

WestMetro HOME Consortium



HOME-ARP ALLOCATION PLAN

March 2023

Prepared for:
The U.S. Department of Housing and Urban Development

Prepared by:



The City of Newton
& West Metro HOME Consortium
In Association with
Barrett Planning Group LLC



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INTRODUCTION

On March 11, 2021, President Biden signed the American Rescue Plan Act ("ARP") into law, providing over \$1.9 trillion in relief to address the continued impact of the COVID-19 pandemic on the economy, public health, State and local governments, individuals, and businesses.¹ Under this Act, Congress and the U.S. Department of Housing and Urban Development (HUD) approved \$5 billion for HOME participating jurisdictions (PJs) to invest in housing and assistance for people experiencing homelessness and other vulnerable populations. Unlike the traditional HOME program, which specializes in building, buying, and rehabilitating affordable housing, HOME-ARP is designed to strengthen efforts to prevent and end homelessness. HUD awarded the WestMetro HOME Consortium \$5,406,962, for use within its thirteen communities: Bedford, Belmont, Brookline, Concord, Framingham, Lexington, Natick, Newton, Needham, Sudbury, Waltham, Watertown, and Wayland. The City of Newton is the Lead Entity.

The HOME-ARP program requirements are outlined in HUD's Community Planning and Development Notice CPD-21-10. HOME-ARP funds can support the following eligible activities: Administration and Planning (15 percent cap), Rental Housing, Tenant Based Rental Assistance (TBRA), Supportive Services, Non-Congregate Shelter Development and Acquisition, and Nonprofit Operating and Capacity Building Assistance (10 percent cap). Activities must primarily benefit individuals and families in the following Qualifying Populations (QPs):

- Homeless, as defined in 24 CFR 91.5;
- At Risk of Homelessness, as defined in 24 CFR 91.5;
- Those Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in CPD-21-10;
- Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in CPD-21-10;
- Veterans and families that include a veteran family member that meet the criteria in one of the populations above.²

The HOME-ARP Allocation Plan requires an Amendment to the HOME FFY2021 Annual Action Plan (AAP) and approval from HUD before the WestMetro HOME Consortium can receive and

¹ U.S Department of Housing and Urban Development, *CPD Notice 21-10*, Section II ("Background"), p.2. September 2021.

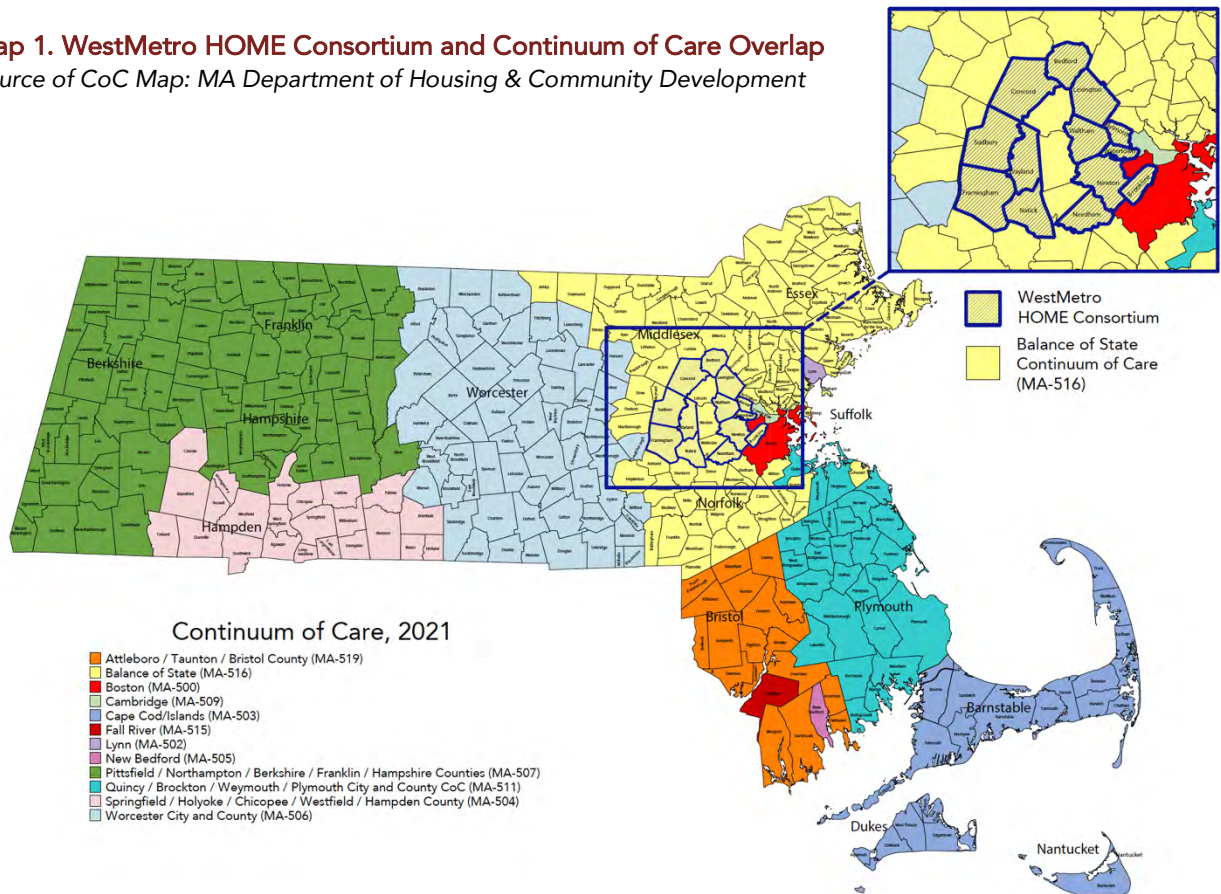
² *Ibid.*, Sections IV.A ("Qualifying Populations") and Section VI ("Eligible Activities"). September 2021.

commit funds to the eligible activities. To ensure resources from this one-time funding source address the most pressing needs within the region, the WestMetro HOME Consortium conducted broad community outreach to engage stakeholders, advocates, housing and homelessness service organizations, and members of qualifying populations. This consultation and public participation process, coupled with a needs assessment and gaps analysis, informed the proposed funding distribution by activity in this Allocation Plan.

Map 1 below shows the geographic relationship between the WestMetro HOME Consortium and the Continuum of Care in which it is located.³ In this plan, the “Consortium” refers to the WestMetro HOME Consortium, which includes thirteen Massachusetts communities: The Towns of Brookline and Needham are in Norfolk County, while the Towns of Bedford, Belmont, Concord, Lexington, Natick, Sudbury, and Wayland and the Cities of Framingham, Newton, Waltham, and Watertown in Middlesex County. “Balance of State Continuum of Care,” “Balance of State,” or “BoS CoC” refers to the MA Balance of State Continuum of Care (MA-516).

Map 1. WestMetro HOME Consortium and Continuum of Care Overlap

Source of CoC Map: MA Department of Housing & Community Development



³ A Continuum of Care (CoC) is a regional or local planning body that coordinates housing and services funding for homeless families and individuals. CoCs apply annually to the U.S. Department of Housing and Urban Development (HUD) for funds to help homeless people. There are twelve CoCs within Massachusetts.

Table 1 below provides a high-level demographic snapshot of each Consortium community.

Table 1. WestMetro HOME Consortium Communities: An Overview

	Total Population	Total Households	% Renter Households	% Minority ⁴	Median Household Income
Bedford	14,383	5,219	29.4%	26.4%	\$140,647
Belmont	27,295	10,253	36.6%	30.4%	\$151,502
Brookline	63,191	26,525	51.7%	34.7%	\$122,356
Concord	18,491	6,795	25.4%	18.2%	\$169,335
Framingham	72,362	27,555	44.8%	46.3%	\$90,638
Lexington	34,454	11,849	17.2%	43.3%	\$202,852
Natick	37,006	14,956	32.7%	24.4%	\$122,914
Needham	32,091	11,282	15.6%	18.9%	\$182,813
Newton	88,923	31,704	28.2%	29.9%	\$164,607
Sudbury	18,934	6,386	7.4%	19.1%	\$217,847
Waltham	65,218	25,129	50.2%	39.6%	\$103,498
Watertown	35,329	16,134	50.5%	26.9%	\$101,402
Wayland	13,943	5,013	9.0%	23.2%	\$203,789
TOTAL	521,620	198,800	36.5%	32.5%	\$130,652

Sources: U.S. Census Bureau, 2020 Decennial Census and American Community Survey 5-Year Estimates, 2017-2021.⁵

⁴ Minority population includes Hispanic, all races including White and not Hispanic, all races other than White.

⁵ Population and household counts in this table may differ from other references in this plan; the above table uses official 2020 US Census counts, whereas most references to households in this plan use the most recent Comprehensive Housing Affordability Strategy (CHAS) data.

CONSULTATION⁶

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

The WestMetro HOME Consortium developed an Engagement Plan to guide the consultation and participation processes required for the HOME-ARP Allocation Plan. This Engagement Plan provided for consultation meetings with community partners, including the Continuum of Care, homeless service providers, domestic violence service providers, veterans' groups, public housing authorities (PHAs), public agencies that address the needs of the qualifying populations, and public and private organizations that address fair housing, civil rights, and the needs of persons with disabilities. Many of these groups fill multiple roles through their housing inventory, shelter services, programming, or collaboration with other organizations.

Table 2. Consultation Interviews & Meetings

Date	Invitees	Date	Invitees
10/20/2022	Municipal Staff	11/04/2022	Advocacy Groups and Organizations
10/21/2022	Municipal Staff	11/04/2022	Housing Developers
10/21/2022	Housing Authorities	11/09/2022	Continuum of Care
10/24/2022	Municipal Staff	Date	Meeting Host
10/25/2022	Housing Authorities	11/01/2022	Newton Fair Housing Committee
10/25/2022	Municipal Staff	11/03/2022	WestMetro HOME Consortium
10/31/2022	Shelters & DV Service Providers	11/14/2022	Newton Commission on Disabilities
10/31/2022	Service Providers, Agencies, Organizations	11/15/2022	Newton Housing Partnership
11/02/2022	Service Providers, Agencies, Organizations	11/29/2022	Engine 6
11/02/2022	Shelters & DV Service Providers	01/19/2023	Newton Planning & Development Board
11/02/2022	McKinney-Vento School Liaisons	02/02/2023	WestMetro HOME Consortium
11/03/2022	Service Providers, Agencies, Organizations	Date	Qualifying Population
11/03/2022	McKinney-Vento School Liaisons	12/02/2023	Guests of Community Day Center of Waltham
11/03/2022	Advocacy Groups and Organizations		

⁶ In accordance with Section V.A of the Notice (page 13), before developing its HOME-ARP allocation plan, at a minimum, a PJ must consult with; CoC(s) serving the jurisdiction's geographic area; homeless service providers; domestic violence service providers; veterans' groups; public housing agencies (PHAs); public agencies that address the needs of the qualifying populations; and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

CONSULTATION INTERVIEWS & MEETINGS

At the outset of this process, the Consortium collaborated on the development of an initial project contact lists based upon previous community development engagement efforts. The City of Newton built upon this list and introduced the project by sharing the Engagement Plan and soliciting feedback. The Consortium then contacted nearly 275 individuals or organizations to participate in consultation interviews, requested meeting times during standing meetings of community partners, and arranged an in-person meeting with those experiencing homelessness at the Community Day Center of Waltham. **Table 2** above lists the consultation interviews and meetings by category and date, while **Table 3** below details the feedback received from the consultation process. The WestMetro HOME Consortium representative members discussed the HOME-ARP Allocation Plan and gave input during their meetings on November 03, 2022 and February 02, 2023. During the February 2023 meeting, the group discussed and voted on the funding allocation outlined in this Plan.

Table 3. Summaries of Consultation Interviews & Meetings

Groups Consulted	Category	Method	Feedback Summary
Town of Sudbury <i>Health Department</i>	Public agencies that address needs of QPs	Virtual Meeting 10/20/2022: Consortium Municipal Staff	Participants discussed the need to streamline processes of accessing assistance, services, housing, etc., as the stress of experiencing or being at risk of homelessness is traumatic. Rising housing-related costs have resulted in significant uptick in need and there are extremely long waitlists in all communities for housing. Many public housing units are not suitable for those with disabilities. Mold and resulting health problems were cited as a significant concern. In addition to streamlining access to services and supports, participants noted that financial assistance such as TBRA, gift cards, groceries, etc. can help alleviate the significant emotional and financial stress at-risk households face.
Town of Needham <i>Public Health</i>			
Town of Watertown <i>Veterans' Services</i>	Veterans' groups		

Table 3. Summaries of Consultation Interviews & Meetings

Groups Consulted	Category	Method	Feedback Summary
Town of Lexington <i>Human Services</i>	Public agencies that address needs of QPs	Virtual Meeting 10/21/2022: Consortium Municipal Staff	Attendees stressed the importance of helping people remain housed if at risk of eviction. This often includes mental health care and other supportive services, which Housing Authorities are generally not equipped to provide without a services coordinator. Other services needed include help with the housing search process, including filling out applications, etc., as staff do not have the capacity or training to act as case managers. One attendee noted that people may be selected in affordable housing lottery but then not be able to finish the application and lose the unit. Vulnerable households include seniors (an increasing number of whom are doubling up), immigrants living in overcrowded conditions, and those with disabilities unable to find an accessible unit. Ultimately many of the issues connect to the lack of availability and variability in housing stock and the resulting years-long waitlists for housing.
City of Framingham <i>Community Development Department</i>			
City of Waltham <i>Planning Department</i>			
Town of Wayland <i>Planning Department</i>			
Town of Newton <i>ADA Coordinator</i>	Public and private organizations that address fair housing, civil rights, and the needs of persons with disabilities		
Town of Needham <i>ADA Coordinator</i>			
Bedford Housing Authority	PHAs	Virtual Meeting 10/21/2022: Consortium Housing Authorities	Housing authorities discussed the lack of services available to vulnerable tenants and noted that sometimes they need to reach out to family of tenants to get them involved. HAs do not all provide housing search assistance tied to the vouchers they administer, and people may lose their vouchers because they cannot find a unit in a timely manner. Vouchers also cannot close the gap between what a landlord could get on the market and what the voucher will match. Generally, there is a need for more units (including accessible units) and more homeless prevention services. All attendees reported getting daily calls from people looking for help and unsure where to turn.
Needham Housing Authority			
Newton Housing Authority			

Table 3. Summaries of Consultation Interviews & Meetings

Groups Consulted	Category	Method	Feedback Summary
City of Watertown <i>Planning Department</i>	Public agencies that address needs of QPs	Virtual Meeting 10/24/2022: Consortium Municipal Staff	Municipal staff in attendance described the lack of legal services, representation, and advocacy for tenants. Some noted that voucher householders sometimes cannot locate a unit and are forced to move away or lose their voucher. Participants discussed the need for more rental units for those who are really struggling. The geographic isolation of some Consortium communities in relation to shelters means there is no good immediate option and people spend savings on motels. Populations with the greatest need include families with children, veterans, seniors, and immigrants. There has been an increase in “couch surfing” or doubling up, both among seniors and immigrant families. Priority needs identified include case management that follows the household, units for a variety of populations (size/type), and rental assistance to stabilize at-risk households.
Town of Bedford <i>Health & Human Services</i>			
Town of Needham <i>Youth & Family Services; Housing Division</i>			
Belmont Housing Authority	PHAs	Virtual Meeting 10/25/2022: Consortium Housing Authorities	Participants discussed the lack of supportive services for HA residents and how this resource is critical for vulnerable households. A resident services coordinator would be very helpful for addressing these needs. Attendees also discussed the inaccessibility of older units and the need for rehabilitation across communities.
Framingham Housing Authority			
Watertown Housing Authority			
Wayland Housing Authority			
Brookline Housing Authority	PHAs	Written comments provided by Brookline Planning & Community Development Department 10/25/2022	Waiting lists for seniors and the disabled include 2,551 households, and 6,033 households for family housing. Ten to 20 percent are fleeing extreme needs such as domestic violence, homelessness, facing eviction, or are victims of fire or natural disasters. Minority populations tend to be concentrated in BHA properties located in the northern section of the Town along with most of the Town’s other affordable housing developments.

Table 3. Summaries of Consultation Interviews & Meetings

Groups Consulted	Category	Method	Feedback Summary
Town of Needham <i>Building Department; Public Health</i>	Public agencies that address needs of QPs	Virtual Meeting 10/25/2022: Consortium Municipal Staff	Attendees discussed the need for housing with supportive services, emphasizing that services are key for vulnerable households. All PHAs generally can offer is housing, even though many tenants need services. Some specified that having counselors with lived experience would be helpful. Municipal staff often do not have access to resources to assist those in emergency situations or are unsure where to direct people. As one attendee explained, "We are not case workers skilled in navigating the affordable housing world and the application process" such as pulling together documents, deadlines, etc. With COVID-related resources running out, there was concern about an impending "tsunami of evictions." There was consensus that creating rental housing was a priority, with capacity to be able to provide referrals and other supports to people. RHSO provided additional written comment on 12/08/2022 advocating for TBRA to help tenants stay in their homes, particularly extremely low-income households most impacted by COVID.
Town of Belmont <i>Planning Department</i>			
Town of Brookline <i>Planning Department</i>			
City of Newton <i>Senior Center; Housing & Community Development Office</i>			
Regional Housing Services Office (RHSO)	PHAs		
Sudbury Housing Authority			
South Middlesex Opportunity Council (SMOC)	Housing and homeless service providers	Virtual Meeting 10/31/2022: Shelters & DV Service Providers	While providers noted the need for more accessible units, discussion focused considerably on supportive service needs. Metro Housing Boston stated that representative payee programs for Social Security or SSI payments would be helpful for those who cannot manage these payments. Programs around hoarding and other mental health issues are also needed to help tenants at risk of eviction. Job skills training would be valuable for single adults not yet eligible for Social Security but who have aged out of or lost long-term employment. Wrap around services (financial assistance, landlord/tenant help, education) can ensure people will remain successfully housed. Lastly, it was noted that staffing at shelters is a challenge.
Metro Housing Boston			

Table 3. Summaries of Consultation Interviews & Meetings

Groups Consulted	Category	Method	Feedback Summary
Watertown Foundation	Community resources	Virtual Meeting 10/31/2022: Service Providers, Agencies, Organizations	Attendees discussed the importance of TBRA and other forms of financial assistance. Short-term rental assistance administered at the local level (as opposed to RAFT or other resources administered by a larger entity) can allow communities to help households quickly. ⁷
Watch CDC	Public and private organizations that address fair housing, civil rights, and the needs of persons with disabilities		Supportive services were also highlighted as a need, with one attendee noting that “just three people can help 700 households a year” by providing consistent case management. Legal services to assist those facing evictions were also emphasized. In terms of demographics of those in need, participants discussed households “doubling up,” undocumented immigrants, older adults who may not have a disability but are not old enough to qualify for Social Security, couples who will be separated by gender, and others without a safety net.
Housing Families			
Newton Fair Housing Committee	Public and private organizations that address fair housing, civil rights, and the needs of persons with disabilities	Virtual Committee Meeting 11/01/2022 (Standing Meeting)	Following a 11/01/2022 presentation to the Newton Fair Housing Committee, the NFHC provided a written response on 11/07/2022. The committee noted that available data does not fully identify need, especially for the “invisible homeless” and the “disability homeless” in each community. There is a need for emergency services and shelter in the City of Newton that are not being met. Those who are homeless or at-risk are often forced to leave Newton because there are not enough emergency services or other resources in the community and the waitlist for a voucher in is approximately nine years. The NFHC stated that Consortium should ensure that services and shelter are provided equitably among the WestMetro communities to avoid displacement of residents in need and noted Newton’s responsibilities to Affirmatively Further Fair Housing.

⁷ RAFT: Residential Assistance for Families in Transition

Table 3. Summaries of Consultation Interviews & Meetings

Groups Consulted	Category	Method	Feedback Summary
Wayside Youth	Human services; homeless service provider	Virtual Meeting 11/02/2022: Service Providers, Agencies, Organizations	Attendees noted the need for more affordable rental housing and vouchers, as well as more temporary solutions including hotel vouchers, to help during transitions. Low threshold housing and housing search assistance are important for getting vulnerable populations access to units; this process can be difficult for those with fluctuating incomes, no credit history, or with a criminal record. Eligibility requirements for programs such as RAFT are also problem because people need to be on the brink of homelessness to get help. Rental support (for current and back rent) to catch people prior to getting an eviction notice should be available. Many applications for Cousens fund assistance are either families or those over 70, and mostly renters versus homeowners, with 75% of requests asking for rental help.
Department of Mental Health	Public agencies that address needs of QPs		
Newton Cousens Fund	Community resources		
Community Day Center of Waltham	Homeless service providers	Virtual Meeting 11/02/2022: Shelters & DV Service Providers	Providers discussed challenges with accessing financial assistance, both to remain housed and to move into housing. RAFT takes too long, people who are housed are experiencing more instability than ever before, and upfront costs for moving high. Some noted an increase in non-English speakers and described the challenges of helping these and other vulnerable populations get necessary documentation. One provider noted an increase in younger folks needing shelter, particularly young parents (teens/early twenties). Providers also emphasized the importance of housing search assistance and other supportive services such as mental health support. Lack of credit or landlord history makes getting a unit difficult and people do not know where to turn. Attendees agreed that TBRA and supportive services are a crucial use of funds.
Family Promise MetroWest			
REACH	Domestic violence service providers		

Table 3. Summaries of Consultation Interviews & Meetings

Groups Consulted	Category	Method	Feedback Summary
Waltham Public Schools	Public agencies that address needs of QPs	Virtual Meeting 11/02/2022: McKinney-Vento School Liaisons	Attendee described students living in unsafe or overcrowded situations, particularly immigrant families, and having challenges proving Waltham residency. The cost of transporting McKinney-Vento students is also exorbitant (\$500-\$1,000 per day per route), and those funds potentially could be better used to help families. All HOME-ARP activities have the potential for good, but there is skepticism that communities would support more housing or shelter at the local level.
The Brookline Center for Community Mental Health	Human services provider	Virtual Meeting 11/03/2022: Service Providers, Agencies, Organizations	Meeting participants discussed the challenges with relocating and finding housing due to competitive market, loss of jobs during pandemic, and difficulty matching with potential roommates. Attendees stressed the need for housing search assistance to foster connections with landlords. RAFT changes have made it very difficult for families to access support before being threatened with eviction. Supportive services are crucial, and case management provided at shelters is often insufficient according to clients. Folks with mental health challenges are more likely to struggle with keeping on top of the paperwork. Priority activities should include rental housing construction and rehabilitation with embedded supportive services.
West Suburban YMCA	Homeless service provider		
MetroWest Mediation	Legal services		
MA Department of Mental Health	Public agencies that address needs of QPs		
Framingham Public Schools	Public agencies that address needs of QPs	Virtual Meeting 11/03/2022: McKinney-Vento School Liaisons	Participants discussed the need for immediate resources to help families in crisis, particularly short-term transitional stays while waiting for shelter. Unaccompanied youth also have unique challenges and support needs. Concerns discussed included families not knowing where to go for assistance; immigrant families being fearful about seeking help; and need for legal/mediation support for families facing eviction.
Wayland Public Schools			

Table 3. Summaries of Consultation Interviews & Meetings

Groups Consulted	Category	Method	Feedback Summary
CAN-DO	Public and private organizations that address fair housing, civil rights, and the needs of persons with disabilities	Virtual Meeting 11/03/2022: Advocacy Groups and Organizations	Attendee emphasized the need to get information from and into the hands of those who would most benefit from these funds, noting that language accessibility is a large problem. The concentration of need is connected to where resources are, so while some more affluent communities may appear to have lower needs, it may be that households have had to relocate. RAFT program changes were also identified as a problem for households, as it is now more difficult to get assistance unless about to be evicted. The attendee also discussed the trauma of homelessness or being at risk and the need for services that meet people where they are. CAN-DO also shared suggestions for other groups to connect with in this process.
Natick Affordable Housing Trust	Public agencies that address needs of QPs	Virtual Meeting 11/04/2022: Advocacy Groups and Organizations	Attendees highlighted that accessibility of older buildings an issue; Family Promise was able to address this with private fundraising, but for housing units in the community, this continues to be a problem. The lack of units and length of waitlists (8+ years for Section 8) is a major source of frustration. Attendees identified creation of units (over non-congregate shelter) and TBRA as priorities.
Family Promise MetroWest	Homeless service provider		
Newton Community Development Foundation	Nonprofit housing developer	Virtual Meeting 11/04/2022: Nonprofit Housing Developers	Attendees noted an increase in families with children facing homelessness as compared to seniors. HOME-ARP funds should focus primarily on unit creation; for NCDF, supportive services would go together with any units they create because they have a resident services coordinator and partner with other organizations such as Springwell.

Table 3. Summaries of Consultation Interviews & Meetings

Groups Consulted	Category	Method	Feedback Summary
MetroWest Community Development Corporation	Nonprofit housing developer	Phone Call 11/08/2022: Nonprofit Housing Developers	MWCDC holds lotteries every two years and noted that senior and family housing is the most in demand. Recognizing the need for housing search assistance, MWCDC provides weekly sessions open to the public. Costs associated with moving are also a major challenge. Supportive service needs include financial assistance, legal support, and job skills training.
Balance of State Continuum of Care	Continuum of Care	Virtual Meeting 11/09/2022: Continuum of Care	Continuum of Care staff discussed challenges of conducting PIT counts, particularly after COVID. Attendees also discussed the importance of collaborative funding for future projects and consulting with developers to get an understanding of feasibility.
Newton Commission on Disabilities	Public and private organizations that address fair housing, civil rights, and the needs of persons with disabilities	Virtual Committee Meeting 11/14/2022 (Standing Meeting)	Participants discussed the need for accessible apartments in Newton, especially at extremely low-income levels. Some also stated that Housing Authority residents would benefit from having greater access to supportive services, including financial and rental assistance. Nonprofits who assist those with intellectual or developmental disabilities would benefit from being able to set units or funds aside for their clientele.
Newton Housing Partnership	Public agencies that address needs of QPs	Virtual Committee Meeting 11/15/2022 (Standing Meeting)	Partnership members emphasized that development takes time and is extremely expensive. Discussion focused on whether it made sense to use the funds on supportive services and TBRA over development.
Engine 6 Newton Housing Advocates	Public and private organizations that address fair housing, civil rights, and the needs of persons with disabilities	Virtual Committee Meeting 11/29/2022	Members discussed best possible uses of funds, noting that development takes a long time and perhaps the focus should be on projects already in motion within the Consortium communities. Supportive services that help stabilize vulnerable households would also be highly beneficial.
Community Day Center of Waltham: Guests & Staff	Qualifying Population & Homeless service provider	In-Person Meeting 12/02/2022	See summary following this table.

Table 3. Summaries of Consultation Interviews & Meetings

Groups Consulted	Category	Method	Feedback Summary
Newton Planning and Development Board	Public agencies that address needs of QPs	Virtual Board Meeting 01/19/2023 (Standing Meeting)	Because the Newton Planning & Development Board hosts public hearings for the Consortium's plans, this pre-hearing public meeting served to provide the P&D Board with information about the project and findings to date, with an opportunity for questions and comments. Discussion focused on some of the needs highlighted in the data, as well as suggestions for presenting the information during the public hearing.
WestMetro HOME Consortium	Public agencies that address needs of QPs	Virtual Meetings 11/03/2022 02/02/2023 (Standing Meeting)	Consortium members discussed needs assessment and gaps analysis findings at both meetings, as well as a summary of the consultation and public participation takeaways at the February meeting. During the February 2023 meeting, members reviewed several funding scenarios, ultimately refining and selecting the proposed allocation included in this Plan by unanimous vote of members present.

CONSULTATION WITH QUALIFYING POPULATIONS

City of Newton staff and project consultants attended a meeting at the Community Day Center of Waltham to meet with those experiencing homelessness. Guests emphasized the need for units, fewer roadblocks to *getting* a unit, financial assistance associated with moving (e.g., first, last, and security), and consistent case management with housing search assistance. Food cards, transit cards, and other small payments are enormously helpful and allow those experiencing homelessness to have one less roadblock to navigate. In terms accessing housing, there are often so many barriers and strings attached that it can be especially difficult when homeless; applications are overly complex, many do not have access to a computer, and gathering paperwork is time-consuming and potentially costly.

Guests described how doing the "right things" needed to improve individual circumstances — e.g., getting a job and looking for housing — are extremely difficult when homeless, and even more so with a criminal record. "Bad things" are happening every day — particularly in encampments — because people do not have a roof over their heads. Maintaining sobriety often

requires distancing oneself from individuals still actively battling substance use issues, which is difficult with “nowhere to go.” There is a real need for stability; having a small place to live and sleep such as an SRO would be extremely helpful and healing. Some expressed frustration with how hard it is to access help, how long everything takes, how many roadblocks there are, and being repeatedly asked to share their stories without any benefit to them.

The most stated needs in addition to simply having a unit typically related to financial challenges, as landlords require first, last, and security deposits, as well as broker’s fees more recently. Landlords seem to be “traumatized” by the eviction moratorium and seem less likely to rent to unhoused folks. This point was also emphasized by staff, who stressed the importance of building relationships with landlords, connecting clients who are likely to be successful in maintaining their housing, and continuing to check in on clients once housed to keep that trust with landlords.

CONSULTATION SURVEY

In addition to the above consultation meetings, the Consortium circulated an online survey for service providers. The survey was sent to Continuum of Care (CoC) staff, homeless service providers, domestic violence service providers, veterans’ groups, public housing authorities (PHAs), public agencies that address the needs of the qualifying populations, and public and private organizations that address fair housing, civil rights, and the needs of persons with disabilities. Twenty-five people responded to the survey, which was open from December 16, 2022, to January 16, 2023. Questions focused on the identification of barriers for those who are experiencing homelessness or are at risk of homelessness, gaps between housing, shelter, and service delivery, anticipated resources to leverage with HOME-ARP funds, and how to prioritize the eligible activities based on level of need. “Development or preservation of affordable rental housing” was labeled as the most urgent need, and “creating new affordable housing units” was the most urgent need relating to affordable rental housing. The second highest need identified was supportive services, with “homeless prevention” ranked as the greatest need for supportive services. A complete survey summary can be found in the Appendix.

Summarize feedback received and results of upfront consultation with these entities.

Consultation involved three main activities: interview sessions, meetings with the WestMetro HOME Consortium, and a provider survey. The interviewed stakeholders represented a variety of affiliations, including the Continuum of Care, homeless service providers, domestic violence service providers, veterans’ groups, public housing authorities (PHAs), public agencies that address the needs of the qualifying populations, and public and private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

These community partners had varying levels of direct experience with the Qualifying Populations under HOME-ARP, and the Consortium communities differ from each other considerably in terms of demographics (see **Table 1**); nonetheless, some key observations were commonly shared:

- There is marked increase in need, with more at-risk households who previously would have been able to “stay afloat” no longer able to keep up with rising housing costs, largely exacerbated by the COVID-19 pandemic’s impact on the housing market.
- The cycle of homelessness is often precipitated and perpetuated by small hurdles that snowball.
- Many interrelated issues are rooted in the broader need for more deeply affordable rental housing and supportive services.
- Navigating the continuum of services, shelter, and housing is extremely confusing, time intensive, and challenging, especially for those in the midst of a crisis.
- Certain vulnerable subpopulations have unique needs, including elderly populations, immigrants/ESL populations, youth and young adults, LGBTQ youth, single-parent households, those with mental illness, and those with substance use disorders, including those in recovery.

PUBLIC PARTICIPATION⁸

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

The Public Participation process included three initial community meetings (virtual), an online community survey, and a final virtual public hearing on the Draft Plan.

- **Date(s) of public notice:** The Public Notice for the public hearing ran in the Boston Herald and MetroWest Daily on February 22, 2023 and was distributed to the project email list on February 27, 2023.
- **Public comment period:** Start date – March 6, 2023; end date – March 21, 2023
- **Date(s) of public hearing:** March 6, 2023 (virtual)

Table 4 below outlines the complete list of public participation efforts conducted during the development of the HOME-ARP Allocation. Participants in any engagement effort had their information added to the project contact list for future updates. More information on feedback from each effort is described in the upcoming narratives.

Table 4. Public Participation Opportunities

Engagement Method	Location	Date and Time	Participants
Virtual Public Meeting #1	Zoom	12/05/2022 • 7:00-8:30pm	19
Virtual Public Meeting #2	Zoom	12/06/2022 • 5:00-6:30pm	14
Virtual Public Meeting #3	Zoom	12/07/2022 • 12:00-1:30pm	43
General Public Survey	Online (Qualtrics)	11/21/2022 to 12/22/2022	204
Virtual Public Hearing	Zoom	03/06/2023 • 7:00pm	≈13 ⁹
Comment Period	--	03/06/2023 to 03/21/2023	5

Describe efforts to broaden public participation.

The public participation aligned with the project's Engagement Plan as well as the Consortium's Citizen Participation Plan to provide for effective communication, accessibility, reasonable accommodation for persons with disabilities, and meaningful access to participation by limited

⁸ PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of no less than 15 calendar days. The PJ must follow its adopted requirements for "reasonable notice and an opportunity to comment" for plan amendments in its current citizen participation plan. In addition, PJs must hold at least one public hearing during the development of the HOME-ARP allocation plan and prior to submission.

⁹ Five P&D Board members, three City staff members, and two representatives from the consultant team were present at the Public Hearing, as well as three members of the public who provided comments.

English proficient (LEP) residents. The project's initial stakeholder and distribution list was built out with assistance from Consortium representatives and City staff. As the project progressed, the list of contacts evolved and lengthened.

Initial community meetings and the public survey were advertised within Consortium communities with assistance from the WestMetro HOME Consortium, on social media, and through email blasts to the project distribution list. Attendees who registered in advance for the community meetings were able to request oral interpretation in several languages other than English; one participant requested and was provided a Spanish interpreter. The community survey was translated into Simple Chinese, Haitian Creole, Portuguese, Russian, Spanish, and Urdu. The formal public hearing was advertised in the Boston Herald and MetroWest Daily News and shared through the previous outreach methods used for the initial community meetings and online survey. Those requesting reasonable accommodations had a point of contact at the City.

The formal Public Notice and the Engagement Plan are provided in the Appendix.

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

This section breaks down community feedback into two categories:

- A. Input received during the development of the plan. This feedback, collected via three public meetings and a community survey, shaped the contents and proposed allocation included in this plan.
- B. Comments received during the Public Hearing and comment period.

A. INPUT DURING PLAN DEVELOPMENT

December Community Meetings

The WestMetro HOME Consortium held a series of three community meetings in December 2022 to inform the Needs Assessment. All meetings followed the same format. The public input received during each meeting is summarized below.

DECEMBER 5, 2022: KEY TAKEAWAYS

- Broader societal issues intersect with homelessness; inequities within support systems are reflected in inverse levels of need.
- Newcomer populations face unique challenges due to languages barriers and immigration issues.
- Domestic violence is likely underreported. Other readily available statistics also likely downplay need among vulnerable populations: "Numbers make good bureaucratic sense but are not reflective of the reality."

- Many households are afraid of eviction, especially when landlords seem determined to remove a tenant and begin imposing fees or other random costs. Much of this concern comes from families with younger children.
- It is critical to engage with populations for whom the funds are intended to benefit. However, this can be traumatic for vulnerable populations, as they live through this every day and are often repeatedly expected to share their experiences with little benefit to them. Promises to compensate either go unfulfilled or take too long. Compensation should be immediate at the time of consultation.

DECEMBER 6, 2022: KEY TAKEAWAYS

- Families with children and people with disabilities often face discrimination.
- Tenants often do not know their rights. When people are facing homelessness, they are too pressured to advocate for themselves.
- An increase in housing search assistance and housing advocates would have enormous benefit. The lack of housing has led to a highly competitive rental market, which makes the housing search process emotionally taxing on folks.
- Massachusetts has a new tool called the Housing Navigator; all available units that are affordable and accessible statewide should be listed on this resource.
- Affluent communities tend to see the problem as being “elsewhere” — without reflecting on why people who work in their communities are often unable to live there.

DECEMBER 7, 2022: KEY TAKEAWAYS

- Those most at risk include: homeless or at-risk population age 16-24, particularly those with mental health issues; LGBTQ youth without family support systems; low-income and working families with children; single parents, particularly those who moved into the community from DV or family shelters; immigrant households; older adults with adult children living at home due to mental or physical health issues; and seniors at risk of losing housing.
- Seemingly indirect issues often add to the challenges vulnerable households face. E.g., those with complex medical needs sometimes forego necessary treatment because of transportation challenges.
- Overcrowding is increasingly common among immigrant families in Waltham; however, this population is fearful about seeking help because of their status.
- Current systems do not consider the impact of trauma on executive functioning - it can be hard to remember details, focus, stay calm, and plan. Forms, applications, and programs are too complex or have too many steps for people *without* these challenges,

let alone for someone experiencing the trauma of homelessness. “This is not a personal deficit problem; this is a structural problem.”

- People must retell and reshare their trauma repeatedly to get their needs met because they are referred to multiple organizations. The solution would be for those in need to have one (trained) point person who can do complex case management and assess what an individual can or cannot do.
- Getting into units is a challenge for potential tenants who do not pass a background check, have poor credit, are voucher holders, etc. Some are forced to pay a broker to assist in the search, which is costly.

Community Survey Takeaways

The Consortium circulated an online survey from December 16, 2022 to January 16, 2023, available in English, Simple Chinese, Haitian Creole, Spanish, Portuguese, Russian, and Urdu. There were 204 responses, 3 of which were in Spanish and the rest in English. When asked what the top five needs were from a list of thirteen options, affordable rental housing was the most popular selection, with 79 percent of survey-takers choosing it among their responses. Supportive services were the second most selected priority, although with 33 percent of respondents selecting this option, it was much further behind rental housing. A complete report of the results is in the Appendix.

INPUT ON DRAFT PLAN

Public Hearing: March 6, 2023

On March 6, 2023 the Newton Planning & Development Board held a virtual public hearing as advertised through a formal legal notice according to the City’s Citizen Participation Plan. **Table 5** outlines all verbal comments received during the hearing and responses from the City.

Table 5. Summary of Comments Received at Public Hearing

Comment Received	Response
1. A Planning and Development (P&D) Board Member suggested going the lowest AMI possible for the HOME-ARP units rather than allowing up to 30 percent of the units to be for low-income households (i.e., earning up to 80 percent AMI). The Board Member stated a preference for including this directly in the plan rather than including criteria in the RFP that would favor projects not including or limiting these low-income units to maximize units for ELI households.	Page 9 of CPD-21-10 states that “PJs are encouraged to use this flexibility [of including up to 30 percent low-income units] only when it is required to facilitate development of a HOME-ARP rental project.” The Consortium takes this recommendation seriously and agrees that HOME-ARP units should be reserved for Qualifying Populations to the greatest extent possible. The Consortium intends to include criteria in the RFP regarding preferences for projects that include only or maximize QP units beyond the requirements under HOME-ARP.

Table 5. Summary of Comments Received at Public Hearing

Comment Received	Response
<p>2. Another P&D Board Member requested that the accomplishments of HOME-ARP projects be reported out as available, particularly information about the race and ethnicity of participants in HOME-ARP programs by community by program.</p>	<p>The Consortium will collect racial and ethnic data for participants in HOME-ARP programs to the extent required by HUD.</p>
<p>3. A member of the public provided two comments and one question:</p> <ul style="list-style-type: none"> a. The plan does not address COVID, which is at odds with the intent of the American Rescue Plan Act. b. The plan should reflect the unique demographics of each community so that resources are allocated equitably across the Consortium. c. In addition, this commenter asked for clarification about how comments and responses would be addressed and included in the plan. 	<ul style="list-style-type: none"> a. The plan has been amended to explain the connection of the HOME-ARP program to COVID, and some qualitative input from the consultation process regarding the impact of the pandemic has been added where relevant. However, there is not a requirement under the HOME-ARP program to tie the funds directly back to those most impacted by COVID, and in the interest of assisting the broadest spectrum of Qualifying Populations possible, the Consortium has elected not to include any preferences. b. The Consortium has elected to open the RFP process to organizations across all Consortium communities rather than determining distribution by geography. This ensures the process will not unduly hinder the ability of respondents to propose quality projects that would have the greatest benefit for Qualifying Populations. The Consortium may add RFP criteria surrounding the geographic location of projects, with more consideration given to projects serving areas with limited resources for Qualifying Populations. Ultimately, however, the more critical piece of assessment will be the level of impact and quality of a proposal, as well as its alignment with the HOME-ARP regulations. In addition, through the RFP process the Consortium will encourage applicants to center diversity, equity, and inclusion (DEI) in their proposals and may include criteria specifically assessing the organization's commitment to DEI and the extent to which a project would advance equity considerations. c. Comments and responses will be included in the plan, including the reasons for not accepting a comment, if applicable.

Table 5. Summary of Comments Received at Public Hearing

Comment Received	Response
<p>4. A representative from the Brookline Community Development Corporation (BCDC) commented that:</p> <ul style="list-style-type: none"> a. \$800,000+ for Administration and Planning is excessive. b. The allocation should include nonprofit operating or capacity building. c. There should be more allocated to TBRA based on the needs of the community and of Qualifying Populations. The Consortium could assist far more households with TBRA than with unit creation, and these funds will not “go very far” for capital costs. 	<ul style="list-style-type: none"> a. Administrative and Planning funds are for use over several years of administering the HOME-ARP program (through 9/30/2030). Should the Consortium not require the maximum allocation of Administration and Planning, it can reallocate those funds to other activities. b. Under HOME-ARP, “PJs may award operating expense assistance or capacity building assistance to a nonprofit organization if it reasonably expects to provide HOME-ARP funds to the organization for any of the eligible HOME-ARP activities within 24 months of the award” (p.67). Thus, because nonprofits applying for these funds would <i>also</i> need to apply for other funding categories within two years, and because the funding is so limited compared to the level of need, the Consortium has chosen to directly fund the types of activities nonprofits would potentially be providing – supportive services, rental housing, or TBRA. c. The Consortium acknowledges that TBRA could provide more immediate assistance to a greater number of households. However, the Consortium determined that being able to support the creation of units for ELI households in particular was a rare opportunity with lasting impact, which is why HOME-ARP rental housing has received the highest allocation.
<p>5. Another P&D Board Member had two comments:</p> <ul style="list-style-type: none"> a. The focus on permanent housing should not come at the expense of those needing emergency stabilization. b. Funds should tie back more directly to populations most affected by COVID. 	<ul style="list-style-type: none"> a. Between Supportive Services and TBRA, the Consortium is currently allocating over \$1M toward activities that have the potential to provide emergency assistance for households, in addition to \$1M for Non-Congregate Shelter for currently homeless households. The Consortium recognizes that the need for stabilization resources <i>far</i> surpasses the available funds. However, the Consortium determined that being able to support the creation of units for ELI households was a rare opportunity with lasting impact. b. In the interest of assisting the broadest spectrum of Qualifying Populations possible and avoiding the potential to violate requirements relating to fair housing, civil rights, and nondiscrimination, the Consortium has elected not to include any preferences.

Table 5. Summary of Comments Received at Public Hearing

Comment Received	Response
6. A City Councilor from Waltham had the following questions: <ul style="list-style-type: none"> a. Who receives the TBRA funding to administer – communities or organizations? b. What would the Consortium be looking for from an organization or city/town in terms of responses to the RFP for rental housing development? c. Can funds be reallocated if necessary? 	<ul style="list-style-type: none"> a. Municipalities or organizations can respond to the RFP for TBRA funds to administer a local TBRA program. b. RFPs have not been developed yet, but criteria will likely be similar to what the Consortium looks for with HOME projects – capacity of the organization to carry out the project, experience with federal funds and HUD regulations, familiarity with layering subsidies, general strength of the project, income levels served and needs met, etc. c. Funds can be reallocated to other activities. Depending on the size and type of reallocation, this may require a substantial amendment to the plan according to the Consortium’s Citizen Participation Plan.
7. A P&D Board Member reiterated the questions from Comment #4 above and asked for a response.	See response to Comment #4.

Comment Period: March 6-March 21, 2023

While the draft Allocation Plan was made publicly available on February 27, 2023, the Comment Period opened on March 6 and ran for 15 days through March 21. During this time, the City of Newton received five written comments. These comments as well as the City’s responses are included in the Appendix of this plan.

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

Recommendations for alternative funding allocations across eligible activities were taken into consideration, but ultimately were not accepted. While the Needs Assessment and Gaps Analysis were the primary factors influencing the allocations proposed in this plan, the needs for all activities far surpass what the Consortium’s available HOME-ARP funds can address; as such, the Consortium considered other factors for determining the best use of these one-time funds, including uses with the most *lasting* impact, as well as the capacity across the Consortium and within the City of Newton to administer certain activities. Nonetheless, the Consortium is open to reallocating funds if the responses to the initial RFPs indicate more or less of a demand for certain activities, or if some activities are deemed infeasible within the constraints of the HOME-ARP program.

Suggestions for a deeper quantitative data analysis regarding the impacts of COVID were not accepted. However, more references to *qualitative* input received through the consultation process have been added to the narrative of the plan where relevant.

Comments suggesting an analysis of the racial and ethnic breakdown of those receiving supportive services were explored but not addressed in this plan due to the complexities of weaving together partial data from different funding sources and programs that may overlap, not cover all communities, or have different reporting requirements. For example, the City of Newton is the sole recipient of ESG funds within the Consortium, although it has subrecipients in Brookline, Newton, Waltham, and Watertown. These funds are used for certain supportive services (including homelessness prevention services) — *in addition to* emergency shelter and rapid rehousing programs. While the City of Newton reports the racial and ethnic breakdown of participants in ESG programs in its Consolidated Annual Performance and Evaluation Reports (CAPERs) as required by HUD, this information is not broken down further into program type or location. Thus, narrowing down to supportive services *alone* was not possible within the scope of this project, nor would it allow for a Consortium-wide analysis. Similarly, South Middlesex Opportunity Council (SMOC) receives state ESG funds administered by DHCD, which allocates these funds statewide and does not provide a breakdown by race or program type in its CAPER. The Continuum of Care also funds certain supportive services; however, all Consortium communities are part of the Balance of State Continuum of Care, which provided a breakdown by race for all program types included in its Homeless Management Information System (HMIS), but not specific program information for SSO (“Supportive Services Only”) projects. Because of the intricacies of these data points, a thorough analysis of the racial and ethnic makeup of supportive service recipients exceeds the scope of this project, but is a worthy project to pursue in the future if resources allow.

Comments requesting certain requirements for projects beyond the specifications of the HOME-ARP program were not accepted. Examples included suggestions for specific supportive service programs, not allowing the option for up to 30 percent of HOME-ARP rental units to be for low-income households, and other similar comments. As noted in **Table 5** and in the responses to the written comments in the Appendix, the Consortium instead intends to include RFP criteria that favor projects most directly and effectively meeting the needs of Qualifying Populations.

NEEDS ASSESSMENT AND GAPS ANALYSIS¹⁰

The Needs Assessment and Gaps Analysis evaluates the size and composition of qualifying populations across the WestMetro HOME Consortium and compares that information with existing shelter, housing, and service gaps. The entirety of the Needs Assessment and Gaps Analysis uses quantitative and qualitative data, including observational data from the Allocation Plan's Consultation and Public Participation phases. Quantitative data sources include but are not limited to the following, with abbreviations used throughout this Plan:

Balance of State Continuum of Care

- Point-in-Time (PIT) Count, 2022
- Housing Inventory Count (HIC), 2022
- Homeless Management Information System (HMIS), November 2022 Report

U.S. Bureau of the Census

- American Community Survey (ACS) Five-Year Estimates, 2017-2021
- U.S. Decennial Census, 2020

U.S. Department of Housing and Urban Development (HUD)

- Comprehensive Housing Affordability Strategy (CHAS), 2015-2019

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

HOMELESS AS DEFINED IN 24 CFR 91.5

The Point-In-Time (PIT) Count quantifies the number of sheltered and unsheltered people experiencing homelessness on a single night, typically in January. Continuums of Care (CoCs) conduct the annual count for those in emergency shelter, transitional housing, and Safe Havens.¹¹

¹⁰ In accordance with Section V.C.1 of the Notice (page 14), a PJ must evaluate the size and demographic composition of all four of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. If the PJ does not evaluate the needs of one of the qualifying populations, then the PJ has not completed their Needs Assessment and Gaps Analysis. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

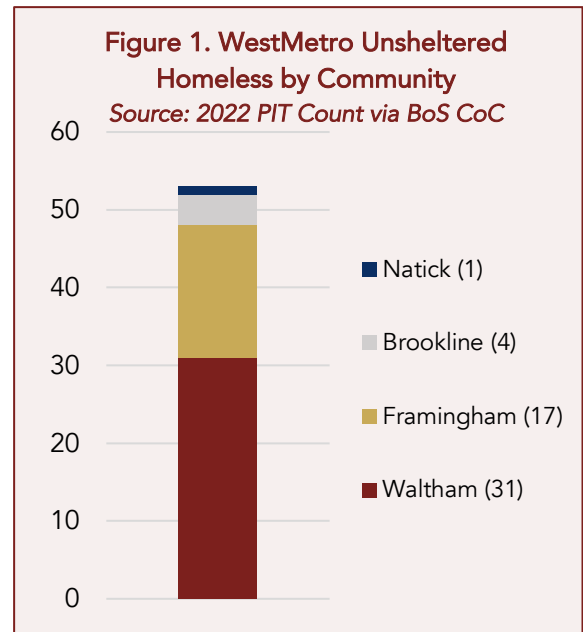
¹¹ Safe Haven is a form of supportive housing that serves hard-to-reach homeless persons with severe mental illness who come primarily from the streets and have been unable or unwilling to participate in housing or supportive services. Since the passing of The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act), HUD no longer funds new Safe Haven projects.

Each count is locally coordinated and carried out with partners using Homeless Management Information Systems (HMIS) data collected through the Homelessness Data Exchange (HDX). The WestMetro HOME Consortium is within the Balance of State Continuum of Care (see Map 1). Where possible, the CoC provided data specific to the Consortium communities within their region.

The 2022 PIT Count identified 655 individuals in approximately 315 households experiencing homelessness within the Consortium. **Table 6** below shows 2022 PIT numbers of sheltered and unsheltered homeless individuals, both individuals and those within families. Unsheltered homeless individuals made up 8 percent (53 people), with the highest number of unsheltered individuals in Waltham (**Figure 1**).

Table 6. 2022 PIT Count

Status	# in CoC	# in Consortium
Emergency Shelter	2,652	546
Transitional Housing	281	56
Unsheltered	302	53
TOTAL	3,235	655



Of those counted in the 2022 PIT, 476 were in family households (157 households), not including the 47 counted in domestic violence (DV) shelters or transitional housing. The remaining 132 were individuals.

Racial & Ethnic Disparities

In addition to PIT Counts, data from the CoC's Homeless Management Information System (HMIS) provides client-level data on the provision of homeless services within the region.¹² Based on HMIS data, there are *significant* racial and ethnic disparities between the homeless population and the total population of both the Consortium and the CoC region, primarily among Black and

¹² Generally, DV victims receiving services or shelter from a DV provider are not included in HMIS.

Hispanic populations (**see Table 7**); at 39 percent, Black individuals are significantly more represented among the homeless population within the Consortium compared to the total population of Consortium communities. Hispanic/Latino individuals are also overrepresented among the homeless population within the Consortium, jumping from 8 percent to 29 percent.

Table 7. Race and Ethnicity of Homeless Population Compared to Total Population

	CoC Region HMIS	CoC Region Total Population	Consortium HMIS	Consortium Total Population
Race				
White	48%	70%	36%	69%
Black	32%	5%	39%	4%
Asian Alone	1%	9%	1%	14%
Two or More Races	3%	8%	2%	8%
American Indian and Alaska Native	<1%	<1%	0%	<1%
Native Hawaiian and Other Pacific Islander	1%	0%	<1%	0%
Other/Unknown	14%	7%	23%	5%
Ethnicity				
Hispanic/Latino	32%	12%	29%	8%
Non-Hispanic/Latino	60%	88%	58%	92%
Unknown	8%	--	12%	--

Sources: Balance of State Continuum of Care 2022 PIT Count and 2020 US Decennial Census

The CoC has recently explored the issue of systemic inequity through data analysis and consultation with CoC members, including a mapping exercise and a member survey. The two most significant disparities identified through this process were:

- The percentage of persons of color in the homeless system far outweighed the percent in the overall population within the CoC.
- The percentage of placements into housing for persons of color was disproportionate to the percentage of white households placed. It was unclear if this was the result of landlord decisions or those made at the case management level.¹³

HMIS includes data for the Street Outreach program, which includes activities designed to meet the immediate needs of unsheltered homeless persons by connecting them with emergency shelter, housing, or critical services, and providing them with urgent, non-facility-based care. There were no Street Outreach clients recorded in the Consortium communities; however, within

¹³ Massachusetts Balance of State Continuum of Care, "FY2022 CoC Collaborative Application," p.28. Accessed February 2023 at <https://www.mass.gov/doc/fy22-coc-application/download>

the broader CoC region, there were ≈83 Street Outreach clients, 90 percent of whom were White. This may indicate that while Black persons are disproportionately represented among the homeless within the region (both sheltered and unsheltered), unsheltered homeless are much more likely to be White than any other race.

Chronically Homeless

HUD defines chronic homelessness as a homeless individual with a disability (as defined in section 401(9) of the McKinney-Vento Assistance Act (42 U.S.C. 11360(9)) who lives in a place not meant for human habitation, a safe haven, or in an emergency shelter and has been homeless for at least twelve months; an individual who has been residing in an institutional care facility for less, including jail, substance abuse or mental health treatment facility, hospital, or similar facility, for fewer than 90 days and met all of the criteria of this definition before entering that facility; or a family with a head of household who meets all of the criteria, including a family whose composition has fluctuated while the head of household has been homeless.¹⁴ There were 21 chronically homeless individuals within the Consortium communities accounted for in the BoS CoC HMIS as of November 2022, all of whom were in Emergency Shelter. While HMIS does not list any Street Outreach clients for the Consortium communities, when looking at the CoC region, 15 percent of the 190 chronically homeless individuals were Street Outreach clients (i.e., unsheltered).¹⁵

Veterans

The November 2022 HMIS report tallied fewer than five homeless veteran clients receiving HMIS services within in the Consortium communities. However, it is worth noting that there are no HMIS Street Outreach data for the Consortium communities, which means that unsheltered veterans will not be included in the HMIS data. While there are no shelter or transitional housing projects within the Consortium dedicated to veterans, according to the 2022 Housing Inventory Count (HIC), 130 beds of Permanent Supportive Housing and Other Permanent Housing are located in Bedford.¹⁶

Youth and Young Adults

HMIS reports 239 children under 18 years of age in Emergency Shelter or Transitional Housing within the Consortium, making this age group the most represented among HMIS clients. In

¹⁴ Department of Housing and Urban Development. "Definition of Chronic Homelessness." HUD Exchange. Accessed November 2022 at <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/definition-of-chronic-homelessness/>.

¹⁵ Balance of State Continuum of Care 2022 November 2022 HMIS Report

¹⁶ See pages 35-36 for detailed definitions of project types, including Permanent Supportive Housing and Other Permanent Housing.

addition, HMIS reports 52 young adults between the ages of 18 and 24, with 67 percent in Emergency Shelter and the remaining 33 percent in Transitional Housing.

McKinney-Vento data also provides information regarding youth homelessness. The Massachusetts Department of Elementary and Secondary Education (DESE) tracks McKinney-Vento data to ensure the enrollment, attendance, and success of homeless youth in each school district. Students are entered into the data collection system based on their district enrollment; therefore, students sheltered in the district community but transported back to their school of origin in another district are not included. Under McKinney-Vento, students who are doubling up with another family or staying in a hotel/motel are considered homeless. This definition does not qualify them as homeless for purposes of the PIT count or qualifying for certain HMIS programs (unless the hotel or motel stay is provided in lieu of shelter beds due to capacity issues). This explains why the numbers are significantly higher than those reported in HMIS. In 2021-2022, districts from the thirteen Consortium communities reported between 1,286-1,241 homeless students, 77 percent of whom were doubling up.¹⁷ **Table 8** shows the number of reported McKinney-Vento students by district for the Consortium. Cells with data representing fewer than 10 students are suppressed, so a range is provided for the total.¹⁸

Table 8. Homeless Youth Enrolled in Public Schools, 2021-2022

District	# of Students	District	# of Students
Bedford	<10	Needham	23
Belmont	<10	Newton	67
Brookline	35	Sudbury	9
Concord	9	Waltham	130
Framingham	922	Watertown	13
Lexington	16	Wayland	9
Natick	35	TOTAL	1,286-1,241

Source: Massachusetts Department of Elementary and Secondary Education

¹⁷ McKinney-Vento count for youth staying in shelter or in a hotel/motel for 2021-2022 is ≈254, which more closely approximates HMIS data.

¹⁸ Massachusetts Department of Elementary and Secondary Education, 2021-2022 McKinney Vento Homeless Data Report. Report shared by email from the Department on September 20, 2022.

AT RISK OF HOMELESSNESS AS DEFINED IN 24 CFR 91.5

Those considered at risk of homelessness per CPD Notice 21-10 are households: with an annual income below 30 percent of AMI; who do not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter; and who meet certain specific living conditions such as exiting a publicly funded institution, living in a hotel/motel, undergoing eviction, moving two or more times in the past 60 days, and more. There are also specific definitions for households with children who do not qualify under the section but qualify under other federal definitions. The best available data on those making 30 percent AMI (considered “extremely low-income” or ELI) is the Comprehensive Housing Affordability Strategy (CHAS) data. CHAS data are custom tabulations of American Community Survey (ACS) data from the U.S. Census Bureau that demonstrate the extent of housing problems and housing needs for low-income households. It is used by governments to plan how to spend HUD funds and may also be used by HUD to distribute grant funds.¹⁹ CHAS 2019 data shows an estimated 22,780 extremely low-income (ELI) households in the Consortium, or 12 percent of total households. **Table 9** shows this distribution by community, and **Map 2** shows the geographic distribution of all ELI households by community. Brookline, Framingham, and Waltham households are significantly more likely to be extremely low income than the other Consortium communities.

Table 9. Households with Incomes <30% AMI (ELI Households)

Community	All Households	Households with Incomes ≤30% AMI (ELI)		
		Total	Owners	Renters
Bedford	5,310	7.7%	3.6%	4.1%
Belmont	9,820	11.1%	4.9%	6.2%
Brookline	24,435	16.2%	3.2%	13.1%
Concord	6,635	7.9%	2.5%	5.4%
Framingham	28,220	16.6%	3.5%	13.1%
Lexington	11,810	9.0%	4.3%	4.7%
Natick	14,535	10.9%	4.6%	6.3%
Needham	10,800	7.5%	3.1%	4.3%
Newton	30,655	9.6%	3.8%	5.8%
Sudbury	6,385	5.9%	4.6%	1.3%

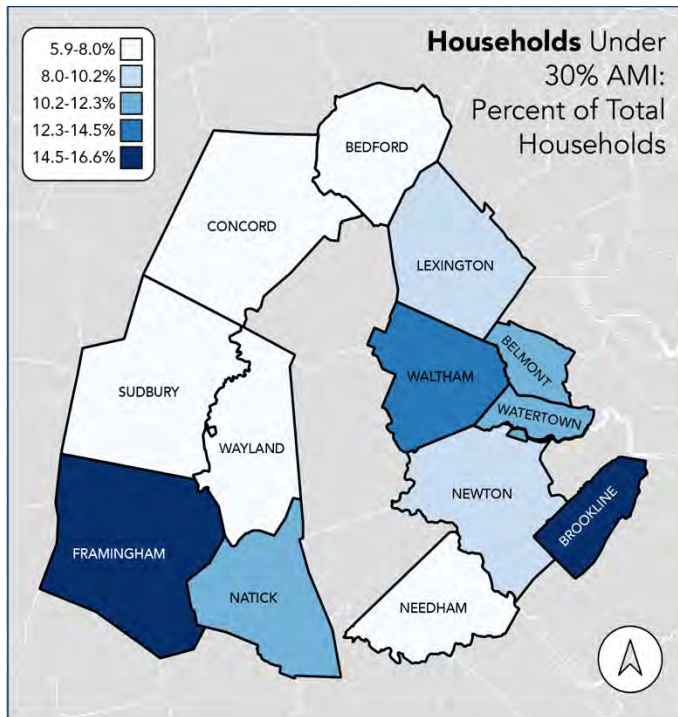
¹⁹ Department of Housing and Urban Development. “Consolidated Planning/CHAS Data.” HUD Exchange. Accessed November 2022 at <https://www.huduser.gov/portal/datasets/cp.html>.

Table 9. Households with Incomes <30% AMI (ELI Households)

Community	All Households	Households with Incomes ≤30% AMI (ELI)		
		Total	Owners	Renters
Waltham	23,690	13.1%	3.9%	9.1%
Watertown	15,620	12.1%	4.8%	7.3%
Wayland	4,785	7.6%	3.9%	3.8%

Source: 2015-2019 CHAS

Map 2. ELI Households by Community



ELI households are also much more likely to experience a HUD-defined housing problem, including: incomplete kitchen facilities; incomplete plumbing facilities; overcrowding; and cost burden greater than 30 percent (or greater than 50 percent as severe cost burden).²⁰ Nearly three-quarters of WestMetro HOME Consortium ELI householders experience at least one housing problem compared to 31 percent of total Consortium households.²¹ **Table 10** provides a Consortium-wide overview of households with housing problems by income.

²⁰ Cost burden refers to the amount of household income spent on housing costs. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost refers to “select monthly owner costs,” which includes mortgage payment, utilities, association / condo fees, insurance, and real estate taxes. Households are said to be cost-burdened when they pay more than 30 percent of household income toward housing, and severely cost-burdened when they pay more than 50 percent of household income toward housing. Overcrowding refers to having more than one person per room, and severe overcrowding refers to having more than 1.5 persons per room.

²¹ U.S Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS), 2015-2019.

Table 10. Consortium Households by Income and Presence of Housing Problems

	Households with 1+ Housing Problem(s)	Total Households	Percent
Household Income ≤30% AMI	16,820	22,780	73.8%
Household Income 31% to 50% AMI	13,595	18,120	75.0%
Household Income 51% to 80% AMI	13,035	23,470	55.0%
Household Income 81% to 100% AMI	5,839	15,980	36.5%
Household Income >100% AMI	10,790	112,375	9.6%
Total	60,040	192,700	31.2%

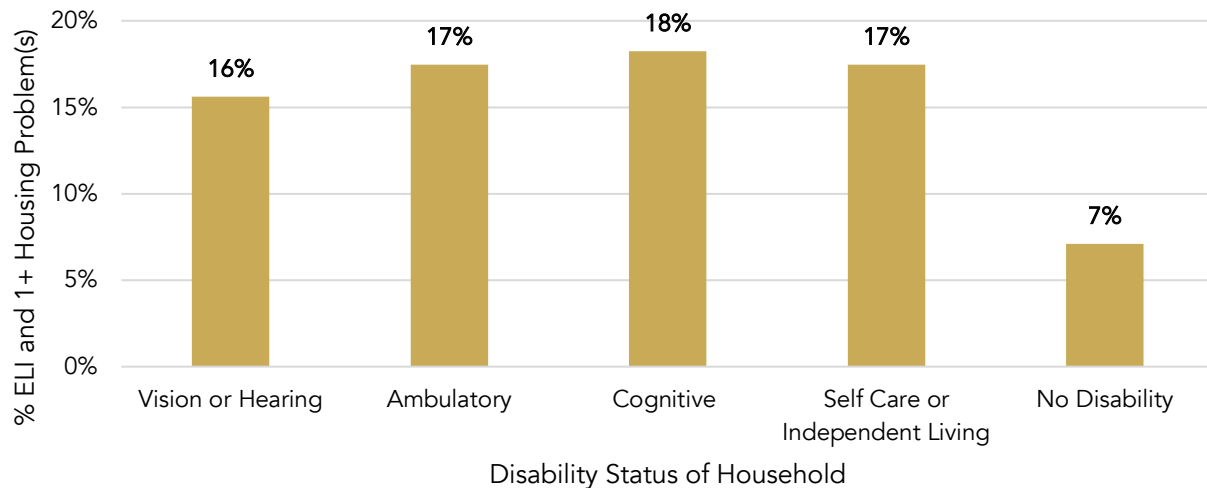
Source: CHAS 2015-2019

Disability Status

Households where a member has a disability are particularly vulnerable. Across the Consortium, an estimated 12 percent of all households are ELI and experiencing at least one housing problem.²² Among households where no householders have a disability, only 7 percent of households are ELI with at least one housing problem; by comparison households of the four HUD-defined disability types range from 16 to 18 percent ELI with at least on housing problem, as shown in **Figure 2**. For reference, an estimated 18 percent of all households in the Consortium have a household member with a disability.

Figure 2. ELI with 1+ Housing Problem(s) as Percent of Household with Disability by Type

Source: CHAS 2015-2019



²² Ibid.

Race and Ethnicity

Across the Consortium, minority households are disproportionately more likely to either be extremely low income, or extremely low income with at least one severe housing problem. **Table 11** highlights the percentage of ELI or ELI with at least one housing problem among racial or ethnic groups. Black and Hispanic households are more likely to be ELI than all households combined (20.2 percent, 18.8 percent, and 11.5 percent respectively), and Black households are more likely to be ELI with at least one housing problem than all households combined (12.4 percent and 6.4 percent, respectively).

Table 11. Consortium ELI Households with 1+ Housing Problem(s) by Race

		Race/Ethnicity as % of Households	ELI Households	ELI Households w/ 1+ Housing Problem(s)
Non-Hispanic	White	76.8%	10.8%	6.6%
	Black or African-American	2.9%	20.2%	12.4%
	Asian	12.4%	12.6%	7.3%
	American Indian or Alaska Native	0.1%	12.0%	12.0%
	Pacific Islander	0.0%	0.0%	0.0%
	Hispanic, any race	5.8%	18.8%	1.3%
	Total	--	11.5%	6.4%

Eviction Filings

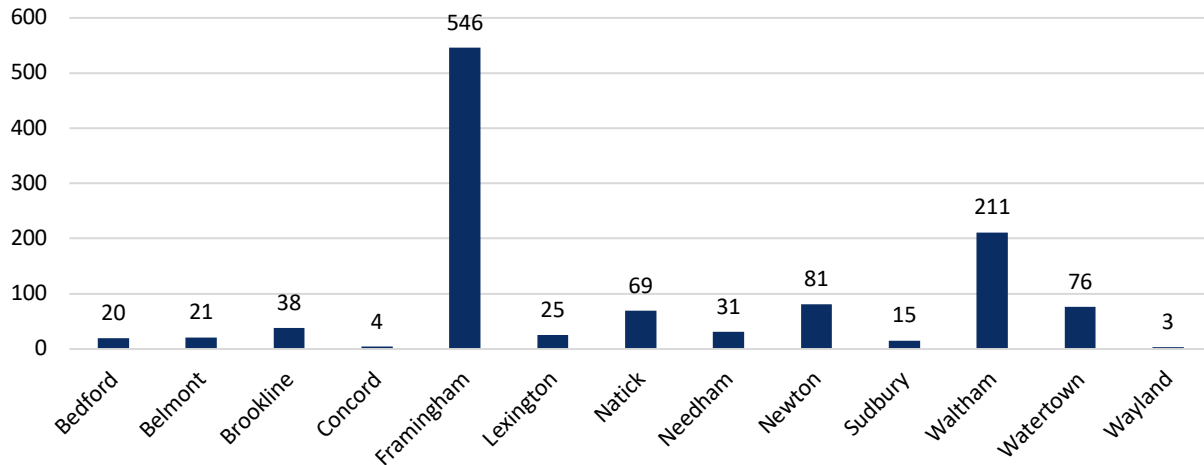
The frequency of evictions also indicates a community's level of need, particularly when compared to the percentage of renter households. **Figure 3** displays the number of eviction filings during the 2022 calendar year, although these filings may not have resulted in evictions. Framingham had both the highest number of eviction filings during the 2022 calendar year, as well as the highest rate of evictions as compared to their renter estimated households at 4.4 percent. Concord had the lowest rate of filings compared to renter households at 0.2 percent.²³

²³ Estimated renter households from American Community Survey 5-Year Estimates, 2017-2021, Table B25003; eviction filings are from MassLandlords, Inc and are available at <https://masslandlords.net/policy/eviction-data/filings-year-ending-2022-12-31/>

**Figure 3. Eviction Filings by Community,
Calendar Year Ending December 31, 2022**

Source: MassLandlords, Inc.

(Note: Court filings have not necessarily resulted in evictions)



FLEEING, OR ATTEMPTING TO FLEE, DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, STALKING, OR HUMAN TRAFFICKING, AS DEFINED BY HUD IN THE NOTICE

For domestic violence, HUD includes cases where an individual or family believes that there is a threat of imminent harm from further violence due to dangerous or life-threatening conditions, including a child, that has taken place within the primary nighttime residence or has made the individual or family afraid to return or remain within the same dwelling unit in this definition of qualifying population. For sexual assault, this includes cases where an individual believes there is a threat of imminent harm from further violence if the individual remains within the same dwelling unit they are currently occupying, or the sexual assault occurred on the premises during the 90-day period preceding the date of the request for transfer. Human trafficking includes both sex and labor trafficking, as outlined in the Trafficking Victims Protection Act of 2000 (TVPA).

In their FY2020 Annual Report, REACH reported serving all Consortium communities except Framingham in some capacity. For all communities served, REACH provided 5,344 bed nights at its Emergency Shelter (averaging 14.6 DV survivors sheltered per night), answered 1,385 hotline calls, accompanied 178 survivors to court, and provided support to 301 adults clients.²⁴ In 2022, SMOC provided 1,900 individuals with domestic and sexual violence counseling and prevention programs through its Voices Against Violence (VAV) program, and seven of its 12 ES

²⁴ REACH Beyond Domestic Violence, *Annual Report FY2020*. Accessed February 2023 at <https://reachma.org/wp-content/uploads/2021/09/Annual-Report-FINAL.pdf>

beds were occupied on the night of the 2022 PIT.²⁵ The Second Step reports assisting an average 58 DV survivors at any given time in its residential programs.²⁶ On the night of the PIT, all ten of its RRH beds were occupied, as well as four of its thirteen available family TH units and three of its available single adult TH units.²⁷

RIA House in Framingham provides services to victims of human trafficking. In 2021, RIA assisted 118 victims through its services, which include peer mentorship, therapy, case management, and support groups. They report having 43 new clients in 2021.²⁸ Statewide data on human trafficking is also available through the Human Trafficking Hotline. This resource is operated by Polaris and supported by the United States Department of Health and Human Services and tracks reports by state across the nation. The hotline has tracked 2,650 reports relating to human trafficking connected to Massachusetts since its inception in 2007. These reports have led to the identification of 905 cases of human trafficking and 1,703 victims.²⁹ The hotline does not provide County-level or local data.

OTHER POPULATIONS REQUIRING SERVICES OR HOUSING ASSISTANCE TO PREVENT HOMELESSNESS AND OTHER POPULATIONS AT GREATEST RISK OF HOUSING INSTABILITY, AS DEFINED BY HUD IN THE NOTICE.

“Other Populations” include households where providing supportive services or assistance would prevent the family’s homelessness or would serve those with the greatest risk of housing instability. This population includes households who do not qualify under the populations above but either:

- previously qualified as “homeless,” are housed due to temporary or emergency assistance, and need additional assistance or supportive services to avoid homelessness;
- have an annual income less than 30 percent AMI (Extremely Low Income, or ELI) and are severely cost burdened; or

²⁵ South Middlesex Opportunity Council, *2022 Annual Report*. Accessed February 2023 at <https://www.smoc.org/pdf/Annual%20Report%202022.pdf>; Balance of State Continuum of Care 2022 Point-in-Time (PIT) Count

²⁶ The Second Step, “Who We Are.” Accessed February 2023 at <https://thesecondstep.org>.

²⁷ Balance of State Continuum of Care 2022 Point-in-Time (PIT) Count

²⁸ RIA, *Celebrating the Strength of One & the Power of Many: Annual Report 2021*. Accessed February 2023 at <https://riahouse.org/uploads/3/4/5/1/34517823/ar2021forweb.pdf>

²⁹ National Human Trafficking Hotline, “Massachusetts; All Time Statistics (Since 2007).” Accessed January 2023 at <https://humantraffickinghotline.org/en/statistics/massachusetts>

- have an annual income less than or equal to 50 percent AMI (Very Low Income, or VLI) and meets certain conditions.³⁰

As with “At-Risk” populations, CHAS data is the primary sources available to analyze qualifying populations in this category. Fifteen percent of Consortium households (29,265) are experiencing a severe housing problem, with 54 percent of those households being renters.³¹ **Table 12** below narrows this data further to ELI and VLI households by tenure and shows that ELI owner households are more likely to be experiencing a severe housing problem than renters, whereas among VLI households, renters are more vulnerable.

Table 12. Consortium ELI & VLI Households with Severe Housing Problems by Tenure

	# Households	# Households w/ 1+ Severe Housing Problem(s)	% Households w/ 1+ Severe Housing Problem(s)
ELI Renter Households	15,350	8,385	54.6%
ELI Owner Households	7,430	5,385	72.5%
All ELI Households	22,780	13,770	60.4%
VLI Renter Households	10,075	4,345	43.1%
VLI Owner Households	8,045	2,875	35.7%
All VLI Households	18,120	7,220	39.8%

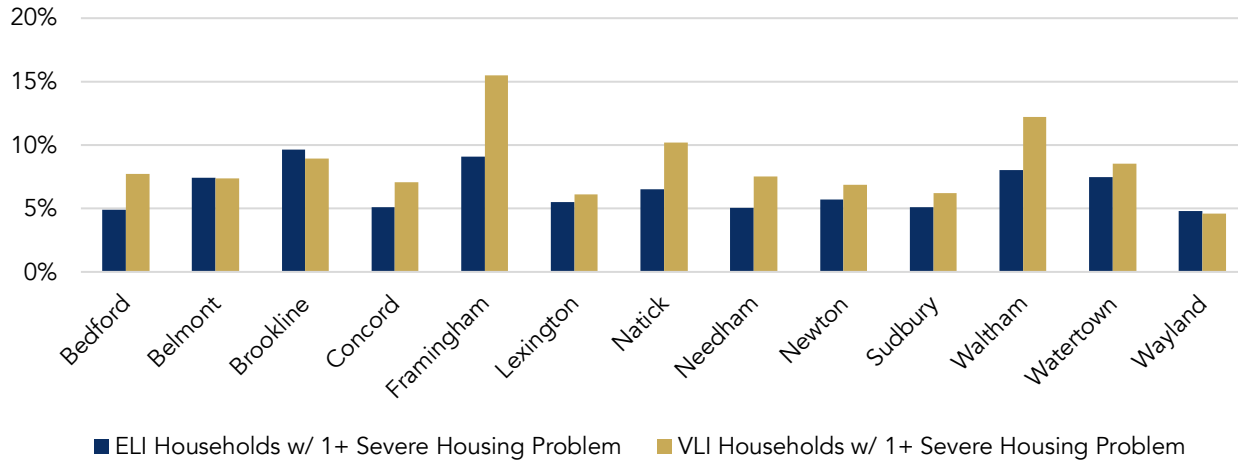
Source: CHAS 2015-2019

Figure 4 shows the percentage of all households for each of the thirteen Consortium communities that are ELI or VLI with at least one severe housing problem. Brookline, Framingham, and Waltham have the highest percentages of households who are ELI and experiencing at least one severe housing problem, and Framingham, Waltham, and Natick have the highest percentages of households who are VLI and experiencing at least one severe housing problem.

³⁰ Condition may include exiting a publicly funded institution, living in a hotel/motel, undergoing eviction, moving two or more times in the past 60 days, and more. A complete list of conditions is listed in the CPD Notice 21-10.

³¹ HUD-defined housing problems include incomplete kitchen facilities; incomplete plumbing facilities; overcrowding; and cost burden greater than 30 percent (or greater than 50 percent as severe cost burden).

**Figure 4. ELI and VLI Households w/ 1+ Severe Housing Problem(s)
 as Percent of Total Households**



Severely cost-burdened ELI households are considered a Qualifying Population under “Other populations” defined in Notice CPD 21-10. Severe cost burden means that a household is paying more than half of their income toward select housing costs. **Table 13** outlines the incidence of cost burden among ELI and VLI households across the Consortium, while **Map 3** indicates the concentration of severely cost burdened ELI households in relation to total households within each community. The CHAS data relays how prevalent this issue is, with 59 percent of ELI households and 36 percent of Very Low Income (VLI) households paying more than half of their income toward housing costs. Across all income levels, an estimated 13 percent of the Consortium’s total households are severely cost-burdened.³²

Table 13. WestMetro Households by Income, Tenure, and Cost Burden

	Renter Households			Owner Households			All Households		
	Severely Cost-Burdened	Total	Percent	Severely Cost-Burdened	Total	Percent	Severely Cost-Burdened	Total	Percent
≤ 30% AMI (ELI)	8,005	15,350	52.2%	5,360	7,430	72.1%	13,365	22,780	58.7%
>30-50% AMI (VLI)	3,805	10,075	37.8%	2,655	8,045	33.0%	6,460	18,120	35.7%

Source: CHAS 2015-2019

³² Source: U.S Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS), 2015-2019.

Certain household types are significantly more likely to be ELI and severely cost-burdened than others. Across the Consortium, small families are the most common household type, defined as either two persons both under 62 years old, or a family with 3-4 members (ages undefined), and large families (5 or more persons) are the least common household type. In general, family household types are much less likely to be ELI and severely cost-burdened than non-family household types. Elderly non-family households (typically a single older adult or perhaps older non-family adults living as roommates) are the most likely to have extremely low incomes *and* be severely cost burdened, as shown in **Table 14**. This is an important consideration when planning for unit types and sizes for Qualifying Populations.

Map 3. ELI & Severely Cost-Burdened Households by Community

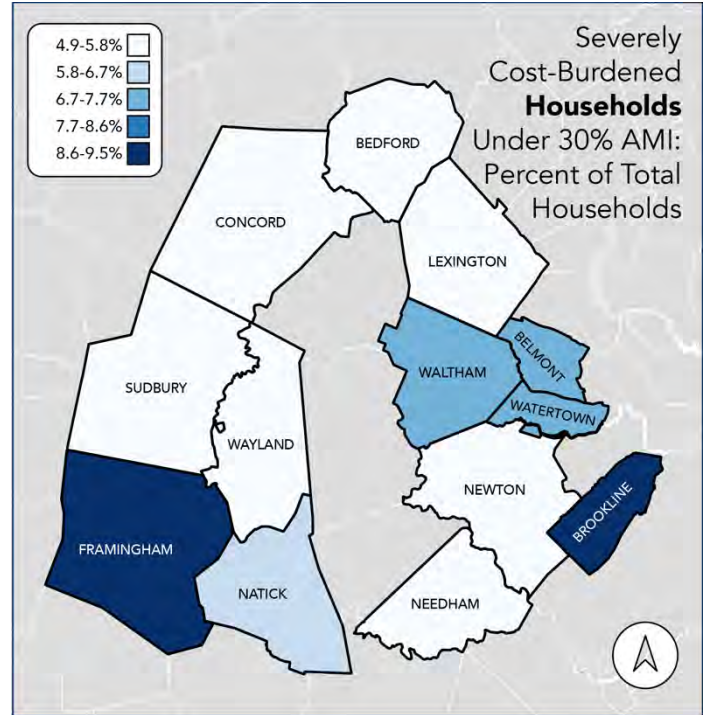


Table 14. Consortium ELI and VLI Households by Household Type

	% Household Type ELI and Severely Cost-Burdened	% Household Type VLI and Severely Cost- Burdened	Household Type as % of Total Households
Elderly Family (2 ppl, either or both 62+)	3.9%	2.5%	15.3%
Small Family (2 ppl, neither person 62+, or 3-4 ppl)	3.7%	2.0%	44.4%
Large Family (5+ ppl)	3.3%	0.9%	6.4%
Elderly Non-Family	17.0%	6.7%	14.5%
Other Household Type (non-elderly, non-family)	10.4%	4.8%	19.4%

Source: CHAS 2015-2019.

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

The WestMetro HOME Consortium has multiple programs, financial resources, shelter beds, units, and other resources available to assist qualifying populations within its five communities:

CONTINUUM OF CARE

In December 2016, the Brookline-Newton-Waltham-Watertown Continuum of Care merged with the Massachusetts Balance of State Continuum of Care (BoS CoC). Since this merger, all WestMetro HOME Consortium communities are now part of the BoS CoC (see **Map 1**).

Continuums of Care are responsible for compiling and reporting a Housing Inventory Count, or HIC. This annual inventory tallies beds and units available for those who are homeless or in permanent supportive housing. Types of projects include the following:³³

- Emergency Shelter (ES) means any facility with the primary purpose of providing a temporary shelter for the homeless and which does not require occupants to sign leases or occupancy agreements.
- Transitional Housing (TH) projects facilitate the movement of homeless individuals and families to permanent housing within a reasonable amount of time (usually 24 months). Transitional Housing provides temporary housing with supportive services to individuals and families experiencing homelessness with the goal of interim stability and support to successfully move to and maintain permanent housing.
- Permanent Housing (PH) is a community-based housing model, the purpose of which is to provide housing without a designated length of stay. PH program participants must be the tenant on a lease (or sublease) which: has an initial term of at least one year; is renewable for a minimum term of one month; and is terminable only for cause. Permanent Housing includes:
 - Permanent Supportive Housing (PSH): permanent housing in which housing assistance (e.g., long-term leasing or rental assistance) and supportive services are provided to assist households with at least one member (adult or child) with a disability in achieving housing stability.

³³ U.S. Department of Housing and Urban Development, "CoC Program Components Overview." Accessed February 2023 at <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-program-components/coc-program-components-overview/>

- Rapid Re-housing (RRH): permanent housing that provides short-term (up to three months) and medium-term (4-24 months) tenant-based rental assistance and supportive services to households experiencing homelessness.
- Other Permanent Housing (OPH): permanent housing that is neither PSH or RRH and may or may not include services for those without disabilities.

The 2022 HIC report for the BoS CoC lists 7,053 total year-round beds. Of these, an estimated 1,197 are located within the WestMetro HOME Consortium communities in 41 different projects. There are an additional 103 overflow beds for families, as well as 15 seasonal beds for adults. **Table 15** in the next section provides additional detail about the types and numbers of beds within the Consortium.

The Massachusetts Department of Housing and Community Development (DHCD) is the Collaborative Applicant for the CoC, which means it submits the CoC's Consolidated Application for annual funding to HUD. DHCD is also the Homeless Management Information System (HMIS) Lead for the CoC. The BoS CoC is divided into four regions for managing its Coordinated Entry System (CES), a process for assessing the needs of new homeless or at-risk clients and connecting them to services, shelter, or housing.

The BoS CoC applies to HUD for annual funding using a collaborative application that includes project funding requests ranked by the CoC's Ranking and Review Committee. The Committee uses a standardized ranking tool adopted by the CoC and adjusted annually as needed.³⁴ The BoS CoC was awarded \$23,903,388 to fund 48 projects in FY2021 and applied for \$23,852,777 for FY2022.

EMERGENCY SOLUTIONS GRANT (ESG)

Over the past three years, Newton has been awarded an average of \$165,069 annually in ESG funds, not including CARES Act ESG funds, which totaled \$1.4M. Newton generally awards these ESG funds to five recipients: Brookline Community Mental Health Center, Community Day Center of Waltham, Middlesex Human Service Agency, REACH Beyond Domestic Violence, and The Second Step, Inc. The ESG funds support the nonprofit organizations' emergency shelter for homeless individuals; transitional housing and supportive services to survivors of domestic violence and their families; and case management and supportive services to assist those at risk of homelessness and to help house homeless individuals and families.³⁵ The Consortium's

³⁴ Massachusetts Balance of State Continuum of Care, "FY2022 CoC Collaborative Application," p.35. Accessed February 2023 at <https://www.mass.gov/doc/fy22-coc-application/download>

³⁵ City of Newton Housing & Community Development Office, *Consolidated Plan for the City of Newton Housing and Community Development Program and the WestMetro HOME Consortium, July 1, 2020 – June 30, 2025*, p.129

FFY2021-2025 Consolidated Plan includes a goal of using an estimated \$838,670 over five years for supportive services for those experiencing or at risk of homelessness.³⁶

HOME INVESTMENT PARTNERSHIPS PROGRAM

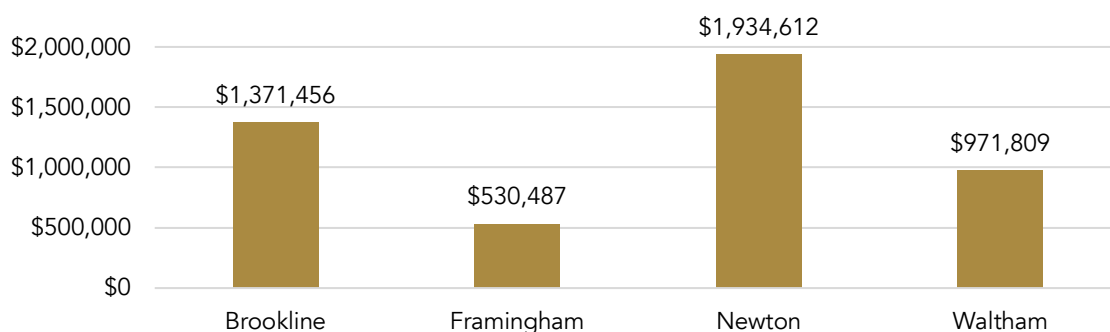
Since its inception in 1992, the WestMetro HOME Consortium has provided grants and loans of HOME funds to create over 550 units of affordable housing.³⁷ The Consortium's FFY2021-2025 Consolidated Plan includes goals for HOME-funded projects including but not limited to TBRA (\$2.3M), rehabilitation of existing units (\$4.4M), and production of affordable units (\$2.9M).³⁸ The City of Newton's FFY2021 Consolidated Annual Performance and Evaluation Report (CAPER) reiterates this focus, noting that for FFY2021 the Consortium focused on three goals: TBRA, rehabilitation of existing units, and production of affordable units. The CAPER also notes that there are several HOME-assisted affordable housing projects in the pipeline at various stages of development that will be completed in subsequent years.³⁹

COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)

There are four entitlement communities within the Consortium – Brookline, Framingham, Newton, and Waltham. These communities receive annual Community Development Block Grant (CDBG) funds, which can be used for affordable housing acquisition and social services for low- and moderate-income residents, among other activities. **Figure 5** displays the 3-year average of CDBG funds received by the Consortium's four entitlement communities from 2019-2021.

Figure 5. 3-Year Average of CDBG Funds by Entitlement Community, 2019-2021

Source: HUD Awards and Allocations Report



³⁶ Ibid., p.182

³⁷ City of Newton Housing & Community Development, "WestMetro HOME Consortium." Accessed February 2023 at <https://www.newtonma.gov/government/planning/housing-community-development/westmetro-home-consortium>

³⁸ City of Newton Housing & Community Development Office, *Consolidated Plan for the City of Newton Housing and Community Development Program and the WestMetro HOME Consortium, July 1, 2020 – June 30, 2025*, p.182

³⁹ City of Newton Housing & Community Development Office, *Consolidated Annual Performance and Evaluation Report, September 1, 2021 DRAFT*, p7

PUBLIC HOUSING AUTHORITIES⁴⁰

Regionally, the Consortium's thirteen public housing authorities provide a significant source of affordable housing. There are approximately 5,500 public housing units Consortium-wide, of which 4,420 are accessible to persons with disabilities. Local housing authorities also administer housing vouchers programs, which subsidize rent and utilities in eligible private housing.

REGIONAL HOUSING SERVICES OFFICE

Bedford, Concord, Lexington, Sudbury, and Wayland are all members of the Regional Housing Services Office (RHSO), an entity established by interlocal agreement of nine communities to provide for local housing-related support, monitoring and inventory management, program development and administration, trainings, and more.⁴¹

REGIONAL ADMINISTERING AGENCIES

Massachusetts is broken into nine Regional Administering Agency (RAA) regions. RAAs work with DHCD to oversee the administration of various assistance programs including federal Section 8 rental vouchers, the Massachusetts Rental Voucher Program (MRVP), and Residential Assistance for Families in Transition (RAFT), which provides financial assistance for rent, utilities, or moving costs. RAAs serving the Consortium include SMOC and Metro Housing Boston.

SHELTER, HOUSING, AND SERVICE PROVIDERS

The WestMetro HOME Consortium has numerous shelter, housing, and service providers that work with Qualifying Populations. **Table 15** lists primary providers of shelter or permanent housing within the WestMetro HOME Consortium. REACH and South Middlesex Opportunity Council (SMOC) are the only providers of Emergency Shelter (ES) beds for domestic violence victims within the Consortium, although Newton Housing Authority and the Second Step, provide Transitional Housing (TH), Rapid Re-Housing (RRH), and Other Permanent Housing (OPH) beds for a total of 116 beds dedicated for DV survivors.⁴² For the 2022 PIT count, 21 DV ES beds were utilized.⁴³

⁴⁰ Summary taken from FFY2021-2025 Consolidated Plan, p.69; current as of the publication of that plan.

⁴¹ Regional Housing Services Office, "RHSO Service Model." Accessed February 2023 at https://www.rhsohousing.org/sites/g/files/vyhlif421/f/uploads/model_fy23.pdf

⁴² Balance of State Continuum of Care 2022 Housing Inventory Count (HIC)

⁴³ Balance of State Continuum of Care 2022 Point-in-Time (PIT) Count

Table 15. Shelter & Permanent Housing Providers

Organization	Location ⁴⁴	Project Type	Clientele	# Beds
Advocates, Inc.	Waltham	PSH	Adult	22
Brookline Community Mental Health	Brookline	TH	Family	14
		RRH	Adult	6
Caritas Communities	Bedford	PSH	Veteran	61
Community Day Center of Waltham	Waltham	ES (Seasonal)	Day Center	15
Eliot Community Human Services	Lexington	ES	Adult	10
		RRH	Adult	60
FamilyAid Boston	Brookline	ES	Family	51
Family Promise MetroWest	Natick	ES	Family	4
Hearth	Brookline	OPH	Adult	9
Middlesex Human Service Agency	Waltham	ES	Adult	31
		ES	Family	23
Newton Housing Authority	Newton	TH	DV	13
		OPH		10
Pine Street Inn	Brookline	OPH	Adult	58
		PSH		43
REACH	Waltham	ES	DV	22
South Middlesex Opportunity Council (SMOC)	Framingham	ES	Adult	18
			Family	412
			DV	12
		PSH	Adult	104
			Family	29
		OPH	Adult	12
The Second Step	Newton	RRH	DV	10
		TH		49
US Department of Veterans Affairs	Bedford	PSH	Veteran	69
Wayside Youth and Family	Framingham	ES	Youth	8
		TH		9
West Suburban YMCA	Newton	OPH	Adult	28

Source: Detailed 2022 HIC Report provided by Balance of State CoC, February 2023.

In addition to the developers of permanent housing listed above, other nonprofit housing

⁴⁴ The locations listed in Table 15 may not reflect a project's physical address, as some projects are scattered site projects or have confidential locations.

developers include Newton Community Development Foundation, MetroWest Collaborative Development, Friends of 2Life Communities, Brookline Community Development Corporation, Citizens for Affordable Housing Development in Newton Development Organization (CAN-DO), and B’Nai Brith Housing. There are numerous service providers within the Consortium, including but not limited to the Boys & Girls Club, WATCH CDC, Brookline Center for Community Mental Health, Riverside Community Care, and African Cultural Services. Legal and mediation services include MetroWest Mediation and Housing Families. RIA House is a highly specialized provider focused on case management and other services for victims of human trafficking.

The Community Engagement Plan included in the Appendix includes a more complete list of organizations within the WestMetro HOME Consortium or that service the Consortium communities.

Describe the unmet housing and service needs of qualifying populations.

Qualifying Populations (QPs) include:

- Homeless as defined in 24 CFR 91.5
- At Risk of Homelessness as defined in 24 CFR 91.5
- Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice
- Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice

AFFORDABLE RENTAL UNITS

The unmet needs of all qualifying populations are largely rooted in the lack of an affordable and diverse housing inventory across the Consortium, which drives up the cost of housing and makes it difficult to move QPs from shelter into permanent housing. Providers and members of QPs alike report the challenges of transitioning from shelter into safe, stable, affordable housing because there simply are not enough units to meet the needs of these vulnerable populations. The lack of housing options contributes to extremely long wait lists for PHAs, vouchers, and emergency shelters, and has created a highly competitive selection process for getting into even market rate units. Several providers and members of Qualifying Populations reported that landlords are less likely to select applicants with lower credit scores, those who cannot pass a background check, homeless individuals even if they are employed, or voucher holders; the rental market is extremely competitive, and landlords often have many applicants from whom to choose. Being able to move clients into units they can afford *quickly* means that service providers would be able to direct more specialized attention to highly vulnerable populations not yet ready for permanent housing.

NON-CONGREGATE SHELTER

Beyond the general lack of affordable rental units, the Consortium's shelter resources are concentrated within a few communities. Most of the Consortium's 591 ES beds are in or associated with Framingham (450, 333 of which are scattered site), with Waltham (76 beds) and Brookline (51) also hosting a significant number. In addition, several people experiencing homelessness revealed that congregate adult shelters without sobriety requirements — while filling a necessary and important need for low-barrier shelter — do not provide an ideal setting for healing, particularly for those in recovery.⁴⁵

TENANT-BASED RENTAL ASSISTANCE

Many providers as well as municipal staff stressed the importance of Tenant-Based Rental Assistance, or TBRA. Waltham and Framingham both operate TBRA programs and reported that additional resources to support these programs would allow them to assist more households. Using FY2020 HOME funds, Framingham assisted an estimated 10 households with security deposit assistance and 7 households with rental assistance for at least twelve months. Waltham assisted an estimated 29 households with security deposits and 19 households with rental assistance for at least twelve months.⁴⁶

Some providers also noted that recent changes to the state's RAFT program have made it much more challenging for households to receive assistance.⁴⁷ Consultation partners noted that families now need to be on the brink of homelessness (e.g., having received an eviction notice) to receive RAFT whereas that previously was not required. This means that households need to be at a point of imminent crisis before getting this assistance. Metro Housing Boston, the Regional Administering Agency for several WestMetro HOME Consortium communities, reported that some more affluent towns are experiencing increasing need based upon RAFT applications. For FY2022, Metro Housing Boston assisted 82 Brookline households with RAFT, spending just over \$700,000 in rental assistance. In Belmont, Metro Housing Boston assisted 71 households, spending just over \$650,000 in rental arrears alone. Watertown saw significant need, with 166 households receiving RAFT, totaling just over \$1.6M in both rental assistance and arrears. In terms of demographics, Metro Housing Boston noted an increase in single adults,

⁴⁵ The 2022 HIC lists 14 Rapid Re-Housing (RRH) beds for DV survivors provided by Family & Community Resources, Inc. (FCR). FCR indicates that they provide Transitional Housing for DV survivors, but these beds are not included in the HIC. Source: Family & Community Resources, Inc., "Transitional Housing for Survivors." Access on February 10, 2023 at <https://www.fcr-ma.org/housing-project>.

⁴⁶ Report provided by the City of Newton Housing and Community Development Office, February 1, 2023.

⁴⁷ RAFT: Residential Assistance for Families in Transition

women in particular, aged 50-60+ who have lost their jobs and are not yet eligible for social security.

During the consultation process, some providers expressed significant concern that there would soon be a wave of evictions as COVID-related resources run out, while others noted the lingering impact of COVID-related job loss and how challenging it has been for low-income households to regain footing if significantly behind on rent.

SUPPORTIVE SERVICES

Case Management

While lack of units drives many issues discussed in this Allocation Plan, vulnerable populations whose basic needs are not being met may struggle to navigate the challenging system of waitlists, applications, seeking out available resources, and more. The consultation process revealed a lack of wrap-around case management services to streamline connections between service providers, largely due to capacity issues. Filling out applications, tracking down services, gathering documents, repeatedly having to share personal stories, and other roadblocks add stress for those experiencing the trauma of homelessness — especially when those efforts do not result in basic needs being met. Wrap-around consistent and compassionate case management can reduce these repetitive and stressful procedural barriers for Qualifying Populations in need of support.

Housing Search Assistance

Members of Qualifying Populations specifically raised the need for housing search assistance; one person experiencing homelessness described how they cannot even get “their foot in the door” at unit showings, and a service provider reported that those searching for housing often must resort to paying for a broker, adding yet another cost for vulnerable households to incur. Qualifying Populations would benefit from having an advocate who not only helps them search and apply for units, but also act as a liaison connecting them to landlords.

Financial and Other Assistance

Both providers and members of Qualifying Populations shared how valuable financial assistance can be in allowing households to “stay afloat” by taking other non-housing expenses off the table, such as transportation, food assistance, childcare, and more.

Other Supportive Services

Service providers, municipal staff, and PHA staff discussed an increase in supportive service needs ranging from immigrant services, translation assistance, transportation, childcare, treatment for substance use disorders, mental health counseling, legal representation, and more.

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

SHELTER, TRANSITIONAL, AND SUPPORTIVE INVENTORY

Table 16 below utilizes numeric data from the Housing Inventory Count (HIC) and Point-In Time (PIT). The data used to create this table are specific to the WestMetro HOME Consortium and were compiled with assistance from the Balance of State Continuum of Care.

Table 16. Homeless Needs Inventory and Gap Table

	Current Inventory						Homeless Population				Gap Analysis		
	Family		Adults Only	Vets	Victims of DV		Family HH (1+ child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only
	Beds	Units	Beds/Units	Beds/Units	Beds	Units ⁴⁸					Beds	Units	Beds/Units
ES	490	167	67	0	34	14							
TH	14	7	9	0	62	22							
PSH	29	6	169	130	0	0							
RRH	0	0	66	0	10	6							
OPH	0	0	107	0	10	4							
Total	533	180	418	130	116	46							
Sheltered Homeless							157 HH/ 476 ppl	79	<5	>26 HH/ 47 ppl			
Unsheltered Homeless							0	53	Unknown	Unknown			
Total ES & TH Only⁴⁹	504	174	76	0	96	36	157 HH/ 476 ppl	132	<5	Unknown			
Current Gap											+28 beds	+17 units	-56 beds

Data Sources: Balance of State CoC: 2022 Point in Time Count (PIT), 2022 Housing Inventory Count (HIC), and HMIS November 2022 Report

Notes for Inventory Columns: All numbers for beds are year-round figures. There are an additional 103 overflow family beds not included in this table, as well as 15 seasonal adult beds. DV victim beds have been separated out from the family and adult bed totals. DV units include units for households with and without children.

Notes for Homeless Population Columns: The unsheltered homeless counts by community were provided by the Balance of State CoC. Consortium-level PIT data did not indicate veteran status; the veteran figure in this table comes from HMIS, reported November 2022.

Notes for Gap Analysis Columns: Those in PSH, OPH, and RRH are not considered currently homeless, so beds under those programs are not used to calculate gaps for currently homeless households.

Based on **Table 16**, the Consortium appears to have a surplus in the number of family beds. However, multiple providers emphasized the PIT's data limitations: PIT counts only account for one night of the year, do not count those who are "doubling up" or living in a hotel/motel

⁴⁸ DV units include units for households with children and households without children

⁴⁹ Those in PSH, OPH, and RRH are not considered currently homeless, so beds under those programs are not used to calculate gaps for currently homeless households.

without assistance, and may undercount those living in their cars or in another uncaptured setting not fit for human habitation. Among the Consortium communities, there were 951 students reported as “doubling up” with other families to the Massachusetts Department of Elementary and Secondary Education.

In addition, Massachusetts is a right-to-shelter state, which means adults with a dependent minor who qualify for shelter must be housed, whether in an actual shelter or in another facility. Emergency Assistance (EA) shelters for families with children are funded and administered by the Massachusetts Department of Housing and Community Development (DHCD). All referrals come through DHCD, and clients are placed through a statewide by-name list. While DHCD has a policy of keeping families within a 20-mile radius of their current community, this is subject to availability, and clients can be sent wherever there is an opening; thus, Consortium families in need of emergency shelter would not necessarily be placed in the Consortium’s several EA shelters - five SMOC EA shelters located in Framingham, scattered site SMOC EA shelter beds, Mary’s House in Waltham, FamilyAid Boston in Brookline, and BoS CoC overflow hotel beds.⁵⁰ Family shelter beds can also seem deceptively high because the beds assigned to a unit represent a maximum number of household members that could fit; if a family has only 2 members but is placed in a 5-bed unit, those three beds will not be utilized because there is a 1 family per 1 unit ratio.

HOUSING INVENTORY

While there is a demand in the region for housing at a range of income levels, for HOME-ARP Qualifying Populations, there is currently an estimated gap of 1,840 units affordable to ELI and VLI renter households, as shown in **Table 17**. **Figure 6** demonstrates the mismatch between renter households at varying income levels compared to the affordability of the units they are housed in. An estimated 56 percent of ELI renter households and 42 percent of VLI renter households are housed in units they cannot afford.⁵¹ This mismatch can occur when lower income households have no choice but to take whatever unit they can get regardless of cost, as well as when households with higher incomes occupy lower-rent units that are not deed-restricted for occupancy by eligible households.

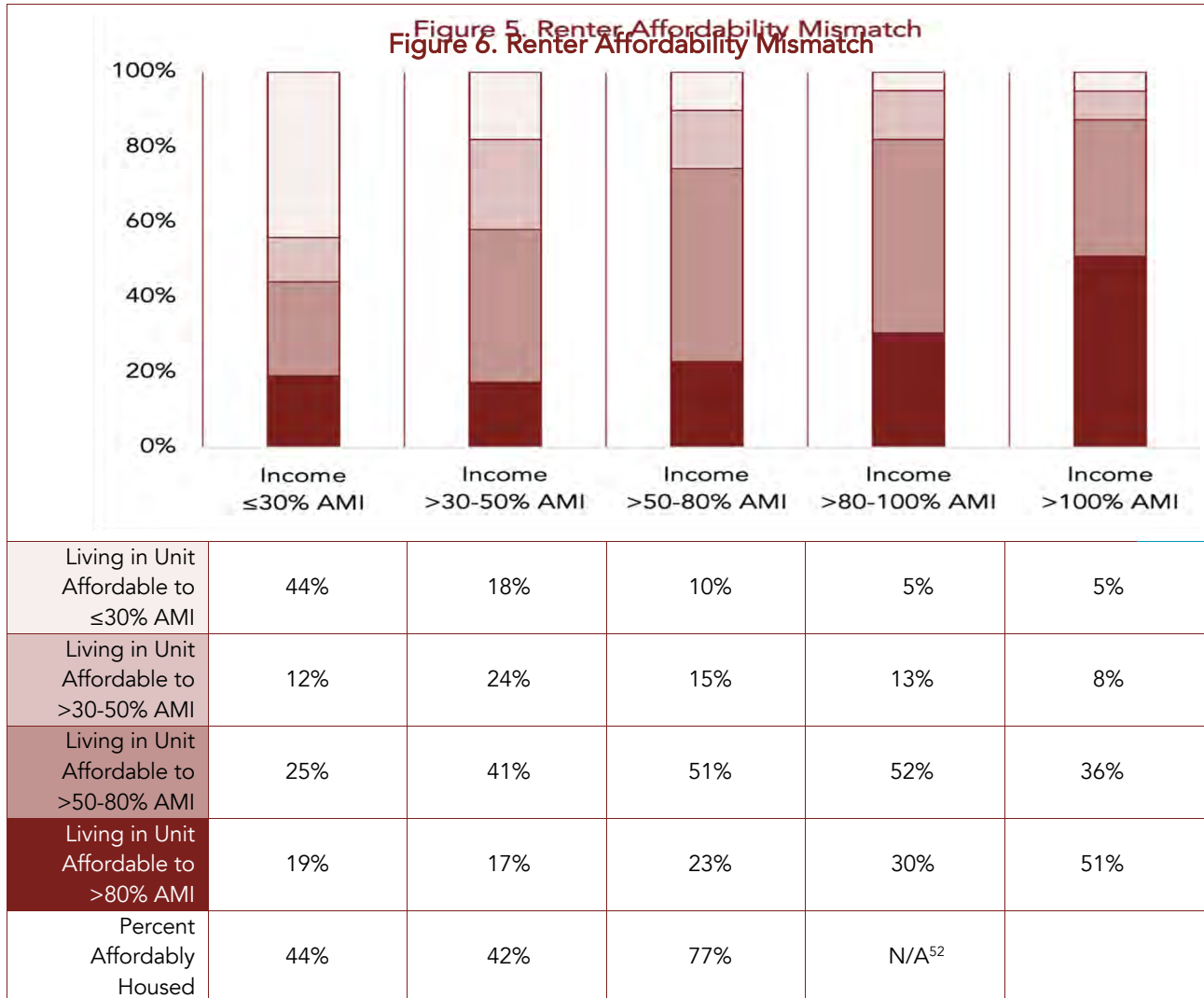
⁵⁰ Family Promise MetroWest in Natick is also a family shelter, but is not managed through the state.

⁵¹ U.S Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS), 2015-2019. Calculation derived from Tables 14B, 17B, and 18C.

Table 17. WestMetro Estimated Unit Gaps for ELI and VLI Renter Households.

Income Level	Rental Units Affordable to Income Level	Total Renter Households	Gap Analysis
≤ 30% AMI (ELI)	11,543	15,350	-3,807 Units
30-50% AMI (VLI)	9,254	10,075	-821 Units
Total ELI and VLI	20,797	25,425	-4,628 Units

Source: CHAS 2015-2019



Source: CHAS 2015-2019

⁵² CHAS data do not break down unit affordability beyond greater than 80% AMI. Therefore, precise affordability mismatch cannot be determined for households over 80% AMI.

Identify additional characteristics associated with instability and increased risk of homelessness included in the PJ's definition of "other populations."⁵³

The WestMetro HOME Consortium will not include additional conditions to define "other populations."

Identify priority needs for qualifying populations.

While the Consultation and Public Participation processes, Needs Assessment, and Gaps Analysis highlighted significant needs in terms of shelter, housing, service delivery, financial assistance, and more, the core issue facing QPs is the need for various types of deeply affordable rental housing for vulnerable households. Moving homeless, at-risk, and other qualifying populations into suitable housing will provide these households with the stability necessary to focus on other needs they may be experiencing. Beyond this core issue, the needs vary considerably based on population. Those experiencing homelessness could benefit from increased non-congregate shelter capacity; some members of Qualifying Populations spoke about how unhealthy the congregate shelter environment can be for them, especially if they are in recovery or are otherwise vulnerable. In addition, homeless individuals navigating an extremely traumatic time in their lives benefit from compassionate care and consistent, reliable case management that will enable them to secure housing — and successfully remain housed. Supportive services — particularly financial assistance and other homelessness prevention services — would also benefit currently-housed individuals and families who are at risk and perhaps just one catastrophe away from homelessness.

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

Levels of need and gaps in the housing inventory and service delivery system were based on consultation with a variety of providers, those experiencing homelessness, and the general public. In addition, the Consortium reviewed datasets including but not limited to: 2015-2019 CHAS data, 2022 PIT Counts, 2022 Housing Inventory Counts (HIC), a November 2022 HMIS report prepared by the CoC, 2020-2022 McKinney-Vento data, 2017-2021 American Community Survey (ACS) estimates, Public Housing Authority data, and other miscellaneous datasets and reports from providers. The Consortium also reviewed its current Consolidated Plan, Analysis of Impediments, and most recent Annual Action Plan and CAPER.

⁵³ Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of "other populations" that are "At Greatest Risk of Housing Instability."

HOME-ARP ACTIVITIES

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

The WestMetro HOME Consortium will allocate HOME-ARP funds through the issuance of Requests for Proposals. All eligible projects may apply. Projects that best meet the needs of Qualifying Populations as defined by the HOME-ARP Program, have demonstrated experience with one or more of the eligible activities, and align with the RFP's competitive criteria, HOME-ARP standards, budget requirements, and existing planning efforts (the Annual Action Plan, the Five-Year Consolidated Plan, etc.) will receive priority consideration.

The WestMetro HOME Consortium will form Project Review Committees consisting of representatives from multiple Consortium communities. The Project Review Committees will review all requests for compliance prior to making recommendations to the full WestMetro HOME Consortium for final approval by vote. The final review of responses and award notice dates are to be determined. However, the Consortium hopes to begin the process shortly following Plan approval. As with the regular HOME program, rental developments are subject to underwriting and must include the appropriate requirements in their agreements, including inspections during the minimum affordability and compliance periods. All approved projects are subject to monitoring by the Consortium.

Describe whether the PJ will administer eligible activities directly.

HOME-ARP funding and activities will be directly administered by the WestMetro HOME Consortium through the City of Newton's Housing & Community Development Office, in partnership with the community where the project is taking place.

Identify the subrecipient or contractor responsible for the administration of the PJ's entire HOME-ARP grant and describe its role and responsibilities in administering all of the PJ's HOME-ARP program, if applicable.

The WestMetro HOME Consortium did not and will not allocate funds to a subrecipient or contractor to administer the entirety of the HOME-ARP grant. Upon HUD approval of this Allocation Plan, the Consortium will reimburse itself for approximately 15 percent of its administrative funds to cover the costs of hiring a consultant to draft the HOME-ARP Allocation Plan. Per HUD guidance, PJs may use five percent of the 15 percent administrative cap for staff and other allowed administrative costs before approval to assist with plan compilation and submission and can reimburse itself for allowable consultant fees incurred for Allocation Plan development after HUD plan approval.

Use of HOME-ARP Funding⁵⁴

Table 18. Use of HOME-ARP Funding

	Funding Amount	Percent of Grant	Statutory Limit
Supportive Services	\$750,000	14%	--
Acquisition and Development of Non-Congregate Shelters	\$1,000,000	18%	--
Tenant Based Rental Assistance (TBRA)	\$300,000	6%	--
Development of Affordable Rental Housing	\$2,545,918	47%	--
Non-Profit Operating	--	0%	5%
Non-Profit Capacity Building	--	0%	5%
Administration and Planning	\$811,044	15%	15%
Total HOME ARP Allocation	\$5,406,962		

Additional Narrative

Using a substantial portion of these one-time HOME-ARP funds for development and rehabilitation of affordable rental housing is one of the most effective strategies to assist Qualifying Populations. Creating additional units will help relieve waiting lists for public housing and project/tenant-based vouchers, and also address housing instability for at-risk households. The other eligible activities, while also critical, cannot succeed unless rental units are available. Shelter guests need suitable units to move into when they are ready for permanent housing, a challenge identified by both members of Qualifying Populations as well as providers.

That said, unit availability is just one piece of the puzzle. Those exiting shelter often need housing search assistance and benefit from having an advocate assist them. This not only helps alleviate the stress of this complex and sometimes frustrating process, but also reassures landlords who can build a rapport with trusted service providers. To provide this level of assistance and support, however, requires consistent, reliable, and compassionate case management.

⁵⁴ In accordance with Section V.C.2. of the Notice (page 4), PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.

Other supportive services identified as a need for those experiencing homelessness include mental health counseling, financial assistance, and more. These services are often critical for helping vulnerable households obtain and *keep* their housing — and they are also contingent upon the availability of case managers, social workers, and healthcare professionals.

Recognizing the concentration of current shelter resources in just a handful of Consortium communities, the WestMetro HOME Consortium has allocated \$1,000,000 of its HOME-ARP funds toward Non-Congregate Shelter. Should the Consortium not receive viable responses to the RFP for Non-Congregate Shelter in a timely manner, NCS funds will be reallocated toward other HOME-ARP activities, through the substantial amendment process if triggered.

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

The Consultation and Public Participation processes and Needs Assessment and Gaps Analysis indicate the need for increasing the supply of affordable rental housing available to HOME-ARP Qualifying Populations, as well as a variety of supportive services — both to *keep* people housed and to assist those experiencing homelessness. Therefore, rental housing is the most funded activity at 47 percent, with a substantial amount for supportive services that may or may not fund services directly tied to HOME-ARP units. In addition, many providers emphasized the need for flexible TBRA that could make a significant impact for households experiencing crisis by providing a critical lifeline for avoiding eviction, particularly as current TBRA programs lose COVID-related funding and the state’s RAFT program has recently changed its requirements. However, given the one-time nature of these funds, the Consortium did not dedicate a large portion of HOME-ARP funds to TBRA programs and determined 6 percent was reasonable. Lastly, many in the consultation process noted the concentration of emergency resources in just a few communities; while these communities do have the highest levels of need, there are households in *all* Consortium communities at great risk of homelessness. These one-time funds could allow an interested party to pursue the creation of NCS — and potentially later convert the NCS to much-needed permanent housing after the 15-year compliance period.

HOME-ARP PRODUCTION HOUSING GOALS

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

The Consortium estimates that its HOME-ARP allocation will support the creation of twelve affordable rental units. While the HOME-ARP program does not have a per-unit subsidy limit, the Consortium anticipates that eligible projects would utilize additional funding sources and is assuming a subsidy of \$200,000 per unit for purposes of this calculation. At least 70 percent of HOME-ARP units within a project would be reserved for members of Qualifying Populations, with up to the remaining 30 percent for LMI households. Should these units be included in larger projects leveraging other funding sources such as Low-Income Housing Tax Credits (LIHTC), other units in the development(s) may not be limited to HOME-ARP QPs.

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

This use of HOME-ARP funds aligns with the Consortium's primary HOME/CDBG goal under its FY2023 Annual Action Plan, which is the production of new affordable housing units.⁵⁵ This is in alignment with the highest priority goal of the FY2021-FY2025 Five-Year Consolidated Plan – the production of new affordable housing units. Goals 2 and 3 also relate to affordable housing – the rehabilitation of existing units and the acquisition of existing units, respectively.⁵⁶

OTHER PLAN ELEMENTS

Preferences

The WestMetro HOME Consortium will not give preferences to one or more Qualifying Populations or subpopulations.

HOME-ARP Refinancing Guidelines

The WestMetro HOME Consortium will not offer refinancing options with HOME-ARP funds.

⁵⁵ City of Newton Housing & Community Development Office, *FY23 (FFY22) Annual Action Plan*, p.2

⁵⁶ City of Newton Housing & Community Development Office, *Consolidated Plan for the City of Newton Housing and Community Development Program and the WestMetro HOME Consortium, July 1, 2020 – June 30, 2025*, p.158

APPENDICES

Appendix A: Certifications, SF-424, SF-424B, and SF-424D

Appendix B: Public Hearing Notice

Appendix C: Project Community Engagement Plan

Appendix D: Community Survey Results

Appendix E: Written Comments and City Responses

HOME-ARP CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the participating jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

Uniform Relocation Act and Anti-displacement and Relocation Plan --It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.

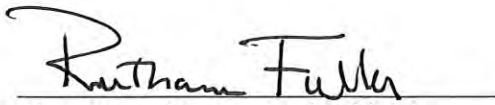
Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

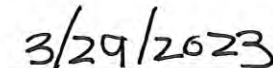
1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

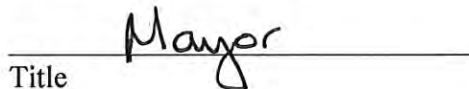
Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and program requirements.

Section 3 --It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

HOME-ARP Certification --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.


Signature of Authorized Official


Date


Title

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

*** 2. Type of Application:**

- ☒ New
☐ Continuation
☐ Revision

*** If Revision, select appropriate letter(s):**

*** Other (Specify):**

*** 3. Date Received:**

4. Applicant Identifier:

M21-DP250213

5a. Federal Entity Identifier:

UPG Code: MA251650 Newton

5b. Federal Award Identifier:

M21-DP250213

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:**

City of Newton

*** b. Employer/Taxpayer Identification Number (EIN/TIN):**

04-6001404

*** c. UEI:**

UE9YQW2H1ZA

d. Address:

*** Street1:**

1000 Commonwealth Ave.

Street2:

*** City:**

Newton

County/Parish:

*** State:**

MA: Massachusetts

Province:

*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

02459-1149

e. Organizational Unit:

Department Name:

Planning Department

Division Name:

Housing/Community Development

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Ms.

*** First Name:**

Amanda

Middle Name:

*** Last Name:**

Berman

Suffix:

Title: Director of Housing and Community Development

Organizational Affiliation:

City of Newton

*** Telephone Number:** 617-796-1147

Fax Number:

*** Email:** aberman@newtonma.gov

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

X: Other (specify)

Type of Applicant 3: Select Applicant Type:

*** Other (specify):**

WestMetro HOME Consortium; BoS

*** 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME Investment Partnerships Program

*** 12. Funding Opportunity Number:**

MA21-DC25-0213

*** Title:**

WestMetro HOME Consortium; HOME-ARP funding

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Form SF 424 Attachment - Question 14.pdf

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

WestMetro HOME Consortium Program - HOME-ARP

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:**

* a. Applicant MA-004

* b. Program/Project MA-004

Attach an additional list of Program/Project Congressional Districts if needed.

Form SF 424 Attachment - Question 16.pdf

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date: 07/03/2023

* b. End Date: 09/30/2030

18. Estimated Funding (\$):

* a. Federal	5,406,962.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	5,406,962.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)**

☐ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name: Ruthanne

Middle Name:

* Last Name: Fuller

Suffix:

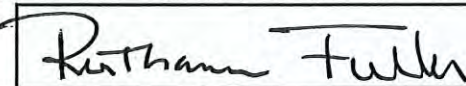
* Title: Mayor

* Telephone Number: 617-796-1000

Fax Number:

* Email: rfuller@newtonma.gov

* Signature of Authorized Representative:



* Date Signed: 3/29/2023

Form SF 424
City of Newton

14. Areas Affected by Project – Attachment

CDBG Program: City of Newton

WestMetro HOME Consortium: Bedford, Belmont, Brookline, Concord, Framingham, Lexington, Natick, Needham, Newton, Sudbury, Waltham, Watertown, and Wayland

Continuum of Care and/or ESG: Brookline, Newton, Waltham, Watertown

Form SF 424
City of Newton

16. Congressional Districts of Program/Project – Attachment
MA-003; MA-004; MA-005; MA-006

ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

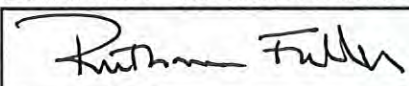
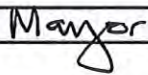
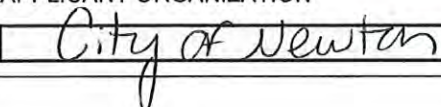
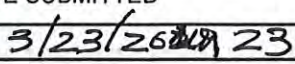
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE 
APPLICANT ORGANIZATION 	DATE SUBMITTED 

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

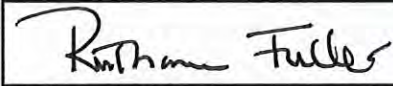
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
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16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
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18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Mayor
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Newton	3/29/2023



Newton Planning and Development Board

NOTICE OF PUBLIC HEARING, DOCUMENT AVAILABILITY, AND COMMENT PERIOD

The Planning & Development Board will hold this meeting as a virtual meeting on **Monday, March 6, 2023, at 7:00 pm**. No in-person meeting will take place at City Hall.

To view and participate in this virtual meeting on your computer at the above date and time, visit <https://us02web.zoom.us/j/86798940437>, or visit www.zoom.us, click "Join a Meeting" and enter the following Meeting ID: 867 9894 0437.

To view and participate in this virtual meeting on your smartphone, download the "ZOOM Cloud Meetings" app in any app store or visit www.zoom.us. At the above date and time, click on "Join a Meeting" and enter the following Meeting ID: 867 9894 0437. You may also join the meeting from your smartphone by dialing 1 (305) 224-1968 and entering 86798940437#. For audio only, call 1 (305) 224-1968 and enter Meeting ID: 86798940437#.

PUBLIC HEARING ITEM:

The City of Newton and the WestMetro HOME Consortium, consisting of twelve other member communities (the Towns of Bedford, Belmont, Brookline, Concord, Lexington, Natick, Needham, Sudbury, and Wayland and the Cities of Framingham, Waltham, and Watertown), have prepared a DRAFT HOME-ARP Allocation Plan ("Draft Plan"), which outlines the strategy and planned expenditures of federal HOME-ARP funds from the U.S. Department of Housing and Urban Development (HUD). This one-time allocation must be used to assist a qualifying population of individuals or households who are: homeless; at risk of homelessness; fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; and other vulnerable populations as listed in HUD CPD Notice 21-10, Section IV by providing affordable rental housing, tenant-based rental assistance, supportive services, or non-congregate shelter. The WestMetro HOME Consortium was awarded \$5,406,962 in HOME-ARP funds, which will be administered by the City of Newton. The Draft Plan outlines the activities and goals planned to address the needs of qualifying populations within the Consortium communities. Allocated funds must be spent by September 30, 2030.

The Draft Plan will be available online at <https://www.newtonma.gov/government/planning/housing-community-development> on February 27, 2023. A printed copy of the plan will be available in the Newton Housing & Community Development Office, Newton City Hall, Second Floor. A 15-day public review comment period will take place from March 6, 2023 through March 21, 2023. Comments on the proposed plan will be accepted at the public hearing and in writing to Amanda Berman, Director of Housing and Community Development, Planning and Development Department, 1000 Commonwealth Avenue, Newton, MA, 02459 or via email at aberman@newtonma.gov. The deadline for submitting comments is March 21, 2023, at 5:00 p.m.

If you need a reasonable accommodation, please contact the City of Newton's ADA/Section 504 Coordinator, Jini Fairley, at least two business days in advance of the meeting: jfairley@newtonma.gov or (617) 796-1253. The City's TTY/TDD direct line is: 617-796-1089. For the Telecommunications Relay Service (TRS), please dial 711.



WestMetro HOME Consortium

HOME-ARP Allocation Plan

COMMUNITY ENGAGEMENT PLAN

INTRODUCTION

Through the American Rescue Plan Act of 2021 (ARP), the U.S. Department of Housing and Urban Development (HUD) has awarded **\$5,406,962** to the WestMetro HOME Consortium for housing, services, and shelter to individuals experiencing homelessness or housing instability. The WestMetro HOME Consortium includes Bedford, Belmont, Brookline, Concord, Framingham, Lexington, Natick, Needham, Newton, Sudbury, Waltham, Watertown, and Wayland. The City of Newton is the lead entity.

HUD requires all recipients of HOME-ARP funding to develop a HOME-ARP Allocation Plan. The Allocation Plan requires approval by HUD before the Consortium can receive and begin to commit HOME-ARP funds. To ensure that resources from this one-time funding source address the most pressing homelessness and housing instability needs, the Consortium will conduct broad community outreach to engage stakeholders, advocates, and housing and homelessness service organizations working in our communities. This consultation process, coupled with extensive data collection and analysis, will inform the needs assessment, gap analysis, and implementation program required for the HOME-ARP Allocation Plan.

How can HOME-ARP funds be used?

- Preservation and Production of Affordable Rental Housing
- Tenant-Based Rental Assistance (TBRA)
- Housing-Related Supportive Services
- Acquisition and Development of Non-Congregate Shelters (NCS)
- Non-profit operating assistance or capacity building

What populations are HOME-ARP funds designed to help? Who are “qualifying populations” for this program?

- Homeless, as defined in section 103(a) of the McKinney Vento Homeless Assistance Act
- At risk of homelessness, as defined in section 401 of McKinney Vento
- Fleeing or attempting to escape domestic violence, dating violence, sexual assault, stalking, or human trafficking.
- Supported through services or assistance that otherwise prevent homelessness or risk of housing instability.
- A veteran or a family, including a veteran that meets one or more of the previous criteria.

In addition to assessing the housing and homelessness assistance needs of the program’s target populations, the HOME-ARP Allocation Plan is concerned with these related issues:

- **Equity:** to ensure that individuals with fewer opportunities to access housing resources can benefit from safe, consistent programs that may meet their needs.
- **Community Connectivity:** by evaluating current institutions and housing resources, the plan aims to facilitate communication and coordination among various organizations to help people experiencing housing scarcity capitalize on new and existing programs.
- **Respect & Discretion:** to identify, understand, plan for, and address the needs of individuals with homelessness or housing scarcity without compromising their privacy, safety, and autonomy.

PURPOSES OF COMMUNITY ENGAGEMENT

Community engagement is at the heart of the HOME-ARP Allocation Plan process. When analyzing the needs of qualifying populations, the WestMetro HOME Consortium will consider both existing support institutions and stakeholders. Housing data and institutional resources may show a significant gap in needs; however, the personal and organizational knowledge of people in the Consortium's communities is critical for an effective planning process. Engagement and outreach opportunities will be facilitated through dialogue and participation to:

- **Evaluate** the presence of qualifying populations (listed on page 2 of this document).
- **Identify and involve** the people and organizations with interest in housing solutions.
- **Learn** from those familiar with the housing needs of individuals of those who are homeless, at risk of homelessness, or facing housing instability due to domestic violence.
- **Consult** with faith-based and cultural organizations that provide social services within Consortium to understand existing, successful programs, opportunities, and constraints to housing security.
- **Present recommendations** to the WestMetro HOME Consortium and document feedback from in-person and online outreach methods.
- **Convey the needs assessment results** and outreach efforts to the community, the organizations involved with housing services, and WestMetro HOME Consortium decision-makers.

STAKEHOLDERS, ADVOCATES, ADVISORS, DECISION MAKERS

As used in this engagement plan, "**stakeholder**" means:

- Qualifying populations who are homeless, at risk of being homeless, or defined in the law as another vulnerable population,
- Individuals currently receiving services through the Continuum of Care (CoC), and
- People who experience or have experienced housing insecurity, homelessness, or vulnerability.

Advocates are existing organizations advocating for homeless and vulnerable populations, such as shelter providers, housing organizations, social service agencies, health care agencies and organizations, faith-based community leaders, and others. The initial list of identified advocates and community partners can be found beginning on page 8 of this document.

Community Partners are the elected and appointed officials and professional staff in the Consortium's communities.

Decision Makers include the WestMetro HOME Consortium and the City of Newton's Department of Planning & Community Development.

RESOURCES, SCALE OF ENGAGEMENT, PROJECT SCHEDULE

Community outreach opportunities will advance equity and encourage community conversation. Considerations made to further these intentions include:

- **Equity.** The intentional inclusion of community members who have experienced housing scarcity aims to elevate the voices of those who have faced uncertainty due to various circumstances and are not always included in traditional modes of outreach.
- **Access to Information.** Documents regarding the federal standards of the HOME American Rescue Plan Act and additional interim updates will be accessible through on the WestMetro HOME Consortium's webpage at <https://www.newtonma.gov/government/planning/housing-community-development/westmetro-home-consortium>
OR
<https://tinyurl.com/WestMetroHOMEConsortium>
- **Community.** The WestMetro HOME Consortium covers thirteen municipalities. Although these communities share similar affordable housing challenges, they also have quite different patterns of residential development, different market conditions, different social and economic obstacles, and different development constraints. The focus of the HOME-ARP planning process ultimately must focus on qualifying populations and the activities the Consortium can support with HOME-ARP resources.
- **Multiple & Iterative.** There will be multiple opportunities to engage agencies, organizations, and individuals throughout the process.

Resources

The City of Newton has engaged Barrett Planning Group to assist the WestMetro HOME Consortium with developing this plan.

Scale of Engagement

This engagement plan aims to connect existing advocacy and support networks within the Consortium to assess the current needs of people experiencing homelessness or housing instability. Public consultation meetings open to residents of the Consortium will be offered twice during the planning process – once for general consultation and again for the final public hearing. Consultation with members of qualifying populations will require assistance from service providers, and we aim to conduct at least one in-person engagement opportunity geared toward those experiencing housing instability. The engagement process will also include a survey for the general public as well as service providers. Needs for language interpretation and translation will be assessed and addressed as appropriate. The project schedule below outlines our engagement plans in project phases.

Project Schedule and Participation

PHASE I: AUGUST 2022

- Mobilization
- Gather data
- Kick off meeting with City of Newton staff

PHASE II: SEPTEMBER-OCTOBER 2022

- Begin public information process through online platforms and social media.
- Reach out to advocates, community partners, and stakeholders
- Confirm dates for major information and consultation meetings
- Finalize engagement plan
- Initial consultation with WestMetro HOME Consortium: project background
- Interview organizations and agencies responding to the outreach process.
- Specific consultation meetings with advocates and service organizations

PHASE III: OCTOBER-DECEMBER 2022

- Conduct a survey of service providers, public officials, and staff in the Consortium communities, as well as a survey for the general public
- Facilitate three virtual community meetings for the general public and at least one in-person consultation meeting
- Develop Needs Assessment and Gap Analysis
- Follow-up consultation with the WestMetro HOME Consortium, options for programming HOME-ARP funds

PHASE IV: DECEMBER 2022-JANUARY 2023

- Develop programmatic goals
- Draft HOME-ARP Plan preparation
 - Draft recommendations and implementation program
 - Draft plan
 - Public hearing
 - Draft submission for HUD review
 - Response to HUD comments
- Revisions and final plan
- Submission of HOME-ARP Plan

Communications

Information about the HOME-ARP Allocation Plan will be made available primarily through the City of Newton's Office of Housing & Community Development.

The consulting team will create consistent design elements for all PDF and print materials, advertisements, and engagement events. The consulting team will deliver all materials produced to WestMetro HOME Consortium for dissemination throughout Consortium communities.

Messaging

This planning process is defined by the current needs of residents in communities represented in the WestMetro HOME Consortium. An accurate depiction of the regulations for this special one-time program and how HOME ARP may benefit Consortium residents is vital to this project. Outreach opportunities facilitated by the consulting team aim to orient the plan toward an equitable allocation of funds to meet the needs of qualifying populations.

The needs of the homeless, those at risk of homelessness, and vulnerable populations are unique. The consulting team aims to prepare materials to depict personal realities and the need for additional resources. An informational campaign depicting individuals included in the qualifying populations and beneficial programs may alter misconceptions of this planning process and begin community discourse.

ORGANIZATIONS, ADVOCATES, COMMUNITY PARTNERS

The Consortium will aim to consult with the following organizations, advocates, and community partners during the development of this plan. This list is subject to change.

Housing /Homelessness Services & Advocacy

Balance of State Continuum of Care
Bristol Lodge Men's & Women's Shelters
CAN-DO
Community Day Center of Waltham
Engine 6
Family Promise Metrowest
Friends of 2Life Communities
Metro Housing Boston
Metro West Collaborative Development
Newton Community Development Foundation
Regional Housing Services Office (RHSO)
Self Help, Inc.
South Middlesex Opportunity Council (SMOC)
U-CHAN
Watch CDC
Bedford Housing Authority
Belmont Housing Authority
Brookline Housing Authority
Concord Housing Authority
Framingham Housing Authority
Lexington Housing Authority
Natick Housing Authority
Needham Housing Authority
Newton Housing Authority
Sudbury Housing Authority
Waltham Housing Authority
Watertown Housing Authority
Wayland Housing Authority

Healthcare

Brookline Community Mental Health Center
CHNA 7 (Community Health Coalition of Metrowest)
CHNA 15 (NorthWest Suburban Health Alliance)
CHNA 17 (Greater Cambridge/Somerville Community Health Network)
CHNA 18 (West Suburban Health Network)
Eliot Community Health Services
Springwell

Disability Services & Advocacy

Advocates
MetroWest Center for Independent Living
Opportunities for Inclusion
Perkins School for the Blind
The Price Center
Work, Community, Independence, Inc.

Domestic Violence & Trafficking

Domestic Violence Services Network
Family Promise Metrowest
REACH Beyond Domestic Violence
RIA, Inc.
The Second Step
Voice Against Violence / SMOC

Human Services/Multi-Services

Action for Boston Community Development, Inc. (ABCD)

Community Action Program Intercity, Inc. (CAPIC)

Community Teamwork, Inc. (CTI)

Middlesex Human Services Agency

Natick Service Council, Inc.

Riverside Community Care

Salvation Army

Self Help, Inc. (SHI)

Wayside Youth & Family Support Network

West Suburban YMCA

Faith Based Organizations

Newton Interfaith Clergy Association

Food Assistance

Framingham/Waltham WIC Program

Lexington Food Pantry

Education, Employment, & Youth Services

Boys & Girls Club

MassHire Framingham Career Center

Minuteman Regional Vocational Technical

South Middlesex Regional Vocational Technical

(See also: **Community Partners**)

Cultural Groups & Organizations

ELPAC- English Learning Parents Advisory Council at Newton North High School and Newton South High School

Newton Coalition of Black Residents

Africano Waltham

Legal & Mediation Services

Greater Boston Legal Services

Housing Families

Metropolitan Mediation Services

MetroWest Legal Services

MetroWest Mediation Services

Middlesex Community College Law Center

Volunteer Lawyers Project

Veterans' Services

Amvets Post #79 (Natick)

VFW Post #1274 (Natick)

West Suburban Veterans District

(See also: **Community Partners**)

Community Partners**TOWN OF BEDFORD**

ADA Coordinator

Bedford Public Schools

Code Enforcement

Council on Aging

Health Department

Health & Human Services

Planning Department

Police Department

Veterans' Services

Youth & Family Services

TOWN OF BELMONT

ADA Coordinator

Belmont Public Schools

Office of Community Development

Council on Aging

Health Department

Police Department

Veterans' Services

Youth & Family Services

TOWN OF BROOKLINE

ADA Coordinator
Brookline Public Schools
Building Department
Council on Aging
Planning & Community Development
Police Department
Veterans Services

TOWN OF CONCORD

ADA Coordinator
Building & Inspections
Concord Public Schools
Health Department
Human Services
Planning Division
Police Department
Veterans' Services

CITY OF FRAMINGHAM

ADA Coordinator
Council on Aging
Disability Committee
Fair Housing Committee
Framingham Public Schools
Public Health
Inspectional Services
Planning & Community Development
Police Department
Veterans' Services

TOWN OF LEXINGTON

ADA Coordinator
Building Office
Human Services Department
Lexington Public Schools
Planning Department
Police Department
Public Health
Senior Services
Veterans' Services

TOWN OF NATICK

ADA Coordinator
Building Department
Council on Aging
Health & Human Services
Natick Public Schools
Community & Economic Development
Police Department
Veterans Services

TOWN OF NEEDHAM

ADA Coordinator
Building Department
Council on Aging
Health & Human Services
Needham Public Schools
Planning & Community Development
Police Department
Veterans Services

CITY OF NEWTON

ADA Coordinator
Council on Aging
Health & Human Services
Inspectional Services
Newton Public Schools
Horace Cousens Industrial Fund
Planning & Community Development
Police Department
Veterans Services

TOWN OF SUDBURY

ADA Coordinator
Building Department
Council on Aging
Health Department
Sudbury Public Schools
Planning & Community Development
Police Department
Veterans Services

CITY OF WALTHAM

ADA Coordinator
Council on Aging
Health Department
Inspectional Services
Planning & Community Development
Police Department
Veterans Services
Waltham Public Schools

CITY OF WATERTOWN

ADA Coordinator
Building & Inspectional Services
Council on Aging
Disability Commission
Health Department
Inspectional Services
Planning & Zoning Department
Police Department
Veterans' Services
Watertown Public Schools

TOWN OF WAYLAND

ADA Coordinator
Building Department
Council on Aging
Health Department
Planning Department
Police Department
Town Manager
Veterans' Services
Wayland Public Schools
Youth Services

State Agencies

Department of Children & Families
Department of Development Services
Department of Elementary & Secondary Education
Department of Housing & Community Development
Department of Mental Health
Department of Public Health – F.O.R. Families
Department of Transitional Assistance
Department of Veterans Affairs

SUMMARY OF WESTMETRO HOME CONSORTIUM HOME-ARP ALLOCATION PLAN SURVEYS

From December 16, 2022 to January 16, 2023, Barrett Planning Group conducted two online surveys to learn about the needs of people facing homelessness in the MetroWest area to inform the WestMetro HOME Consortium's HOME-ARP Allocation Plan. Members of the public could take the online general public survey in English, Portuguese, Spanish, Haitian Creole, Russian, Chinese (Simplified), or Urdu. The Consortium's network of service providers, housing providers, and health care providers, city/town staff, and local officials took a second survey that asked respondents to prioritize needs they see in their professional roles. This summary will describe the results of each of the surveys and their key takeaways.

General Public

There were 204 responses to the general public survey. Three participants provided their responses in Spanish, and all other responses were given in English.

WHO TOOK THE SURVEY?

The survey included demographic questions to provide insight as to whom the survey reached in the community. Among survey takers, the most represented age group was 55-64 years old, and 73.0 percent were women. While 41.3 percent of respondents live in households of two, 19.9 percent have households of three, and households of one and four were about equally common (16.9 percent and 16.4 percent respectively). The majority of survey respondents reported that they were White (77.7 percent), and 10.7 percent preferred not to disclose their race. Fewer than ten respondents were Black (4.6 percent), four were of more than one race (2.0 percent), and three were Asian (1.5 percent). Twelve respondents reported they were Hispanic/Latin(a/o/x).

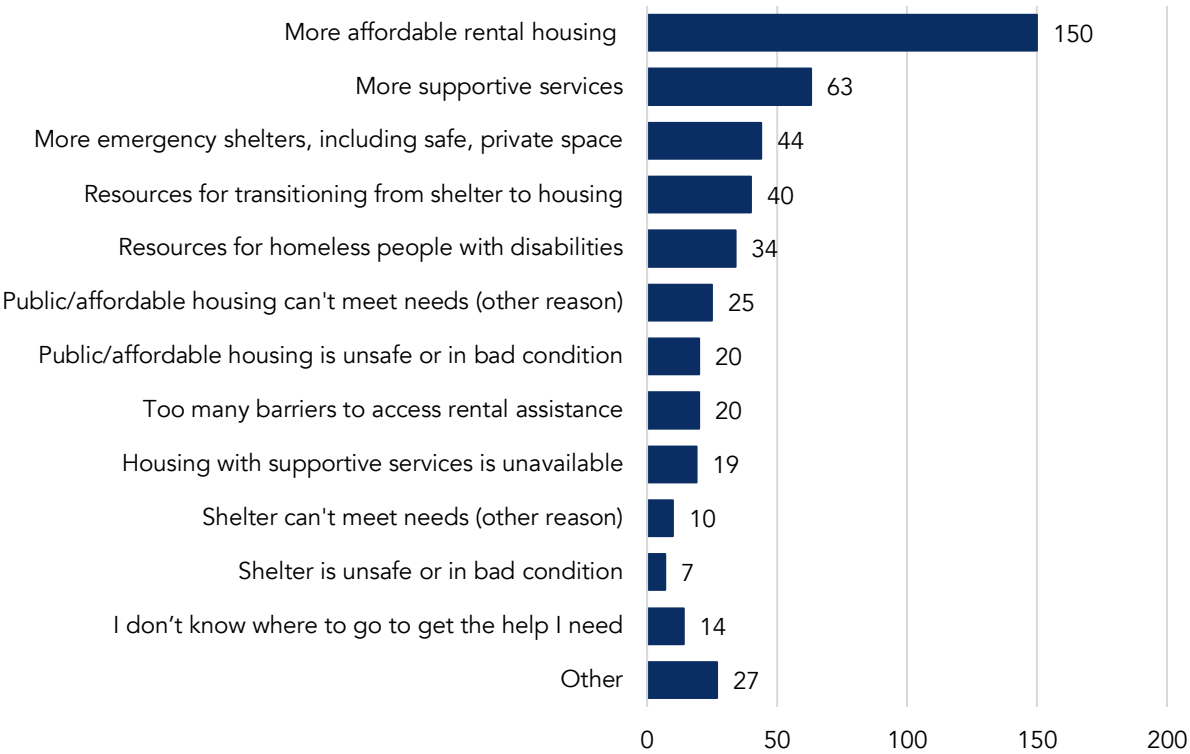
COMMUNITY HOUSING NEEDS

Of 201 respondents, 70.1 percent have secure housing and own their homes. About 12 percent rent, and about 12 percent have housing with income restrictions. Only 2.5 percent have been homeless in the past, but 6.0 percent report they are worried they could become homeless in the future.

When asked about the most urgent needs in their communities, respondents overwhelmingly indicated (150 out of 191, 78.5 percent) that their communities need more affordable rental

housing. The second most popular answer was that respondents’ communities need more supportive services for people who are, have been, or could become homeless (63 out of 191, 33.0 percent), followed by the need for more emergency shelters (44 out of 191, 23.0 percent). One fifth indicated that there are not enough resources for people transitioning out of homelessness. **Figure A1** illustrates respondents’ selections of most urgent needs. The survey invited participants to select up to five priority items, but there was an average of 2.48 responses per participant.

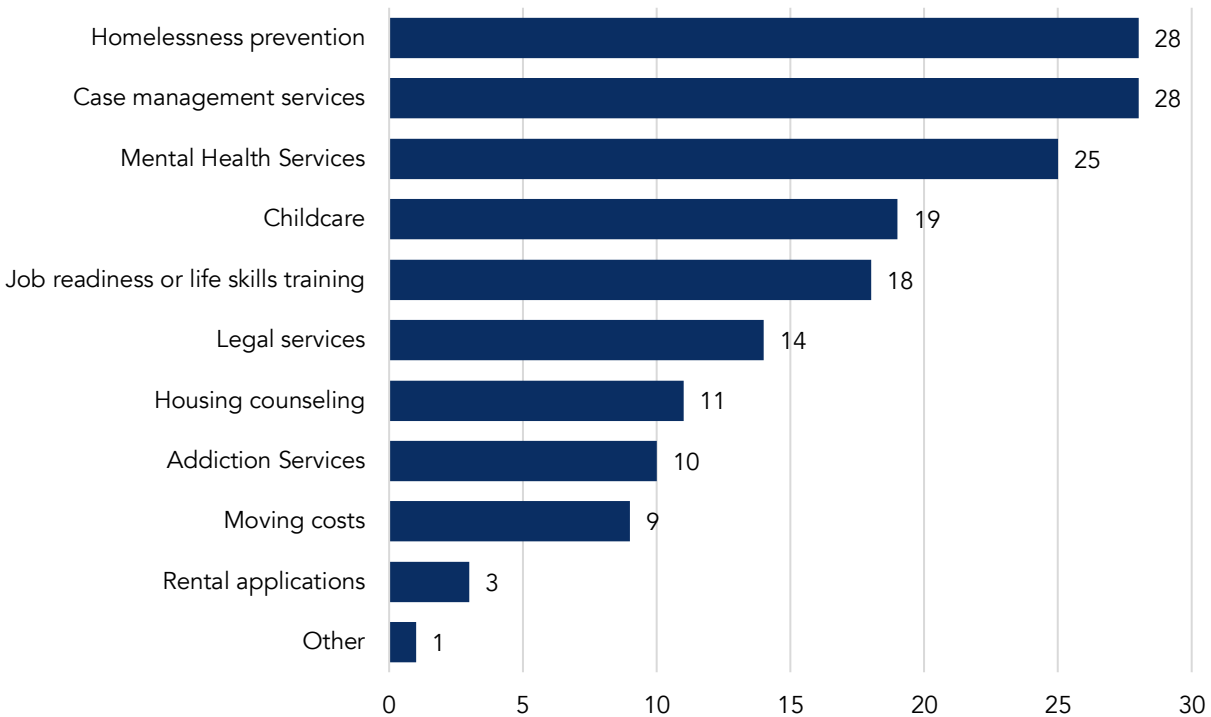
Figure A1. Most Urgent Community Needs Related to HOME-ARP Eligible Activities



For those who indicated that there was a need for supportive services, there was a follow-up question about the types of supportive services that are most needed respondents’ communities. Each participant was asked to select up to three priorities, and homelessness prevention and case management services were the most common selections (each 44.4 percent). **Figure A2** shows the selections of the 63 survey participants who received this question based on their selections among community needs. About 30 percent of respondents indicated that childcare and life skills training are also priority service needs. Legal services, housing counseling, addiction services, moving costs, rental applications, and other were all selected half as often or less compared to the most popular selections.

APPENDIX D

Figure A2. Priority Supportive Services Among Survey Respondents



For respondents who indicated that they were currently homeless, had been homeless in the past, or are at risk of homelessness, the survey asked about utilization and overall availability of resources. **Table A1** shows the resources that survey participants have used and needed. While nearly half of these survey-takers have not used homelessness resources, more than half indicated that they have needed rental assistance, but it was not available. Nearly a third were unable to access transitional housing when they needed it.

Table A1. Resources Used and Needed

	Used		Needed but not available	
	#	% (out of 17)	#	% (out of 16)
Down payment assistance (on a mortgage)	2	11.8%	3	18.8%
Emergency shelter for a family	2	11.8%	3	18.8%
Emergency shelter for an individual	1	5.9%	1	6.3%
Mortgage payment assistance	0	0.0%	1	6.3%

APPENDIX D

Table A1. Resources Used and Needed

	Used		Needed but not available	
	#	% (out of 17)	#	% (out of 16)
Other supportive services	4	23.5%	2	12.5%
Permanent supportive housing	1	5.9%	2	12.5%
Rental assistance	4	23.5%	8	50.0%
Resources and facilities for those with disabilities	0	0.0%	1	6.3%
Resources for veterans	0	0.0%	0	0.0%
Resources for victims of domestic violence	4	23.5%	1	6.3%
Transitional housing	2	11.8%	5	31.3%
None/not applicable	7	41.2%	5	31.3%

LOCAL HOUSING ISSUES

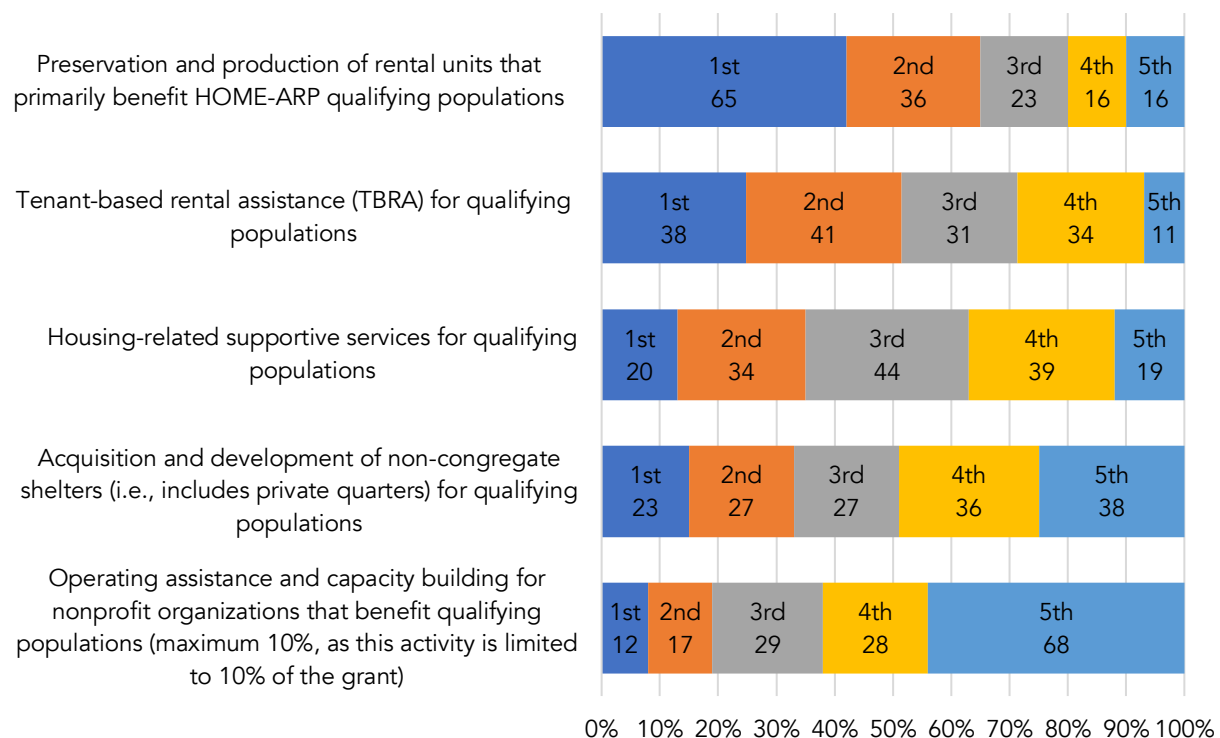
Of 202 respondents who answered whether they believe housing discrimination is an issue in their communities, 94 (46.5 percent) said yes, 72 (35.6 percent) were unsure, and 36 (17.8 percent) said no. Of 82 who answered whether they have experienced housing discrimination personally, 17 (20.7 percent) had, and nearly 4 in 5 had not. Of 74 participants who explained why they believe there is housing discrimination in the area, common answers included discrimination based on income, source of income, race, national origin and immigration status, disability status, family status, and gender identity or sexual orientation. Many noted that they believe development patterns and pricing levels in their communities amount to de facto discrimination as well.

When asked what groups of people are at risk of homelessness because their community failed to meet their housing needs, the most common answers were immigrants and refugees (particularly with limited English proficiency), the elderly and people with disabilities on fixed incomes, racial and ethnic minority groups, working people who have low incomes, single mothers, young people/families, LGBTQ populations, and victims of domestic violence. Some also mentioned that low-income households are not the only ones facing housing insecurity within the WestMetro HOME Consortium communities because of very high costs of living, even compared to moderate incomes.

HOME-ARP ALLOCATION

Survey-takers prioritized the eligible activities for HOME-ARP funding according to needs in the Consortium. **Figure A3** shows the overall prioritization of each activity, with preservation and production of rental units that primarily benefit HOME-ARP qualifying populations receiving the most support – nearly 2 of every 3 respondents (65 percent) ranked it either first or second priority. More than half of respondents prioritized tenant-based rental assistance first or second also. Two in three respondents also indicated that operating assistance and capacity building for nonprofits is either last or second-to-last priority.

**Figure A3. General Public Funding of HOME-ARP
Eligible Activities by Priority Level**

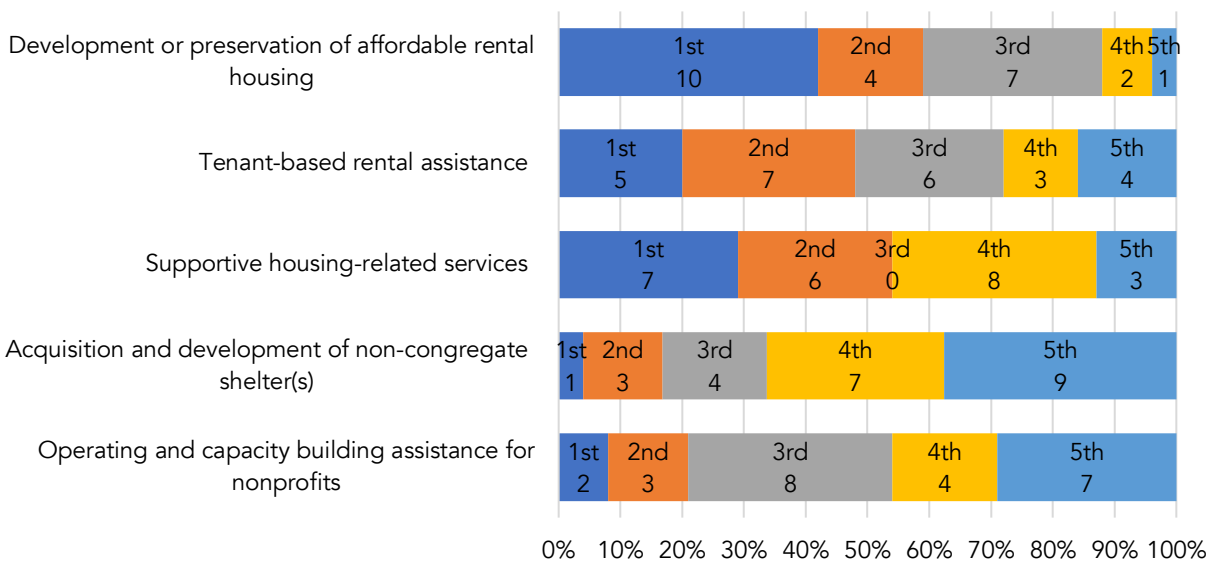
**Provider Survey**

The survey for local service providers, state agencies, and municipal staff and officials received 25 responses. Respondents represented service areas ranging in size from the Greater Boston area, to the MetroWest, to single communities within the Consortium. Twelve service providers/agencies and thirteen local officials or members of municipal staff completed the survey.

LEVELS OF NEED

The survey asked respondents to rank the urgency of needs in their service area. **Figure A4** shows that the rankings from this survey and from the public survey varied slightly, with preservation or production of affordable rental housing still selected as the most urgent need, but with supportive housing-related services at the second most prioritized need, followed by tenant-based rental assistance, operating assistance and capacity building for nonprofits, and acquisition and development of non-congregate shelters. In a later question, respondents were asked to prioritize funding for these activities, shown in **Figure A5**.

Figure A4. Service Provider Ranking Priority Needs



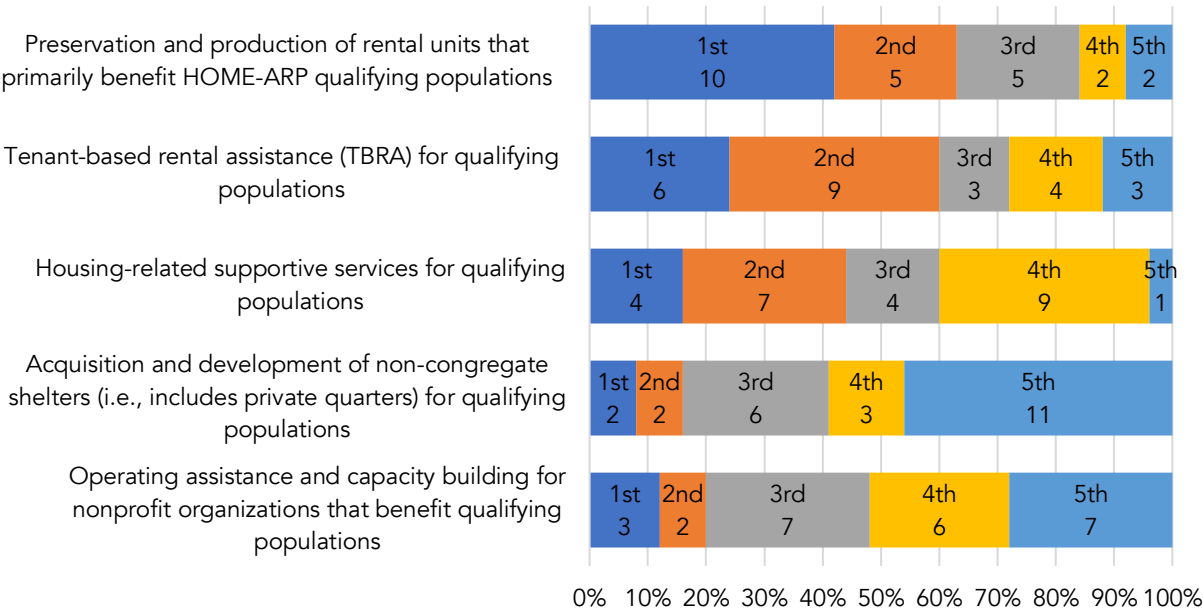
All of these needs, however, represent broad categories, so follow-up questions asked about actions that the Consortium could choose to pursue within each eligible activity category. Developing and preserving affordable rental housing is a very urgent need and can have many approaches, so participants were asked to rank needs for: permanent supporting housing, creating new units, rehabilitation of existing units, or other. Thirteen of twenty-five respondents indicated that creating new affordable housing units is the first priority, so its median ranking was one. The median ranking of permanent supportive housing was two, and rehabilitation of existing units was three.

Within supportive services, homelessness prevention was the most prioritized need, followed by case management, mental health services, and housing counseling. All other options received relatively similar levels of support, except for rental applications and moving costs, which were rated as low priority more often.

Regarding the acquisition and development of non-congregate shelter, the clear highest-priority need is in acquiring existing buildings for use as non-congregate shelters. Scattered sites, hotel/motel room conversion, and conversion of existing shelters all shared a median ranking of third priority.

Figure A5 below illustrates survey-takers’ selections for funding priorities, given the needs they identified in previous questions. The chart shows that the most urgent needs and funding priorities do not quite align because tenant-based rental assistance was selected as a first or second priority activity for funding by 60 percent of providers, making it second ranked, rather than third as shown in **Figure A4**.

Figure A5. Service Provider Funding of HOME-ARP Eligible Activities by Priority Level

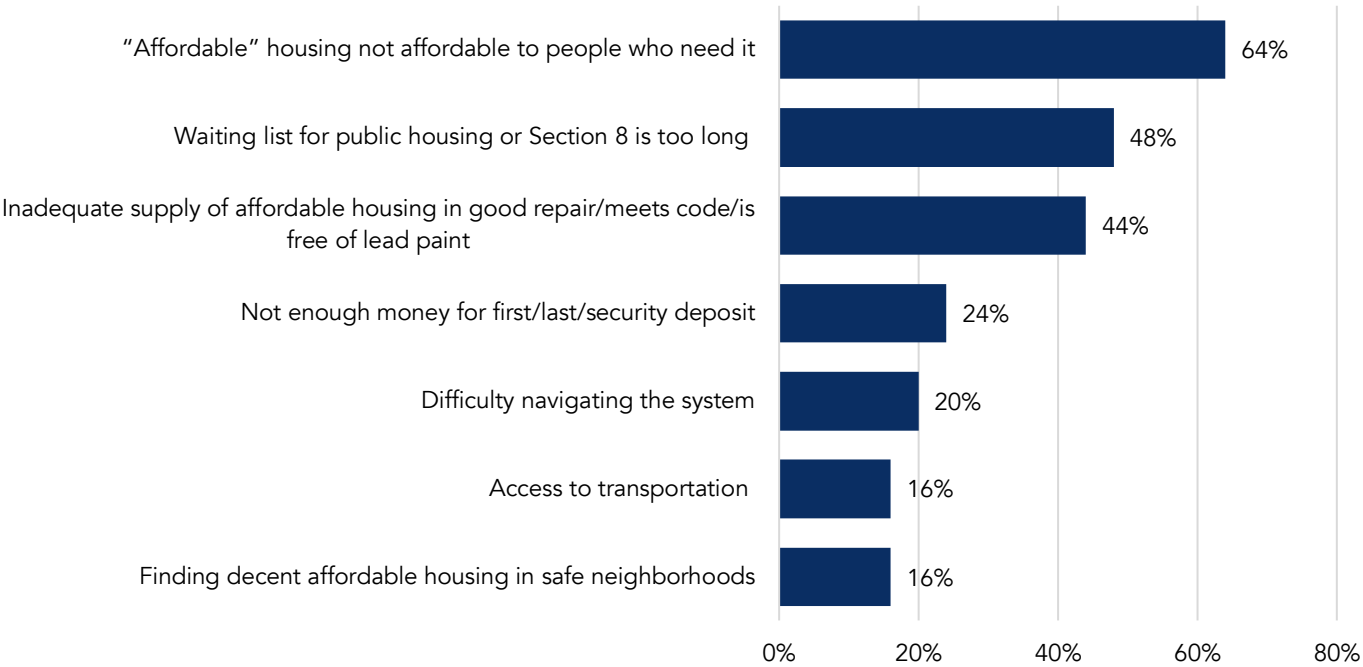


Providers were asked to identify the three primary barriers that low-income, homeless, and at-risk people face in the MetroWest when they search for housing they can afford. **Figure A6** shows the most common selections among the 25 respondents. Others wrote in barriers including rigidity of income restrictions that jeopardize the program eligibility of people in need, as well as general local resistance to developing affordable housing (NIMBYism). To combat NIMBYism, one respondent suggested public education centered on strategic economic benefits of affordable housing and the vetting and requirements that affordable housing applicants must undertake, which each may alleviate some community concerns.

A later question asked respondents about the greatest unmet housing needs in the area, and many responses centered on the availability and accessibility of affordable housing units: there are too few units, the waitlists are too long, and rent affordability levels fail to align with income levels. These answers serve to reinforce the answers shown in **Figure A6**. Other responses discussed the service needs of people facing housing insecurity and how homeless people are given very little support to help them navigate the trauma of homelessness and the challenges of exiting homelessness. These services range from mental health resources to helping people understand affordable housing applications and their requirements.

The greatest unmet needs providers identified related to shelter and to supportive services were asked separately, but all of these answers shared themes. There is a lack of shelters and shelter beds in the area, and in particular, there is a lack of non-congregate shelter where people and families can feel safe. Transportation was identified as a major barrier as well, including a safe and accessible way to get to and from shelter or healthcare facilities. Gaps in mental health and addiction stability resources were also identified, as well as growing challenges associated with finding appropriate care since the COVID-19 pandemic. Others also suggested that housing search assistance is a critical service need.

Figure A6. Primary Barriers to Housing



APPENDIX D

The survey asked respondents about barriers that qualifying populations experience related to housing opportunity and choice. Answers varied, but they primarily focused on the paucity of available units and the requirements of the affordable housing application process itself:

- There are not enough affordable units.
- Waitlists are too long.
- Looking for housing is hard enough, and then there is complicated paperwork, which is hard to navigate and understand.
- Once someone gets past the paperwork and they've applied for a unit, low incomes, poor credit, and prior evictions can disqualify a potential tenant.
- Upfront costs can be a barrier even if someone makes it past all the hurdles associated with finding an affordable unit: they owe first and last month's rent plus a security deposit at move-in.

APPENDIX E

COMMENT #1: Stephanie Blackwelder via email on March 6, 2023

Hi Amanda!

My name is Stephanie from the city of Waltham, my concern is the money allocated to the building of the 12-13 affordable housing units at 200,000 each unit. Is it possible for each city to find existing buildings which are not being used to turn into affordable housing? It just seems like 2,545,918 is a lot for development housing which in reality is not affordable at a rent of 2,100 plus utilities or 2,600 +.

I don't see elderly, low income or single parents able to afford this type of rent per month. If it is possible to allocate the funds to either purchase a home or provide assisting so the population stays out of homelessness?

Thank you!

Stephanie Blackwelder

City Response:
Hi Stephanie,

Thank you for your comment. The Consortium voted to allocate 47%, or \$2,545,918, of HOME-ARP funds to the development of affordable housing units as consultation with service providers, qualifying populations, and the public showed the greatest need is for more deed-restricted deeply affordable units. Additionally, the Gap Analysis showed that approximately 56% of extremely low-income individuals (who have an income below 30% of the area median income) and 58% of very low-income individuals (who have an income between 30 and 50% area median income) are living in a unit that is unaffordable to them.

The funds made available for the development of affordable rental housing can be used for projects that are already in development and new projects in any of the communities within the Consortium. This could include the purchase and re-development of unused buildings into affordable rental housing. To note, at least 70% of all units created with HOME-ARP funds must be used to house qualifying populations, i.e., those who are unhoused, those at-risk of becoming unhoused, as well as those at the greatest risk of housing instability.

HOME-ARP funds will likely be used with other public funding sources to support the creation of new, deeply affordable units. In Newton, for example, the total development cost per unit at this time is approximately \$650,000. Therefore, HOME-ARP dollars are not enough on their own to create new housing units. In terms of rent, it is likely that many of the individuals and/or households that would occupy the HOME-ARP units would not be expected to pay more than 30% of their monthly income. In some scenarios, this would mean that individuals with no income would not be required to pay anything towards their rent until their income situation changes.

While HOME-ARP funds cannot be used to purchase a home for individuals, the Consortium chose to allocate approximately \$750,000 to supportive services and \$300,000 into tenant-based rental assistance for qualifying populations. Under each category of funding, rental assistance can be paid on behalf of a qualifying tenant. Under the supportive services funding category, qualifying populations may also receive supportive case management that will help move them into a more stable and permanent housing situation.

To: [Stephanie Blackwelder](#)
Cc: [Shaylyn Davis](#)
Subject: RE: Draft WestMetro HOME Consortium HOME-ARP Allocation Plan Available for Comment
Date: Tuesday, March 21, 2023 11:39:11 AM
Attachments: [image001.png](#)

Hi Stephanie,

Thank you for your comment. The Consortium voted to allocate 47%, or \$2,545,918, of HOME-ARP funds to the development of affordable housing units as consultation with service providers, qualifying populations, and the public showed the greatest need is for more deed-restricted deeply affordable units. Additionally, the Gap Analysis showed that approximately 56% of extremely low-income individuals (who have an income below 30% of the area median income) and 58% of very low-income individuals (who have an income between 30 and 50% area median income) are living in a unit that is unaffordable to them.

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Best,

Amanda Berman
Pronouns: she/her/hers
Director of Housing & Community Development
Department of Planning & Development
City of Newton
617-796-1147 (Direct)
617-796-1120 (Dept)
aberman@newtonma.gov
www.newtonma.gov/gov/planning

APPENDIX E

COMMENT#1: Stephanie Blackwelder via email on March 6, 2023

From: Stephanie Blackwelder <sblackwelder08@gmail.com>
Sent: Monday, March 6, 2023 8:09 PM
To: Amanda Berman <aberman@newtonma.gov>
Subject: Fwd: Draft WestMetro HOME Consortium HOME-ARP Allocation Plan Available for Comment

[DO NOT OPEN links/attachments unless you are sure the content is safe.]

Hi Amanda!

My name is Stephanie from the city of Waltham, my concern is the money allocated to the building of the 12-13 affordable housing units at 200,000 each unit. Is it possible for each city to find existing buildings which are not being used to turn into affordable housing? It just seems like 2,545,918 is a lot for development housing which in reality is not affordable at a rent of 2,100 plus utilities or 2,600 +.

I don't see elderly, low income or single parents able to afford this type of rent per month. If it is possible to allocate the funds to either purchase a home or provide assisting so the population stays out of homelessness?

Thank you!

Stephanie Blackwelder

----- Forwarded message -----

From: Alexis Lanzillotta <alexis@barrettplanningllc.com>
Date: Tue, Feb 28, 2023 at 4:59 PM
Subject: Draft WestMetro HOME Consortium HOME-ARP Allocation Plan Available for Comment
To: Alexis Lanzillotta <alexis@barrettplanningllc.com>
Cc: Amanda Berman <aberman@newtonma.gov> _____>, Judi Barrett <judi@barrettplanningllc.com>

Good evening,

The WestMetro HOME Consortium, through the City of Newton, has prepared a [DRAFT HOME-ARP Allocation Plan](#)

APPENDIX E

COMMENT #1: Stephanie Blackwelder via email on March 6, 2023

Notice 21-10 by providing housing, rental assistance, supportive services, or non-congregate shelter.

The WestMetro HOME Consortium was allocated \$5,406,962 in HOME-ARP funds that will be administered by the City of Newton. The Consortium consists of the Towns of Bedford, Belmont, Brookline, Concord, Lexington, Natick, Needham, Sudbury, and Wayland; and the Cities of Framingham, Newton, Waltham, and Watertown.

Public Hearing

The Newton Planning & Development Board will hold a virtual public hearing to receive public comments on the Draft Plan.

- Date: Monday, March 6, 2023 @ 7:00 p.m. (Virtual)
- Zoom: <https://us02web.zoom.us/j/86798940437>. You may also join the meeting from your smartphone by dialing 1 (305) 224-1968 and entering the Meeting ID 86798940437#.

If you need a reasonable accommodation, please contact the City of Newton's ADA/Section 504 Coordinator, Jini Fairley, at least two business days in advance of the meeting: jfairley@newtonma.gov or (617) 796-1253. The City's TTY/TDD direct line is: 617-796-1089. For the Telecommunications Relay Service (TRS), please dial 711.

Comment Period

The Draft Plan is available for review [online](#) and in person at the Newton Housing & Community Development Office, Newton City Hall, Second Floor. Comments on the Draft Plan will be accepted at the Public Hearing and in writing from March 6, 2023 through March 21, 2023 at 5:00pm. Please send written comments to Amanda Berman, Director of Housing and Community Development, Planning and Development Department, 1000 Commonwealth Avenue, Newton, MA, 02459 or via email at aberman@newtonma.gov.

You are receiving this email because you are on the project distribution list for this project. If you no longer wish to receive emails from Barrett Planning Group about the WestMetro HOME Consortium's HOME-ARP Allocation Plan, please reply to this email and let me know.

We appreciate your assistance spreading the word within your networks. If you have questions, please reach out to me or Shaylyn Davis, Senior Community Development Planner for the City of Newton, at sdavis@newtonma.gov. Thank you!

Alexis Lanzillotta, AICP
Senior Planner
Barrett Planning Group LLC
350 Lincoln Street, Suite 2053
Hingham, MA 02043
Office: 781.934.0073 x2
Cell: 774.454.3042

APPENDIX E

COMMENT #1: Stephanie Blackwelder via email on March 6, 2023

WestMetro HOME Consortium



APPENDIX E

COMMENT #2: Andrew Cohn via email on March 9, 2023

Dear Director Berman,

I have been a resident of Newton since 1977. I am currently a member of Uniting Citizens for Housing Affordability in Newton (U-CHAN). I am sending comments on the Draft HOME ARP Allocation Plan (hereafter "HOME ARP Plan"). While the comments are mine and not formally those of U-CHAN, nevertheless my years with U-CHAN have informed my comments:

The HOME ARP Plan indicates an aim to provide "Other Supportive Services." This is helpful. However, I note that for persons who are coming into affordable housing in Newton, especially those with lower-incomes, it is very important for there to be supportive services, such as those provided by the EMPATH Economic Mobility program, to assist in social adjustments. Affordable housing cannot only be about bricks and mortar, but must also be about enabling those families coming into such housing to make a successful adjustment to their new living situations. Programs such as EMPATH Economic Mobility, are a critical part of a successful integration of affordable housing into our community.

I would appreciate if the final HOME ARP Plan's treatment of "Other Supportive Services" made express reference to such integrative programs as EMPATH.

Thank you for your attention and consideration.

Sincerely,

Andrew Cohn

City Response:

Hi Andrew,

Thank you for your comment and suggestion. The Consortium recognizes that HOME funds provide a unique opportunity to provide supportive services to individuals and families experiencing or at-risk of homelessness. The HOME-ARP Allocation Plan does not make references to any specific programming because the Requests for Proposals (RFPs) have not yet been developed. As we do not know which services providers will apply under the Supportive Services RFP, it is necessary to keep this term broad and within the scope of what the HOME-ARP funds are able to provide.

The HOME-ARP Allocation Plan references the specific needs under the supportive services funding category that were identified throughout the consultation process on page 42. This includes wrap-around case management, housing search assistance, financial assistance, and other supportive services described as immigrant services, translation assistance, transportation, childcare, treatment of substance use disorders, mental health counseling, etc. HUD's CPD Notice 21-10, which you will find attached, describes the Supportive Services funding category in much more depth from page 42 through 55. We will provide additional detail on what these additional supportive services could include, as identified in the Needs Assessment.

APPENDIX E

COMMENT #2: Andrew Cohn via email on March 9, 2023

From: [Auravali Bhowan](#)
To: [andrew.cohn](#)
Cc: [Gustavo Dantas](#)
Subject: RE: Comments on the Draft HCME ARP Allocation Plan
Date: Tuesday, March 21, 2023 11:45:13 AM
Attachments: [2023-1-15foros_047007_0201-2023-03-21-11-45-13-AM.pdf](#)

Hi Andrew,

Thank you for your comment and suggestion. The Consortium recognizes that HOME-ARP funds give a unique opportunity to provide supportive services to individuals and families experiencing or at-risk of homelessness. The HOME-ARP Allocation Plan does not make references to any specific programming because the Requests for Proposals (RFPs) have not yet been developed. As we do not know which services providers will apply under the Supportive Services RFP, it is necessary to keep this term broad and within the scope of what the HOME-ARP funds are able to provide.

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Best,

Armando Barrios
Professor, arbarrios@uic.edu
Director of Housing & Community Development
Department of Planning & Development
City of Chicago
617-796-1147 (Direct)
arbarrios@uic.edu
<http://people.fordham.edu/~arbarrios/>
<http://people.fordham.edu/~arbarrios/>

[DO NOT OPEN links/attachments unless you are sure the content is safe.]

To: Amanda Berman
Director of Housing and Community Development
Planning and Development Department
City of Newton

From: Andrew Cohn
29 Jarneson Road,
Newton MA 02459

Dear Director Berman,

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APPENDIX E

COMMENT#3: Kathy Laufer via email on March 17, 2023

I am writing to respond to the February 2023 Draft of the WestMetro Home Consortium Home-ARP Allocation Plan

I appreciate the detail that Barrett Planning Group LLC included in this Plan.

I also appreciate the numerous Consultation Interviews & Meetings and Virtual Public Meetings and General Public Survey. I want to note that there was no reference to duplication of numbers between those consulted in interviews & meetings and the virtual public meetings and survey. Given that there was no cross referencing, I think it's fair to assume the numbers of attendees and those in the "groups consulted" may be duplicates, thus lowering the numbers, which even at the full tally may not be of statistical significance.

Thus, I appreciate more the actual feedback summaries and comments.

For clarification of the Funding Budget located on page 48, could you please clarify:

- if the cost (fees) of Barrett Planning Group LLC is coming out of the Administration and Planning amount of \$811,044 – the maximum allowed by HUD?
- if not, what funds were used to pay the consultants fees?
- how much were the consultation fees?

I am in favor of these funds being used exclusively for very low-income individuals and families who are part of the Qualifying Populations and who were most impacted by COVID. This was the intent of this act and we should honor that by being diligent in this area,

Thank you.

Kathy Laufer

26 Mosman Street, W. Newton

City Response:

Hi Kathy,

Thank you for your comment and questions. We acknowledge that, throughout the consultation process, there may have been some overlap in who was providing comments and feedback during the various provider and public meetings, as well as the general survey. The Barrett Planning Group, with the help of municipal staff throughout the WestMetro HOME Consortium, was able to develop a robust list of contacts throughout all 13 communities, however, with many groups and individuals responding via email and participating throughout the consultation process. The consultation process, in addition to all of the data gathered and analyzed by the Barrett Planning Group, informed the Needs Assessment and Gap Analysis as well as the Consortium's decision to allocate the funding across the Rental Housing, Supportive Services, Non-Congregate Shelter, TBRA, and Administration & Planning activities.

All fees associated with the development of the HOME-ARP Allocation Plan, including those costs incurred by contracting with the Barrett Planning Group, will be coming out of the Administration and Planning line item after the Plan has been approved by HUD. The total cost of bringing on the Barrett Planning Group to develop the Allocation Plan is \$125,000.00. As staff will be administering the program through September 2030, the Consortium voted to allocate the maximum amount of 15%, or \$811,044 to Administration and Planning.

The COVID-19 pandemic exacerbated many of the issues that have been brewing for years throughout our region. As is required, HOME-ARP funding will be used to support those who are either unhoused or are at the greatest risk of becoming unhoused in our communities. More about program eligibility across the HOME-ARP program activities can be found in HUD's CPD Notice 21-10.

APPENDIX E

COMMENT#3: Kathy Laufer via email on March 17, 2023

From: [Amanda Berman](#)
To: kklaufer@aol.com
Cc: [Shaylyn Davis](#)
Subject: RE: WestMetro Draft ARP Plan
Date: Wednesday, March 22, 2023 12:52:01 PM

Hi Kathy,

Thank you for your comment and questions. We acknowledge that, throughout the consultation process, there may have been some overlap in who was providing comments and feedback during the various provider and public meetings, as well as the general survey. The Barrett Planning Group, with the help of municipal staff throughout the WestMetro HOME Consortium, was able to develop a robust list of contacts throughout all 13 communities, however, with many groups and individuals responding via email and participating throughout the consultation process. The consultation process, in addition to all of the data gathered and analyzed by the Barrett Planning Group, informed the Needs Assessment and Gap Analysis as well as the Consortium's decision to allocate the funding across the Rental Housing, Supportive Services, Non-Congregate Shelter, TBRA, and Administration & Planning activities.

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Thank you for your comments,

Amanda Berman
Pronouns: she/her/hers
Director of Housing & Community Development
Department of Planning & Development
City of Newton
617-796-1147 (Direct)
617-796-1120 (Dept)
aberman@newtonma.gov
www.newtonma.gov/gov/planning

From: kklaufer@aol.com <kklaufer@aol.com>
Sent: Friday, March 17, 2023 7:40 AM
To: Amanda Berman <aberman@newtonma.gov>

APPENDIX E

COMMENT#3: Kathy Laufer via email on March 17, 2023

Subject: WestMetro Draft ARP Plan

[DO NOT OPEN links/attachments unless you are sure the content is safe.]

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- **if not, what funds were used to pay the consultants fees?**
- **how much were the consultation fees?**

I am in favor of these funds being used exclusively for very low-income individuals and families who are part of the Qualifying Populations and who were most impacted by COVID. This was the intent of this act and we should honor that by being diligent in this area,

Thank you.

Kathy Laufer

26 Mosman Street, W. Newton

APPENDIX E

COMMENT #4: Bethany Hadvab via email on March 21, 2023

Hi Amanda,

Thank you for all that you are doing to support this swift process of understanding and allocating the HOME-ARP funding.

After reviewing the proposal, the trauma of housing insecurity was noted numerous times. I wanted to emphasize the importance of ensuring that systems created by this funding are trauma informed so that they are accessible to those in need of the services. Additionally, trauma informed services help to reduce further trauma and harm.

Here is the CDC's infographic on trauma-informed care principals:

https://www.cdc.gov/orr/infographics/6_principles_trauma_info.htm

And here is a diagram that illustrates some of the symptoms of trauma:



Thank you!

Bethany

Bethany Hadvab, LICSW (she/her)
Board of Health Social Worker
Town of Sudbury
Department of Public Works Building
275 Old Lancaster Road
Sudbury, MA 01776
978-440-5476
<https://sudbury.ma.us/socialworker/>

City Response:

Thank you Bethany. Appreciate your comments and information about trauma-informed care.

APPENDIX E

COMMENT #4: *Bethany Hadvab via email on March 21, 2023*

From: [Amanda Berman](#)
To: [Hadvab, Bethany](#)
Cc: [Shaylyn Davis](#)
Subject: RE: Comments on the HOME-ARP Allocation Plan
Date: Tuesday, March 21, 2023 12:49:28 PM

Thank you Bethany. Appreciate your comments and information about trauma-informed care.

Best,

Amanda Berman
Pronouns: she/her/hers
Director of Housing & Community Development
Department of Planning & Development
City of Newton
617-796-1147 (Direct)
617-796-1120 (Dept)
aberman@newtonma.gov
www.newtonma.gov/gov/planning

From: Hadvab, Bethany <HadvabB@sudbury.ma.us>
Sent: Tuesday, March 21, 2023 12:22 PM
To: Amanda Berman <aberman@newtonma.gov>
Subject: Comments on the HOME-ARP Allocation Plan

[DO NOT OPEN links/attachments unless you are sure the content is safe.]

Hi Amanda,

Thank you for all that you are doing to support this swift process of understanding and allocating the HOME-ARP funding.

After reviewing the proposal, the trauma of housing insecurity was noted numerous times. I wanted to emphasize the importance of ensuring that systems created by this funding are trauma informed so that they are accessible to those in need of the services. Additionally, trauma informed services help to reduce further trauma and harm.

Here is the CDC's infographic on trauma-informed care principals:
https://www.cdc.gov/orr/infographics/6_principles_trauma_info.htm

And here is a diagram that illustrates some of the symptoms of trauma:

APPENDIX E



Thank you!

Bethany

Bethany Hadvab, LICSW (she/her)
Board of Health Social Worker
Town of Sudbury

Sudbury, MA 01776

PLEASE READ: Informed consent, confidentiality and mandated reporting in the Social Work Office <https://sudbury.ma.us/socialworker/?p=1326>

Monday, Wednesday, Thursday 8:30am-4pm
Tuesday 8:30am-7pm

IMPORTANT: Please be aware the Secretary of State has determined that e-mail is a public record and thus not confidential.

APPENDIX E

COMMENT #5: Josephine McNeil via email on March 21, 2023

RESPONSE TO WESTMETRO HOME CONSORTIUM DRAFT HOME ARP ALLOCATION PLAN

I am pleased to have the opportunity to provide comments and questions to the Plan. My comments and questions are related to following areas:

- A. Adherence to the intent of the American Rescue Plan (ARP). The ARP was enacted by the congress and signed by President Biden to address the health and economic harm caused by COVID19. The legislation instituted and provided funding for numerous programs including HOME ARP to address those harms. Government entities that were given funds were directed to imbed “equity” in their decision-making.
- B. Needs Assessment and Gap Analysis
- C. Soliciting RFPs and Selection of sub-recipients

ADHERENCE TO THE AMERICAN RESCUE PLAN

The Plan is almost silent on the ARP. The only mention is in Appendix B, the community Engagement Plan, in the first sentence of the Introduction. The only mention of equity is on pages 2 and 3 of the same document. I believe the lack of focus negatively influenced the draft plan. I think that was substantiated by the responses I received at the public hearing on March 6th when I was told in response to my question that there was no requirement that the proposed services be directed toward those who had been negatively impacted by COVID.

HOME ARP COMMUNITY ENGAGEMENT REQUIREMENTS

B. Needs Assessment and Gap Analysis

I acknowledge that the socio-economic, racial, and ethnic and size of population differences among the thirteen communities that make up the Metrowest Consortium presented a challenge for the consultant and Newton as the lead agency in the community engagement process.

Notwithstanding that challenge, I have the following questions and comments with respect to the community engagement:

- Were the elected officials in each community made aware of the planning process and what role did they play?
- There appears to be an over representation of Newton agencies when compared with other communities.
- Was there any effort made to receive input from those families/individuals who had received eviction filings (page 30, Figure 3)?
- What is the explanation for the low participation rate by Blacks and Hispanics in the survey given the data that shows they are disproportionately represented among the very-low and extremely-low populations in each community?
- Missing in the gaps analysis is racial breakdown on those who are currently receiving services to address homelessness. That data as compared with need might have influenced the determination of priorities.
- Were “impacted homeless persons” from any community other than Waltham interviewed? If so, which ones?

C. Soliciting RFPs and Selection of sub-recipients.

In the draft Plan, the response to how it would solicit proposals, the Consortium responded that it would issue Requests for Proposals and select those projects that best meets the needs the Consortium’s qualifying populations.

- I think the wording should state “best meets the needs of the qualifying populations in the HOME ARP program”.

APPENDIX E

COMMENT #5: Josephine McNeil via email on March 21, 2023

It further states that the Consortium will form Project Review Committees consisting of representatives from multiple Consortium communities.

- Given the fact that some of the requirements for the HOME ARP program specifically state that it is different from the HOME program, it would be important that the Review Committees include a broader more representative group of individuals including some “impacted persons”. That would be in keeping with the desire for equitable outcomes.

It also mentions that there should be a relationship between the Annual Action Plan and the Consolidated Plan and priority would be given to those projects.

- While I agree that proposals in those plans may be relevant, they should not automatically be granted priority by the review committee. To do so, would negate the community engagement process which has been more inclusive than either the Annual Action Plan or the Consolidated Plan.

Lastly, I don’t support the recommended Use of Funds for the following reasons:

A careful reading of the comments from the interviewees and the survey respondents lead me to the conclusion that while there is a recognition that there is a need for more housing; there was a recognition that the qualified population need immediate help.

Therefore, my personal belief and I think the surveys and interviews support it is that most of the funding should be directed toward services and programs that benefit the qualified populations in the immediate future. The HOME Arp Use of Funds Recommendations should be revamped to prioritize services rather than the development of housing. Funding should be provided to serve those that are currently homeless or at-risk of homelessness and other qualifying populations. Included in the RFP should be services for those who are housed and paying more than 30% of their income for rent; self-sufficiency programs; housing counseling to help identify housing units and identify other benefits and help to complete the applications and funding for one-time emergencies to stabilize those currently housed and funding for a TBRA pool designated for those living in smaller Consortium communities lacking the infrastructure to implement their own.

Finally, given the impediments to development in many of the Consortium communities, it would take a minimum of 3 years before a unit could be occupied.

The qualifying populations need help and hope today. They should not be expected to wait for the benefits due to them with the passage of the ARP, especially those intended to them through the HOME ARP.

City Response to All Comments and Questions:

Hi Josephine,

Thank you for your comments and questions. We’ve broken down our responses based on how your comments and questions were broken down below:

A. Adherence to American Rescue Plan:

The HOME-ARP funding the WestMetro HOME Consortium received came out of the \$1.9 trillion of relief that President Biden signed into law through the American Rescue Plan Act in 2021. Of the \$1.9 trillion, Congress appropriated \$5 billion to the HOME-ARP program. Please see the text regarding the use of the HOME-ARP funds, found on page 2 HUD CPD Notice 21-10, below:

“To address the need for homelessness assistance and supportive services, Congress appropriated \$5 billion in ARP funds to be administered through HOME to perform four

APPENDIX E

COMMENT #5: Josephine McNeil via email on March 21, 2023

activities that must primarily benefit qualifying individuals and families who are homeless, at risk of homelessness, or in other vulnerable populations. These activities include: (1) development and support of rental housing, (2) tenant-based rental assistance (TBRA), (3) provision of supportive services, and (4) acquisition and development of non-congregate shelter units. The program described in this notice for the use of the \$5 billion in ARP funds is the HOME-American Rescue Plan or 'HOME-ARP.'"

We do, however, acknowledge that the COVID-19 pandemic exacerbated the issues that have existed within the WestMetro HOME Consortium for many years. Thus, we are focusing our efforts to adhere to the HOME-ARP program requirements in order to serve individuals and families who are unhoused or at the greatest risk of becoming unhoused with this funding.

B. Needs Assessment & Gap Analysis

Were the elected officials in each community made aware of the planning process and what role did they play?

The Barrett Planning Group worked with municipal staff from each of the communities to develop a robust list of contacts to engage with throughout the Consultation process. Although elected officials were not specifically engaged as a separate group of individuals, as housing authorities and other social services agencies were, elected officials did participate throughout the consultation and public meetings process.

There appears to be an over representation of Newton agencies when compared with other communities.

Each municipality provided their own community's contacts to the Barrett Planning Group to develop the consultation list. Throughout the engagement process, Barrett Planning Group and Newton staff encouraged the other consortium communities to participate in the planning process. Newton's Citizen Participation Plan requires consultation with Newton's various public boards and, in addition to the HOME-ARP consultation requirements (found on page 13 of CPD Notice 21-10), led to many Newton agencies being consulted.

Was there any effort made to receive input from those families/individuals who had received eviction filings (page 30, Figure 3)?

The source used to compile the eviction filings by community, MassLandlords, Inc., does not provide information regarding the individuals and families involved in an eviction case.

What is the explanation for the low participation rate by Blacks and Hispanics in the survey given the data that shows they are disproportionately represented among the very-low and extremely-low populations in each community?

The survey link was sent out to the complete list of consultation contacts and publicized online through the City of Newton's website as well as social media. The other 12 Consortium communities also publicized the survey through their own websites and through communication with their own communities and contacts.

Missing in the gaps analysis is racial breakdown on those who are currently receiving services to address homelessness. That data as compared with need might have influenced the determination of priorities.

We acknowledge that a racial breakdown of those who are currently receiving services throughout the Consortium was not included in the Gap Analysis. Pages 42-46 of the

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COMMENT #5: Josephine McNeil via email on March 21, 2023

Allocation Plan provide a qualitative summary of the gap analysis as it relates to supportive services. These findings strongly influenced the recommendation to allocate \$750,000 to supportive services and \$300,000 to TBRA. As required by HUD, the Consortium will collect racial and ethnic data on those for those who are receiving services and/or TBRA through HOME-ARP.

Were “impacted homeless persons” from any community other than Waltham interviewed? If so, which ones?

Unfortunately, we were unable to plan any other in person consultations with other agencies outside of the Community Day Center of Waltham, though multiple requests for consultation were made by both municipal staff and the Barrett Planning Group. A barrier we encountered in planning these consultations surrounded the inability of the HOME-ARP program to provide direct payments to impacted individuals for their participation. This limited the ability to schedule consultations with many service providers in the Consortium.

C. Soliciting RFPs and Selecting Subrecipients

I think the wording should state “best meets the needs of the qualifying populations in the HOME ARP program”.

The HOME-ARP program funds for the WestMetro HOME Consortium will primarily serve folks from the qualifying populations that exist within the Consortium. We can change the sentence to read “...that best meets the needs of the qualifying populations in the Consortium, as defined by the HOME-ARP program.”

Given the fact that some of the requirements for the HOME ARP program specifically state that it is different from the HOME program, it would be important that the Review Committees include a broader more representative group of individuals including some “impacted persons”. That would be in keeping with the desire for equitable outcomes.

The Consortium will take this recommendation into consideration at the appropriate time.

While I agree that proposals in those plans may be relevant, they should not automatically be granted priority by the review committee. To do so, would negate the community engagement process which has been more inclusive than either the Annual Action Plan or the Consolidated Plan.

All proposals received by the WestMetro HOME Consortium must adhere to the goals and strategies put forth in our Annual Action Plans and Consolidated Plan. This does not negate the consultation process that the Consortium has undergone for the HOME-ARP Allocation Plan, however, as HOME-ARP standards will still apply.

A careful reading of the comments from the interviewees and the survey respondents lead me to the conclusion that while there is a recognition that there is a need for more housing; there was a recognition that the qualified population need immediate help.

Therefore, my personal belief and I think the surveys and interviews support it is that most of the funding should be directed toward services and programs that benefit the qualified populations in the immediate future. The HOME Arp Use of Funds Recommendations should be revamped to prioritize services rather than the development of housing. Funding should be provided to serve those that are currently homeless or at-risk of homelessness and other qualifying populations. Included in the RFP should be services for those who are housed and paying more than 30% of their income for rent; self-sufficiency programs; housing counseling to help identify housing units

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COMMENT #5: Josephine McNeil via email on March 21, 2023

and identify other benefits and help to complete the applications and funding for one-time emergencies to stabilize those currently housed and funding for a TBRA pool designated for those living in smaller Consortium communities lacking the infrastructure to implement their own.

Finally, given the impediments to development in many of the Consortium communities, it would take a minimum of 3 years before a unit could be occupied.

The qualifying populations need help and hope today. They should not be expected to wait for the benefits due to them with the passage of the ARP, especially those intended to them through the HOME ARP.

The Consortium voted to allocate 47%, or \$2,545,918, of HOME-ARP funds to the development of affordable housing units as consultation with service providers, qualifying populations, and the public showed the greatest need is for more deed-restricted, deeply affordable units. Additionally, the Gap Analysis showed that approximately 56% of extremely low-income individuals (who have an income below 30% of the area median income) and 58% of very low-income individuals (who have an income between 30 and 50% area median income) are living in a unit that is unaffordable to them.

Additionally, the Consortium chose to allocate approximately \$750,000 to supportive services and \$300,000 into tenant-based rental assistance for qualifying populations as we acknowledged the need for units of housing in addition to the services that can be provided to the qualifying populations through these eligible funding categories. Under each category of funding, rental assistance can be paid on behalf of a qualifying tenant. Under the supportive services funding category, qualifying populations may also receive supportive case management that will help move them into a more stable and permanent housing situation, among other services that can be provided. Pages 42-55 of HUD's CPD Notice 21-10 (attached) provide a full explanation of all the services eligible under the Supportive Service funding category.

Although the actual units developed with HOME-ARP may not be immediately available to qualifying populations, the support offered under both the supportive services and TBRA RFPs may be available immediately so long as there are eligible respondents to the RFP.

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COMMENT #5: *Josephine McNeil via email on March 21, 2023*

From: [Amanda Berman](#)
To: jomac1941@aol.com
Cc: [Shaylyn Davis](#)
Subject: RE: Comments and Quesions Re; the HOME ARP Allocation Plan
Date: Wednesday, March 22, 2023 5:02:38 PM

Yes, your comments and questions (and our responses) will be included in the HOME-ARP plan.

Best,

Amanda Berman
Pronouns: she/her/hers
Director of Housing & Community Development
Department of Planning & Development
City of Newton
617-796-1147 (Direct)
617-796-1120 (Dept)
aberman@newtonma.gov
www.newtonma.gov/gov/planning

From: jomac1941@aol.com <jomac1941@aol.com>
Sent: Wednesday, March 22, 2023 4:56 PM
To: Amanda Berman <aberman@newtonma.gov>
Subject: Re: Comments and Quesions Re; the HOME ARP Allocation Plan

[DO NOT OPEN links/attachments unless you are sure the content is safe.]

Thanks for your response. Please confirm my questions and comments and your response will be included in the Draft Allocation Plan sent to HUD for approval.

Thanks, Josephine

On Wednesday, March 22, 2023 at 04:20:55 PM EDT, Amanda Berman <aberman@newtonma.gov> wrote:

Thank you for your comments and questions. We've separated out our responses based on how your comments and questions were broken down below:

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COMMENT #5: Josephine McNeil via email on March 21, 2023

The HOME-ARP funding the WestMetro HOME Consortium received came out of the \$1.9 trillion of relief that President Biden signed into law through the American Rescue Plan Act in 2021. Of the \$1.9 trillion, Congress appropriated \$5 billion to the HOME-ARP program. Please see the text regarding the use of the HOME-ARP funds, found on page 2 HUD CPD Notice 21-10, below:

“To address the need for homelessness assistance and supportive services, Congress appropriated \$5 billion in ARP funds to be administered through HOME to perform four activities that must primarily benefit qualifying individuals and families who are homeless, at risk of homelessness, or in other vulnerable populations. These activities include: (1) development and support of rental housing, (2) tenant-based rental assistance (TBRA), (3) provision of supportive services, and (4) acquisition and development of non-congregate shelter units. The program described in this notice for the use of the \$5 billion in ARP funds is the HOME-American Rescue Plan or ‘HOME-ARP.’”

We do, however, acknowledge that the COVID-19 pandemic exacerbated the issues that have existed within the WestMetro HOME Consortium for many years. Thus, we are focusing our efforts to adhere to the HOME-ARP program requirements in order to serve individuals and families who are unhoused or at the greatest risk of becoming unhoused with this funding.

B. Needs Assessment & Gap Analysis

Were the elected officials in each community made aware of the planning process and what role did they play?

The Barrett Planning Group worked with municipal staff from each of the communities to develop a robust list of contacts to engage with throughout the Consultation process. Although elected officials were not specifically engaged as a separate group of individuals, as housing authorities and other social services agencies were, elected officials did participate throughout the consultation and public meetings process.

There appears to be an over representation of Newton agencies when compared with other communities.

Each municipality provided their own community’s contacts to the Barrett Planning Group to develop the consultation list. Throughout the engagement process, Barrett Planning Group and Newton staff encouraged the other consortium communities to participate in the planning process. Newton’s Citizen Participation Plan requires consultation with Newton’s various public boards and, in addition to the HOME-ARP consultation requirements (found on page 13 of CPD Notice 21-10), led to many Newton agencies being consulted.

Was there any effort made to receive input from those families/individuals who had received eviction filings (page 30, Figure 3)?

The source used to compile the eviction filings by community, MassLandlords, Inc., does not provide information regarding the individuals and families involved in an eviction case.

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COMMENT #5: Josephine McNeil via email on March 21, 2023

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Were "impacted homeless persons" from any community other than Waltham interviewed? If so, which ones?

Unfortunately, we were unable to plan any other in person consultations with other agencies outside of the Community Day Center of Waltham, though multiple requests for consultation were made by both municipal staff and the Barrett Planning Group. A barrier we encountered in planning these consultations surrounded the inability of the HOME-ARP program to provide direct payments to impacted individuals for their participation. This limited the ability to schedule consultations with many service providers in the Consortium.

C. Soliciting RFPs and Selecting Subrecipients

I think the wording should state "best meets the needs of the qualifying populations in the HOME ARP program".

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Given the fact that some of the requirements for the HOME ARP program specifically state that it is different from the HOME program, it would be important that the Review Committees include a broader more representative group of individuals including some "impacted persons". That would be in keeping with the desire for equitable outcomes.

The Consortium will take this recommendation into consideration at the appropriate time.

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COMMENT #5: Josephine McNeil via email on March 21, 2023

still apply.

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Therefore, my personal belief and I think the surveys and interviews support it is that most of the funding should be directed toward services and programs that benefit the qualified populations in the immediate future. The HOME Arp Use of Funds Recommendations should be revamped to prioritize services rather than the development of housing. Funding should be provided to serve those that are currently homeless or at-risk of homelessness and other qualifying populations. Included in the RFP should be services for those who are housed and paying more than 30% of their income for rent; self-sufficiency programs; housing counseling to help identify housing units and identify other benefits and help to complete the applications and funding for one-time emergencies to stabilize those currently housed and funding for a TBRA pool designated for those living in smaller Consortium communities lacking the infrastructure to implement their own.

Finally, given the impediments to development in many of the Consortium communities, it would take a minimum of 3 years before a unit could be occupied.

The qualifying populations need help and hope today.

Best,

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COMMENT #5: Josephine McNeil via email on March 21, 2023

Amanda Berman

Pronouns: she/her/hers

Director of Housing & Community Development

Department of Planning & Development

City of Newton

617-796-1147 (Direct)

617-796-1120 (Dept)

aberman@newtonma.gov

www.newtonma.gov/gov/planning

From: jomac1941@aol.com <jomac1941@aol.com>

Sent: Tuesday, March 21, 2023 4:17 PM

To: Amanda Berman <aberman@newtonma.gov>

Subject: Comments and Questions Re; the HOME ARP Allocation Plan

[DO NOT OPEN links/attachments unless you are sure the content is safe.]

Hello Amanda,

I am pleased to have the opportunity to submit my attached my comments and questions on the Draft HOME ARP Allocation Plan.

I look foward to your response.

Thanks, Josephine

When responding, please be aware that the Massachusetts Secretary of State has determined that most email is public record and therefore cannot be kept confidential.