supportive services help to maximize housing stability and work to prevent the return to homelessness. The GNCOC also utilized the existing Veterans By Name List, which is updated biweekly, as a reference to locate and provide services to homeless veterans in their known locations.

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

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

The Nashua Housing and Redevelopment Authority (NHRA) continued working on a major redevelopment that will have a significant positive impact on the number of affordable housing units. The Bronstein Apartments redevelopment will create 216 units of affordable housing. The prior apartment complex only had 48 units. Once the Bronstein Apartment redevelopment has been completed, a total of 48 project-based vouchers will be dedicated to the site. The City of Nashua has dedicated \$700,000 in HOME funds to the project, and \$430,000 was expended in PY 2021.

The NHRA completed other general capital improvements at various sites within their portfolio. Recent work completed included repair and replacement of driveways, walkways, sidewalks, and parking areas. Other work involved the roof replacement on one building in Vagge Village.

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

The Nashua Housing and Redevelopment Authority has a Resident Advisory Board (RAB) consisting of public housing residents and Section 8 participants. The Executive Director meets with the RAB annually to discuss any programmatic opportunities and plans for new initiatives. RAB members participate in the creation and acceptance of NHRA's Annual PHA Plan and work together with NHRA staff to address common goals and objectives.

The City of Nashua planned in PY 2021 to set up a pilot homebuyer assistance program that would be marketed to PHA residents as well as other lower-income residents interested in homeownership. The program set-up was delayed in large part due to the lengthy vacancy of the Urban Programs Manager position. Program set-up is anticipated to be complete within the first half of PY 2022.

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

N/A. The Nashua Housing and Redevelopment Authority has not been designated as a troubled PHA.

## **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)**

Affordability and vacancy rates continue to pose barriers to affordable housing in Nashua. During PY 2020, the City's Board of Aldermen voted to establish a housing trust fund to incentivize and fund affordable housing development. In PY 2021, the City established the co-chairs for the housing trust fund (the Economic Development Director and the Community Development Director), and the housing trust fund's co-chairs met with the Urban Programs Manager to discuss how to pair CDBG and HOME resources with the housing trust fund to maximize impact on affordable housing.

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

Underserved needs are mainly comprised of insufficient funding for housing rehabilitation and for existing non-profit agencies. The City of Nashua addresses these needs by pursuing other grant opportunities, such as the Lead Paint & Healthy Homes Program. Nashua CDBG funds were expended on the remediation of both owner-occupied and rental housing through the Housing Improvements Program (<https://www.nashuanh.gov/316/Housing-Improvement-Programs-Rehab>). When possible, the Housing Improvements Program and the Lead Paint & Healthy Homes Program coordinate on projects to address as many health and safety concerns as possible in as expediated a manner as possible.

In addition, CDBG funding was allocated to homeless services (Nashua Soup Kitchen & Shelter, Marguerite's Place), foster youth and other vulnerable youth (Nashua Children's Home, Girls Inc., Nashua Police Athletic League), and severely disabled residents (PLUS Company, Opportunity Networks, Gateways Community Services).

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

Since 2007, the City of Nashua has been successful in securing grant funding from HUD's Office of Healthy Homes and Lead Hazard Control to address lead paint and other health hazards in units occupied by low to moderate income households. During PY 2020, the City was awarded its fifth grant of \$5.7M. In PY 2021, 28 housing units occupied by low to moderate income families were remediated for lead-based paint hazards.

The City of Nashua's Division of Public Health and Community Services provided free blood lead screenings, education and home visits with a specialist from the Environmental Health Department. The City's Code Enforcement Department has been trained to recognize potential lead hazards, especially in homes where young children reside, and make referrals to the Urban Programs Department.

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

Under the 5-year Consolidated Plan, there are a variety of actions the City has committed to undertake each program year in an effort to reduce the number of poverty-level families and increase self-sufficiency. Most of the PY 2021 CDBG-funded activities assisted agencies who are providing services to break the cycle of poverty such as child care and transitional housing. These included the Nashua Adult Learning Center, Nashua Children's Home, and Marguerite's Place.

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

The ongoing COVID-19 pandemic systemically changed the way the City partners to promote institutional structure. Primarily digital resources were utilized to strengthen communication and eliminate/reduce duplication of services. 2-1-1 is New Hampshire's statewide, comprehensive, information and referral service. Through a unique coalition of non-profit, government, corporate and volunteer partners, New Hampshire residents can dial 2-1-1 to be connected, at no cost, with trained Information and Referral Specialists who can provide them with the health and human service information they need to get assistance. Also, in PY 2021, the state of New Hampshire planned the launch of a related service, NH 9-8-8, which will provide a comprehensive resource for mental health and substance use disorder needs and services.

In addition, the City works in partnership with the GNCOC on the needs of homeless individuals. The City is represented at the GNCOC by the Manager of the Welfare Department, a department within the City of Nashua's Division of Public Health & Community Services (DPHCS), and by the Urban Programs Manager. The Welfare Officer is a member of the GNCOC Executive Board and also chairs the GNCOC Ending Homelessness sub-committee. The Urban Programs Manager attends GNCOC meetings as a general member. The City's DPHCS also provides outreach to homeless and at-risk members of the community through health activities through its Outreach Van.

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

During PY 2020, the City's Board of Aldermen voted to establish a housing trust fund to incentivize and fund affordable housing development. In PY 2021, the City established the co-chairs for the housing trust fund (the Economic Development Director and the Community Development Director), and the housing trust fund's co-chairs met with the Urban Programs Manager to discuss how to pair CDBG and HOME resources with the housing trust fund to maximize impact on affordable housing. It is anticipated that the housing trust fund will work with a mixture of commercial housing developers, non-profit developers, and the Nashua Housing and Redevelopment Authority on housing projects.

In addition, during PY 2021 the Nashua Housing and Redevelopment Authority (NHRA) continued working on a major redevelopment, supported in part by the Nashua HOME funds,

that will have a significant positive impact on the number of affordable housing units. The Bronstein Apartments redevelopment will create 216 units of affordable housing. The prior apartment complex only had 48 units. Once the Bronstein Apartment redevelopment has been completed, a total of 48 project-based vouchers will be dedicated to the site.

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

Federal funds have been used and will continue to be used to address fair housing impediments. The City of Nashua partnered with the Nashua Regional Planning Commission to prepare an Analysis of Impediments to Fair Housing (AI), active through 2025, that is similar to the formerly required Assessment of Fair Housing. The current AI identified certain impediments to fair housing choice that the City of Nashua has addressed in PY 2021.

Impediment: The presence of lead-based paint in older housing stock is an impediment to households with children.

Actions taken: Since 2007, the City of Nashua has been successful in securing grant funding from HUD's Office of Healthy Homes and Lead Hazard Control to address lead paint and other health hazards in units occupied by low to moderate income households. During PY 2020, the City was awarded its fifth grant of \$5.7M. In PY 2021, 28 housing units occupied by low to moderate income families were remediated for lead-based paint hazards.

The City of Nashua's Division of Public Health and Community Services provided free blood lead screenings, education and home visits with a specialist from the Environmental Health Department. The City's Code Enforcement Department has been trained to recognize potential lead hazards, especially in homes where young children reside, and make referrals to the Urban Programs Department.

Impediment: The City's immigrant and Spanish-speaking populations are growing, and linguistic barriers may be present in the housing delivery system.

Actions taken: The City of Nashua has a contract with an outside agency to provide limited language services. The Language Line is available to all departments who engage a customer that is non-English speaking. Over 184 languages can be translated and is updated as needed. Important CDBG and HOME program documents are translated into Spanish and, as practical, other languages. Several city departments, including Urban Programs, employ staff that can communicate fluently in Spanish.

Impediment: There is a lack of full partnership between the Urban Programs Division and Code Enforcement Division.

Actions taken: The new Urban Programs Manager has established monthly meetings with the Code Enforcement Manager to discuss respective programs and partnership opportunities. The Code Enforcement Department's Code Enforcement Officers also coordinates with the Urban Programs Department's lead remediation program to engage in outreach to lower income

households.

Impediments: There is a need for revitalization existing neighborhoods, including new construction/infill; improvement to the conditions of existing stock; and improvement of neighborhoods as a whole.

Actions taken: The Nashua Housing and Redevelopment Authority (NHRA) continued working on a major redevelopment that will have a significant positive impact on the number of affordable housing units. The Bronstein Apartments redevelopment will create 216 units of affordable housing. The prior apartment complex only had 48 units. Once the Bronstein Apartment redevelopment has been completed, a total of 48 project-based vouchers will be dedicated to the site. The City of Nashua has dedicated \$700,000 in HOME funds to the project, and \$430,000 was expended in PY 2021.

In addition, Nashua CDBG funds were expended on the remediation of both owner-occupied and rental housing through the Housing Improvements Program (<https://www.nashuanh.gov/316/Housing-Improvement-Programs-Rehab>). When possible, the Housing Improvements Program and the Lead Paint & Healthy Homes Program coordinate on projects to address as many health and safety concerns as possible in as expediated a manner as possible.

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## **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 Nashua's Uniform Grant Guidance Policies & Procedures, developed consistent with 2 CFR Part 200, addresses Subrecipient Monitoring. The Nashua Urban Programs Department also uses supplemental policies and procedures specific to its CDBG subrecipients. This includes a risk assessment prior to award followed by ongoing monitoring. The up-front risk assessment helps identify any high-risk activities that will require full-scale on-site monitoring visits.

High risk factors might include: subrecipients who are new to the HUD programs implemented; subrecipients who have experienced high turnover in key staff positions; and subrecipients who previously struggled to meet schedules, submit performance reports, and/or submit timely invoices. For PY 2021 CDBG subrecipients, the new Urban Programs Manager opted to conduct on-site monitoring visits with all subrecipients. No findings were issued during these monitorings. One concern was identified in relation to the Nashua Soup Kitchen & Shelter related to a need for more frequent and better communication between the agency and the City.

In addition to the annual monitoring, the City's Grants Management Specialist meets with each CDBG subrecipient to review their record-keeping and intake procedures prior to award. This initial meeting provided an opportunity for the City to ensure the subrecipient will collect the correct information to document compliance with national objective eligibility and accurate accounting procedures. The up-front meeting also included an evaluation of internal controls (*i.e.*, separation of duties) as well as a review of the financial procedures & software.

Public service agency (non-construction) subrecipients are required to submit quarterly reports that document beneficiaries and contain supporting documentation for all reimbursement requests. Public facility (construction) subrecipients submit beneficiary data and progress reports during the course of the physical project work. Urban Programs staff oversee these construction projects for Davis-Bacon Act compliance and approve release of funds directly to the contractors on behalf of the subrecipient.

CDBG desk audits are performed quarterly to confirm national objective compliance, verify expenditures, monitor progress, and to identify subrecipients who may be entering high risk status. Quarterly reports are comprehensive and reviewed in detail before any funds are reimbursed to public service agency subrecipient. HOME desk audits of tenant occupancy and compliance with other regulatory terms is conducted annually, as well as site visits to ensure compliance with property standards. Desk monitoring of HOME occupancy was started in July 2022 and is largely completed. It is anticipated to reach full completion by the end of August 2022.

Monitoring efforts conducted for CDBG-CV activities require the business shall submit a report to the City six months following disbursement of funds. The report must describe the overall impact of the CDBG-CV grant, whether the business is still operational, and whether any jobs were created and/or retained as a result of the funds. The business agrees to refund the City any funds which the City determines were not properly due to the business under the terms of the agreement.

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

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

A notice was printed in the Nashua Telegraph (local paper) on September 12, 2021 notifying of a 15-day comment period. The CAPER was posted to the City's website on 9/22/2021.

No comments were received.

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

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

A few minor changes were made to goals/objectives during PY 2021. The planned fire safety improvements project for the Nashua Police Athletic League building was cancelled. The project was put out to bid multiple times, but no contractors bid on the project. The Urban Programs staff is discussing why the project was not attractive to contractors and will evaluate future projects to determine if they are likely to receive contractor interest. Other challenges include a request from the City of Nashua's Department of Public Works to transfer its CDBG allocation from the Labine Park project to the Sandy Pond Park and delays in the Girls Inc. roof rehabilitation project.

The Urban Programs Development has discussed these issues and has decided, for the PY 23 grant application process, to develop a pre-application workshop for potential applicants with construction-based projects. The workshop will allow Urban Programs staff to obtain information about these projects earlier in the process and to assist subrecipients in developing realistic cost estimates and identify potential challenges in project execution.

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

N/A. The City of Nashua does not have any open Brownfields Economic Development Initiative grants.

## **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 majority of the City's portfolio underwent full monitoring, both on-site and records, in 2018. The full monitoring was not completed until summer of 2019. The units were officially due for an on-site inspection in the summer of 2020, but due to the COVID-19 pandemic, the City of Nashua suspended interior inspections. In PY 2021, the new Urban Programs Manager started work with the City in June 2021, and on-site monitoring was not determined to be possible. Instead, the City conducted desk review monitoring of active HOME projects in July 2022. It is anticipated that this monitoring will be concluded by the end of August 2022. Full on-site monitoring is planned for spring of 2023.

### **Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)**

For projects with five or more HOME-assisted, units, the project sponsor/owner will be required through legally-binding written agreements to affirmatively market any unit available for rent or purchase in a manner to attract tenants or homebuyers, as applicable, without regard to age, sex, sexual orientation, gender identity, race, color, creed, color, religion, marital status, familial status, physical or mental disability, or national origin.

As part of this agreement, the project sponsor/owner must : (1) use the Equal Housing Opportunity logo in all advertising; (2) display a fair housing poster in its rental and sales office(s); (3) when appropriate, advertise and use various media sources, such as local public access channel, social media, postings within neighborhoods (local markets, community centers, etc.) and minority outlets to reach those persons least likely to apply for the housing; (3) maintain files of the project sponsor/owner's affirmative marketing activities for five years after project completion; and (4 )provide access to all affirmative marketing activity files to City staff. As part of the portfolio-wide monitoring, the City of Nashua reviews each project's tenant selection plans, where affirmative marketing is generally contained.

### **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**

No HOME program income was received or used.

### **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)**

The City of Nashua fosters and maintains affordable housing by monitoring the HOME portfolio (long-term affordability) and by creating new units. Potential HOME projects are evaluated, in

part, on the amount of leveraged funds available to develop and maintain the housing. In addition, the City of Nashua has created a housing trust fund to incentivize and fund affordable housing development. In PY 2021, the City established the co-chairs for the housing trust fund (the Economic Development Director and the Community Development Director), and the housing trust fund's co-chairs met with the Urban Programs Manager to discuss how to pair CDBG and HOME resources with the housing trust fund to maximize impact on affordable housing. It is anticipated that the housing trust fund will work with a mixture of commercial housing developers, non-profit developers, and the Nashua Housing and Redevelopment Authority on housing projects.

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## CR-58 – Section 3

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

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
Total Number of Activities	0	5			
Total Labor Hours					
Total Section 3 Worker Hours					
Total Targeted Section 3 Worker Hours					

Table 15 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG	HOME	ESG	HOPWA	HTF
Outreach efforts to generate job applicants who are Public Housing Targeted Workers	0	0			
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.	0	0			
Direct, on-the job training (including apprenticeships).	0	0			
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.	0	0			
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).	0	0			
Outreach efforts to identify and secure bids from Section 3 business concerns.					
Technical assistance to help Section 3 business concerns understand and bid on contracts.	0	0			
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.	0	0			
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.	0	0			
Held one or more job fairs.	0	0			
Provided or connected residents with supportive services that can provide direct services or referrals.	0	0			
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.	0	0			
Assisted residents with finding child care.	17	0			
Assisted residents to apply for, or attend community college or a four-year educational institution.	0	0			
Assisted residents to apply for, or attend vocational/technical training.	0	0			
Assisted residents to obtain financial literacy training and/or coaching.	40	0			
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.	0	0			
Provided or connected residents with training on computer use or online technologies.	0	0			
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.	0	0			
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.	0	0			
Other.	0	0			

**Table 16 – Qualitative Efforts - Number of Activities by Program**

**Narrative**

The City of Nashua generally does not expend \$200,000 or more per construction project. The except for the reporting period in question was for the Bronstein redevelopment project.

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