

# Executive Summary

## AP-05 Executive Summary - 91.200(c), 91.220(b)

### 1. Introduction

Malden addresses a range of community needs through programs that fund affordable housing, home rehabilitation, social services for low-income residents, and physical improvements to the City's parks, public facilities, and infrastructure. The City's Office of Strategic Planning and Community Development (OSPCD) manages several community development programs, including the Community Development Block Grant (CDBG) program and the North Suburban Consortium's HOME Investment Partnerships (HOME) program, both of which are funded by the U.S. Department of Housing and Urban Development (HUD). Before receiving federal funds for the CDBG and HOME programs, the City of Malden develops a five-year strategic plan called the Consolidated Plan that identifies the City's community development needs and goals. For each year during the Consolidated Plan, the City submits an Annual Action Plan to HUD detailing the specific programs, activities, and budgets it will use to achieve Consolidated Plan objectives. This Annual Action Plan is for Program Year 2022, which begins July 1, 2022 and ends June 30, 2023.

### Second Draft Annual Action Plan

The second draft Annual Action Plan includes all activities anticipated to be undertaken during Program Year 2022. At the time of public comment on the first draft, the U.S. Department of Housing and Urban Development had not released actual allocations for Program Year 2022. As a result, the first draft annual action plan included draft budget numbers which were to be adjusted to the actual allocations when available per the plans identified below. However, substantial changes were made to the down payment assistance and homeowner rehabilitation projects associated with the HOME Program that did not align with the budgeting plan outlined in the first draft of the allocation plan made available to the public. As such, this second draft plan is being republished for public comment with the only changes being to the down payment assistance and homeowner rehabilitation projects.

For the CDBG Program, the first draft of the plan assumed reduced funding due to federal budget cuts to the national CDBG program and the expected increase in entitlement communities due to the 2020 Census. If funds are cut further, the budget would be adjusted to reduce public service spending to 15% of the entitlement (prorated between services); admin spending to 20% of the entitlement, and may reduce rehab spending by the remaining amount of the reduction. The CBDG budget experienced a decrease in funding and followed the above plan, included in the first draft, for decreasing budget allocations throughout this second draft.

For the HOME Program, the first draft plan assumed level funding. The HOME Program saw a minor increase in funding Program-wise, but the NSC expects this to impact its allocation marginally, if at all. When actual allocations become available, the funding will be adjusted as follows. The administration project will include 10% of the allocation plus 10% of the anticipated program income. The CHDO Affordable Development project will include 15% of the allocation. The Downpayment Assistance/Closing Cost/Buydown Subsidy and Homeowner Rehab projects will remain with the same funding as stated in this plan. All remaining entitlement funding and anticipated program income will be allocated to the Rental and Ownership Development project.

Instead of the above plan, the Homeowner Rehab project was decreased by \$100,000 and the Downpayment Assistance/Closing Cost/Buydown Subsidy project was increased by \$100,000. All other budget categories were adjusted according to the plan laid out in the first draft of the plan made available to the public. See the particular project screen for an explanation of this change.

## **2. Summarize the objectives and outcomes identified in the Plan**

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The primary objective of HUD's Entitlement Programs is to develop viable communities through the provision of decent housing, a suitable living environment, and expanded economic opportunities. Four priority needs were identified with goals corresponding to those needs. The priority needs were determined by review of data, community meetings, public and stakeholder engagement, and NSC member consultations that took place during the 2020-2024 consolidated planning and regular meetings and public hearings throughout the previous program year in preparation for the creation of this annual action plan.

### **Malden's Community Development Goals and Objectives**

The 2020-2024 Consolidated Plan identified the following goals and objectives for the CDBG and HOME programs. Note that goals and objectives for the HOME program are adopted by the North Suburban Consortium, for which Malden is the lead member.

**Affordable Housing** – The City of Malden and the other seven communities in the North Suburban Consortium recognize the continuing need for the development of affordable owner-occupied and rental housing, rehabilitation of existing housing to ensure affordability and livability, and support to homebuyers. The escalating housing costs in the Greater Boston area have exacerbated an affordable housing crisis among low- and moderate-income households. The City of Malden and the NSC communities have prioritized the creation and preservation of affordable housing, including development of affordable rental and owner-occupied housing, as a strategy to address escalating housing costs for low- and moderate-income households.

**Public Services** – The City of Malden is focused on addressing the needs of low- and moderate-income residents, particularly immigrants, children, seniors, domestic violence survivors, people with disabilities, and other low- and moderate-income populations. The City prioritizes needs related to removing language barriers and other barriers to access; improving public health and health care access; promoting climate adaptation and environmental justice; addressing housing insecurity; and supporting upward mobility and economic opportunity, especially within oppressed groups.

**Parks, Public Facilities and Infrastructure** – The City of Malden has identified a need to improve parks, public facilities, and infrastructure to address accessibility, climate resiliency, and other needs disproportionately affecting low- and moderate-income residents. Through significant input from relevant City Departments and with broad community and stakeholder participation in the Consolidated Planning process, the City of Malden has identified Parks, Public Facilities, and Infrastructure as an important need. Through this need, the City will support its ongoing climate resiliency activities and ensure the City’s public space is accessible to all residents, and meet the needs of low- and moderate-income residents.

**Economic Empowerment** – The City of Malden has identified a need to provide economic opportunities to low- and moderate-income residents through job readiness, skill training, small business support, and other strategies in pursuit of economic justice for oppressed communities. Malden’s recent economic successes have helped reduce joblessness, but wages and incomes remain low and inequities persist. 56% of Malden residents are low- and moderate-income, with 40% of residents earning less than 50% of the Area Median Income (FY18 LMISD). Additionally, oppressed groups face wealth and earnings inequities, as well as higher rates of underemployment. Targeted assistance for local small businesses that create jobs for local residents is a demonstrated strategy towards ensuring economic growth benefits are shared equitably throughout Malden’s diverse community.

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

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

OSPCD, formerly the Malden Redevelopment Authority, has been effective in executing previous Consolidated Plans and Annual Action Plans and meeting CDBG and HOME targets. Some examples include recent investment in public parks in low-income neighborhoods, continued support of food pantries, health clinics, youth programs, and housing assistance through CDBG public services, and a HOME portfolio of more than 700 affordable units throughout the NSC with an additional 47 coming on line in the current Action Plan period. However, the NSC has seen slight delays in new construction and rehabilitation projects underway due to supply chain disruptions caused by the COVID-19 pandemic. Some of the goals set for affordable housing production in Program Year 2021 are now on track to be met during Program Year 2022. OSPCD has also kept in mind the rapidly changing needs of the low-and moderate-income population and the escalating regional housing crisis and continues to partner with agencies and organizations to develop and implement new strategies into the 2022 Annual Action Plan.

#### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

The City of Malden and the North Suburban Consortium implemented a broad-based approach to community participation. Two public hearings with two public comment periods were held in January 2022 and April 2022. The City of Malden along with a consultant has interviewed Public Housing Authorities, homeless, domestic violence, and veteran's service providers, local advocacy groups, and our development partners for the creation of the HOME-ARP Allocation Plan. These interviews have also helped shape the 2022 AAP as the needs of the HOME-ARP qualifying populations are also pertinent to the HOME program and the HOME program may be used to support HOME-ARP projects. Further details regarding these consultation efforts are included in AP-12.

A third public comment period was held throughout the month of June after the actual allocations were released by the U.S. Department of Housing and Urban Development and the budget was updated accordingly throughout this plan.

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

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

Please see the Summary of Public Comments included in AP-12.

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

No comments were rejected. See AP-12 for details.

#### **7. Summary**

See AP-12.

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

### 1. Agency/entity responsible for preparing/administering the Consolidated Plan

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

Agency Role		Name	Department/Agency
CDBG Administrator	MALDEN	Strategic Planning and Community Development	
HOME Administrator	MALDEN	Strategic Planning and Community Development	

**Table 1 – Responsible Agencies**

### Narrative

The Office of Strategic Planning and Community Development (OSPCD) in the City of Malden is the department charged with the administration of the federal Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) on behalf of the North Suburban Consortium. OSPCD prepares all plans and reports, provides financial oversight, and monitors program compliance. Other NSC communities receiving CDBG funds administer their programs at the local level.

### Consolidated Plan Public Contact Information

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## **AP-10 Consultation - 91.100, 91.200(b), 91.215(l)**

### **1. Introduction**

During the consolidated planning process, the OSPCD, on behalf of the City of Malden and the North Suburban HOME Consortium, undertook extensive consultations with relevant agencies, organizations, and community-based groups to obtain input on priority needs, recommend strategies, and investment opportunities related to the City's HUD CDBG and HOME funds. For this annual action plan, OSPCD reviewed the input from the consolidated planning process and held multiple public meetings, placed multiple newspaper ads with public comment periods, and considered the input from the HOME-ARP allocation planning process to inform our approach for the next Program Year.

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

The Malden Redevelopment Authority, which was responsible for the development of the Consolidated Plan, coordinated many of the planning, community development and housing initiatives with the City. The MRA merged with the City of Malden and is known as the Office of Strategic Planning and Community Development (OSPCD). OSPCD maintains continued collaborations with the relevant City Departments, Human Service Organizations, Housing Authorities, Community Housing Development Organizations, and homeless Continuum of Care members. The on-going collaboration enables the coordination of efforts and investments.

OSPCD leads the North Suburban Consortium's planning efforts. As the lead within the Consortium, the MRA seeks to coordinate HOME investments to best address the needs and priorities of NSC member communities.

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

In 2016, the City of Malden, as well as Medford, Revere, Everett, Chelsea, Melrose, and Winthrop, joined the Massachusetts Balance of State Continuum of Care. The Town of Arlington, which is now part of the Arlington-Somerville CofC recently joined the BoS CoC. The BoS CoC is managed by the Massachusetts Department of Housing and Community Development (DHCD) and is made up of 76 cities and towns, primarily in Norfolk and Middlesex counties. Malden shares the following Commonwealth of Massachusetts goals:

1. increase the number of permanent supportive housing units;
2. improve job readiness and employment rate;
3. provide homeless prevention and rapid rehousing assistance; and
4. provide case management services to increase likelihood of residential stability.

On Jun 16,

2019, the MRA and the City of Revere met with the DHCD at their offices in Boston to discuss the development of the 2020-2024 Consolidated Plan. In October 2021, OSPCD virtually met with the BoS CoC to review goals and priority needs in preparation for the HOME-ARP allocation plan.

Malden will continue to seek opportunities to support projects and programs that further the BoS CoC goals. Several projects currently under construction include extremely low-income units, units set-aside for homeless households, and supportive services. The Consolidated Plan consultations, as well as ongoing consultation with the continuum, will continue to have a direct impact on the allocation of funding. In September of 2020, the MRA coordinated a training on the BoS Coordinated Entry system for City of Malden employees to improve employee's awareness of the system and spread the No Wrong Door approach. The No Wrong Door approach is a policy which the OSPCD continues to implement by ensuring that a homeless individual or family seeking assistance is able to find assistance at any door within City Hall. The training focused on how to interact with these individuals, which organizations in the community they could be directed to (chosen from the BoS CoC partners list), and how to assist an individual with filling out and submitting an application for the Coordinated Entry system which pairs homeless households with permanent housing solutions suitable to their needs based on their vulnerability assessment.

OSPCD and NSC expect to fund an 11 HOME unit/14 unit total building in the City of Malden with a Bread of Life food pantry on the first floor. All of the units at this property will be reserved for formerly homeless individuals. In addition, Downing Square, an Arlington project under construction, has 5 units which are reserved for homeless individuals. The Downing Square project also includes an Arlington Eats food pantry which will serve the homeless tenants of the project. Funding the construction of permanent supportive housing units is the main way in which OSPCD assists the BoS CoC in its efforts to address the needs of homeless persons and persons at risk of homelessness.

During the pandemic, the City of Malden launched a Housing Stability Task Force (aka homeless prevention task force), co-chaired by Housing Families. Attendees include relevant City staff and nonprofit service providers, including the Mayor's office, the City's Office of Strategic Planning and Community Development (OSPCD, formerly MRA), the City Health Department, Housing Families, Action for Boston Community Development, Elliott Community Human Services, and others. Each week this group meets to discuss homeless and at-risk cases and each case is referred to the best agency equipped to address the issue. Information is anonymized prior to the meeting to protect constituent confidentiality.

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

The MRA has consulted with the Balance of State CoC on the Coordinated Entry system in 2020, however, none of the members of the NSC receives ESG funding or is responsible for the administration of the Homeless Management Information System (HMIS). OSPCD has continued consultation with the Balance of State CoC in preparation of the HOME-ARP Allocation Plan. Those discussions have helped inform this Action Plan as well.



As a member of the BoS CoC, the OSPCD will regularly consult with non-profits, housing authorities, state agencies, advocacy groups, and property developers, and support/advocate for Balance of State resources for NSC communities.

The City and the MRA advocated for ESG funding in late 2020 for a new individual shelter in Malden. Although the project has not yet received ESG funds, the state Department of Housing and Community Development (DHCD) and Malden's legislative delegation assisted shelter operator Housing Families, Inc. in securing alternative funding sources, and the shelter opened in early 2021.

## **2. Agencies, groups, organizations and others who participated in the process and consultations**

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

1	<b>Agency/Group/Organization</b>	Balance of State Continuum of Care
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Elderly Persons Services-Persons with Disabilities Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Balance of State CoC was consulted in a small meeting in July 2020 on the process for registering individuals in the Coordinated Entry system and best practices for coordinating care for homeless individuals through the No Wrong Door approach. This meeting was followed-up by a training for all City Staff in the Coordinated Entry system and No Wrong Door approach. In addition, we consulted the Balance of State in October 2021 to discuss the priority needs for homeless individuals, including discussion of household size, accessibility needs, and supportive service needs.

2	<b>Agency/Group/Organization</b>	HOUSING FAMILIES, INC.
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Affordable Housing Barriers
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organizations was consulted during a CDC Roundtable, held on April 1, 2021 to assess barriers to affordable housing development and develop strategies to address and overcome barriers to affordable housing development. Housing Families provides transitional and permanent housing and supportive services. It is active in the BoS Continuum of Care governance, and is a strong partner with City of Malden. Housing Families staff lead a local task force on homelessness described above. The task force includes Housing Families, Malden Mayor's Office, Malden Health Department, MRA, and other nonprofits with relevant experiences and services. The outcome of this task force is a more comprehensive and integrated approach to crisis response across all relevant City agencies and local nonprofit services.

3	<b>Agency/Group/Organization</b>	Just-A-Start Corporation
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Families with children Homelessness Strategy Affordable Housing Barriers
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organizations was consulted during a CDC Roundtable, held on April 1, 2021 to assess barriers to affordable housing development and develop strategies to address and overcome barriers to affordable housing development. Just-a-Start will continue to provide mediation services through CDBG, and meet other housing needs as well. Just-A-Start is regularly consulted with on eviction prevention and mediation issues.
4	<b>Agency/Group/Organization</b>	Asian Community Development Corporation
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Affordable Housing Barriers

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organizations was consulted during a CDC Roundtable, held on April 1, 2021 to assess barriers to affordable housing development and develop strategies to address and overcome barriers to affordable housing development. ACDC will continue to engage the low mod community in Malden, especially the Asian community, in housing and community development efforts. ACDC periodically engages with City staff to identify potential opportunities for permanent affordable housing or other community development activities, such as workforce development or homebuyer classes.
5	<b>Agency/Group/Organization</b>	Metro North Housing Corporation
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Affordable Housing Barriers
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organizations was consulted during a CDC Roundtable, held on April 1, 2021 to assess barriers to affordable housing development and develop strategies to address and overcome barriers to affordable housing development. Metro North Housing Corp is working towards the new construction of 14 affordable units within the City of Malden. MetroNorth Housing also attended the HOME-ARP roundtable discussion in October 2021 to discuss potential partnerships and the priority needs of our most vulnerable populations to inform the HOME-ARP allocation plan and the 2022 Annual Action Plan.

6	<b>Agency/Group/Organization</b>	The Neighborhood Developers, Inc., fka CHELSEA NEIGHBORHOOD HOUSING SERVICES
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Market Analysis Affordable Housing Barriers
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organizations was consulted during a CDC Roundtable, held on April 1, 2021 to assess barriers to affordable housing development and develop strategies to address and overcome barriers to affordable housing development. TND will continue to seek affordable housing opportunities in NSC area as well as maintain existing portfolio. TND also attended the HOME-ARP roundtable discussion in October 2021 to discuss potential partnerships and the priority needs of our most vulnerable populations to inform the HOME-ARP allocation plan and the 2022 Annual Action Plan. All TND residents benefit from the TND CONNECT program which aims to help people obtain living wage jobs and financial health and well-being through a wide array of resources and interventions.
7	<b>Agency/Group/Organization</b>	THE SOMERVILLE COMMUNITY CORPORATION
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Affordable Housing Barriers
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organizations was consulted during a CDC Roundtable, held on April 1, 2021 to assess barriers to affordable housing development and develop strategies to address and overcome barriers to affordable housing development. SCC will continue to work with the City of Malden on creating strategies to address Malden's problem properties list.
8	<b>Agency/Group/Organization</b>	Housing Corporation of Arlington
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-homeless Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization participated in the HOME-ARP roundtable discussion in October 2021 to discuss potential partnerships and the priority needs of our most vulnerable populations to inform the HOME-ARP allocation plan and the 2022 Annual Action Plan. HCA is in the process of completing a new development which includes five units set-aside for homeless individuals. They also run a homelessness prevention program.

9	<b>Agency/Group/Organization</b>	ARLINGTON HOUSING AUTHORITY
	<b>Agency/Group/Organization Type</b>	Housing PHA Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	An interview was held in February 2022 to discuss the PHA's inventory of family and elderly housing units as well as the current volume of the waitlist. A discussion was held on the accessibility and service needs of residents.
10	<b>Agency/Group/Organization</b>	CHELSEA HOUSING AUTHORITY
	<b>Agency/Group/Organization Type</b>	Housing PHA Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Strategy



	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	An interview was held in February 2022 to discuss the PHA's inventory of family and elderly housing units as well as the current volume of the waitlist. A discussion was held on the accessibility and service needs of residents.
11	<b>Agency/Group/Organization</b>	Everett Housing Authority
	<b>Agency/Group/Organization Type</b>	Housing PHA Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	An interview was held in February 2022 to discuss the PHA's inventory of family and elderly housing units as well as the current volume of the waitlist. A discussion was held on the accessibility and service needs of residents.
12	<b>Agency/Group/Organization</b>	THE MALDEN HOUSING AUTHORITY
	<b>Agency/Group/Organization Type</b>	Housing PHA Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities

	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	An interview was held in February 2022 to discuss the PHA's inventory of family and elderly housing units as well as the current volume of the waitlist. A discussion was held on the accessibility and service needs of residents.
13	<b>Agency/Group/Organization</b>	MEDFORD HOUSING AUTHORITY
	<b>Agency/Group/Organization Type</b>	Housing PHA Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	An interview was held in February 2022 to discuss the PHA's inventory of family and elderly housing units as well as the current volume of the waitlist. A discussion was held on the accessibility and service needs of residents.

14	<b>Agency/Group/Organization</b>	Melrose Housing Authority
	<b>Agency/Group/Organization Type</b>	Housing PHA Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	An interview was held in February 2022 to discuss the PHA's inventory of family and elderly housing units as well as the current volume of the waitlist. A discussion was held on the accessibility and service needs of residents.
15	<b>Agency/Group/Organization</b>	Revere Housing Authority
	<b>Agency/Group/Organization Type</b>	Housing PHA Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	An interview was held in February 2022 to discuss the PHA's inventory of family and elderly housing units as well as the current volume of the waitlist. A discussion was held on the accessibility and service needs of residents.
16	<b>Agency/Group/Organization</b>	Winthrop Housing Authority
	<b>Agency/Group/Organization Type</b>	Housing PHA Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	An interview was held in February 2022 to discuss the PHA's inventory of family and elderly housing units as well as the current volume of the waitlist. A discussion was held on the accessibility and service needs of residents.
17	<b>Agency/Group/Organization</b>	Action for Boston Community Development, Inc.
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-homeless Services-Health Services-Education Services-Employment

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization participated in the HOME-ARP roundtable discussion in October 2021 to discuss potential partnerships and the priority needs of our most vulnerable populations to inform the HOME-ARP allocation plan and the 2022 Annual Action Plan. ABCD provides a wide variety of programs including housing, financial health, education, and career development services.
18	<b>Agency/Group/Organization</b>	Massachusetts Housing and Shelter Alliance
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization participated in the HOME-ARP roundtable discussion in October 2021 to discuss potential partnerships and the priority needs of our most vulnerable populations to inform the HOME-ARP allocation plan and the 2022 Annual Action Plan. MHSA provides several services aimed at ending homelessness.
19	<b>Agency/Group/Organization</b>	CAMBRIDGE HEALTH ALLIANCE
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization participated in the HOME-ARP roundtable discussion in October 2021 to discuss potential partnerships and the priority needs of our most vulnerable populations to inform the HOME-ARP allocation plan and the 2022 Annual Action Plan. Cambridge Health Alliance provides medical services to low-income households, including many health services covered under the HOME-ARP program.

20	<b>Agency/Group/Organization</b>	RESPOND INC
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Victims of Domestic Violence
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization participated in the HOME-ARP roundtable discussion in October 2021 to discuss potential partnerships and the priority needs of our most vulnerable populations to inform the HOME-ARP allocation plan and the 2022 Annual Action Plan. RESPOND, Inc. provides legal, law enforcement, and intervention services for victims of domestic violence. This is one of the HOME-ARP qualifying population and a population that one of our development partners specialize in.

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

OSPCD consulted with all required types of organizations required. For types of organizations not specially described in this Annual Action Plan, refer to the 2020-2024 Consolidated Plan. All consultation completed in preparation of the consolidated plan is used to inform this annual action plan.

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

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care	Massachusetts Department of Housing and Community Development	Increase affordable housing opportunities for low and very-low income households; increase supportive services for special needs housing and homeless populations

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Housing Production Plan	City of Medford	Increase affordable housing opportunities for low and very-low income households, specifically studio and one-bedroom units; preserve existing affordable housing units
Housing Productions Plan	City of Melrose	Increase affordable housing opportunities for low and very-low income households; preserve existing affordable housing units

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

**Narrative**

The City of Malden recognizes that its housing and economic development initiatives must be placed in a regional context. Malden enjoys good relations with its neighbors and regularly consults with neighboring jurisdictions about regional needs.

The City of Malden through the OSPCD is in regular contact with various public and private agencies to ensure funding priorities are in line and coordinated with current community development goals and objectives. OSPCD consults with numerous housing and real estate entities through its leadership of the North Suburban HOME Consortium. The OSPCD regularly works with Mass. DHCD on jointly funded new rental developments in the eight NSC communities, and coordinates management and monitoring issues involving the existing portfolio.



**AP-12 Participation - 91.401, 91.105, 91.200(c)**

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

Public hearings for the action plan were held in January 2022 and April 2022. Despite newspaper advertisements related to the public hearing, no individuals from the public attended the first meeting to provide input on the action plan goals. However, there has been significant attendance at HOME-ARP roundtables and we held interviews with each of the public housing authorities. The input from these meetings was also used to inform the goals in the PY2022 Action Plan. Goal-setting was based on the 2020-2024 consolidated planning process which involved significant community input which is discussed throughout this action plan. Two attendees came to the second public hearing and asked questions about how the funding gets allocated.

**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing	Non-targeted/broad community	A virtual public hearing on January 26, 2022. There was no attendance.	Not applicable. No attendance.	Not applicable. No comments.	
2	Public Hearing	Non-targeted/broad community	A virtual public hearing on April 13, 2022. Two residents attended the meeting.		All comments were accepted.	
3	Newspaper Ad	Non-targeted/broad community	No responses to newspaper ad placed in Malden Advocate on ????	No comments to newspaper ad placed in Malden Advocate on ????	Not applicable.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Newspaper Ad	Non-targeted/broad community	No responses to newspaper ad placed in Malden Advocate on ????	No comments to newspaper ad placed in Malden Advocate on ????	Not applicable.	

**Table 4 – Citizen Participation Outreach**

## Expected Resources

## AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

### Introduction

To the greatest extent possible, the City of Malden will seek to leverage additional public and private funds to support the goals of this plan and maximize the impact of Community Development Block Grant (CDBG) program funds. OSPCD, in partnership with the City of Malden, evaluates projects and programs to ensure that additional resources are leveraged at every opportunity.

HOME Investment Partnership Program (HOME) resources are utilized throughout the entire North Suburban Consortium area.

Anticipated resources for the next year includes:

- Community Development Block Grant (CDBG) - \$1,733,867
- HOME Investment Partnership Program (HOME) - \$2,513,947
- Total - \$

It is the practice of the City of Malden to reprogram program income as it becomes available for its CDBG program. Virtually all program income from a given year is spent within that year, offsetting other funds that are carried forward to the following year through a Prior Uncommitted Balance line. The CDBG PI shown below is the PI that was received in PY20 through April, all of which was spent within that year. The Prior Year Resources line below reflects funds that were offset by the PI and funds that otherwise were unspent in the previous year. Note that the CDBG PI figure shown below shows actual PI through April PY20, and the PI shown on the SF 424 (\$300,000) reflects anticipated PI in the coming program year.

For the HOME Program, the program income reported is an estimated amount of program income expected to be received during PY22.

### Anticipated Resources

Program	Source	Uses of Funds	Expected Amount Available Year 1	Expected	Narrative Description
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	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,306,818	100,000	327,049	1,733,867	4,298,550	Block grant from U.S. Department of Housing and Urban Development to address housing, community development and economic development needs.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	2,163,947	350,000	0	2,513,947	8,203,788	Grant from U.S. Department of Housing and Urban Development to address affordable housing needs.

Table 2 - Expected Resources – Priority Table

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

The jurisdiction leverages federal resources against other sources of federal, state, local and private funding to maximize the impact of CDBG and HOME funds. Leveraging varies from activity to activity depending on the project scope. For instance, the Federal Low Income Housing Tax Credit (LIHTC), Historic Tax Credits, and various affordable housing loan and grant products from the Federal Home Loan Bank, Mass Housing, and Mass Development, and bond funded assistance from MA DHCD can be leveraged with HOME funding to develop affordable housing.

Although the CDBG program does not require a match, the HOME program (administered by Malden) requires a 25% non-federal cash or non-cash match of the annual grant amount, entitlement, less 10% for administration and 5% for CHDO operating support. The NSC currently has accumulated match of **\$60,172,043**.

The City of Malden anticipates CDBG funds will leverage additional resources. Non-entitlement funds that will be used to further goals of the Strategic Plan may include: private foundations, organizations, and individuals. The following leveraged resources are anticipated during the Consolidated Plan period:

**City Funds:** The annual City budget commits resources for the priority activities including Public Parks, Facilities, and Infrastructure, and the Health Department. Additionally, local Community Preservation Act funds are frequently used in combination with CDBG funds for community development projects.

**Affordable Housing Resources:** Affordable Housing Developments are likely to utilize a variety of State Housing Resources including Housing Bond funds, the Mass Rental Voucher program, Low Income Housing Tax Credits (LIHTC) and private mortgage financing. Many communities in the NSC, including Malden, have Community Preservation Act funds available for affordable housing development as well as for community parks.

**Philanthropy:** Private funding from national, state, and local funders including the United Way, private foundations, and private donors.

**New Market Tax Credits:** NMTC program provides tax credit incentives for non-housing equity investment.

**Section 8 Funds:** Section 8 is administered by the Malden Housing Authority and DHCD and provides rental subsidies.

**Continuum of Care Fund:** Project funds awarded to non-profit human services providers to assist in housing services to homeless persons through a selection system established by the HUD NOFA and administered by the Balance of State Continuum of Care.

The HOME program matching requirements are met through State Housing Bond funds and the Mass Rental Voucher program among other allowable match sources. Matching funds requirements are monitored by OSPCD as the NSC Lead Entity.

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

The City of Malden's new Affordable Housing Trust Fund is working to identify publicly owned land or other property available to address affordable housing and other community development needs. The City of Medford is making a similiar effort after the publication of their Housing Production Plan.

**Discussion**

The priorities identified within the Strategic Plan are the outcome of an extensive, comprehensive effort to identify community needs. The Strategic Plan assesses the available resources to meet those needs. The City of Malden's investments will leverage public and private funds to address the needs regarding economic development, affordable housing, community development, and special needs populations.

Low and moderate income residents' needs continue to change, and the Consortium and the City of Malden's programs will need to change with them. Responding to COVID-19, the housing crisis, combating climate change, and addressing growing wealth disparities are urgent challenges that will require local, state, and federal programs and policymakers to be united behind a strategy of affordable housing development, housing production, climate resiliency, environmental justice, and economic justice.



## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Create New Affordable Housing	2020	2024	Affordable Housing		Affordable Housing	CDBG: \$132,724 HOME: \$1,977,553	Rental units constructed: 44 Household Housing Unit Rental units rehabilitated: 2 Household Housing Unit Homeowner Housing Added: 3 Household Housing Unit Homeowner Housing Rehabilitated: 3 Household Housing Unit
2	Improve Affordable Housing Ownership Opportunities	2020	2024	Affordable Housing		Affordable Housing	HOME: \$185,000	Direct Financial Assistance to Homebuyers: 8 Households Assisted
3	Expand Affordability in Existing Housing	2020	2024	Affordable Housing		Affordable Housing	CDBG: \$105,278 HOME: \$100,000	Rental units rehabilitated: 4 Household Housing Unit Homeowner Housing Rehabilitated: 5 Household Housing Unit
4	Improve Parks Public Facilities and Infrastructure	2020	2024	Non-Housing Community Development		Parks, Public Facilities, and Infrastructure	CDBG: \$640,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 4000 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Improve Public Services	2020	2024	Non-Homeless Special Needs		Public Services	CDBG: \$196,000	Public service activities other than Low/Moderate Income Housing Benefit: 4000 Persons Assisted Homelessness Prevention: 20 Persons Assisted
6	Provide Economic Opportunities	2020	2024	Non-Housing Community Development		Economic Development	CDBG: \$0 HOME: \$0	

**Table 3 – Goals Summary**

**Goal Descriptions**

1	<b>Goal Name</b>	Create New Affordable Housing
	<b>Goal Description</b>	<p>Funding to support the development of affordable housing units by non-profit/ for profit developers including organizations designated as CHDO's. The Consortium has three entities designated as CHDO's that will work on development of rental units. Note that the Action Plan numerical goal is for completed units, per HUD instructions. During the program year there will be approximately 293 rental development units under construction or in the pipeline prepping for loan closing.</p> <p>Anticipated completions: Downing Square, 19R Park Avenue, Arlington 11 HOME units of 34 total; St. Therese 9% Condos, 801 Broadway, Everett, 11 HOME units of 44 total; St. Therese 4% Condos, 801 Broadway, Everett, 11 HOME units of 33 total; St. Therese Townhomes, 10-20 Gledhill Avenue, 3 HOME units of 6 total, 1005 Broadway, Chelsea, 11 HOME units of 38 total.</p> <p>Currently under construction: Downing Square, 19R Park Avenue, Arlington 11 HOME units of 34 total; St. Therese 9% Condos, 801 Broadway, Everett, 11 HOME units of 44 total; St. Therese 4% Condos, 801 Broadway, Everett, 11 HOME units of 33 total; St. Therese Townhomes, 10-20 Gledhill Avenue, 3 HOME units of 6 total, 1005 Broadway, Chelsea, 11 HOME units of 38 total.</p> <p>Anticipated starts: Fellsway West II, 703 Fellsway West, Medford 3 HOME units out of 3 total, Bread of Life, 54 Eastern, Malden 11 HOME units out of 14 total, 25 Sixth Street Rentals, 25 Sixth Street, Chelsea 11 HOME units of 56 total, 25 Sixth Street Condos, 25 Sixth Street, Chelsea 3 HOME units of 6 total. In the pipeline awaiting State funding is 170 Cottage Street, Chelsea which anticipates 11 HOME units of 86 total.</p> <p>Funding for this goal includes the CHDO Operating set-aside.</p> <p>The CDBG Rehab program anticipates rehabbing 5 units this year, including 3 owner-occupied units and 2 rental units.</p>
2	<b>Goal Name</b>	Improve Affordable Housing Ownership Opportunities
	<b>Goal Description</b>	<p>Funding for Direct Assistance to income-eligible First-time Homebuyers. Funds will be used to pay eligible closing costs and downpayment towards the purchase of a single family home (including condos, townhouses). NSC currently does not offer assistance towards purchase of mobile homes. COVID-19 has limited the number of active contractors and the ability of income-eligible buyers to purchase housing in a tight market. The skyrocketing prices of homes throughout the Consortium make it difficult for low to moderate income buyers to find opportunities. However, we expect several affordable inclusionary zoning condominium units to come online in Medford and Chelsea throughout the program year. This will create an opportunity for low-income first-time homebuyers to capitalize on this programmatic resource. The funding for this goal has been increased by \$100,000 for this Program Year since the first draft plan to ensure there is enough funding for future buyers of these units. In addition, the NSC has taken additional measures to better market the program and gain interest.</p>

3	<b>Goal Name</b>	Expand Affordability in Existing Housing
	<b>Goal Description</b>	<p>Expand affordability of existing rental and owner-occupied housing through rehabilitation, thereby improving livability and ensuring homes become or remain affordable to low- and moderate-income households. Rehabilitation includes bringing units to code standard, providing safety improvements, energy efficiency and utility improvements, access modifications, and treatment of lead or other.</p> <p>The CDBG rehab program anticipates rehabilitation of 4 rental and 4 owner-occupied housing units.</p> <p>The HOME homeowner rehabilitation program anticipates rehabilitation of one owner-occupied housing unit.</p>
4	<b>Goal Name</b>	Improve Parks Public Facilities and Infrastructure
	<b>Goal Description</b>	<p>Malden’s CDBG program contributes funding to physical improvement projects throughout the city, including to parks, public facilities, and infrastructure, as well as nonprofit buildings in limited circumstances. Like other CDBG-funded activities, physical improvements must primarily benefit low- and moderate-income (LMI) residents. Examples include improving a park in a low-income neighborhood, upgrading a Malden Public Schools playground, and making Malden’s sidewalks and intersections safer for disabled pedestrians. CDBG funding has been essential to achieving many physical improvements in the City, and is often combined with other funding sources to make large projects possible.</p> <p>PY22 physical improvement projects total \$640,000, including \$150,000 for ADA pedestrian improvements, \$140,000 for Mazonson Basketball Court, and \$350,000 for the Early Learning Center Playground.</p>

5	<b>Goal Name</b>	Improve Public Services
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<p><b>Goal Description</b></p>	<p>Malden's CDBG program provides grants to qualified human service organizations through the public services program. Public services are social services administered by nonprofit agencies and organizations that directly benefit low-income Malden residents. Examples include homelessness prevention, after school programming, and transportation for elderly or disabled residents. Collectively, these programs serve thousands of low-income Malden residents each year and further the CDBG program's objective to address the causes and consequences of poverty.</p> <p>PY22 public services include 14 social service programs that meet the needs of low- and moderate-income households. These include:</p> <ul style="list-style-type: none"> <li>• Action for Boston Community Development's housing assistance program</li> <li>• Asian Community Development Corporation's A-VOYCE Youth Services program</li> <li>• The City of Malden's Malden Elderly Transportation program</li> <li>• First Church of the Nazarene's Malden Warming Center program</li> <li>• Housing Families' Homelessness Prevention program</li> <li>• Immigrant Learning Center's English for Speakers of Other Languages program</li> <li>• Just-A-Start's Housing Stabilization program</li> <li>• Justice Resource Institute's Youth Harbors program</li> <li>• Malden Neighborhood Basketball League</li> <li>• Friends of Malden Teen Enrichment Center's Wellness Program</li> <li>• Mystic Valley Elder Services' Meals Program</li> <li>• Tuft University's Sharewood Project</li> <li>• YMCA Malden, and</li> <li>• YWCA Malden</li> </ul> <p>The total public services budget for PY22 is \$196,000.</p>
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6	<b>Goal Name</b>	Provide Economic Opportunities
	<b>Goal Description</b>	No economic development opportunities are pursued in the PY22 CDBG budget, however OSPCD anticipates potential economic development activities later in the 5-year Consolidated Plan. Additionally, some public services activities promote economic empowerment, but are counted under the Public Services goal.

## AP-35 Projects - 91.420, 91.220(d)

### Introduction

This Year Three Annual Action Plan is planned to meet priority needs identified in the 2020-2024 Consolidated Plan. HOME funds are used for rehab, CHDOs, rental and ownership development, downpayment assistance, and administration. CDBG funds are used for rehab, public service programs, parks, public facilities, public infrastructure, Section 108 repayments, and administration and planning.

In Year 3 NSC intends to use the HOME program for four projects: homeowner rehab, homebuyer assistance, CHDO affordable development and rehab, and new housing development (rental or ownership), consistent with the 5-year plan. These projects will directly enhance the suitable living environment of residents through new or improved accessibility, affordability, or sustainability.

The NSC through the HOME program plans to continue to give priority to creating additional affordable units while also providing resources to create homeownership opportunities and to address critical rehabilitation needs. Rehab will improve the quality of life for residents in their home, first time homebuyer programs will directly benefit households with the opportunity to own a home and contribute to neighborhood stabilization. Creating additional affordable units addresses the critical deficiency in the supply of available housing. The NSC will also consider opportunities to preserve and rehabilitate naturally occurring affordable housing (NOAH) as well as rehabilitation of problem properties as defined by consortium communities' relevant building and inspectional services departments.

Malden's CDBG program continues to support public services, housing rehabilitation, and physical improvement activities to benefit low- and moderate-income people. CDBG funds are also used for CDBG administration to sustain the program's operation and for Section 108 payments to make principle and interest payments for previous CDBG activities that were paid using Section 108 loans.

#	Project Name
1	CDBG Administration PY22
2	HOME Administration PY22
3	CDBG Public Service PY22
4	CDBG Rehab PY22
5	HOME - Homeowner Rehab PY22
6	CHDO Affordable Development PY22
7	Rental and Ownership Development PY22
8	Downpayment Assistance/Closing Costs/Buydown Subsidy PY22
9	Park Improvement PY22
10	Public Facility Improvements PY22
11	Public Infrastructure Improvements PY22



#	Project Name
12	Section 108 Loan Payments

**Table 4 – Project Information**

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

Allocation priorities were based on the needs analysis done for the 5 year plan, in collaboration with the proposals that were received for this program year. Proposals that were deemed most advantageous with respect to meeting the needs as illustrated in the needs assessment were given higher priority. Program income will be used to supplement expected resources available in the next program year's annual action plan process.

NSC estimates 17 HOME units of affordable housing for extremely low-income to moderate income families to be completed in Program Year 2022. High land costs and high housing values are an increasing obstacle to addressing underserved needs. As increasing housing values make it more difficult to buy an affordable house the NSC is allocating more funding to rental development which has the potential through leveraging to create more affordable units. We also continue to face federal regulatory obstacles of interfacing HUD HOME and Homeless funding, each with a different set of rules that don't easily mesh, and continue to seek innovative solutions to serve homeless populations with HOME funded developments. Three of the seventeen units to be completed in Program Year 2022 will be set-aside for referrals from the Somerville Homeless Coalition shelter. In addition, we anticipate getting the Bread of Life project under construction during Program Year 2022. This project will result in fourteen new units for homeless households. Over the last program year we have seen significant increases in construction costs due to the COVID-19 pandemic. As a result, these projects require more public subsidy to continue to have extremely-low and very-low income units. The need for larger commitments means that the number of projects assisted, and subsequently the number of units assisted, will dwindle in future years.

CDBG needs were determined through the Consolidated Plan. The most significant obstacle to addressing underserved needs is lack of affordable housing, which negatively affects LMI people and the ability of programs and projects to serve them. For example, public service programs have difficulty engaging with LMI households when those households have limited stability due to lack of affordable housing. OSPCD is committed to addressing this unmet need, and to improving programs and projects to reduce barriers due to lack of affordable housing.

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

<b>1</b>	<b>Project Name</b>	CDBG Administration PY22
	<b>Target Area</b>	
	<b>Goals Supported</b>	Expand Affordability in Existing Housing Improve Parks Public Facilities and Infrastructure Improve Public Services
	<b>Needs Addressed</b>	Affordable Housing Public Services Parks, Public Facilities, and Infrastructure
	<b>Funding</b>	CDBG: \$261,364
	<b>Description</b>	This project covers CDBG-eligible Planning, Administration, and Management activities. \$270,000 has been budgeted toward this project, which is 20% of the entitlement grant amount.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	Malden City Hall, Third Floor 215 Pleasant Street, Malden MA 02148
	<b>Planned Activities</b>	This project covers CDBG-eligible Planning, Administration, and Management activities, including general administration of the CDBG program and related community development activities.
<b>2</b>	<b>Project Name</b>	HOME Administration PY22
	<b>Target Area</b>	
	<b>Goals Supported</b>	Create New Affordable Housing Improve Affordable Housing Ownership Opportunities Expand Affordability in Existing Housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$251,394
	<b>Description</b>	Administration eligible under the HOME regulations including preparation of the Annual Action Plan. The estimated amount for this project is 10% of the annual grant (\$216,394.70) plus 9.99% of the estimated program income (\$34,999.30) for a total budgeted amount of \$251,394.
	<b>Target Date</b>	6/30/2023

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	Administration of all pre-HOME Agreement work for new activities and monitoring of completed activities takes place through the communities of the North Suburban Consortium: Arlington, Everett, Chelsea, Malden, Medford, Melrose, Revere and Winthrop.
	<b>Planned Activities</b>	Administration of all pre-HOME Agreement work (ie environmental review, underwriting) for new activities. Administration of all monitoring of completed activities. Development of the Annual Action Plan. Completion of annual performance report (CAPER), Participation in training. Investigation of other opportunities to use HOME funds such as rehabilitation of problem properties as defined by consortium communities' relevant building and inspectional services departments.
<b>3</b>	<b>Project Name</b>	CDBG Public Service PY22
	<b>Target Area</b>	
	<b>Goals Supported</b>	Improve Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$202,500
	<b>Description</b>	
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 4,000 low- and moderate-income residents are expected to benefit from the proposed activities, including youth, seniors, people with disabilities, non-English speakers, people experiencing a housing crisis or food insecurity, and families with children needing health care.
<b>Location Description</b>	Public services programming takes place at locations throughout the city, as well as remotely.	

	<b>Planned Activities</b>	<p>PY22 public services include 14 social service programs that meet the needs of low- and moderate-income households. These include:</p> <ul style="list-style-type: none"> <li>• Action for Boston Community Development's housing assistance program</li> <li>• Asian Community Development Corporation's A-VOYCE Youth Services program</li> <li>• The City of Malden's Malden Elderly Transportation program</li> <li>• First Church of the Nazarene's Malden Warming Center program</li> <li>• Housing Families' Homelessness Prevention program</li> <li>• Immigrant Learning Center's English for Speakers of Other Languages program</li> <li>• Just-A-Start's Housing Stabilization program</li> <li>• Justice Resource Institute's Youth Harbors program</li> <li>• Malden Neighborhood Basketball League</li> <li>• Friends of Malden Teen Enrichment Center's Wellness Program</li> <li>• Mystic Valley Elder Services' Meals Program</li> <li>• Tuft University's Sharewood Project</li> <li>• YMCA Malden, and</li> <li>• YWCA Malden</li> </ul>
4	<b>Project Name</b>	CDBG Rehab PY22
	<b>Target Area</b>	
	<b>Goals Supported</b>	Expand Affordability in Existing Housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	CDBG: \$132,724
	<b>Description</b>	
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	5 households, including 2 renter-households and 3 owner-households, most of whom are LMI, are expected to benefit from this activity.
	<b>Location Description</b>	Rehabilitation projects will take place throughout the city.

	<b>Planned Activities</b>	<p>Malden’s Housing Rehabilitation program provides financial assistance to improve housing occupied by low- and moderate-income residents. Program staff assist property owners in applying to the program, scheduling inspections, and hiring and overseeing contractors. The program covers a large number of rehab activities, including: structural, roofing, heating, electrical, plumbing, and HVAC work; internal and external lead abatement and replacement of lead water service pipes; remediation of radon, mold, asbestos, and other hazardous materials; replacement of smoke and carbon monoxide detectors; repairing health or building code violations and “trip and fall” hazards, such as defective floor coverings; weatherization; and work that addresses many other common health and safety hazards.</p> <p>Eligible properties may be owner-occupied or investor-owned single or multi-unit buildings located in the City of Malden. Units assisted must be occupied by low- or moderate income (LMI) households to qualify, with limited exceptions in multifamily housing.</p>
5	<b>Project Name</b>	HOME - Homeowner Rehab PY22
	<b>Target Area</b>	
	<b>Goals Supported</b>	Expand Affordability in Existing Housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$100,000
	<b>Description</b>	Funding of all homeowner rehabilitation activities eligible under the HOME program.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The amount budgeted for homeowner rehabilitation has the capability of funding a couple rehabilitation projects for families in need of a safe and healthy home. However, we expect few, if any, homeowners to capitalize on this resource due to the COVID-19 pandemic which will have limited the capacity of homeowners to consider homeowner rehabilitation and limited the number of active contractors. In addition, the value of homes often exceeds 95% of the purchase price limits before rehabilitation. This regulatory constraint makes many households ineligible for the program. As such, we have reduce the funding for this project by \$100,000 from the first draft of this plan.
	<b>Location Description</b>	Homeowner rehabilitation activities can take place in any of the eight communities of the North Suburban Consortium: Arlington, Chelsea, Evertt, Malden, Medford, Melrose, Revere, Winthrop.

	<b>Planned Activities</b>	At the time of the writing of the Action Plan, there are no planned homeowner rehabilitation activities in the pipeline. This may be attributed to the COVID-19 pandemic which has limited the capacity of municipalities, contractors, and property owners to engage in any rehab activity. It may also be due to the increase home values which result in the homes being valued too high to qualify for the program. Other opportunities for homeowner rehabilitation activities are being investigated such as rehabilitation of problem properties (often a homeowner in distress and unable to maintain the home) as defined by consortium communities' relevant building and inspectional services departments.
6	<b>Project Name</b>	CHDO Affordable Development PY22
	<b>Target Area</b>	
	<b>Goals Supported</b>	Create New Affordable Housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$324,593
	<b>Description</b>	Development and rehabilitation of affordable rental and/or home ownership units via one of three certified CHDOs: Housing Corporation of Arlington, Medford Community Housing, The Neighborhood Developers. Funding for this project is 15% of the grant amount.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	CHDO affordable development opportunities will benefit 67 families, all of whom will be low-to-moderate income, in Everett and Arlington during the 2021 program year. This is based on expected completions of St. Therese 4% Condos, 801 Broadway, Everett, 11 HOME units of 33 total units and Downing Square, 19R Park Avenue, Arlington, 11 HOME units of 34 total units. One CHDO Affordable Development activity - Fellsway West II, 703 Fellsway West, Medford, 3 HOME units of 3 total units - is expected to begin construction in PY22 and complete in PY23.  The below goals are based on HOME units completed for projects funded with CHDO set-aside.

	<b>Location Description</b>	<p>There are 3 CHDOs operating in the NSC, and the locations of their developments are based on the approved areas they serve. Housing Corporation of Arlington(HCA)-Town of Arlington; Medford Community Housing(MCH)-City of Medford; and The Neighborhood Developers(TND)-Cities of Chelsea, Revere, and Everett. Each CHDO has a development in the construction and/or planning stage.</p> <p>The expected completions in Program Year 2022 are located at 19R Park Avenue in Arlington and 801 Broadway in Everett.</p>
	<b>Planned Activities</b>	<p>HCA: Downing Square nearing completion, 11 HOME units of 34 total units.</p> <p>MCH: Fellsway West II loan recently closed, 3 HOME units of 3 total units.</p> <p>TND: St. Therese 4% Condo under construction, Everett, 11 HOME units of 33 total units. There is one project at 170 Cottage Street, Chelsea that is in the pipeline, awaiting State funding.</p> <p>Some of the above CHDOs have additional planned activities that fall under the Rental and Ownership Development project.</p>
7	<b>Project Name</b>	Rental and Ownership Development PY22
	<b>Target Area</b>	
	<b>Goals Supported</b>	Create New Affordable Housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$1,652,960
	<b>Description</b>	<p>Funds for rental and owner development of new units either new construction, adaptive reuse, acquisition, or substantial rehabilitation. This project does not include the 15% CHDO set aside which is shown as Project 6. The CHDO developments will also access funding under this project. This project includes \$75,000 for CHDO operating funds.</p>
	<b>Target Date</b>	6/30/2023



	<p><b>Estimate the number and type of families that will benefit from the proposed activities</b></p>	<p>These activities are estimated to benefit 88 households, 25 of whom will be low to moderate income families benefitting from the North Suburban Consortium HOME program during the 2022 Program Year. The projects include St. Therese 9% Condos, 801 Broadway, Everett, 11 HOME units of 44 total; St. Therese Townhomes, 10-20 Gledhill Avenue, Everett, 3 HOME units of 6 total; and 1005 Broadway, Chelsea, 11 HOME units of 38 total. The St. Therese 9% Condos are reserved for low-income individuals 65 years of age or older. Three of the HOME units will be available to extremely low-income senior households (at or below 30% AMI) and the remaining eight will be available to low-income senior households (at or below 60% AMI). 1005 Broadway includes a variety of units types from one-bedroom to three-bedroom units to assist small and large families. Eight of the HOME units at 1005 Broadway will be available to extremely low income households (at or below 30% AMI) and the remaining three HOME units will be available to low-income households (at or below 60% AMI). The St. Therese Townhomes will be sold at price that is affordable to households between 70% and 80% of AMI. Each townhome has three bedrooms to assist larger families.</p> <p>Goal figures below are based on the HOME units expected to be completed during Program Year 2022.</p>
	<p><b>Location Description</b></p>	<p>These activities will be undertaken throughout the North Suburban Consortium. There are three projects to be completed - two in Everett and one in Chelsea. Two more projects are expected to be completed under the CHDO Affordable Development project.</p>
	<p><b>Planned Activities</b></p>	<p>During the program year there will be approximately 170 rental and homeownership units under construction or in the pipeline prepping for closing. This figure does not include the rental units under construction in the CHDO Affordable Development project. Anticipated completions: St. Therese 9% Condos, 801 Broadway, Everett, 11 HOME units of 44 total; St. Therese Townhomes, 10-20 Gledhill Avenue, Everett, 3 HOME units of 6 total; and 1005 Broadway, Chelsea, 11 HOME units of 38 total. Anticipated starts: Bread of Life, 54 Eastern Ave, Malden, 11 HOME units of 14 total units; 25 Sixth Street Rentals, 25 Sixth Street, Chelsea, 11 HOME units of 56 total units; 25 Sixth Street Condos, 25 Sixth Street, Chelsea, 3 HOME units of 6 total.</p>
<p><b>8</b></p>	<p><b>Project Name</b></p>	<p>Downpayment Assistance/Closing Costs/Buydown Subsidy PY22</p>
	<p><b>Target Area</b></p>	
	<p><b>Goals Supported</b></p>	<p>Improve Affordable Housing Ownership Opportunities</p>

<b>Needs Addressed</b>	Affordable Housing
<b>Funding</b>	HOME: \$185,000
<b>Description</b>	Assistance to potential low-to-moderate income homeowners through downpayment assistance, closing costs, and buydown subsidies.
<b>Target Date</b>	6/30/2023
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Funding budgeted for this section has the capability of assisting approximately 20 low-to-moderate income prospective first-time homebuyers. We expect more households than usual to take advantage of this program due to several inclusionary zoning units coming available in Medford and Chelsea. As such, funding for this project was increased by \$100,000. Outside of these units however, we expect few, if any, potential homeowners to capitalize on this resource due to limited availability from low turn-over, limited capacity of low-to-moderate income homeowners to afford homes during and after the COVID-19 pandemic, and extremely high home values which are above the regulatory purchase price limits and are outside the reach of low-to-moderate income buyers.
<b>Location Description</b>	Downpayment assistance, closing cost assistance, and buydown subsidy activities can take place throughout the eight communities of the North Suburban Consortium: Arlington, Chelsea, Everett, Malden, Medford, Melrose, Revere, Winthrop.

	<b>Planned Activities</b>	The OSPCD continues to stay in contact with the real estate industry particularly through administration of affordable resale covenants. We advertise HUD-certified counseling agencies on the City of Malden and MRA web site, and support Mass Housing's home purchase loan product. Other opportunities such as combining HOME funding with subsidies from the Affordable Housing Trust Fund and MassHousing Workforce Housing will be investigated to determine if leveraging HOME with other subsidy dollars will make homes throughout the North Suburban Consortium more affordable for low-to-moderate income homebuyers. Habitat for Humanity advertises our assistance in its presentation to prospective buyers of Habitat for Humanity houses being constructed in Malden. In addition, the City of Medford has been advertising our downpayment assistance program to buyers of affordable units created under their inclusionary zoning ordinance which resulted in two approved applications during Program Year 2021. Board members are continuing to advertise our program to housing units developed under each communities's inclusionary zoning ordinances. We anticipate assisting eight households during Program Year 2022.
9	<b>Project Name</b>	Park Improvement PY22
	<b>Target Area</b>	
	<b>Goals Supported</b>	Improve Parks Public Facilities and Infrastructure
	<b>Needs Addressed</b>	Parks, Public Facilities, and Infrastructure
	<b>Funding</b>	CDBG: \$490,000
	<b>Description</b>	\$140,000 for Mazonson Basketball Court and \$350,000 for Early Learning Center Playground
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	3,000 households are estimated to benefit from these improvements, primarily families with children.
	<b>Location Description</b>	The Early Learning Center playground is located on Mountain Ave. The Mazonson Basketball Court is located on Green Street.

	<b>Planned Activities</b>	Malden’s CDBG program contributes funding to physical improvement projects throughout the city, including to parks, public facilities, and infrastructure, as well as nonprofit buildings in limited circumstances. Like other CDBG-funded activities, physical improvements must primarily benefit low- and moderate-income (LMI) residents. Examples include improving a park in a low-income neighborhood, upgrading a Malden Public Schools playground, and making Malden’s sidewalks and intersections safer for disabled pedestrians. CDBG funding has been essential to achieving many physical improvements in the City, and is often combined with other funding sources to make large projects possible.
<b>10</b>	<b>Project Name</b>	Public Facility Improvements PY22
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	
	<b>Funding</b>	:
	<b>Description</b>	No public facility improvements are planned for PY22.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	No public facility improvements are planned for PY22.
	<b>Location Description</b>	No public facility improvements are planned for PY22.
	<b>Planned Activities</b>	No public facility improvements are planned for PY22.
<b>11</b>	<b>Project Name</b>	Public Infrastructure Improvements PY22
	<b>Target Area</b>	
	<b>Goals Supported</b>	Improve Parks Public Facilities and Infrastructure
	<b>Needs Addressed</b>	Parks, Public Facilities, and Infrastructure
	<b>Funding</b>	CDBG: \$150,000
	<b>Description</b>	\$150,000 for ADA Pedestrian Improvements
	<b>Target Date</b>	6/30/2023

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This project will benefit an anticipated 1,000 people who are people with disabilities.
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	ADA pedestrian improvements, including curb cuts and signal upgrades to make intersections ADA compliant
<b>12</b>	<b>Project Name</b>	Section 108 Loan Payments
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	
	<b>Funding</b>	CDBG: \$531,825
	<b>Description</b>	Principal and interest payments on Section 108 loans.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	N/A
	<b>Planned Activities</b>	N/A

## **AP-50 Geographic Distribution - 91.420, 91.220(f)**

### **Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed**

HOME funds are targeted Consortium-wide. The NSC Board bases funding decisions on need and opportunity without regard to a specific geographic allocation by community, and has found this to be a successful approach. Over the next year, we expect activities at some point of development or planning within six of the eight NSC communities.

Malden CDBG funds are spent in the City of Malden.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>

**Table 5 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

HOME funds are available to each of the 8 communities in the consortium based on the priority needs identified in the 2020-2024 Consolidated Plan. The Board of the NSC annually allocates funds by program area: First-time homebuyer Assistance, Homeowner Rehabilitation, Rental/Ownership Development, and then funds proposals that are responsive to need, constitute a good public investment, and are ready to proceed. Often the development projects will be receiving LIHTC and subsidies allocated by the Commonwealth of Mass via DHCD, and this funding creates the opportunity to leverage the NSC HOME resources.

### **Discussion**

For the HOME program there are currently housing activities at some point of development or planning in the communities of Chelsea, Revere, Everett, Arlington, Malden, and Medford. The performance data demonstrates most of the 8 communities are beneficiaries of the HOME funding in any given year. The NSC portfolio of assisted projects in the life of the HOME program demonstrate all 8 communities have benefited from the HOME funding.

Malden's CDBG program funds programs within the City of Malden. There are no CDBG target areas within that geography.

## Affordable Housing

### AP-55 Affordable Housing - 91.420, 91.220(g)

#### Introduction

The NSC utilizes HOME funds to support affordable housing programs throughout the entire 8-community jurisdiction. Programs include:

- First Time Homebuyer Program, which provides direct financial assistance to a buyer to be utilized for down payment and closing cost assistance
- Buy Down Subsidies, which reduce the first mortgage amount for the assisted household
- Rehabilitation Loans, which fund housing improvements
- Developer Rental Projects- Multifamily projects undertaken by Developers.
- Developer Homeownership Projects- Acquisition, Rehabilitation, Resale or Acquisition, New Construction, Resale projects where a developer produces an affordable house that is sold to and occupied by an eligible household

Many of the NSC Entitlement Communities additionally allocate a portion of their CDBG or CPA funds towards affordable housing including home rehabilitation as well.

Malden CDBG funds will be used to assist in the rehabilitation of approximately five housing units. Funds may also be used for acquisition and other CDBG-eligible affordable housing-related activities.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	3
Non-Homeless	44
Special-Needs	0
Total	47

**Table 6 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	15
The Production of New Units	47
Rehab of Existing Units	6
Acquisition of Existing Units	8
Total	76

**Table 7 - One Year Goals for Affordable Housing by Support Type**

## Discussion

Existing data and community consultations identify affordable housing as a high priority need. In response to that priority, the NSC will continue its efforts to increase the supply of safe, quality, affordable housing. NSC will continue to work with the existing three CHDOs (The Neighborhood Developers, Medford Community Housing, and Housing Corporation of Arlington) to further affordable housing development. Given the housing stock and market realities of rapidly increasing prices impacting home purchase, NSC will continue to focus its limited resources on production of affordable rental housing. Also, the NSC will continue to look for opportunities to preserve naturally occurring affordable housing, provide housing for homeless families and individuals including housing for homeless students, housing for youth aging out of foster care, community college students living independently, and housing for victims of domestic violence.

The goals above are for HOME units completed for projects completed during the program year. A 34 unit rental development containing 11 HOME units in Arlington, a 44 unit rental development containing 11 HOME units in Everett, a 33 unit rental development containing 11 HOME units in Everett, a 38 unit rental development containing 11 HOME units in Chelsea, and six townhomes containing three HOME units in Everett are expected to be completed this program year. Three of the units at the Arlington development are set-aside for referrals from the Somerville Homesless Coalition shelter. The remaining 44 units are not reserved for any special population other than their low-income requirement. In addition to these goals, the NSC expects to allocate funds for the development of 28 HOME units/79 total units in PY22 for projects in Malden, Medford, and Chelsea. These units will be under construction, but are not expected to be completed in PY22. There is also another development in the pipeline awaiting additional funding commitments. The NSC reviews applications on a rolling basis for large scale development projects, and the application is available on Malden Redevelopment Authority and City of Malden website. The NSC also expects to assist a least eight first-time homebuyers with down payment assistance and at least one homeowner with homeowner rehabilitation during PY22. Applications for both of these programs are reviewed on a rolling basis and are available on the Malden Redevelopment Authority and City of Malden website.

CDBG funds will be used to administer a housing rehabilitation program in Malden.



## **AP-60 Public Housing - 91.420, 91.220(h)**

### **Introduction**

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 included maintaining and improving the condition of the public housing stock, encouraging resident involvement, efficiently managing voucher programs, and providing opportunities and support for resident self-sufficiency.

Additionally, a few of the PHAs are seeking creative opportunities to preserve and produce affordable housing. The Malden Housing Authority has taken a leadership role in discussions on housing and economic empowerment in recent years. MHA has been instrumental in preserving expiring use projects and is now exploring private development opportunities. The Melrose Housing Authority has also been searching for new acquisition opportunities along with the Melrose Affordable Housing Corporation and may submit applications for rental development acquisition during PY22.

### **Actions planned during the next year to address the needs to public housing**

The City of Malden has limited resources to assist the Malden Housing Authority (MHA) with its Capital Needs, yet continues to be supportive in providing necessary community services. This is true of all the NSC Member Communities. The relationships between the Housing Authorities in the Consortium and local governments is very strong and there is close communication and coordination over police and fire safety, public health, and public improvements. The City through the MRA has supported the Malden Housing Authority with timely environmental reviews of its HUD capital improvement funding and plans to continue this support.

Additionally, the City of Malden and the other NSC Communities support PHA efforts to seek/receive designation as a "Moving to Work" agency, increase economic diversity within resident population, and support Family Self-Sufficiency programs. The Housing Authorities also are important strategic partners in their communities and serve on boards and task forces devoted to housing issues.

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

During the Consolidated Plan consultation process, the Malden Housing Authority and the MRA hosted a discussion among all the Consortium Housing Authorities. It was clear from this meeting that resident engagement is a high priority and strong attribute of each housing authority. The residents, through their

resident councils, have opportunities to engage with management on operational issues and discussions of capital needs, management policies, and security issues. The biggest challenge for most public housing authorities is to meet the requests for facilities modernization with the limited capital funding - there is not enough to meet all the requests that come out of the Resident Council discussions. In addition to the formal residents councils there are an array of informal groups who regularly engage in recreation, education, and community service. The City of Malden will continue to support resident engagement through support for public service programs which operate at PHA sites as well as through the recognition of Resident Organizations in the development of future plans. Many public housing authorities in the Consortium regularly make their meeting spaces available to other public service agencies, and as such are an important resource for service facility space.

The Malden Housing Authority operates a homeownership program through the use of Section 32 and Housing Choice Vouchers; however the increased cost of housing affects the feasibility of this program.

**If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

The Malden Housing Authority is not designated as troubled nor is any PHA within the NSC Communities.

**Discussion**

See discussion in above screens.

## **AP-65 Homeless and Other Special Needs Activities - 91.420, 91.220(i)**

### **Introduction**

Homeless and special needs activities are addressed by the City CDBG allocation and by the Consortium HOME allocation. CDBG provides resources to organizations providing assistance to the homeless population or those with special needs under the public service category, and the HOME program provides support in sustaining and creating housing through the allocation of development funds for new projects and the monitoring and technical assistance for existing projects. The NSC expects to fund the development of 11 HOME units (14 units total) of affordable rental housing in the City of Malden which will be reserved for formerly homeless individuals in PY22. In addition, the project will include a food pantry on the first floor which will help to address the needs of the homeless. The NSC also expects the completion of Downing Square in Arlington which has five units (3 of which are HOME units) set-aside for homeless households referred by the Somerville Homeless Coalition. Downing Square's sister project, 117 Broadway, will also house an Arlington Eats food pantry on the first floor. This project is located 2.5 miles from Downing Square and was constructed by the same developer and sponsor.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

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

The City of Malden supports outreach to homeless persons through its CDBG programs, including the Youth Harbors program, Housing Families, and ABCD, and through ongoing dialogue with community partners and government agencies about the needs of Malden's homeless population. This includes coordination with the Balance of State.

In September 2020, City of Malden and Malden Redevelopment Authority staff were invited to attend a training on the Balance of State Coordinated Entry System and No Wrong Door approach so that they may better assist clients.

In February 2021, a new individual homeless shelter opened in Malden operated by Housing Families, Inc. and supported by the City of Malden.

Since October 2021, OSPCD, along with a consultant, has been consulting with homeless, domestic violence, and veteran's service providers in the preparation of the HOME-ARP allocation plan. A survey was circulated to these organizations, housing authorities, housing advocacy groups, and their clients so that we may properly assess the needs of homeless persons and other vulnerable populations. In addition to the survey, the NSC has hosted a HOME-ARP roundtable and one-on-one interviews with public housing authorities and the Balance of State. The assessment of the needs will be used to prioritize our HOME-ARP funding to address the needs and these populations and fill gaps.

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

OSPCD supports two housing organizations in the provision of transitional housing for homeless individuals and families: Housing Families, and Metro North Housing. Housing Families has HOME assisted units in management and will be given relief on rent restrictions as a result of monitoring and working with HUD. Housing Families also receives funding from the Balance of State Continuum and from other state sources. OSPCD, along with several state agencies, has worked with Metro North Housing in its effort to take two transitional housing resources out of bankruptcy and bring them back on line. Currently, Metro North Housing is planning to construct 14 one-bedroom units for formerly homeless individuals using HOME funds. The project will also include a Bread of Life food pantry on the first floor.

In February 2021, a new individual homeless shelter opened in Malden operated by Housing Families, Inc. and supported by the City of Malden.

**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**

Youth Harbors, a program for unaccompanied homeless youth at Malden High School, receives CDBG funds to help homeless young people become stably housed and on track to graduate. OSPCD continues to support this program through CDBG funds.

In February 2021, a new individual homeless shelter opened in Malden operated by Housing Families, Inc. and supported by the City of Malden.

OSPCD intends to fund various programs that will help homeless persons make the transition to permanent housing and independent living with HOME-ARP funds. This may include the development of permanent supportive housing units and the funding of various supportive services. Specific information on this will be found in the HOME-ARP allocation plan which is currently under development.

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

The NSC has reserved HOME funds for a 14 unit permanent supportive housing development at 54 Eastern Avenue, Malden, to be developed by a partnership of Metro North Housing and Bread of Life Food Pantry. At the time of Action Plan submission to HUD the project is prepping for closing and the environmental review has been completed. The NSC will continue to support this development and expects to have a fully executed HOME Agreement for the project in PY22.

Also, in Arlington, the Housing Corporation of Arlington sets aside units for the homeless as it works in collaboration with the Somerville Homeless Coalition. The 20 Westminster project which came on line at the end of the 2019 program year has 3 units set aside for homeless households, and Downing Square, to be completed in Program Year 2022 has 3 units set aside.

OSPCD intends to fund various programs that will help families avoid becoming homeless with HOME-ARP funds. This may include the development of permanent supportive housing units and the funding of various supportive services. Specific information on this will be found in the HOME-ARP allocation plan which is currently under development.

## **Discussion**

The City of Malden is part of the Balance of State. Individuals and households needing assistance can access coordinated entry into the Balance of State through the City or CDBG-assisted nonprofits like Housing Families and ABCD. The NSC will continue to support projects that assist extremely low-income households and homeless households. Projects with extremely low-income units and supportive services are considered more favorable than other projects.

## **AP-75 Barriers to affordable housing -91.420, 91.220(j)**

### **Introduction**

The North Suburban Consortium (NSC) communities of Malden, Medford, Arlington, Chelsea, Everett, Revere, Melrose and Winthrop have reviewed data and community input and developed a strategy to address the shortage of affordable housing. While member communities may have individualized strategies, the NSC continues to promote policies and practices that would support quality affordable housing within each community. The NSC utilizes federal HOME funds to create additional affordable housing units in these communities and rehabilitate older units for low income renters and owners. The biggest barriers are zoning, high land costs affecting development projects, and high property values affecting home purchase programs and homeowner rehab programs. Recently, there have been significant increases in material and labor costs due to COVID-19 related supply chain disruptions and inflation. In addition, materials delivery delays has extended the construction timelines. The increase to construction cost has posed a challenge for developers.

### **Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

During the analysis of Barriers to Affordable Housing, the NSC Communities including the City of Malden identified land availability, development cost, administrative constraints, and infrastructure limitations as barriers. The NSC identified the following actions to remove the negative effects of these barriers:

- Assist private developers to identify development opportunities including surplus City-owned real estate, particularly for affordable housing
- Adopt inclusionary zoning policies that require affordable housing units be created within housing developments
- Permit accessory apartments within zoning regulations
- Create and utilize Community Preservation funds to support affordable housing development
- Provide for expedited review and offer funding for environmental, traffic, and other studies
- Create Transit-oriented (40R) districts and utilize state funding for infrastructure improvements
- Participate in State-sponsored initiatives.
- Leverage HOME funds with local and state resources

The MRA hosted a Community Development Corporation roundtable to discuss barriers developers have in constructing affordable housing. The discussions resulted in changes to the draft inclusionary zoning ordinance in the City of Malden by reducing onerous parking requirements for all affordable units in a project rather than just the required percentage. The inclusionary zoning ordinance was adopted in the City of Malden last year. In addition, the newly formed Malden Affordable Housing Trust Fund will work

to advocate for the above policy changes to remove or ameliorate affordable housing barriers. Community Preservation funds are being used to fund the development of the Bread of Life food pantry in Malden. This funding is essential to the project being fully funded and will result in fourteen new units of affordable housing in addition to the food pantry. In addition, OSPCD helped Asian Community Development Corporation (ACDC) with identifying a property in Malden for affordable housing development. ACDC recently purchased the site and intends to develop at least fifteen new units of housing on the site.

## **Discussion**

As detailed within the Consolidated Plan, and more recently by MHP and MAPC data, the NSC housing supply is inadequate to meet demand. The need for affordable housing far exceeds the available affordable supply. The NSC intends to address this with good communication about the resources we have available and efficient processing of applications for HOME assistance. Additionally the NSC will support projects where NSC HOME funds can leverage other public and private financing. The public policies that the NSC communities can work on to remove barriers are timely HOME application processing and document reviews, timely and thorough environmental reviews, and site identification.

## **AP-85 Other Actions - 91.420, 91.220(k)**

### **Introduction**

Each of the NSC Entitlement Communities has addressed the “Other Action” narratives within their individual Annual Action Plans. The responses provided below are specific to the City of Malden.

### **Actions planned to address obstacles to meeting underserved needs**

The primary obstacle to meeting the underserved affordable housing needs of low and moderate income persons continues to be lack of affordable housing compared to demand, as well as limited available funding. Considering the level of public subsidy required to develop affordable housing, the high cost of development, zoning challenges, and limited developable parcels, the City and the North Suburban Consortium are only able to fund a few projects annually. HOME funds are nearly fully committed for rental developments and our CHDOs have mentioned plans for several new projects on the horizon. While this limitation is beyond the City's ability to address, the City and the North Suburban Consortium are committed to working with the Malden Housing Authority and housing developers- both for-profit and non-profit to identify development opportunities and secure the necessary resources. The rising values have created an obstacle for new homebuyers and the number of properties out of reach to prospective buyers are increasing.

A second obstacle to addressing underserved needs are the challenges of a changing job market. The demands for a higher educated workforce have shut many low and moderate income persons out of living wage jobs. The City will continue to seek to create local employment opportunities, fund agencies that support self-sufficiency programs such as Just a Start and Immigrant Learning Center, and be actively involved with the Regional Employment Board's key initiatives.

### **Actions planned to foster and maintain affordable housing**

The NSC will foster affordable housing through monitoring expiring use properties and to the greatest possible extent to preserve affordability, improve the condition of traditional affordable housing stock, and expand the number of safe, affordable housing units. The first priority is to minimize the loss of existing affordable units. Each community monitors the State-generated Subsidized Housing Inventory. By providing detailed information on subsidy sources and termination dates, communities are able to engage developers early in the process. Throughout the last year, NSC has assisted The Neighborhood Developers with a recapitalization and rehabilitation plan for its Chelsea scattered site portfolio. Throughout the program year, The Neighborhood Developers will be using tax credits to rehabilitate 116 units throughout Chelsea, 80 of which are HOME units. The life/safety systems and accessibility of all of these units will be improved and the affordability of these units which was set to expire between 2029 and 2040 has been extended until 2072.

Secondly, the NSC seeks to improve the housing conditions and insure stability of housing that has



traditionally been affordable housing, housing known as "naturally occurring affordable housing" (NOAH). Investments in housing rehabilitation ensures the continued viability of this housing for low and moderate income households. Third, the City is exploring ways to finance the rehabilitation of problem properties, ones that have been distressed and neglected for a variety of reasons, to return them to productive uses. This may involve a combination of local American Rescue Plan, HOME, AHTF, and CDBG funds.

Finally, the NSC provides HOME financing to First-time buyers and to Affordable Housing Developers to produce additional deed-restricted units. Providing this gap financing, often in collaboration with state agencies (DHCD, CEDAC, MassHousing), is the primary vehicle to foster additional affordable housing. The NSC uses the purchase price limits set annually by HUD in the administration of this program. During Program Year 2022, we expect the development of 12 new deed-restricted homeownership units. Six of these units will be restricted to households at or below 80% AMI under the HOME Program and the remaining six units will be restricted to households at or below 120% AMI under the MassHousing Commonwealth Builder Program.

### **Actions planned to reduce lead-based paint hazards**

The City will fund the reduction of lead-hazard within its home rehabilitation program and lead abatement program from the HUD Office of Healthy Homes.

In addition, the OSPCD, as HOME funds Administrator, will ensure compliance with MA lead laws on all homebuyer assistance and developer-driven projects, both homeowner and rental. All lead laws are also followed in the HOME homeowner rehabilitation program. For the HOME homeowner rehabilitation program, the NSC uses the HUD annually published purchase price limits to determine the 95% of the median area purchase price in accordance with 24 CFR 92.254(a)(2)(iii).

The City of Malden has historically administered a lead-based paint abatement program, funded through a HUD Lead Hazard Control Grant. Key components of the program also included lead poisoning prevention education, community outreach, and technical training to increase the availability of licensed professionals to perform lead related activities. Additionally, a large outreach effort will take place to help low and moderate income homeowners replace their lead water service lines.

### **Actions planned to reduce the number of poverty-level families**

The Action Plan includes funding of public service programs that support self-sufficiency programs for low and moderate income households. Additionally, the City has merged its homeless Continuum of Care efforts with the "Balance of State" CoC. One of the primary goals of the "Balance of State" CoC is to increase workforce participation by homeless and at-risk persons. Homelessness advocacy organizations in Malden are active participants and funding recipients in the Balance of State CoC.

The City is an active member of the Metro-North Regional Employment Board and will continue to support job training and employment readiness programs.

### **Actions planned to develop institutional structure**

The Office of Strategic Planning and Community Development is the department responsible for the development and implementation of the ConPlan and Annual Action Plan. During the development, the OSPCD consulted with key stakeholders, City Departments, and neighboring communities. Throughout the implementation of the Action Plan, OSPCD will continue to coordinate with these partners. For example, three CDBG funded projects, all Public Improvements, will be implemented through City Departments; thirty-five non-profits will operate programs to further the goal of improving the quality of life. OSPCD and MHA are in regular discussions.

With HOME funds, the 8 communities making up the HOME Consortium meet monthly to review projects, portfolio management, and status of community need. The structure created for HOME administration is serving an additional purpose of sharing information on resources and project implementation beyond only HOME-funded projects. The 8 communities also worked in collaboration in the development of the 5-year Consolidated Plan

The City Malden has been part of the Balance of State Continuum of Care for approximately 5 years, and the consultation process for the 2020 Consolidated Plan included discussions with BoS administrators and has prompted regular communication between OSPCD and BoS.

Lastly, we anticipate new and revised structures to meet the needs of vulnerable populations most affected by COVID-19, and fulfill the administrative requirements of additional Federal funding, particularly under CDBG and HOME-ARP.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

Actions include:

Coordination with the new Malden Affordable Housing Trust Fund, exploring collaboration with MassHousing on their down payment assistance program and home purchase loan product in combination with HOME funds, assisting Malden Building Commissioner in rehabilitation of distressed properties and putting back them in use with affordability requirements.

### **Discussion**

Over the next program year, the third year in the 2020-2024 Con Plan, the City's focus will be

on improving the condition of the City's housing stock, addressing the needs of the most vulnerable, increasing the availability of affordable housing and essential services, and improving the quality of the environment for low and moderate income residents. Proposed activities fulfill HUD's priorities of providing decent housing, suitable living environment and expanded economic opportunity, principally for low-and-moderate income persons.

## Program Specific Requirements

### AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)

#### Introduction

OSPCD maintains administrative capacity through the following: (1) continued contact with HUD staff, (2) participation in any HUD-sponsored training (either in person or via HUD Exchange), and (3) active membership in the National Community Development Association (NCDA). These contacts enhance and reinforce the capacity of capable staff in meeting regulatory requirements unique to the CDBG and HOME programs, including but not limited to the specific requirement described in AP-90.

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	5,000
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>5,000</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	95.00%

**HOME Investment Partnership Program (HOME)**  
**Reference 24 CFR 91.220(l)(2)**

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The NSC does not anticipate any forms of investment beyond those identified in Section 92.205. HOME funds are not used on project elements not covered under Section 92.205 such as health centers or food pantries.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The purpose of the resale and recapture provisions is to ensure that the housing purchased with HOME assistance remains affordable to low income buyers in accordance with 24 CFR 92.254 and to provide the initial home buyer with a fair return on investment. The NSC will use recapture of HOME funds in its Homebuyer Program.

For the NSC First Time Homebuyer Program which uses HOME funds to provide down payment and closing cost assistance for homebuyers wishing to purchase market rate units in the jurisdiction, the NSC has adopted the following provisions concerning recapture of subsidy:

- a) HOME funding will be used for down payment and closing cost assistance (up to \$7,500 for a single family, subject to periodic revision based on market conditions).
- b) These funds will be recaptured out of net sale proceeds upon sale or transfer of the property, with the recapture amount declining by 20% of the amount of the down payment and closing cost assistance every year, through five years, that the homeowner has occupied the residence.
- c) Recapture may occur not only when the premises are sold or transferred/refinanced, but also if the premises cease to be the borrower's primary residence, the death of the borrower occurs or there is a change in the title (other than removal of husband or wife or addition of husband or wife).
- d) All recaptured funds will be used to assist other first time home buyers in accordance with 24 CFR 92.254 (a)(4)(ii)(C), subject to sufficient demand for the funds, after which they will be used for other eligible HOME activities.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The NSC also uses HOME funds to assist homebuyers through buy-down subsidies and through development and rehab of ownership units. In these cases, the units are deed restricted with covenants which ensure affordability at least for the minimum affordability period under Section 92.254a.(4). In most cases, the NSC member community elects to place a covenant which restricts the unit for longer than the minimum affordability period. NSC has adopted the following provisions concerning resale restrictions for these properties:

a) These affordable units must be owner-occupied for the entire term of the affordability period.

b) Resale of an affordable unit must be to a household at or below 80% of Area Median Income for the jurisdiction.

c) Maximum resale price of the unit is the price paid by the seller increased in proportion to the increase (but not decrease) in the Boston Area Median Income plus the value of any approved capital improvements made to the property by the seller. In this way, the NSC is able to maintain the affordability of the property to future, income eligible buyers, but it does not compromise the owner's incentive to maintain the property, and provides a reasonable return on all improvements and investments in the property. At no time, will the seller be required to sell the property for less than what they paid, protecting the seller from market downturns to the greatest extent feasible. The affordable restriction on the property will allow the home owner a fair return on their investment.

The Affordable Price at any particular time shall be determined as follows:

Affordable Price = Original Affordable Price x (80% of Current Boston Area Median Income /80% of Original Boston Area Median Income) plus a reasonable return on the Owner's investment in any capital improvement.

For example: When a home owner purchased a unit in 2004 the 80% Area Median Income (AMI) was \$82,600.00. The current 80% of AMI is \$85,680.00. In 2004 home owner paid \$140,000.00 for the affordable unit. Using this resale calculation (outlined below) the maximum resale price is \$181,525.00 (this is the maximum amount seller can receive).

\$140,000 x

80% of 2017 AMI (\$107,100.00) = \$85,680.00

Divided by 80% of 2004 AMI (\$82,600.00) = \$66,080.00

85,680.00/66,080.00 = 1.29661

1.29661 x \$140,000.00 = \$181,525.42

Current Boston Area Median Income” means the HUD published Boston Area Median Income most recently established prior to a resale of the Residence.

d) Should the value of capital improvements result in a maximum resale price that is unaffordable to a reasonable range of low to moderate income buyers, the NSC will ensure continued compliance with the affordable housing restriction by investing additional HOME funds at the closing to buy down the price to an affordable level.

e) For the NSC First Time Homebuyers who utilize HOME funds to assist with down payment and closing costs to purchase units already subject to a resale restriction will be bound by the resale restriction. In addition, a separate financing instrument in the form of a deferred payment, forgivable mortgage for the amount of the down payment assistance may be required, as well.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

In accordance with 91.220(g)(2)(iii), the NSC has adopted the following policy with regard to refinancing existing debt on multi-family housing projects:

a) The North Suburban Consortium recognizes that housing rehabilitation and the creation of new housing is the primary eligible activity and that any new investment would be made to either maintain current affordable units and/or create additional affordable units.

b) The North Suburban Consortium believes that the primary eligible activity can be accomplished without the use of HOME funds to refinance existing debt.

c) However, due to current economic circumstances, the North Suburban Consortium would consider the use of HOME funds in limited circumstances to refinance a portion of existing debt in owner-occupied, multi-family projects eligible under 24 CFR 92.206 (b). This activity must primarily be rehabilitation and the refinancing must be necessary to reduce the overall monthly housing cost of the owner.

d) The units in need of rehabilitation must require at least \$1,000 in HOME assistance to qualify for rehabilitation. In addition, the HOME funds loaned for rehabilitation and the cost of rehabilitation must exceed the amount of debt to be refinanced.

e) The required period of affordability is 15 years, should the NSC use HOME funds to refinance existing debt in conjunction with rehabilitation work at a property.

f) The HOME funds may be invested jurisdiction-wide.

g) NSC HOME funds will not be used to refinance existing debt that is made or insured by any federal program, including the CDBG program.

h) The refinance proposal will be subject to a review if management practices to demonstrate that disinvestment in the property has not occurred, that the long-term needs of the project can be met, and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated.

Regarding CDBG program income, little program income is listed above because the question prompts for program income that has not already been reprogrammed. It is the practice of the City of Malden to reprogram program income as it becomes available. Virtually all program income from a given year is spent within that year, offsetting other funds that are carried forward to the following year through a Prior Uncommitted Balance line. The AP-15 shows total program income received in a given year.



