

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

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

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The goals and objectives for the July 1, 2020 to June 30, 2021 reporting report (Program Year 2020) are based on priority needs identified in the 2020-2024 Five Year Consolidated Plan. The Five Year Plan provided the guidelines for selecting projects and activities to fund during each subsequent program year. The goals identified in the plan, and the anticipated accomplishments available are summarized below.

This year, Malden's CDBG program exceeded its goals in housing rehab, with two rental units and two homeowner units rehabilitated in PY20, above expectations of three total units rehabilitated. CDBG physical improvements - such as parks, public facilities, and infrastructure - served 4,486 people, meeting about 90% of the goal of 5,000 people served. The public services program greatly exceeded expectations, assisting nearly 18,000 people compared to the 5,000 people anticipated. This variance is likely due to changing public services programs that serve more individuals, and higher demand for public services by low- and moderate-income people during the pandemic. Lastly, the CDBG program did not have any economic development activities this year, as in previous years.

NSC HOME: No multifamily projects were completed in PY20 for the HOME program, but we actively managed the process for eleven other multifamily projects. The NSC has eleven multifamily developments at various stages in the pipeline: eight under construction, and three with preliminary HOME fund reservations nearing the beginning of a financial closing process. At this time, we expect all three of the projects with preliminary reservations to begin construction and three of the multifamily developments to be completed by the end of Program Year 2021. In addition, we currently expect three of the projects that are currently under construction to be completed in early Program Year 2022.

### **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
Create New Affordable Housing	Affordable Housing	HOME: \$	Rental units constructed	Household Housing Unit	83	0	0.00%	11	0	0.00%
Create New Affordable Housing	Affordable Housing	HOME: \$	Rental units rehabilitated	Household Housing Unit	6	0	0.00%			
Create New Affordable Housing	Affordable Housing	HOME: \$	Homeowner Housing Rehabilitated	Household Housing Unit	6	0	0.00%			
Expand Affordability in Existing Housing	Affordable Housing	CDBG: \$ / HOME: \$	Rental units rehabilitated	Household Housing Unit	16	2	12.50%	0	2	
Expand Affordability in Existing Housing	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Rehabilitated	Household Housing Unit	43	2	4.65%	3	2	66.67%
Expand Affordability in Existing Housing	Affordable Housing	CDBG: \$ / HOME: \$	Housing for Homeless added	Household Housing Unit	0	0		0	0	
Expand Affordability in Existing Housing	Affordable Housing	CDBG: \$ / HOME: \$	Housing for People with HIV/AIDS added	Household Housing Unit	0	0		0	0	

Improve Affordable Housing Ownership Opportunities	Affordable Housing	HOME: \$	Homeowner Housing Added	Household Housing Unit	0	0		0	0	
Improve Affordable Housing Ownership Opportunities	Affordable Housing	HOME: \$	Direct Financial Assistance to Homebuyers	Households Assisted	10	2	20.00%	2	2	100.00%
Improve Parks Public Facilities and Infrastructure	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5000	4486	89.72%	5000	4486	89.72%
Improve Public Services	Non-Homeless Special Needs	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	8000	17780	222.25%	5000	17780	355.60%
Improve Public Services	Non-Homeless Special Needs	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	0		0	0	
Improve Public Services	Non-Homeless Special Needs	CDBG: \$	Homelessness Prevention	Persons Assisted	0	91		20	91	455.00%
Provide Economic Opportunities	Non-Housing Community Development	CDBG: \$ / HOME: \$0	Businesses assisted	Businesses Assisted	6	0	0.00%			

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.**

The Consolidated Plan's priority needs include affordable housing; public services; parks, public facilities, and infrastructure; and economic development.

For the HOME Program, the actual accomplishments for creation of rental units is below the expected due to slight delays with 571 Revere. Since the end of the program year, the project has received a Temporary Certificate of Occupancy and is working to submit all final documentation to complete the project. The HOME Program did meet the goals for down-payment assistance by supporting two households in the purchase of their first home. This is the highest number of households served by this program in several years due to the rapidly increasing values of homes that price out low and moderate income buyers. In addition, the NSC advised several owners on the affordable resale requirements, a workload that is not included in the Action Plan goals. As properties turn over we see a steady flow of requests for information from owners.

Demand for HOME funded owner-occupied rehabilitation assistance has decreased, and our goal has been decreased over the last few years in accordance with the lack of demand. We feel it is attributable to three factors: (1) the increase in value that allows the owner to access to equity to make desired repairs without the HOME requirements, particularly the requirement to bring the property up to all local and State codes, (2) the rapid increase in market values exceeding the allowable HOME after-rehab value, thus diminishing the pool of likely candidates, and (3) units that could benefit from rehabilitation are being bought by investors, rehabbed, and rented at market rates. Also past HOME, CDBG, and other publically-funded rehab has had a positive impact on the housing stock with fewer units needing rehabilitation. Only one application for homeowner rehabilitation was received over the last program year, but the applicant failed to fully complete the application due to the burden of supplying all income documentation as well as concerns with program requirements.

The CDBG program addressed priority needs within the public services program, particularly through housing stability efforts, and physical improvements achieved improvements for low-mod income areas and for people with disabilities. Please note that park program accomplishments are included in the public facility accomplishments data.

## 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	9,566	0
Black or African American	4,983	0
Asian	7,240	2
American Indian or American Native	7	0
Native Hawaiian or Other Pacific Islander	0	0
<b>Total</b>	<b>21,796</b>	<b>2</b>
Hispanic	2,955	0
Not Hispanic	18,841	2

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

### Narrative

The City of Malden is committed to serving all members of the community, and recognizes that structural racism creates barriers to access for important services and programs, including the City's Community Development Block Group (CDBG) program. The CDBG program continues to emphasize racial equity in its programming, including by improving language access in its public services programs. Success can be measured in part by comparing the racial and ethnic composition of CDBG beneficiaries with that of the city's population overall. In Program Year 2020, CDBG program beneficiaries were 46% white (compared to 40% citywide), 35% Asian (compared to 25% citywide), 24% Black (compared to 14% citywide), and 14% Latinx (compared to 8.4% citywide). Missing from this analysis is an apples-to-apples comparison of the service to other/ multiracial individuals, which is due to differences in racial data categorizations by HUD and the 2020 Census. Broadly speaking, this comparison shows that the CDBG program effectively serves Malden's diverse community, and that the program has reduced major obstacles to CDBG participation. Nevertheless, we know that people of color are disproportionately lower income, and that barriers to access still exist, particularly among immigrant communities that may be more distrustful of federal programs. The City continues to work to build trust in these communities and eliminate other programmatic barriers.

In the HOME Program, 2 new beneficiaries were created during Program Year 2020. Based on the beneficiary data, both beneficiaries identified as Asian. In previous CAPERs, we identified that the HOME program had a potential to increase services to Asian residents. Recently, the Asian beneficiary group has tended to be less than the proportion of the Asian population throughout the Consortium. This may indicate that number of Asian residents served by the HOME program is increasing, however, the low number of beneficiaries make this unclear at this time. More analysis on the beneficiary data in

comparison to the racial make-up in the Consortium will be re-evaluated when multifamily projects are completed.

It is important to note that while the CDBG beneficiaries are limited to Malden, the HOME program beneficiaries come from the eight communities of the North Suburban Consortium: Arlington, Chelsea, Everett, Malden, Medford, Melrose, Revere, Winthrop.

## 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	1,901,292	1,578,743
HOME	public - federal	2,483,085	2,302,412

Table 3 - Resources Made Available

### Narrative

The CDBG program uses resources from the annual entitlement grant, program income (primarily from loan payoffs), and the prior uncommitted balance. During Program Year 2020, \$1,901,292 was available for CDBG projects.

The HOME Program uses funds from several program years, primarily because of the length of time from commitment to completion of construction. The 2020 Annual Action Plan budgeted for \$2,250,504 in Expected Resources based on the PY2020 Entitlement of \$2,050,504 and \$200,000 of estimated Program income. During Program Year 2020, the actual HOME Investment Partnerships Funds made available were \$2,483,048.61. This amount consists of the PY2020 Entitlement of \$2,050,504 and \$432,544.61 of Program Income. The \$200,000 in Program Income was the expected receipts for the 2020 Program Year while the \$432,544.61 represents the actual receipts received. In addition, the NSC made it a practice to save Program Income from previous years to use in future years. At the beginning of the 2020 Program Year, the NSC had \$942,683.86 in Program Income funds from previous years that it partially expended during Program Year 2020.

### Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description

Table 4 – Identify the geographic distribution and location of investments

### Narrative

All CDBG programs take place in the city of Malden. Parks and public facilities programs take place in LMAs or, as in the case of ADA pedestrian improvements, are targeted to primarily benefit a presumed beneficiary like people with ambulatory or visual disabilities. Housing rehabilitation can take place citywide as long as the primary beneficiaries are LMI. Public services are also carried out throughout the city.

HOME Program funds are made available to the eight communities of the North Suburban Consortium: Arlington, Chelsea, Everett, Malden, Medford, Melrose, Revere, and Winthrop. In this program year,

projects were completed in both Arlington and Malden. Moreover, projects are underway in Arlington, Everett, Chelsea, Malden, Medford, and Revere demonstrating that all eight member communities are active in, and benefitting from, the HOME Program.



## 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.**

Matching Requirements: The North Suburban Consortium complies with federal matching requirements for HOME through the Massachusetts Rental Voucher Program managed by the housing authorities. Larger development projects also receive many sources of funding such as low income tax credits, and other state, local, and private financing which also count towards the NSC HOME Match dollars. The NSC HOME program has a significant amount of carry over match from prior years. Notwithstanding, we added to the amount of match in this Program Year with tenant based rental assistance, the State's MVRP program, managed by the housing authorities.

With regard to CDBG funds, many of our parks improvements projects and our public services leverage other funds to complete the work. For example, other local funds were used with CDBG funds to make improvements to the Beebe School and FitzGerald School playgrounds. Our public services applicants are required to detail how their programs leverage other funds, and our scoring system weighs leveraged funding among other important criteria when considering programs to approve. The ADA Pedestrian improvements project used local and state resources from Chapter 90 funds.

<b>Fiscal Year Summary – HOME Match</b>	
1. Excess match from prior Federal fiscal year	59,545,256
2. Match contributed during current Federal fiscal year	1,122,149
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	60,667,405
4. Match liability for current Federal fiscal year	495,362
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	60,172,043

**Table 5 – 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
Non-HOME Chelsea Housing Authority	09/30/2020	739,504	0	0	0	0	0	739,504
Non-HOME Everett Housing Authority	09/30/2020	213,851	0	0	0	0	0	213,851
Non-HOME Malden Housing Authority	09/30/2020	168,794	0	0	0	0	0	168,794

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
\$	\$	\$	\$	\$
942,684	432,545	868,994	0	506,235

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>						
Dollar Amount	0	0	0	0	0	0
Number	0	0	0	0	0	0
<b>Sub-Contracts</b>						
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0
	Total	Women Business Enterprises	Male			
<b>Contracts</b>						
Dollar Amount	0	0	0			
Number	0	0	0			
<b>Sub-Contracts</b>						
Number	0	0	0			
Dollar Amount	0	0	0			

**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	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

**Table 9 – 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		0	0			
Businesses Displaced		0	0			
Nonprofit Organizations Displaced		0	0			
Households Temporarily Relocated, not Displaced		0	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	0	0	0	0	0
Cost	0	0	0	0	0	0

**Table 10 – 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 Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	13	2
Number of Special-Needs households to be provided affordable housing units	1	0
<b>Total</b>	<b>14</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	11	0
Number of households supported through Rehab of Existing Units	11	0
Number of households supported through Acquisition of Existing Units	2	2
<b>Total</b>	<b>24</b>	<b>2</b>

Table 12 – Number of Households Supported

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

HOME New Units: Production of new units was below the one-year goal due to delays with the project known as 571 Revere. All eleven HOME units projected to be completed this year were part of that project. Since the close of the Program Year, the project has obtained a Temporary Certificate of Occupancy and is working on submitting all required close-out documentation. There are seven other projects under construction during Program Year 2020. Development of rental projects is typically a multiyear endeavor that takes longer than 12 months to complete.

Demand for HOME funded owner-occupied rehabilitation assistance has decreased, and we have decreased our goal accordingly. We feel it is attributable to three factors: (1) the increase in value that allows the owner access to equity to make desired repairs without the HOME requirements, particularly the requirement to bring the property totally up to standards, and (2) the rapid increase in market values exceeding the allowable HOME after-rehab value, thus diminishing the pool of likely candidates, and (3) units that could benefit from rehab are being bought by investors, rehabbed, and rented at market rents. Also past HOME, CDBG, and other publicly-funded rehab has had a positive impact on the housing stock with fewer units needing rehab.

The HOME-funded homebuyer assistance goal of 2 was met this year. Typically, we have little to no HOME-funded homebuyer assistance activities because the increases in housing values has put most previously modest-priced units out of reach for low and moderate income buyers. In addition to reaching our goal, we advised several owners of the affordable resale requirements, a workload that is not included in the Action Plan goals. As properties turn over, we see a steady flow of requests from owners.

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

For the HOME Program, the NSC anticipates a greater emphasis on new construction and adaptive reuse rental development and a de-emphasis on home buyer acquisition and home owner rehabilitation. However, the NSC intends to research ways in which the homebuyer acquisition and home owner rehabilitation programs can be adapted to be less burdensome for applicants and increase the likely pool of candidates by considering establishing local homeownership value limits. With rental development, the HOME dollars can be leveraged with LIHTC and other public funding to create more affordable units, whereas downpayment and rehab assistance does not leverage as much additional funding. Also, demand for development funding is strong, far exceeding our funding level, and we have three CHDOs that keep the pipeline active. The demand for rental development compared to a decrease in demand for down payment and rehab assistance has led to more funding budgeted for rental development and less for the other two projects in the new Action Plan.

**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.**

<b>Number of Households Served</b>	<b>CDBG Actual</b>	<b>HOME Actual</b>
Extremely Low-income	5	0
Low-income	5	2
Moderate-income	1	0
<b>Total</b>	<b>11</b>	<b>2</b>

**Table 13 – Number of Households Served**

## **Narrative Information**

In our HOME multifamily developments that have State funding we are seeing varying levels of affordability including more than the HOME-required units for very low income households as the result of the additional state subsidies and a variety of state bond-funded programs. We are also seeing mission-driven non-profit developers working with homeless providers to offer more than the required very low income units. However, no multifamily projects were completed this year. For HOME-funded down payment assistance, we are seeing that the homebuyers are just below the 80% AMI limit. The high prices of housing make it difficult for anyone with a lower income than 80% AMI to afford housing. As a result, the beneficiary data for the two completed HOME activities indicates that both households were between 60% and 80% AMI, or "Low Income" by HOME Program standards.

Please note that for the HOME Program "Low Income" refers to individuals at 80% or below AMI, "Very Low Income" refers to individuals at 50% or below AMI, and "Extremely Low Income" refers to individuals at or below 30% AMI. For CDBG, "Moderate Income" refers to individuals at 80% or below AMI, "Low Income" refers to individuals at or below 50% AMI, and "Extremely Low Income" refers to individuals at 30% or below AMI.

## **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**

CDBG public services include programs specializing in meeting the needs of homeless families and individuals, including outreach and needs assessments. Specifically, Action for Boston Community Development, Housing Families, Just-A-Start, and Youth Harbors have outreach and intake processes in place for working with homeless persons. The City works closely with these organizations to serve people experiencing homelessness. In addition, City staff have been trained in the No Wrong Door approach and the Coordinated Entry program. During the 2020 Program Year, MRA staff assisted two homeless individuals with their Coordinated Entry application to assist them in being connected to resources. Housing Families is connected to the Balance of State Continuum of Care network.

City staff have also supported a new individual homeless shelter in Malden operated by Housing Families. Opened during COVID-19 in response to a NOFO from DHCD, the shelter ultimately did not receive ESG funds but was funded through a combination of other sources from state and private funders. In PY21, the City anticipates using some CDBG-CV funds to support the shelter. The shelter serves approximately 20 individual adults experiencing homelessness and has a waitlist of about 100 people as of writing.

The City of Malden has supported outreach to homeless persons through partner organizations and through the Malden Warming Center. Homeless individuals who present in locations around Malden and who seek shelter are referred to the City's Human Services Director or first responders, who arrange for transportation to the Malden Warming Center or, depending on the need, arrange for a motel room for the individual (or family).

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

CDBG public services, including Housing Families, have experience placing homeless persons into shelters. After the COVID-19 pandemic made the need for additional shelter space painfully clear, the MRA worked with local non-profit agencies and the City to submit an application for ESG-CV funds for a shelter to take place at a Malden motel. DHCD has since funded that shelter proposal with non-ESG funds, with funding secured through June 2022. The shelter is administered by Housing Families, Inc. in coordination with the City and with community partners such as Bread of Life and Elliot Human Services. The shelter is in response to a persistent increase in homelessness, most recently evidenced by the dozens of homeless individuals relying on the Warming Center, which operates only during limited winter months and does not offer the same security or comfort as a shelter.



**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**

No HOME units were completed during Program Year 2020 to help low-income individuals and families avoid becoming homeless. However, there are 131 units funded with the HOME Program that are under construction and will be completed over the next few program years, increasing the housing supply for low-income individuals and families. In addition, many of these units are paired with social services such as The Neighborhood Developer's CONNECT Team which provides housing assistance, financial education, job skills training, and job search assistance as well as the East Boston Neighborhood Health Center which offers a variety of physical and mental health services. The East Boston Neighborhood Health Center also administers the PACE program which incorporates a variety of medical, recreational, socialization, rehabilitation, and therapeutic recreation services for elderly individuals.

The City of Malden has used COVID-related funding, including CDBG-CV, CvRF-MP, and other funds to prevent eviction and homelessness through rental assistance, mediation, and legal aid, both directly and through nonprofit public services partners.

**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**

In addition to our strong and growing web of CDBG-funded public services that work in homelessness prevention, the City has funded a security deposit pilot program, administered by ABCD, that uses local funds to provide security deposits for qualifying low-income households seeking a rental unit. The security deposit (or balance) would be returned to the program after completion of the tenancy, allowing each dollar to be used multiple times to help house people. The City of Malden also participates in the Balance of State and City staff have been trained in the No Wrong Door Approach and Coordinated Entry System. In addition, the staff was informed of homeless services providers within the City and surrounding communities that homeless individuals can be directed to for immediate assistance after being registered in the Coordinated Entry System such as Housing Families and the Malden Warming Center.

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

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

Malden along with each of the NSC Member Communities has an independent Public Housing Authority. Each Authority manages the public housing stock within its jurisdiction and administers federal and state housing vouchers. The majority of the PHAs have both federal and state-financed public housing.

While each community is served by a different PHA, the PHAs share common goals. These shared goals include improving the condition of the public housing stock, encouraging resident involvement, and providing opportunities and support for resident self-sufficiency.

The City of Malden has extremely limited resources to assist the Malden Housing Authority with its Capital Needs. This is true of all the NSC Member Communities. The City has supported the MHA's efforts at the recapitalization and restructuring of its housing portfolio to accomplish needed capital projects and ensure long-term sustainability of the public housing stock.

The MHA partners in programs with the City of Malden, the Malden Redevelopment Authority and various local housing and supportive service providers, such as Mystic Valley Elder Services, Housing Families, Heading Home, the Massachusetts Departments of Mental Health, Triangle, ROCA and other qualified non-profit providers in order to assist MHA resident and participant families and homeless, elderly and disabled individuals and families in being, and remaining, housed.

The MHA continues to take action to increase assisted housing choices during its 5 Year Plan term: by conducting Section 8 outreach of owner/landlords; by implementing a voucher homeownership program and a Section 32 homeownership program related to the disposition of 15 scattered-site units in partnership with the Malden Redevelopment Authority and the City of Malden; and by project-basing up to the maximum twenty percent (20%) of the MHA's Section 8 Tenant-Based Vouchers, and as that baseline number may be increased by any additional award or assignment of HUD Section 8 Voucher Assistance.

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

The Malden Housing Authority (MHA) continues to offer programs and activities that meet the needs of its residents. This includes advertising Job Postings, Training Opportunities and Bids/Projects on the MHA website to make residents aware of these opportunities; providing reasonable access to persons with disabilities for all Malden Housing Authority programs; cross advertisement programs such as lead paint abatement grants; administering applicable federal and state laws and regulations to achieve high ratings in compliance; providing decent, safe and sanitary housing in good repair – in compliance with program uniform physical condition standards – for extremely low, very low and low-income families;

achieving a healthy mix of incomes in its public housing developments by attracting and retaining higher income families and by working toward de-concentration of poverty goals; encouraging self-sufficiency of participant families and assist in the expansion of family opportunities which address educational, socio-economic, recreational and other human services needs; and promoting fair housing and the opportunity to participate in the public housing program and its services.

The MHA provides its residents with opportunities to become involved in management and policy implementation and encourages residents to participate in self-sufficiency and homeownership activities. Examples of these opportunities include:

Community Service Program: Non-exempt residents are required, as identified in the lease agreements, to contribute eight hours per month of community service, participate in eight hours per month of economic self-sufficiency activity, or a combination of the two.

Housing Choice Voucher & Public Housing Family Self-Sufficiency Programs: Residents are provided opportunities to engage in services offered by other local agencies including educational, financial, and personal development. A sample of programs available to residents includes intensive case management, resume development, employment search, credit repair counseling, and health and nutrition.

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

There are no troubled PHAs in the consortium area.

## **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 recently adopted an inclusionary zoning policy that requires certain developers to build a percentage of units as affordable, and provides some bonuses to do so. The City continues to review existing zoning to identify how best to remove barriers to build affordable housing, including the possibility of an affordable housing overlay district or other methods.

Several zoning restrictions exist which have the effect of limiting or hampering affordable housing development, or that serve as barriers to affordable housing. Land use controls and zoning ordinances are the primary obstacles, including widespread single-family zoning that restrict multi-unit homes from being built, such as two-family or triple decker housing that would be complementary to the existing housing stock. This is consistent throughout most of the NSC communities. Burdensome parking restrictions that require developers to build one parking space per bedroom also limit supply of affordable housing, particularly for units that have more than one bedroom and would therefore be appropriate for families with children. Consolidated Plan and CHAS data show a lack of housing suitable for families with children, and these restrictions may exacerbate that problem. Additional zoning restrictions that limit building heights in the downtown could also hamper affordable housing development, though these restrictions are not likely to have the same level of impact as the single-family zoning or parking restriction requirements.

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

The City is working with community partners to overcome language barriers and build trust among immigrant communities. The Consolidated Plan specifically named language barriers as a priority in public services. Public service subrecipients are asked about how they overcome language barriers, and the City has used language translation services more expansively while administering CDBG-CV rental and small business programs. In addition, marketing materials and applications for HOME assisted units throughout the NSC communities are offered in several different languages upon request to the property managers.

The City has also responded to national movements for racial justice by hiring a diversity, equity, and inclusion coordinator.

The City recognizes a need for greater affordable housing, and recently established an Affordable Housing Trust Fund. The Trust Fund's Board began meeting in early 2020.

The City also recently conducted an ADA Self-Evaluation, which will inform efforts to make City

programs more accessible.

Although CDBG and HOME serve a greater proportion of communities of color than exists in the city as a whole, we need to ensure that all members of our community - especially those with language barriers, which are associated with lower incomes and economic instability - can be served. In the HOME program the fair housing marketing plans are very extensive and assure that a diverse population is appropriately served in the rent up of new units as well as units under management. All marketing materials for new projects are posted in several local newspapers, including minority newspapers which may be translated in Spanish, Arabic, Brazilian Portuguese, Mandarin, and other local languages.

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

The CDBG housing rehabilitation program works in tandem with the Lead and Healthy Homes funding to address lead-based paint and other lead hazards.

All NSC communities are committed to lead abatement, and address it in all projects according to HUD directives. Outside of Malden, HOME and local CDBG funds remain the primary source of funds for lead abatement, and lead inspections are a routine part of all HOME-funded owner-occupied rehab projects. Furthermore, full abatement is performed at all properties awarded HOME funds where construction activity takes place as a part of the overall project.

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

The City recognizes a need for greater affordable housing, and recently established an Affordable Housing Trust Fund. The Trust Fund's Board began meeting in early 2020. The City recognizes that housing is a primary driver - and, too often, a consequence - of poverty. In establishing an Affordable Housing Trust Fund, the City is taking steps to invest in more affordable housing projects in the long-run.

The NSC has committed to funding over 130 new affordable units throughout its communities which will provide housing for low income, very low-income, and extremely low-income families when completed over the next few Program Years.

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

The City established an Affordable Housing Trust Fund Board, with representatives from City government, nonprofit developers, housing service nonprofits, the MHA, and LMI residents. The Trust recently finalized its Action Plan.

The City has developed a rich mosaic of partners that include non profit partners, the housing authority, and a variety of local government offices. CDBG programs, specifically public services, continue to encourage service providers to form partnerships and combine their efforts where practical. For the HOME program we would add the 7 other participating communities in the HOME consortium and an

array of state agencies and quasi-state agencies as partners.

The Malden Redevelopment Authority merged into the City of Malden as the new Office of Strategic Planning and Community Development (OSPCD), which has improved vertical alignment regarding institutional capacity to address affordable housing and community development needs on a programmatic and policy level.

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

Our CDBG public services programs have brought different public service providers together, and has also better connected city agencies like the senior center to service organizations. Similarly, the school department has built a relationship with the Sharewood Project health clinic, which provides hundreds of school physicals for students each year.

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

The biggest impediment to fair housing choice is the increasing cost of housing in comparison to income. In fact the housing purchase prices and valuations are now often above the HUD statutory limit, and therefore HOME down payment assistance and rehab assistance cannot be used. To overcome this impediment we are using HOME funds to create affordable rental and homeownership housing throughout the 8-community consortium jurisdiction. We have multifamily developments either under construction or in the pipeline in Chelsea, Everett, Revere, Malden, Arlington, and Medford.

The agency ensures that Affordable Housing Marketing Plans and Tenant Selection Plans for new rental units allow information to reach the widest audience possible. Any HOME assisted project needs to have fair housing information clearly listed on all marketing materials with provision for translation services and accommodations as needed. Member communities maintain relationships with realtors and local banks that have staff who can serve households who are not native English speakers.

## **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**

In general, staff follows at least three channels for subrecipient monitoring: 1) a “desk audit” of reports and reimbursement requests; 2) readily accessible technical assistance; and 3) on-site monitoring visits. The City of Malden recognizes that monitoring is an important and ongoing component of the entitlement grant programs and is committed to on-site visits to program site during the course of each program year. Additional monitoring is conducted to ensure compliance with programmatic regulations especially to new sub recipients, sub recipients having difficulty expending funds in a timely manner and those who are identified as needing technical assistance. Due to the COVID-19 pandemic, any on-site inspections scheduled for the HOME Program were done with electronic or mail submissions of materials where possible to prevent the spread of COVID-19.

*Subrecipient Monitoring:* City staff conduct a risk assessment to identify subrecipients that may require a comprehensive on-site monitoring, by carefully examining subrecipients past performance. High-risk subrecipients include those which are:

- new recipients of federal funds;
- experiencing turnover in key staff positions or a change in goals or direction;
- agencies with previous compliance or performance problems including failure to meet schedules, submit timely reports, or clear monitoring or audit findings;
- carrying out high-risk activities (such as economic development); and
- undertaking multiple entitlement grant funded activities at the same time.

*Davis Bacon Compliance:* Consultations with subrecipients and their contractors are held at the start of the grant to ensure all parties are aware of requirements. MRA staff conducts site visits and employee interviews, and check weekly payroll forms for accuracy and compliance.

*MBE/WBE Outreach:* Outreach to minority and women owned businesses are encouraged in both projects supported with entitlement funds as well as other city projects. The City encourages the utilization of MBE/WBE businesses by:

- Making direct reference to encourage minority and women business enterprises to participate in all solicitation for bids
- Pass-through requirements to private and nonprofit groups acting as subrecipients of

Consolidated Plan program funds, to the maximum extent possible, seek the inclusion of minorities and women-owned businesses in funded activities.

*Fair Housing/Section 3 Compliance:* The City ensures compliance with Fair Housing and Section 3 during the process of awarding grant agreements to selected agencies and throughout the program year.

**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 of availability of the CAPER was posted on September 10, 2021 in the local weekly newspaper (the Malden Advocate) which is widely distributed at various public venues, including City Hall, the Senior Center, and local coffee shops, and the draft CAPER was available on the MRA web site. A public hearing was held using Zoom during the 15 day comment period.



**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 recent years, the City's CDBG program has undergone slow but steady changes to improve its ability to serve communities of color and other underserved groups. This has included building relationships with local community organizations and improving translation and interpretation services in CDBG programs. Obstacles to programs continue, including the length and complexity of CDBG rehab applications and the financial terms of that program. The City is currently evaluating potential changes to the CDBG rehab program that would help low- and moderate-income people live in healthy and affordable homes.

Reported outcomes, accomplishments, and PI in PY20 do not reflect any open Section 108 loan activities.

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

No

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

## **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**

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

For the safety of tenants and inspectors, the NSC utilized a waiver under the “Availability of Waivers and Suspensions of the HOME Program Requirements in Response to COVID-19 Pandemic” memo published by Acting Assistant Secretary for Community Planning and Development, John Gibbs, on April 10, 2020 which, after a December 4, 2020 amendment, extended the requirement for PJs to complete on-site inspections of HOME-assisted rental housing to September 30, 2021. The NSC will continue to look for new guidance that may be released by HUD or public health officials related to inspections during the COVID-19 pandemic. Currently, the NSC holds a contract with MetroHousing Boston to complete on-site inspections of HOME-assisted rental housing by September 30, 2021, pending new guidance from HUD or public health officials. In total, approximately 181 HOME-assisted units in 52 HOME-assisted developments within the consortium’s communities were expected to be inspected this program year. This includes uncompleted inspections from Program Year 2019 as well as the required Program Year 2020 inspections.

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

All HOME development projects are required to submit an affirmative marketing/tenant selection plan. Because most rental developments have multiple funding sources there are several public agencies reviewing thus assuring a quality and complete plan. During Program Year 2020, we reviewed the affirmative marketing and tenant selection plans for three projects, St. Therese Townhomes, 181 Chestnut, and 1005 Broadway. In addition to reviewing the marketing plan we also review and comment on the final advertisement before rent-up, which we did in the case of 571 Revere, 34 units in Revere, 11 of which are HOME units and Downing Square, 34 units in Arlington, 11 of which are HOME units. The rent-up period for 571 Revere and Downing Square are not yet complete.

### **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**

Under the latest HOME IDIS instructions in the middle of the 2017 program year we began to save program income for the purpose of showing it as a resource budgeting it in the next program year. At the beginning of the Program Year the NSC had \$942,683.86 in Program Income. \$135,498.81 of those funds are committed (but not yet expended) to 571 Revere. In addition, \$432,544.61 in receipts were

received for 2020 Program Income. In Program Year 2020, \$804,058.49 in program income was expended on project costs associated with 181 Chestnut (\$700,000), Downing Square (\$451.12), 571 Revere (\$742.19), St. Therese Townhomes (\$100,717.03), Russel Place Down Payment Assistance (\$351.37), and Adams Street Down Payment Assistance (\$1,796.78). In addition, \$64,935.13 was expended in Program Administration. The beneficiaries of both down payment assistance projects identified as Asian. The rent-up portion for Downing Square, a 34 unit project with 11 HOME units constructed by HCA, 571 Revere, a 51 unit project with 11 HOME units constructed by TND, 181 Chestnut, a 32 unit project with 9 HOME units rehabilitated by TND and the St. Therese Townhomes, a 6 unit homeownership program with 3 HOME units constructed by TND are underway, but are not yet complete so we are unable to provide tenant characteristics at this time.

**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 NSC was very active in affordable resales: providing information to current owners, reviewing requests for resale computations, and assisting approximately 5 cases with the complete process including income qualifying the buyer and undertaking a property inspection. We assisted approximately 3 additional current owners by providing the resale price and process. During the 2020 Program Year, we also added 6 prospective homebuyers to our affordable housing resale list to make them aware of our affordable properties that end up for sale. We field 2 to 3 phone calls a month from residents seeking information about down payment assistance and housing counseling classes. The NSC works with other agencies such as Boston Private and local city-led initiatives to advertise other affordable housing programs to our affordable housing resale list and on our website. Lastly the City of Malden undertook a Housing Needs Assessment under a contract with MAPC and the City of Medford recently developed a Housing Production Plan.

The NSC also has a project under rehabilitation that is the acquisition and rehabilitation of 32 units of naturally-occurring affordable housing in Chelsea. This project will permanently deed restrict 30 of the 32 units within this building to maintain affordability of these units for the future. The NSC hopes to see more of these projects in the future and expects to review applications such as these from the City of Malden which is designing a rehabilitation program for NOAHs and vacant, problem properties within the City.