

HOME-ARP Allocation Plan Template with Guidance

Consultation

In accordance with Section V.A of the Notice (page 13), before developing its HOME-ARP allocation plan, at a minimum, a PJ must consult with:

- CoC(s) serving the jurisdiction's geographic area,
- homeless service providers,
- domestic violence service providers,
- veterans' groups,
- public housing agencies (PHAs),
- public agencies that address the needs of the qualifying populations, and
- public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

Template:

Describe the consultation process including methods used and dates of consultation:

The City of Nashua's Urban Programs Manager position was vacant during the end of 2021 and the first half of 2022. Therefore, the consultation process was started when the current Urban Programs Manager began work in June 2022. The Urban Programs Manager identified the local and regional agencies that met the requirements of the HOME-ARP notice for consultation and contacted these agencies via email to schedule the consultations. Consultations occurred via in-person meetings, telephone meetings, and video conferences during June and July 2022.

List the organizations consulted:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Harbor Care / Harbor Homes	COC, homeless service provider, veterans group, public agency that addresses the needs of qualifying populations, public agency that addresses the needs of persons with disabilities	Video conference	The agency stated that the Nashua area needs more multifamily housing units. The agency stated that COC efforts have reduced homelessness among veterans and persons living with HIV/AIDS to functional zero in the Nashua region.
PLUS Company	Public agency that addresses the needs of persons with disabilities	Telephone	The agency stated that the Nashua area lacks both affordable and accessible housing, for both agency staff and for residents with disabilities. The agency also stated that there is a lack of transportation outside the City of Nashua.
Nashua Soup Kitchen and Shelter	Homeless services provider	In-person meeting	The agency stated that there is a need for better implementation of the state’s Accessory Dwelling Units (ADU) law, more outreach to and support for housing developers, and the pairing of available affordable housing grant funds with substantial matching funds to create the biggest possible impact.
Neighborworks of Southern New Hampshire	Public agencies that address the needs of the qualifying populations, CHDO	Video conference	The agency indicated that there is continuing need for affordable housing development in the City of Nashua. The agency also indicated that conflicting guidelines between the HOME program and certain mortgage programs can complicate affordable housing projects.
Marguerite’s Place	Homeless services provider	In-person meeting	The agency stated that it specializes in phase 1 transitional housing. The agency stated that

			community needs include next-step housing in between shelter and market-rate permanent housing, need for family resource centers, recovery housing for women with children, and additional homeless services for families to address rise in family (vs. individual) homelessness.
Disability Rights Center of New Hampshire	Organization that addresses fair housing, organization that addresses civil rights, organization that addresses the needs of persons with disabilities	Telephone meeting	The agency stated that there is a need for housing that is accessible for persons with a variety of disabilities and that is located near public transportation. The agency also stated that there is a need for mixed housing that houses both disabled persons and non-disabled persons. The agency also suggested that HOME program request for proposals include calls for accessibility, such as universal design standards, with the possibility of awarding bonus points for projects that incorporate accessibility beyond the federally-required minimum standards.
Gateways Community Services	Organization that addresses the needs of persons with disabilities	In-person meeting	The agency stated that there is a need for independent living housing models for adults with disabilities, ideally with a live-in unit made available for support staff. The agency also stated that there is a need for funding for home accessibility modifications.
Bridges Domestic & Sexual Violence Support	Domestic violence services provider	Telephone meeting	The agency stated that there is a need for more affordable housing, as the currently unbalanced market allows landlords to reject potential tenants who have bad credit history (such as many domestic violence survivors) or are otherwise seen as “difficult.” The agency also identified language barriers and lack of housing for single homeless women as community issues.

Greater Nashua Mental Health	Organization that addresses the needs of persons with disabilities	In-person meeting	The agency stated that there is a need for multilingual housing services, more affordable housing, housing services for Deaf residents, and post-housing placement case management. The agency also suggested the vacant Daniel Webster College campus as a potential site for a permanent supportive housing project.
One Greater Nashua	Organization that addresses civil rights	In-person meeting	This organization is a coalition of agencies and citizens focused on creating a more welcoming environment for all Nashua residents and especially immigrant and refugee residents. Identified housing concerns include increases in rent (\$100-\$200) as soon as a renter's one-year lease is up, decrease in housing quality, interest in living in multicultural communities, and need for smaller units and more dense housing.
New Hampshire Legal Assistance	Organization that addresses fair housing	Telephone meeting	The agency stated that disability is the protected category for which New Hampshire Legal Assistance receives the most housing discrimination complaints, including prohibitions on emotional support animals. The agency also stated that there are language access needs around illiteracy in addition to Limited English Proficiency, and a broad affordability crisis. The agency suggested that the hybrid meetings (in-person and video conference) piloted during the early stages of the COVID-19 pandemic should be maintained to increase public meeting access to as many residents as possible.
Nashua Housing and Redevelopment Authority	Public housing agency	Telephone meeting	The agency stated that the current public housing stock is aging and in need of rehabilitation and expansion. The agency also stated

			that there is a need for more diversified locations of affordable housing, as most affordable housing in Nashua is currently concentrated in the downtown regions.
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Summarize feedback received and results of upfront consultation with these entities:

Enter narrative response here.

Public Participation

In accordance with Section V.B of the Notice (page 13), PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

PJs are required to make the following information available to the public:

- The amount of HOME-ARP the PJ will receive, and
- The range of activities the PJ may undertake.

Throughout the HOME-ARP allocation plan public participation process, the PJ must follow its applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for persons with disabilities and providing meaningful access to participation by limited English proficient (LEP) residents that are in its current citizen participation plan as required by 24 CFR 91.105 and 91.115.

Template:

Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:

- ***Date(s) of public notice:*** Click or tap to enter a date.
- ***Public comment period:*** start date - Click or tap to enter a date. end date - Click or tap to enter a date.
- ***Date(s) of public hearing:*** Click or tap to enter a date.

Describe the public participation process:

Enter narrative response here.

Describe efforts to broaden public participation:

Enter narrative response here.

Summarize the comments and recommendations received through the public participation process either in writing, or orally at a public hearing:

Enter narrative response here.

Summarize any comments or recommendations not accepted and state the reasons why:

Enter narrative response here.

Needs Assessment and Gaps Analysis

DRAFT

Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	99	30	61	-	65								
Transitional Housing	56	21	60	-	65								
Permanent Supportive Housing	85	27	173	-	83								
Other Permanent Housing	48	8	0	0	0								
Sheltered Homeless						90	87	47	11				
Unsheltered Homeless						0	18	-	-				
Current Gap										0	0	18	0

Data Sources: HUD 2021 Continuum of Care Housing Inventory Count Report, 2021 Continuum of Care Homeless Populations and Subpopulations Report

Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	16,519		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	1,870		
Rental Units Affordable to HH at 50% AMI (Other Populations)	4,638		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		3,245	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		2,290	
Current Gaps			3,754

Data Sources: New Hampshire Housing Finance Authority; 2018 Comprehensive Housing Affordability Strategy (CHAS)

Describe the size and demographic composition of qualifying populations within the PJ's boundaries:

Homeless as defined in 24 CFR 91.5

Per the 2021 Point in Time count, there were 197 persons experiencing homelessness within the City of Nashua.

At Risk of Homelessness as defined in 24 CFR 91.5

Per data from the 2016-2018 American Community Survey and from New Hampshire Housing Finance Authority, there are 3,245 households within the City of Nashua which are at 30% of the area median income and experiencing one or more severe housing problems. Currently there is not data on what number of these households do not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or the other outlined qualifications for being "at risk of homelessness."

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

Per the 2021 annual report from the Nashua Police Department, there were 270 reported sexual assaults and 2,033 reported domestic violence incidents in 2021, for a total of 2,303 persons. However, it is known that sexual assaults and domestic violence are often underreported. Data from the New Hampshire Violence Against Men Survey suggests that almost 5% of men in New Hampshire have experienced sexual and/or domestic violence, and data from the New Hampshire Coalition Against Domestic and Sexual Violence indicates that 23% of New Hampshire women have experienced sexual and/or domestic violence. Assuming similar rates for the City of Nashua specifically, this would equal 10,230 women and 2,184 men within the city.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice

Per data from the 2016-2018 American Community Survey and from New Hampshire Housing Finance Authority, there are 2,290 households within the City of Nashua which are at 50% of the area median income and experiencing one or more severe housing problems.

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing (Optional):

According to the 2021 Housing Inventory Count, there are 99 family emergency shelter beds, 61 adult-only emergency shelter beds, and 65 veteran emergency shelter beds. There are 56 family transitional shelter beds, 60 adult-only transitional shelter beds, and 65 veteran transitional shelter beds. There are 85 family permanent supportive housing (PSH) beds, 173 PSH beds, and 83 PSH veteran beds. There is a deficit of 18 beds for currently homeless Nashua residents, but if

those at risk of homelessness are factored in, the deficit in available homeless shelter beds and services is measured in the thousands.

In addition, according to HUD data on the Housing Choice Voucher (HCV) program, the Nashua Housing and Redevelopment Authority has a leasing potential of only 93 families or 10.24% of total units.

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

Unmet needs, as identified through analysis of annual data and through consultations, include affordable private-market housing, HCV program vouchers adequate to pay for private-market units, additional permanent supportive housing, expanded public transit, and affordable child care.

At Risk of Homelessness as defined in 24 CFR 91.5

Unmet needs, as identified through analysis of annual data and through consultations, include affordable private-market housing, HCV voucher access, affordable child care.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

Unmet needs, as identified through analysis of annual data and through consultations, include affordable private-market housing, affordable child care, and homeless shelter options for single homeless women.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice

Unmet needs, as identified through analysis of annual data and through consultations, include affordable private-market housing, HCV program vouchers adequate to pay for private-market units, additional permanent supportive housing, expanded public transit, affordable child care, and language services for immigrant and ESL residents.

Identify any gaps within the current shelter and housing inventory as well as the service delivery system:

Gaps within the current shelter system include a lack of homeless shelter beds for single women experiencing homelessness and a continuing need for expanded permanent supportive housing. Gaps within the current housing inventory consist primarily of a lack of units affordable for lower-income residents. This gap is expanding, as well, as many buildings currently housing lower-income residents are in the process of renovation, and it is anticipated that the rents for these buildings will increase after the renovations are concluded. Gaps within the service delivery system include lack of public transit in the wider Nashua metropolitan region (versus within just the city itself) and a lack of affordable childcare, exacerbated by the closure of several childcare centers within the city during the COVID-19 pandemic.

Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of “other populations” that are “At Greatest Risk of Housing Instability,” as established in the HOME-ARP Notice. If including these characteristics, identify them here:

N/A.

Identify priority needs for qualifying populations:

Priority needs include additional emergency shelter; additional permanent supportive housing; additional affordable rental housing, especially for residents at 30% AMI or less; and supportive services to assist domestic/sexual violence survivors and ESL residents to obtain housing.

Explain how the PJ determined the level of need and gaps in the PJ’s shelter and housing inventory and service delivery systems based on the data presented in the plan:

The level of need and gaps in the system were determined by review of data from the American Community Survey (ACS), Comprehensive Housing Affordability Strategy (CHAS), the HUD Point in Time and Housing Inventory Count reports, as well as consultation with the agencies listed above.

HOME-ARP Activities

Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:

The City of Nashua plans to solicit applications through a two-pronged approach. The City of Nashua will develop a grant application specific to the HOME-ARP funds and (1) post the grant application and request for applications to the city website and social media sites and (2) send the grant application and request for applications via email to a list of existing non-profit and housing developer partners.

Rental housing development: The City of Nashua plans to solicit applications through a two-pronged approach. The City of Nashua will develop a grant application specific to the HOME-ARP funds and (1) post the grant application and request for applications to the city website and social media sites and (2) send the grant application and request for applications via email to a list of existing non-profit and housing developer partners.

The initial eligibility criteria for funding shall include:

- The organization shall comply with all requirements of the HOME-ARP program during the entire project period, which shall begin upon submission of the grant application and shall end upon conclusion of all HOME-ARP program-funded activities.

- The organization shall demonstrate the organizational ability and financial capacity to undertake, comply, and manage the proposed eligible activity.
- The organization shall demonstrate its familiarity with the requirements of other federal, state, or local housing programs that may be used in conjunction with HOME-ARP program funds to ensure compliance with all applicable requirements and regulations of such programs.
- The organization shall demonstrate adequate experience and capacity to conduct HOME-ARP program-eligible activities as evidenced by its ability to own, construct, or rehabilitate, and manage and operate an affordable multifamily rental housing development.

Supportive services: The City of Nashua plans to solicit applications through a two-pronged approach similar to but separate from the rental housing development solicitation. The City of Nashua will develop a grant application specific to the HOME-ARP funds and (1) post the grant application and request for applications to the city website and social media sites and (2) send the grant application and request for applications via email to a list of existing non-profit and housing developer partners.

Eligible supportive services shall include direct services such as support with housing and benefits applications and reexaminations; treatment or case planning; coordination of on-going healthcare, including mental health and substance use treatment; and support with managing tenancy and community relationships as well as organizational support to develop capacity to provide quality services. Eligible grant applications shall be evaluated on the basis of community need for the proposed activity, organizational experience with federal grant programs and HOME specifically, and organizational programmatic and financial capacity to successfully execute the proposed activity.

Describe whether the PJ will administer eligible activities directly:

The City of Nashua does not plan to use a subrecipient or contractor to carry out the administration of the HOME-ARP grant funds. No portion of the City of Nashua's HOME-ARP administrative funds were provided, nor will they be provided, to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan.

If any portion of the PJ's HOME-ARP administrative funds are provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:

No portion of the City of Nashua's HOME-ARP administrative funds were provided, nor will they be provided, to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan. The City of Nashua does not plan to use a subrecipient or contractor to carry out the administration of the HOME-ARP grant funds.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 100,000.00		
Acquisition and Development of Non-Congregate Shelters	\$ 0.00		
Tenant Based Rental Assistance (TBRA)	\$ 0.00		
Development of Affordable Rental Housing	\$ 1,194,894.40		
Non-Profit Operating	\$ 80,930.90	5 %	5%
Non-Profit Capacity Building	\$ 0.00	5 %	5%
Administration and Planning	\$ 242,792.70	15 %	15%
Total HOME ARP Allocation	\$ 1,618,618.00		

Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:

The City of Nashua will allocate the largest amount of its HOME-ARP Program funds, (\$1,013,963.50) to the development of affordable rental housing. Eligible costs may include but are not limited to: property acquisition, hard and soft development costs, and operating subsidies required to serve extremely low-income households.

The City of Nashua will also allocate \$100,000 to supportive services that will either be paired with the newly created rental units or be provided to existing supportive housing providers to deliver improved quality care to qualifying populations. Supportive services can include but are not limited to:

- support with housing and benefits applications and re-examinations
- coordination of healthcare, assistance with transportation, and access to food
- support in navigating relationships with landlords and the broader community
- homeless diversion funds, which include payment of a household’s first month’s rent, security deposits, utility arrears, car repairs, etc.

Funds in the amount of \$80,930.90 will be allocated to non-profit operating expenses, including but not limited to expenses for homeless shelter services, sexual/domestic violence survivor services, housing support and stabilization services, fair housing education and outreach, etc.

The remaining funds will be expended on HOME-ARP program administration and planning costs (\$242,792.70), mainly consisting of City of Nashua Urban Programs Subdivision staff salaries and benefits, and on non-profit capacity building (\$80,930.90). Non-profit capacity building eligibility will be limited to organizations receiving HOME-ARP funds for the development of affordable rental housing or the provision of supportive services.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

Homeless residents who are extremely low-income or very low-income often require a wide range of services and supports to remain stably housed. Outreach and consultation efforts generated a wide range of responses on system gaps and strategies to address them. The highest priority needs that were consistently identified through these efforts were: (1) increasing the supply of housing affordable to the city's lowest-income and highest-need residents; (2) expanding supportive services and fair housing outreach to help lowest-income and highest-need residents to access both private-market and public housing; and (3) expanding permanent supportive housing (PSH) and supportive services to help lowest-income and highest-need residents to maintain housing that is affordable.

Increasing the supply of affordable housing: Priority needs, discussed above, include additional permanent supportive housing and additional affordable rental housing, especially for residents at 30% AMI or less. The level of need and gaps in the system were determined by review of data from the American Community Survey (ACS), Comprehensive Housing Affordability Strategy (CHAS), the HUD Point in Time and Housing Inventory Count reports, as well as consultation with the agencies listed above. The lack of affordable housing was mentioned as the largest housing issue in multiple consultations.

The funding of development of affordable rental housing addresses this need.

Expanding supportive services for housing access: Priority needs, discussed above, include additional permanent supportive housing and supportive services to assist domestic/sexual violence survivors and ESL residents to obtain housing. The level of need and gaps in the system were determined by review of data from the American Community Survey (ACS), Comprehensive Housing Affordability Strategy (CHAS), the HUD Point in Time and Housing Inventory Count reports, as well as consultation with the agencies listed above.

The funding of non-profit operating expenses and non-profit capacity building both address this need.

Expanding supportive services and PSH for housing maintenance: Priority needs, discussed above, include additional permanent supportive housing. The level of need and gaps in the system were determined by review of data from the American Community Survey (ACS), Comprehensive Housing Affordability Strategy (CHAS), the HUD Point in Time and Housing Inventory Count reports, as well as consultation with the agencies listed above.

The funding of non-profit operating expenses and non-profit capacity building both address this need.

HOME-ARP Production Housing Goals

Template

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

The City of Nashua estimates that 10 units of affordable rental housing will be produced through the planned HOME-ARP allocations. The housing may include but is not limited to housing intended for residents experiencing homelessness, chronically homeless residents, survivors of domestic or sexual violence, residents with disabilities, and residents who are Limited English Proficiency (LEP) or speak English as a Second Language (ESL). All such housing shall comply with all requirements of the Fair Housing Act, HUD's fair housing policies, and the City of Nashua's current Assessment of Fair Housing.

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how the production goal will address the PJ's priority needs:

The City of Nashua estimates that 10 units of affordable rental housing will be produced through the planned HOME-ARP allocations. It is anticipated that these units also will be financed through the state Low Income Housing Tax Credit program, the state Affordable Housing Fund, the federal and municipal Housing Trust Funds, and/or private financing sources. All potential projects will be evaluated, in part, on the availability of other funding sources and the project's ability to leverage additional financing opportunities. This will help to maximize the impact of the City of Nashua's HOME-ARP allocation.

Preferences

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

In an effort to provide maximum program flexibility and to ensure the HOME-ARP funds provide housing opportunities to all Nashua residents, the City of Nashua has elected not to apply preference among the qualifying populations.

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

N/A.

Limitations in a HOME-ARP rental housing or NCS project

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:

The City of Nashua does not intent to limit eligibility for HOME-ARP rental housing to a particular qualifying population or subpopulation of a qualifying population.

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

N/A.

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):

N/A.

HOME-ARP Refinancing Guidelines

The City of Nashua does not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds.

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