

**CITY OF WORCESTER
COMMUNITY DEVELOPMENT BLOCK GRANT**

**SECOND YEAR ACTION PLAN / PROGRAM YEAR 47
SUBSTANTIAL AMENDMENT #1
July 1, 2021 – June 30, 2022**



October 28, 2022

BACKGROUND AND OVERVIEW

Pursuant to recent US Department of Housing and Urban Development (HUD) guidance, *The American Rescue Plan* appropriated \$5 billion to help communities provide housing, shelter, and services for people experiencing and other qualifying populations. These HOME Investment Partnerships Program – American Rescue Plan (HOME-ARP) funds are in addition to your regular FY 2021 HOME formula allocation. This one-time funding creates a significant opportunity for you to meet the housing and service needs of your community’s most vulnerable populations.

HOME-ARP funding gives jurisdictions significant new resources to address their homeless assistance needs by creating affordable housing or non-congregate shelter units and providing tenant-based rental assistance or supportive services. HOME-ARP funds are allocated through the HOME formula to all participating jurisdictions that qualified for an annual HOME Program allocation for FY 2021. HOME-ARP funds must be used for individuals or families from the following qualifying populations: homeless; at-risk of homelessness; fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; other populations where providing assistance would prevent the family’s homelessness or would serve those with the greatest risk of housing instability; and veterans and families that include a veteran family member that meet one of the preceding criteria.

HOME-ARP funds can be used for four eligible activities including the production or preservation of affordable housing; tenant-based rental assistance; supportive services, including homeless prevention services and housing counseling; and the purchase or development of non-congregate shelter for individuals and families experiencing homelessness. HOME-ARP funds are available for expenditure until September, 2030.

As per HUD guidance, through an amendment to its Consolidated Submission for Community Planning & Development (2020-2024), Second Year Action Plan, the City of Worcester has allocated \$5,969,718 in HUD supplemental HOME-ARP funds to activities including \$1,052,049.22 for Supportive Services, \$372,838.57 for acquisition and development of non-congregate shelters, \$ 550,128.88 for tenant based rental assistance (TBRA), \$2,845,531.33 for development of affordable rental housing, \$253,713 for non-profit operating and capacity building, and \$895,457 for administration and planning.

SUBSTANTIAL AMENDMENT POLICIES

A PJ is not required to amend its citizen participation plan to change the public comment period to a 15-day public comment period, as permitted by the HOME-ARP Notice (page 13). The HOME-ARP Notice Appendix includes a waiver and alternative requirement to waives Section 105 and 107 of the Cranston-Gonzales National Affordable Housing Act (42 USC 12705 and 12707) and the citizen participation plan requirements at 24 CFR 91.105, 91.115, and 91.401, and imposes the alternative requirements described in the HOME-ARP Notice (pages 67 and 68 of the Appendix). Per the waiver and alternative requirement, a PJ is required to follow its adopted requirements for “reasonable notice and opportunity to comment” for plan amendments in its current citizen participation plan except for where its plan conflicts with the alternative requirements of the Appendix. Consequently, a PJ is not required to amend its current citizen participation plan because the Appendix permit a reduced public comment period of 15 days and requires one public hearing during the development of the HOME-ARP allocation plan prior to submission to HUD. All other aspects of the requirements of the citizen participation plan will remain in effect.

Title 24 Section 91.505 of the Code of Federal Regulations stipulates that participating jurisdictions shall amend their approved action plans whenever they make one of the following decisions:

1. To make a change in its allocation priorities or a change in the method of distribution of funds;

2. To carry out an activity, using funds from any program covered by the Consolidated Plan (including Program Income) not previously described in the action plan; or
3. To change the purpose, scope, location, or beneficiaries of an activity.

The Regulation (CFR 91.505) further requires that a jurisdiction identify in its Citizen Participation Plan the criteria they use for determining what constitutes a substantial amendment. Consistent with these requirements, the Citizen Participation Plan adopted by the City of Worcester as a component of its 2020-2024 Consolidated Five Year Plan identifies three criteria that will require a substantial amendment:

1. To make a change in its allocation priorities or a change in the method of distribution of funds;
2. To carry out an activity, using funds from any program covered by the Consolidated Plan (including Program Income) not previously described in the action plan; or
3. To change the purpose, scope, location, or beneficiaries of an activity.

PROPOSED SUBSTANTIAL AMENDMENT

This proposed amendment will allow the City of Worcester to fund the following activities and programs utilizing new and supplemental funds and guidance from the U.S. Department of Housing HUD related to the *HOME Investment Partnerships Program – American Rescue Plan (HOME-ARP)* Public Law. The following, as generally described herein, will be funded by amending the approved Second Year (July 1, 2021 – June 30, 2022) Action Plan. The proposed projects, programs and activities are as follows:

As such, on or about the 4th week of April, 2021, the City of Worcester anticipates receiving the following entitlement funds from HUD with the following allocation/award amounts:

- **HOME-American Rescue Plan or “HOME-ARP”: \$5,969,718**

The City of Worcester is therefore proposing to substantially amend its Consolidated Submission for Community Planning & Development (2020-2024), Second Year Action Plan, July 1st, 2021 – June 30th, 2022, in order to additionally fund the following activities and programs through the above supplemental allocations as itemized and further described in this amendment document on the following pages:

HOME-ARP: \$5,969,718

1. Supportive Services	\$ 1,052,049.22
2. Acquisition and Development of Non-Congregate Shelters	\$ 372,838.57
3. Tenant Based Rental Assistance (TBRA)	\$ 550,128.88
4. Development of Affordable Rental Housing	\$ 2,845,531.33
5. Non-Profit Operating and Capacity Building	\$ 253,713

6. Administration and Planning

\$ 895,457

Please Note: The allocation amounts provided above are based upon estimates and are subject to change. Final allocation amounts will be subject to 2 CFR 200.00 et. seq. (entitled “Uniform Administrative Requirements for Federal Awards”) for requirements formerly set forth in O.M.B. Circular A-122 and satisfaction of additional HOME-ARP program eligibility criteria, as well as any other guidance or regulations as they may relate to the HOME Investment Partnerships Program – American Rescue Plan (HOME-ARP) Public Law.

PROPOSED AMENDMENT ACTIVITY DESCRIPTIONS

This proposed amendment will allow the City of Worcester to fund the following activities and programs utilizing new and supplemental funds and guidance from the U.S. Department of Housing HUD related to the *HOME Investment Partnerships Program – American Rescue Plan (HOME-ARP)* Public Law. The following, as generally described herein, will be funded by amending the approved Second Year (July 1, 2021 – June 30, 2022) Action Plan. The proposed projects, programs and activities are as follows:

HOME-ARP: \$5,969,718

1. Supportive Services \$ 1,052,049.22

City of Worcester Executive Office of Economic Development, Housing Development Division

HOME-ARP funds may be used to provide a broad range of supportive services to qualifying individuals or families as a separate activity or in combination with other HOME-ARP activities. Supportive services include: a) services listed in section 401(29) of the McKinney-Vento Homeless Assistance Act (“McKinney-Vento Supportive Services”)1 (42 U.S.C. 11360(29)); b) homelessness prevention services; and c) housing counseling services.

2. Acquisition and Development of Non-Congregate Shelters \$ 372,838.57

City of Worcester Executive Office of Economic Development, Housing Development Division

A non-congregate shelter (NCS) is one or more buildings that provide private units or rooms as temporary shelter to individuals and families and does not require occupants to sign a lease or occupancy agreement. HOME-ARP funds may be used to acquire and develop HOME-ARP NCS for individuals and families in qualifying populations. This activity may include but is not limited to the acquisition of land and construction of HOME-ARP NCS or acquisition and/or rehabilitation of existing structures such as motels, hotels, or other facilities to be used for HOME-ARP NCS. HOME-ARP funds may not be used to pay the operating costs of HOME-ARP NCS. Consequently, PJs must consider the availability of ongoing operating funds for the HOME-ARP NCS so that the HOME-ARP NCS can remain viable through the restricted use period specified in this Notice.

3. Tenant Based Rental Assistance (TBRA) \$ 550,128.88

City of Worcester Executive Office of Economic Development, Housing Development Division

HOME-ARP funds may be used to provide tenant-based rental assistance to qualifying households (“HOME-ARP TBRA”). In HOME-ARP TBRA, the PJ assists a qualifying household with payments to cover the entire or insufficient amounts that the qualifying household cannot pay for housing and housing-related costs, such as rental assistance, security deposits, and utility deposits. HOME-ARP

TBRA assisted households may choose to rent a unit in a HOME-ARP rental project or any other eligible rental unit. HOME-ARP TBRA is a form of rental assistance that is attached to the household and not a particular rental unit. Therefore, the HOME-ARP TBRA assisted household may choose to move to another unit with continued HOME-ARP TBRA as long as the new unit meets the applicable property standards of this Notice. If a HOME-ARP TBRA assisted household chooses to move, the rental assistance contract terminates and a new rental assistance contract for the new unit will be executed according to HOME-ARP TBRA requirements. The HOME-ARP TBRA assisted household must notify the PJ before moving in order to receive continued HOME-ARP TBRA.

4. Development of Affordable Rental Housing \$ 2,845,531.33
City of Worcester Executive Office of Economic Development, Housing Development Division

HOME-ARP funds may be used to acquire, rehabilitate, or construct affordable rental housing primarily for occupancy by households of individuals and families that meet the definition of one or more of the qualifying populations described in Section IV.A of this Notice (“qualifying households”). Unlike the regular HOME Program, which targets HOME-assisted rental units based on tenant income, 70 percent of all HOME-ARP units will admit households based only upon their status as qualifying households. This complicates the underwriting and operation of projects that include HOME-ARP units. As a result, the requirements for HOME-ARP rental housing provide significant flexibilities to enable HOME-ARP rental projects to remain financially viable and affordable for the qualifying populations throughout the minimum compliance period.

Eligible HOME-ARP rental housing includes “housing” as defined at 24 CFR 92.2, including but not limited to manufactured housing, single room occupancy (SRO) units, and permanent supportive housing. Emergency shelters, hotels, and motels (including those currently operating as non-congregate shelter), facilities such as nursing homes, residential treatment facilities, correctional facilities, halfway houses, and housing for students or dormitories do not constitute housing in the HOME-ARP program. However, HOME-ARP funds may be used to acquire and rehabilitate such structures into HOME-ARP rental housing.

5. Non-Profit Operating and Capacity Building \$ 253,713
City of Worcester Executive Office of Economic Development, Housing Development Division

Eligible Costs:

- a. Operating Expense Assistance: Operating expenses are defined as reasonable and necessary costs of operating the nonprofit organization. These costs include employee salaries, wages and other employee compensation and benefits; employee education, training, and travel; rent; utilities; communication costs; taxes; insurance; equipment, materials, and supplies.

HOME-ARP funds used for operating expenses must be used for the “general operating costs” of the nonprofit organization. These operating costs must not have a particular final cost objective, such as a project or activity, or must not be directly assignable to a HOME-ARP activity or project. For example, HOME-ARP funds for operating expenses may not be used for staffing costs to provide supportive services or develop HOME-ARP-rental housing (as operating costs to develop HOME-ARP rental housing are paid for by a developer fee which is a project delivery or soft cost). Because ARP does not permit any HOME-ARP funds to be used to operate a shelter, all costs related to operating a non-congregate shelter (e.g., allocable overhead and staffing costs, insurance, utilities) also cannot be paid with HOME-ARP funds.

The actual costs of implementing a specific activity or project, including staff costs to deliver supportive services or administer HOME-ARP TBRA, are considered HOME-ARP project delivery costs or project soft costs and are not eligible costs under Nonprofit Operating and Capacity Building Assistance.

HOME-ARP project delivery costs are those allowable costs incurred for implementing and carrying out eligible HOME-ARP projects or activities, such as supportive services. All project delivery costs are allocable to a HOME-ARP project, including direct project and related delivery costs integral to developing the project or providing the activity. HOME-ARP project delivery costs may be paid, if eligible, by HOME-ARP funds provided under a written agreement for the activity or project and must not be paid with nonprofit operating expense or capacity building assistance.

- b. Capacity Building Assistance: Capacity building expenses are defined as reasonable and necessary general operating costs that will result in expansion or improvement of an organization's ability to successfully carry out eligible HOME-ARP activities. Eligible costs include salaries for new hires including wages and other employee compensation and benefits; costs related to employee training or other staff development that enhances an employee's skill set and expertise; equipment (e.g., computer software or programs that improve organizational processes), upgrades to materials and equipment, and supplies; and contracts for technical assistance or for consultants with expertise related to the HOME-ARP qualifying populations.

6. Administration and Planning \$ 895,457

City of Worcester Executive Office of Economic Development, Housing Development Division

The PJ may expend, for payment of reasonable administrative and planning costs, up to 15 percent of its HOME-ARP allocation. Reasonable administrative and planning costs for the HOME-ARP program include:

- 1. Reasonable costs of overall HOME-ARP program management, coordination, monitoring, and evaluation. Such HOME-ARP costs include, but are not limited to, necessary expenditures for the following:
 - a. Salaries, wages, and related costs of the PJ's staff. If a PJ charges costs to this category, the PJ may either include the entire salary and related costs allocable to the HOME-ARP program of each person whose primary responsibilities with regard to the HOME-ARP program involves program administration assignments, or the prorated share of the salary, wages, and related costs of each person whose job includes any program administrative assignments. A PJ may only use one of these two methods. Program administration includes:
 - i. Developing systems and schedules for complying with HOME-ARP program requirements, including systems to prevent a duplication of benefits among beneficiaries of HOME-ARP activities;
 - ii. Developing interagency agreements and agreements with entities receiving HOME-ARP funds;
 - iii. Monitoring HOME-ARP activities for progress and compliance with HOME-ARP program requirements;
 - iv. Preparing HOME-ARP reports and other documents related to the HOME-ARP program for submission to HUD; 19
 - v. Coordinating the resolution of audit and monitoring findings on HOME-ARP activities;
 - vi. Evaluating HOME-ARP program results against stated objectives in the HOME-ARP allocation plan, and vii. Managing or supervising persons whose primary responsibilities with regard to the HOME-ARP program include such assignments as those described above.
 - b. Travel costs incurred for official business in carrying out the HOME-ARP program.
 - c. Administrative services performed under third party contracts or agreements, including such services as general legal services, accounting services, and audit services.
 - d. Other costs for goods and services required for administering the HOME-ARP program, such as: rental or purchase of equipment, insurance, information systems necessary to track and implement beneficiaries of HOME-ARP activities in accordance with the requirements of this Notice, utilities, office supplies, and rental and maintenance (but not purchase) of office space.
 - e. Costs of administering HOME-ARP TBRA and HOME-ARP supportive services programs.

2. Staff and overhead costs of the PJ directly related to carrying out a HOME-ARP project, in accordance with 24 CFR 92.207(b).
3. The provision of information and other resources to residents and citizen organizations participating in the planning, implementation, or assessment of projects being assisted with HOME-ARP funds.
4. Activities to affirmatively further fair housing (AFFH) in accordance with 24 CFR 5.151 and the PJ's certification as required under this Notice and 24 CFR 5.152. The AFFH definition in HUD's Interim Final Rule entitled, "Restoring Affirmatively Furthering Fair Housing Definitions and Certifications" (86 FR 30779, June 10, 2021), as amended, at 24 CFR 5.151, and the AFFH certification requirement, at 24 CFR 5.152, available at <https://www.federalregister.gov/documents/2021/06/10/2021-12114/restoring-affirmatively-furthering-fair-housing-definitions-and-certifications>.
5. Indirect costs may be charged to the HOME-ARP program under a cost allocation plan prepared in accordance with 2 CFR part 200, subpart E, as amended.
6. Preparation of the HOME-ARP allocation plan as required in this Notice. Preparation includes the costs of public hearing, consultations, and publications.
7. Costs of complying with the applicable Federal requirements in 24 CFR part 92, subpart H. Project-specific environmental review costs may be charged as administrative or project costs in accordance with 24 CFR 92.206(d)(8) and is at the discretion of the PJ.

Contracts, or contract amendments, for all above activities will be executed once formal scopes of work have been reviewed and determined to be cost reasonable per 2 CFR 200.00 et. seq. (entitled "Uniform Administrative Requirements for Federal Awards") for requirements formerly set forth in O.M.B. Circular A-122 as well as full satisfaction of additional program eligibility criteria, including completion of Environmental Reviews per 24 CFR Part 58.

CITIZEN PARTICIPATION

In accordance with 24 CFR 91.105 (c) (3) for local governments, this proposed Substantial Amendment for use of HOME-ARP was made available for a 15-day citizen review and comment period from October 4, 2022 through October 18, 2022 and was published in the Worcester Telegram & Gazette on October 3, 2022. A second 15-day citizen review and comment period was also held from November 9, 2022 through November 23, 2022 and was published in the Worcester Telegram & Gazette on November 8, 2022. The Substantial Amendment (contained herein) was available during regular business hours between 8:30 a.m. and 5:00 p.m., Monday through Friday at the following locations:

- The City of Worcester Department of Housing and Neighborhood Development website- Main Page: <http://www.worcesterma.gov/housing-neighborhood-development>
- The City of Worcester's Community Development website, Policies & Procedures Page: <http://www.worcesterma.gov/housing-neighborhood-development/community-development-block-grants/policies-procedures>

A public hearing was also be held at 5:00 PM, Thursday, October 13, 2022 by the Executive Office of Office of Economic Development to discuss the Draft Substantial Amendment (contained herein). The hearing was held in City Hall Room 310B, 3rd Floor, City Hall, 455 Main Street, Worcester, MA 01608.

Public input, comments, and inquiries were directed to the City of Worcester's Executive Office of Economic Development as follows:

- By E-mail: Development@worcesterma.gov
- By Phone: (508) 799-1400

The final day for accepting public comments was on Friday, October 18, 2022.

HOME-ARP Allocation Plan

CONTENTS

HOME-ARP Allocation Plan.....	2
The consultation process - methods used and dates of consultation:	2
List the organizations consulted	3
Summarized feedback received and results of upfront consultation with these entities.....	4
Public Participation	4
Efforts to broaden public participation.....	6
Needs Assessment and Gaps Analysis	7
The size and demographic composition of qualifying populations within the PJ's boundaries	10
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	18
The unmet housing and service needs of qualifying populations:.....	26
Gaps within the current shelter and housing inventory as well as the service delivery system.....	28
Priority needs for qualifying populations	28
PJ determination of 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.....	28
The method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors	29
Description of how the PJ will administer eligible activities	29
Use of HOME-ARP Funding	30
Description of how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis	30
Description of 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	30
HOME-ARP Production Housing Goals.....	30
Estimate of the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation.....	31
Description of 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	31

HOME-ARP ALLOCATION PLAN

THE CONSULTATION PROCESS - METHODS USED AND DATES OF CONSULTATION:

On April 14, 2022 a webex meeting was held involving the Agencies and Organization listed below. During the HOME-ARP meeting we discussed the amount of HOME-ARP grant we were awarded, who the qualifying populations as defined by HUD are, how funds can be used, initial CoC data on the qualifying populations, and what the next steps would be. Also a survey was provided to participants to provide more detailed answers to questions regarding priorities and funding amounts. Survey results were due on April 29, 2022. (Survey results can be found as addendum to this plan).

After this initial consultation and data analysis an initial allocation plan was developed. On October 3, 2022 an advertisement was placed in the Worcester Telegram and Gazette for an initial 15-day public comment period, which occurred from October 4, 2022 through October 18, 2022. During this time there was also a public hearing at City Hall on October 13, 2022. Feedback provided by Central Massachusetts Housing Alliance (CMHA), the local CoC was for more funding to development of affordable housing.

Based on comments received and demand for development of affordable housing the breakdown of the funds were increased to affordable rental housing development and readvertised on the paper and the website. On November 8, 2022 another notice was placed in the paper and 15-day comment period was advertised, which occurred from November 9, 2022 through November 23, 2022. No further comment was received and the plan was submitted to HUD for review.

LIST THE ORGANIZATIONS CONSULTED

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Central Massachusetts Housing Alliance	CoC	Online Meeting/Survey	Webex Meeting/Survey
Worcester Housing Authority	Public Housing Agencies	Online Meeting/Survey	Webex Meeting/Survey
Catholic Charities	Homeless and domestic violence service providers	Online Meeting/Survey	Webex Meeting/Survey
South Middlesex Opportunity Council (SMOC)	Homeless and domestic violence service providers	Online Meeting/Survey	Webex Meeting/Survey
Net of Compassion (NOC)	Homeless and domestic violence service providers	Online Meeting/Survey	Webex Meeting/Survey
Living in Freedom Together (LIFT)	Homeless and domestic violence service providers	Online Meeting/Survey	Webex Meeting/Survey
Community Health Link (CHL)	Homeless and domestic violence service providers	Online Meeting/Survey	Webex Meeting/Survey
Abby's House	Homeless and domestic violence service providers	Online Meeting/Survey	Webex Meeting/Survey
Dismas House	Homeless and domestic violence service providers	Online Meeting/Survey	Webex Meeting/Survey
Friendly House	Homeless and domestic violence service providers	Online Meeting/Survey	Webex Meeting/Survey
Genesis Club	Homeless and domestic violence service providers	Online Meeting/Survey	Webex Meeting/Survey
Our Fathers House	Homeless and domestic violence service providers	Online Meeting/Survey	Webex Meeting/Survey
Veterans Inc.	Veterans Group that address the needs of the qualifying populations	Online Meeting/Survey	Webex Meeting/Survey
Family Health Center	Public agencies that address the needs of the qualifying populations	Online Meeting/Survey	Webex Meeting/Survey
YWCA	Public agencies that address the needs of	Online Meeting/Survey	Webex Meeting/Survey

	the qualifying populations		
Eliot	Public agencies that address the needs of the qualifying populations	Online Meeting/Survey	Webex Meeting/Survey
LUK	Public agencies that address the needs of the qualifying populations	Online Meeting/Survey	Webex Meeting/Survey
AIDS Project Worcester (APW)	Public agencies that address the needs of the qualifying populations	Online Meeting/Survey	Webex Meeting/Survey
Open Sky	Public agencies that address the needs of the qualifying populations	Online Meeting/Survey	Webex Meeting/Survey
Office of Human Rights	Fair Housing, Civil Rights, and needs of persons with Disabilities	Online Meeting/Survey	Webex Meeting/Survey
Worcester Legal Aid	Fair Housing and Civil Rights	Online Meeting/Survey	Webex Meeting/Survey

SUMMARIZED FEEDBACK RECEIVED AND RESULTS OF UPFRONT CONSULTATION WITH THESE ENTITIES

After the meeting and the survey, the consultation process resulted in funding recommendations and prioritization of the following categories:

- 1 Production or Preservation of Affordable Rental Housing
- 2 Supportive Services, Homeless Prevention Services, and Housing Counseling
- 3 Tenant-Based Rental Assistance (TBRA)
- 4 Purchase and Development of Non-Congregate Shelter
- 5 Nonprofit Operating and Capacity Building Assistance (capped at 5% of grant)

In addition, the comments received mentioned or were in support of the following eligible activities:

Production or Preservation of Affordable Rental Housing mentioned 6 times
 Supportive Services, Homeless Prevention Services, and Housing Counseling mentioned 1 time
 Tenant-Based Rental Assistance (TBRA) mentioned 1 time
 Purchase and Development of Non-Congregate Shelter mentioned 1 time
 Nonprofit Operating and Capacity Building Assistance (capped at 5% of grant) not mentioned
 (Survey results attached as addendum)

PUBLIC PARTICIPATION

In accordance with Section V.B of the Notice (page 13), PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs

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

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

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

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

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

- ***Date(s) of public notice: 10/3/2022 second 11/8/2022***
- ***Public comment period: start date – 10/4/2022 end date – 10/18/2022***
- ***Second Public comment period: start date – 11/9/2022 end date – 11/23/2022***
- ***Date(s) of public hearing: 10/13/2022***

Describe the public participation process:

In accordance with 24 CFR 91.105 (c) (3) for local governments, this proposed Substantial Amendment for use of HOME-ARP funds, was made available for a 15-day citizen review and comment period from October 4, 2022 through October 18, 2022 as was published in the Worcester Telegram & Gazette on October 3, 2022. The Substantial Amendment was made available during regular business hours between 8:30 a.m. and 5:00 p.m., Monday through Friday at the following locations:

- The City of Worcester Department of Housing and Neighborhood Development website- Main Page: <http://www.worcesterma.gov/housing-neighborhood-development>
- The City of Worcester’s Community Development website, Policies & Procedures Page: <http://www.worcesterma.gov/housing-neighborhood-development/community-development-block-grants/policies-procedures>

A public hearing was also held at 5:00 PM, Thursday, October 13, 2022 by the Executive Office of Office of Economic Development to discuss the Draft Substantial Amendment. The hearing was held in City Hall Room 310B, 3rd Floor, City Hall, 455 Main Street, Worcester, MA 01608.

Public input, comments, and inquiries were directed to the City of Worcester’s Executive Office of Economic Development as follows:

- By E-mail: Development@worcesterma.gov
- By Phone: (508) 799-1400

EFFORTS TO BROADEN PUBLIC PARTICIPATION

In addition to the outreach listed above, the original list of agencies who serve qualifying populations were re consulted to make them aware of the opportunity to be consulted again. Specifically the Office of Human Rights was invited to comment. The City also published two 15-day comment periods for these funds, which is above and beyond the requirements. In addition the public hearing had interpreter services available and the location was ADA accessible. We have also followed the City of Worcester's LEP plan which can be found here and summarized below:

[Limited English Proficiency | City of Worcester, MA \(worcesterma.gov\)](https://www.worcesterma.gov/limited-english-proficiency)

WHAT IS AN LEP PERSON?

An LEP person is someone who does not speak English as their primary language and has limited ability to read, speak, and/or write English at a level that permits him/her to interact efficiently with English speakers or documents without language assistance.

HOW WILL THE CITY OF WORCESTER ASSIST AN LEP PERSON?

Through a partnership with Ascentria Language Bank, City employees have access to telephonic and face to face interpreters in 90 different languages. Community members can request an interpreter at any time. Access to telephone interpreters will take no longer than five minutes and face to face interpreters will need to be requested at least 48 hours in advance.

REMEMBER

The City of Worcester does not discriminate on the basis of disability in admission to, access to or operation of its programs, services or activities.

EQUAL ACCESS TO PUBLIC MEETINGS

All City sponsored public meetings and hearings must be held in locations that are accessible to people with disabilities, including people who use wheelchairs.

Persons with disabilities are invited to make their needs known to program staff or to the ADA Coordinator should they need:

1. Auxiliary aids and services for effective communication or
2. Written materials in alternative formats, or
3. Reasonable modifications in policies and procedures in order to access programs and activities of the City of Worcester.

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

Initial comment period comment verbally received from CMHA that more funding should be allocated to the development of affordable housing category. No Comments were received during the second comment period.

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

All comments received were accepted.

NEEDS ASSESSMENT AND GAPS ANALYSIS

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.

Template:

OPTIONAL Homeless Needs Inventory and Gap Analysis Table



HOME-ARP allocation plan Needs Assessment and GAP Analysis Homeless Needs Inventory and Gap Analysis Table

	Homeless											
	Current Inventory(HIC)				Homeless Popluation(PIT)					Gap Analysis		
	Family		Adults	Vets	People in HH W/Child	Households w/children	Adult only	Vets	DV	With Child		Adult Only
	Beds	Units	Beds	Beds						Beds	Units	Beds
Emergency Shelter	594	183	135	21								
Transitional Housing	88	30	225	115								
Permanent Supportive Housing	232	87	222	0								
Other Permanent Housing ⁴	0	0	3	0								
Sheltered Homeless					345	104	154	15	12			
Unsheltered Homeless					0	0	178	12	20			
Total Sheltered and Unsheltered					345	104	332	27	32			
Current Gap ³										-249 ¹	-79 ¹	197 ²
1	The bed and unit inventory figures represent a max capacity. At the time of the PIT Count congregate family programs were operating at a reduced capacity due to the COVID emergency.											
2	The Adult bed count of 135 that this is based on does not include 50 beds that are classified as seasonal at Hotel Grace. Were those additional 50 shelter beds included, the gap would be 147 .											
3	The gap is calculated as the difference between the nubmer of City of Worcester Emergency Shelter openings less the number of people in emergency shelter or unsheltered on the night of the PIT.											
4	As of September 2021 an additional 73 OPH openings became available with the advent of the Emergency Housing Vouchers at the Worcester Housing Authority.											

Data Sources: 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation with CMHA the CoC

OPTIONAL Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Level of Need
	# of Units	# of Households	# of Households
Total Rental Units	42,040		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	17,195		
Rental Units Affordable to HH at 50% AMI (Other Populations)	7,635		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		11,370	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		5,805	
0%-30% AMI Renter HH w/ with more than 1.5 persons per room (At-Risk of Homelessness)			210
0%-50% AMI Renter HH w/ with more than 1.5 persons per room (At-Risk of Homelessness)			280

Data Source: Comprehensive Housing Affordability Strategy (CHAS)

THE SIZE AND DEMOGRAPHIC COMPOSITION OF QUALIFYING POPULATIONS WITHIN THE PJ'S BOUNDARIES

Homeless as defined in 24 CFR 91.5

The First HOME-ARP Qualifying Population includes Homeless, as defined in 24 CFR 91.5 Homeless (1), (2), or (3):

- (1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - (i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
 - (ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or
 - (iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;
- (2) An individual or family who will imminently lose their primary nighttime residence, provided that:
 - (i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
 - (ii) No subsequent residence has been identified; and
 - (iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks needed to obtain other permanent housing;
- (3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition

In regards to this qualifying population, most of the data was gathered with the assistance of the Central Massachusetts Housing Alliance (CMHA), who is the designated CoC for Worcester County. The data gathered was more specific to the City of Worcester and the full report is attached as an addendum item to this report. Their summarization of the homeless population is as follows: "In System Performance Measures reported to HUD this year, 2,150 people were served in shelter and outreach programming in Worcester County this year and that this reflects a very direct need. Over 10,000 applicants are on the Worcester Housing Authority waiting list. Worcester is also host to a Homeless Prevention program where folks at risk of homelessness, due to rental and utility arrearages and issues reflecting stability are served. The Housing Counseling program in Worcester has served more than 12,000 clients annually in each of the last two years." The table needs table produced by the CoC there are 449 clients in the shelter system, which shows a need in the community.

In addition to the above data from the CoC on the Homeless population, the unaccompanied youth population was investigated. In a report from the Massachusetts Commission on Unaccompanied Homeless Youth on homelessness, housing instability, and access to services among youth and young adults under the age of 25 in the Commonwealth there was data relating to Worcester and/or Worcester County. In the report there were 50 Youth from Worcester alone who were identified from the 2019 survey. Of these 50 youth who participated in the survey, 29 met the commission's definition of an

unaccompanied homeless youth or young adult (UHY) as a person who is 24 years of age or younger; and is not in the physical custody or care of a parent or legal guardian; and lacks a fixed, regular, and adequate nighttime residence. Below were two tables on the population that identified overall demographics and reasons for being unaccompanied youth or young adult.

At Risk of Homelessness as defined in 24 CFR 91.5

The Second HOME-ARP Qualifying Population includes the at risk of homelessness category as an individual or family that has an annual income below 30 percent of median family income for the area, as determined by HUD, does not have sufficient resources or support networks, and meets one of the following conditions (economically stressed):

- (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
- (B) Is living in the home of another because of economic hardship;
- (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
- (D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low income individuals;
- (E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;
- (F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
- (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan.

Comprehensive Housing Affordability Strategy ("CHAS") data

Summary Level: City

Data for: Worcester city; Massachusetts

Year Selected: 2015-2019 ACS

Income Distribution Overview	Owner	Renter	Total
Household Income <= 30% HAMFI	3,040	17,195	20,235
Household Income >30% to <=50% HAMFI	3,645	7,635	11,280
Household Income >50% to <=80% HAMFI	5,145	8,065	13,210
Household Income >80% to <=100% HAMFI	3,830	3,330	7,160
Household Income >100% HAMFI	13,890	5,815	19,705
Total	29,555	42,040	71,595
Housing Problems Overview 1	Owner	Renter	Total
Household has at least 1 of 4 Housing Problems	8,780	21,245	30,025
Household has none of 4 Housing Problems OR cost burden not available	20,775	20,795	41,570
Total	29,555	42,040	71,595
Severe Housing Problems Overview 2	Owner	Renter	Total
Household has at least 1 of 4 Severe Housing Problems	4,115	12,175	16,290
Household has none of 4 Severe Housing Problems OR cost burden not available	25,435	29,865	55,300
Total	29,555	42,040	71,595
Housing Cost Burden Overview 3	Owner	Renter	Total
Cost Burden <=30%	20,995	19,615	40,610
Cost Burden >30% to <=50%	4,770	9,490	14,260
Cost Burden >50%	3,435	10,700	14,135
Cost Burden not available	355	2,225	2,580
Total	29,555	42,040	71,595
Income by Housing Problems (Owners and Renters)	Household has at least 1 of 4 Housing Problems	Household has none of 4 Housing Problems OR cost burden not available no other problems	Total
Household Income <= 30% HAMFI	13,885	6,350	20,235
Household Income >30% to <=50% HAMFI	8,225	3,055	11,280
Household Income >50% to <=80% HAMFI	5,615	7,590	13,210
Household Income >80% to <=100% HAMFI	1,280	5,880	7,160
Household Income >100% HAMFI	1,015	18,690	19,705
Total	30,025	41,570	71,595
Income by Housing Problems (Renters only)	Household has at least 1 of 4 Housing Problems	Household has none of 4 Housing Problems OR cost burden not available no other problems	Total
Household Income <= 30% HAMFI	11,370	5,825	17,195
Household Income >30% to <=50% HAMFI	5,805	1,830	7,635
Household Income >50% to <=80% HAMFI	3,435	4,625	8,065
Household Income >80% to <=100% HAMFI	345	2,985	3,330
Household Income >100% HAMFI	290	5,525	5,815
Total	21,245	20,795	42,040
Income by Housing Problems (Owners only)	Household has at least 1 of 4 Housing Problems	Household has none of 4 Housing Problems OR cost burden not available no other problems	Total
Household Income <= 30% HAMFI	2,515	525	3,040
Household Income >30% to <=50% HAMFI	2,420	1,225	3,645
Household Income >50% to <=80% HAMFI	2,180	2,965	5,145
Household Income >80% to <=100% HAMFI	935	2,895	3,830
Household Income >100% HAMFI	725	13,165	13,890
Total	8,780	20,775	29,555
Income by Cost Burden (Owners and Renters)	Cost burden > 30%	Cost burden > 50%	Total
Household Income <= 30% HAMFI	13,710	10,840	20,235
Household Income >30% to <=50% HAMFI	8,090	2,690	11,280
Household Income >50% to <=80% HAMFI	5,220	515	13,210
Household Income >80% to <=100% HAMFI	870	15	7,160
Household Income >100% HAMFI	510	80	19,705
Total	28,400	14,135	71,595
Income by Cost Burden (Renters only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income <= 30% HAMFI	11,205	8,895	17,195
Household Income >30% to <=50% HAMFI	5,685	1,655	7,635
Household Income >50% to <=80% HAMFI	3,085	135	8,065
Household Income >80% to <=100% HAMFI	130	0	3,330
Household Income >100% HAMFI	85	15	5,815
Total	20,190	10,700	42,040
Income by Cost Burden (Owners only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income <= 30% HAMFI	2,505	1,945	3,040
Household Income >30% to <=50% HAMFI	2,400	1,030	3,645
Household Income >50% to <=80% HAMFI	2,135	380	5,145
Household Income >80% to <=100% HAMFI	740	15	3,830
Household Income >100% HAMFI	425	65	13,890
Total	8,205	3,435	29,555

1. The four housing problems are: incomplete kitchen facilities; incomplete plumbing facilities more than 1 person per room; and cost burden greater than 30%.

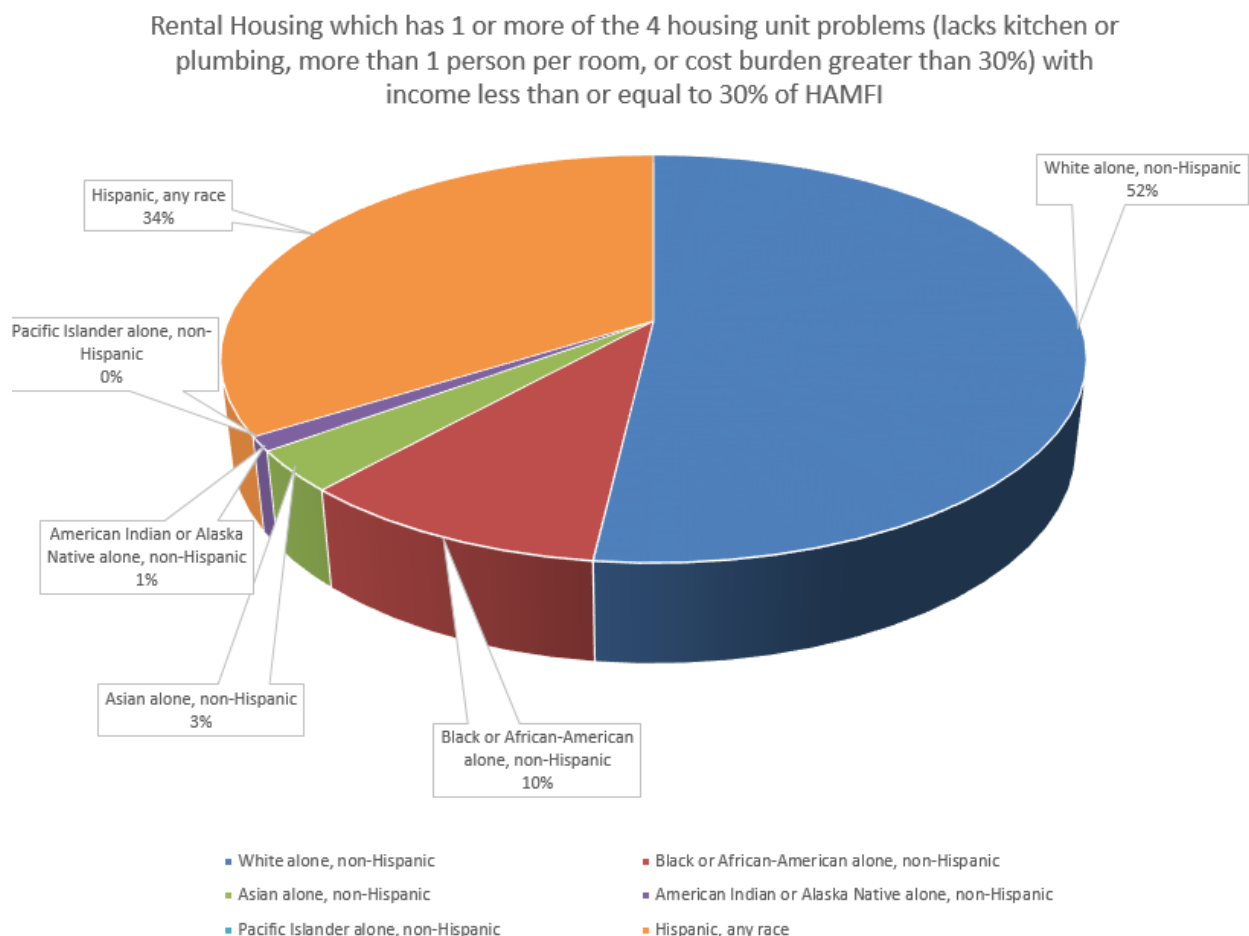
2. The four severe housing problems are: incomplete kitchen facilities; incomplete plumbing facilities; more than 1 person per room; and cost burden greater than 50%.

3. Cost burden is the ratio of housing costs to household income. For renters- housing cost is gross rent (contract rent plus utilities)

From the above 2015-2019 CHAS data there are 11,370 households that have incomes at or below 30% of the area median income (AMI) and also have at least 1 of the 4 severe housing problems. These severe housing problems are as follows:

- Having incomplete kitchen facility,
- Having incomplete plumbing facility,
- Having more than 1 person per room, and/or
- Being cost burdened greater than 50%

These 11,370 households can be considered economically stressed and in need of support so as not to enter the homelessness system. In regards to the demographics of this population, please see below pie chart which provides that breakdown. Reaching further into the data there are 210 households that have incomes below the AMI and also lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room. This population defined by HUD and identified in the CHAS data exists in the City of Worcester and needs assistance to remain housed.



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

The third HOME-ARP Qualifying Population includes any individual or family who is fleeing or is attempting to flee, domestic violence (DV), dating violence, sexual assault, stalking, or human trafficking. In the City of Worcester there is an Advisory Committee on the Status of Women whose stated goal is to formulate, encourage, promote and monitor programs and policies relating to the status of women in the City of Worcester. In May of 2022 the committee presented a report titled, “Gender-Based Violence in Worcester”, which provided statistics which captured most of the size and demographics of this qualifying population (<http://www.worcesterma.gov/uploads/4f/da/4fda10ab443073d20636f37bc069e7fe/gender-based-violence.pdf>). Below are some excerpts from the report.

Fleeing or attempting to flee domestic violence

“Similar to other forms of gender-based violence, Intimate Partner Violence (IPV) is underreported. Not all survivors seek support from a domestic violence organization, either because they are unaware of the free services available, or they are not ready to engage, or do not feel they need the service. Many survivors do not report incidents to the police for fear of retribution by the perpetrator or in some cases fear of losing their children to state agencies.

The YWCA of Central Massachusetts is involved in multiple intervention services through community partnerships and initiatives, including Worcester Intervention Network (WIN), Safety Assistance for Every Person Leaving Abuse Now (SAFEPLAN), Domestic Violence High Risk Team (DVHRT).

WIN FY 21		SAFEPLAN			DVHRT FY 21	
Duplicated	56	FY 19	FY 20	FY 21	Tracked	4,053
Unduplicated	1,161	1,214	1,061	917	Watched	1,407

The pandemic caused a decline or minimal increases in utilization of services. SAFEPLAN had a 13 percent decrease over the prior year, while the WIN program only had 28 new participants during the 2021 fiscal year.

However, the level of service utilization is not reflective of the scope of the problem. Firstly, the number of cases tracked only capture the victims who use these intervention services. The total number of cases is estimated to be higher. Secondly, the service utilization does not measure the intensity of the violence. For example, according to the YWCA, with WIN, there were “multiple calls for the same address within a short period of time as well as a quick escalation in the level and intensity of violence. In a few reports the victims shared that they did not tell the full story the first time the police responded, while they were sheltering in place with the abuser.”

City of Worcester Department of Health & Human Services (HHS) is funded with Emergency Solution funds to engage in Street Outreach activities to support homeless outreach and engagement program. Services will include engagement of target populations, case management services, needs assessment evaluation and connecting target population to other community based resources. During the period of July 1, 2021 through June 30, 2022, HHS connected 30 individuals to community based services/agencies. The CoC also reported via the homeless needs analysis table that 32 individuals (12 sheltered/ 20 unsheltered) are victims of domestic violence.

Human trafficking

“Over the last fiscal year, Living in Freedom Together (LIFT) saw an increase in people seeking services due to COVID-19, with 130 new individuals serviced. 120 were identified as survivors of sexual exploitation and more than 50 were survivors of some form of trafficking. Of the 120 survivors, 7 were minors. Part of the increase in people being serviced was the expansion of LIFT’s services, including youth mentorship and the opening of Jana’s Place, a new 15-bed women’s shelter.

87% of LIFT participants reported that in addition to daily exploitation they were experiencing another form of interpersonal violence such as homelessness and substance use disorder, which further perpetuates the cycle of abuse.

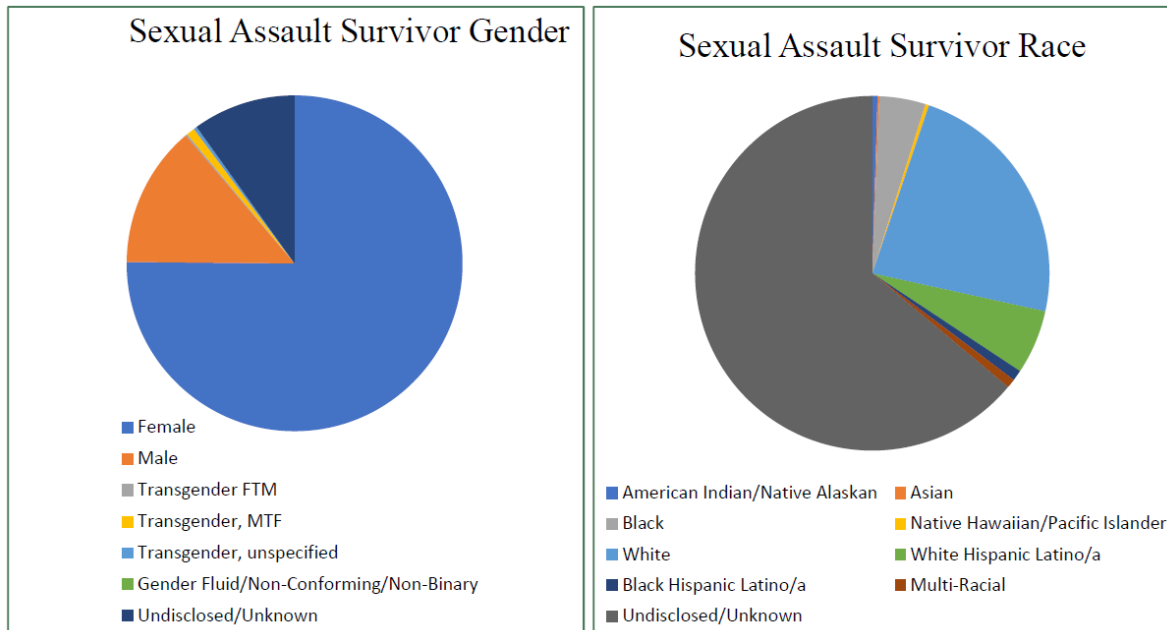
According to Attorney Beth Keeley, Human Trafficking Division Chief, MA Attorney General’s Office, human trafficking and exploitation affects all communities and demographics. Certain issues can make people more vulnerable to exploitation: prior traumatization, poverty or socio-economic struggles, racism, substance use disorder and other disabilities are just a few.

The population LIFT serves reflects that it is the most vulnerable and marginalized in our communities who are exploited, including women and girls of color, those with low-income backgrounds, and LGBTQ+ youth. In FY 2021, the people LIFT served were 25% Hispanic or Latinx, 20% Black or African-American, 6% multiple races, 4% Native, Hawaiian, or Pacific Islanders, and 45% White. LIFT served 22 LGBTQIA+ individuals in FY 2021, 8 of whom identified as gender-expansive. This is most likely severely underreported due to not being able to explore and not feeling safe in their identities yet.”

Dating violence, stalking and sexual assault

“618 people received support services for sexual violence from Pathways for Change in FY 2021, out of Worcester alone. Within Central Massachusetts as a whole, the organization serviced over 2,000 people.

Sexual violence affects everyone. Pathways for Change tracked the following demographic information based on voluntarily provided disclosures from survivors they serviced. In FY 2021, 10-15% of survivors that volunteered information were people of color, had mental illnesses, or identified within the LGBTQIA+ community.”



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

The fourth HOME-ARP Qualifying Population includes other populations where providing supportive services or assistance under section would prevent the family’s homelessness or would serve those with the greatest risk of housing instability. The two different definitions are below:

1) **Other families requiring services or housing assistance to prevent homelessness** is defined as households (i.e., individuals and families) who have previously been qualified as “homeless” as defined in 24 CFR 91.5, are currently housed due to temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed, and who need additional housing assistance or supportive services to avoid a return to homelessness.

2) At **greatest risk of housing instability** is defined as household who meets either paragraph (i) or (ii) below:

(i) has annual income that is less than or equal to 30% of the area median income, as determined by HUD and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs);

(ii) has annual income that is less than or equal to 50% of the area median income, as determined by HUD, AND meets one of the following conditions from paragraph (iii) of the “At risk of homelessness” definition established at 24 CFR 91.5:

(A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;

(B) Is living in the home of another because of economic hardship;

(C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;

(D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low income individuals;

(E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;

(F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or

(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan.

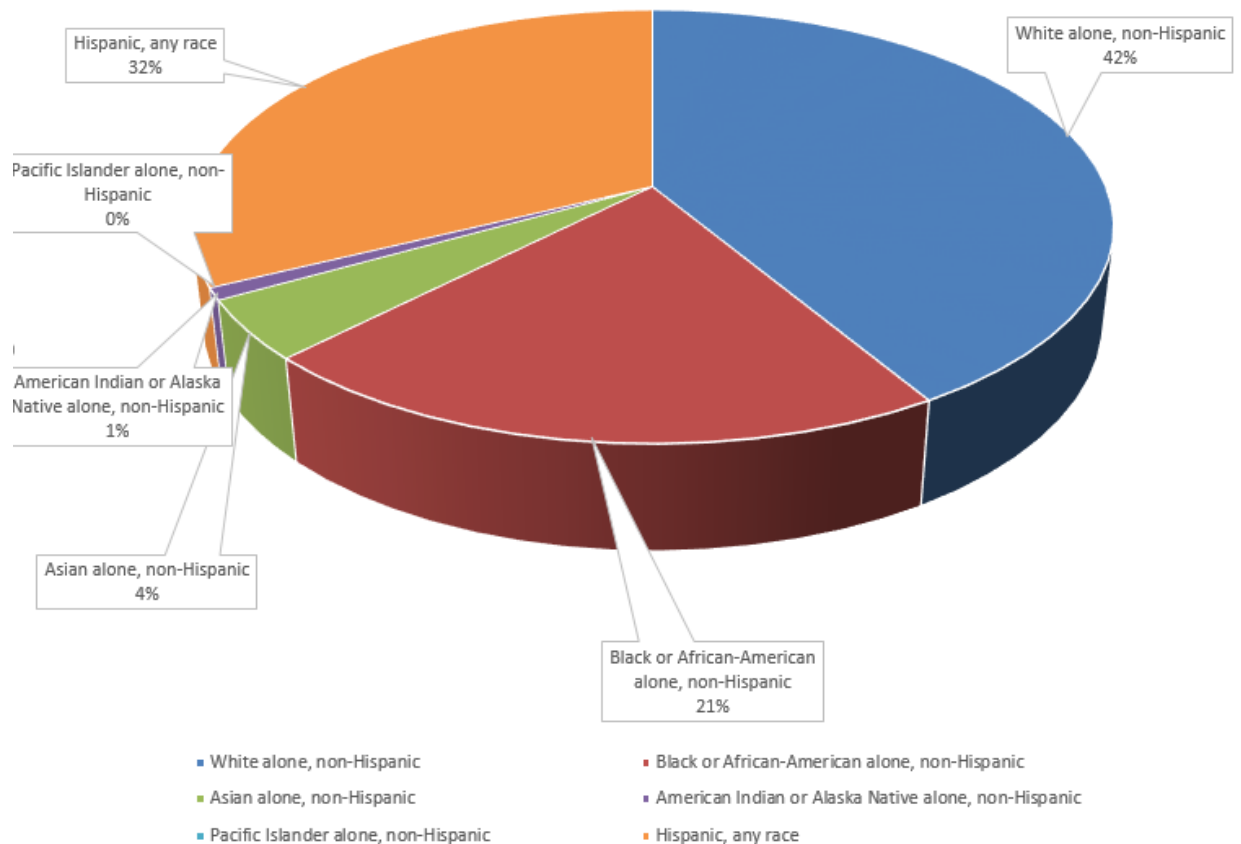
Regarding the **other families requiring services or housing assistance to prevent homelessness** category there isn't specific data, however we can infer by the demand for program such as the emergency rental assistance program funded by ARPA which addressed housing rent arrears. Based on the demand and households served, there are at least 800 households who received emergency rental assistance, who may need to continue to receive assistance to not fall into the homelessness system.

In regards to the **greatest risk of housing instability** category we can examine the following data from the CHAS table. From the above 2015-2019 CHAS data there are 5,805 households that have incomes greater than 30% area median income (AMI) to at or below 50% of the area median income (AMI) and also have at least 1 of the 4 severe housing problems. These severe housing problems are as follows:

- Having incomplete kitchen facility,
- Having incomplete plumbing facility,
- Having more than 1 person per room, and/or
- Being cost burdened greater than 50%

These 5,805 households can be considered economically stressed and in need of support so as not to enter the homelessness system. In addition to that category HUD also identified households who have income below 30% of AMI and also are cost burdened above 50%. For rental households this means that these households are paying more than 50% of their income to rental costs. This classifies both groups into the category of having greatest risk of housing instability. In regards to the demographics of this population, please see below pie chart which provides that breakdown. Reaching further into the data there are 70 households that have incomes between 30% and 50% AMI and also lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room. This population defined by HUD and identified in the CHAS data exists in the City of Worcester and needs assistance to remain housed.

Rental Housing which has 1 or more of the 4 housing unit problems (lacks kitchen or plumbing, more than 1 person per room, or cost burden greater than 30%) with income greater than 30% but less than or equal to 50% of HAMFI



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

Homeless as defined in 24 CFR 91.5

Resources currently available for the homeless population come from various sources. Below are the main program/agencies funded in the City of Worcester from the CoC, City of Worcester, and Federal/State Resources:

Central Massachusetts Housing Options-Worcester East Side CDC

Application Amount: \$60,400.00 (supportive services, operations, admin)

Permanent Supportive Housing program with a capacity to serve 8 severely mentally ill individuals in Worcester.

Coordinated Assessment Program-South Middlesex Opportunity Council, Inc.

Application Amount: \$246,602.00 (supportive services, ad min)

Supportive Services Only for Coordinated Entry, the project provides assessment services to over 1,000 unique individuals per year. The target population for the program is homeless unaccompanied adult men and women.

Friendly Family Housing-Friendly House, Inc.

Application Amount: \$456,937.00 (leasing, rental assistance, supportive services, admin)

Permanent Supportive Housing program with a capacity to serve 16 families in Worcester.

Genesis Supportive Housing-Genesis Clubhouse, Inc.

Application Amount: \$167,840.00 (rental assistance, supportive services, admin)

Permanent Supportive Housing program with capacity to serve 12 severely mentally ill individuals in Worcester.

Green House-Community Healthlink, Inc.

Application Amount: \$135,709.00 (supportive services, operating, admin)

Permanent Supportive Housing program with capacity to serve 10 individuals with substance abuse issues in Worcester.

Healthy Impact Supportive Housing-Community Healthlink, Inc.

Application Amount: \$131,040.00 (rental assistance, supportive services, admin)

Permanent supportive housing program with capacity to serve 28 families and individuals (containing at least 1 household member with HIV/AIDS} in Worcester.

PSH-50 Oriol-Worcester Community Housing Resources, Inc.

Application Amount: \$290,826 (rental assistance, admin)

Permanent Housing Project to serve 20 individuals with project based rental assistance at 50 Oriol Dr.

Safe Haven-Community Healthlink, Inc.

Application Amount: \$370,862.00 (Leasing, supportive services, admin)

Safe Haven project with capacity to serve 13 mentally ill individuals in Worcester.

Worcester Transitional Housing Consortium-Friendly House

Application Amount: \$477,145.00 (leasing, supportive services, operating, admin)

Transitional Housing program consisting of 2 projects with combined capacity to serve 18 families in Worcester.

The City of Worcester annually funds programs and shelters through the Emergency Solutions Grant (ESG) Program. Below is a summary of the latest programs funded related to the homelessness or prevention of homelessness:

Agency	Activity Funded	Award
Open Sky	Rapid Re-Housing	\$42,079.79
Veteran's Inc.	Emergency Shelter	\$16,031.82
South Middlesex Opportunity Council	Rapid Re-Housing-Tenant & Project Based	\$60,000.00
Net of Compassion	Emergency Shelter – Overnight Seasonal	\$75,000.00
South Middlesex Opportunity Council	Emergency Shelter Case Management	\$50,000.00
Central Massachusetts Housing Alliance	Homeless Management Info. System (HMIS)	\$15,000.00

City of Worcester Department of Health & Human Services (HHS)	Street Outreach	\$40,224.44
Aids Project Worcester	Street Outreach	\$24,500.00

LUK has six year round emergency beds for young adults; these are the only young adult specific emergency beds in the Worcester County region. LUK also has the capacity to place young people in hotels as needed via agreements that guarantee access for young people via accounts with Hampton Inn/ Courtyard Marriott in Worcester and Motel 6 in Leominster/North County. LUK Outreach staff frequents the shelter and motel sites to ensure young adults are receiving developmentally appropriate services and to maintain communication and relationships with the staff. Additionally, staff work to help the young adult identify possible family or friends to stay with, providing financial (when indicated) and case management support during their stay

Veterans Inc, Homeless Shelter Operations: \$100,000.00

Veterans Inc. will expand their shelter operations with 12 additional shelter beds. The COVID-19 Pandemic has placed considerable strain on the city's homeless population. Existing shelter operations did not allow for the physical distancing necessary to prevent the spread of the disease. Funds will be used for the staffing, supplies and operations of these temporary shelters including city health and medical staffing, shelter sub-recipient operations, staffing, meals, equipment, communication devices, cleaning and other eligible items.

Restorer of Broken Bridges, Homeless Shelter Operations: \$300,000 ESG-CV

The COVID-19 Pandemic has placed considerable strain on the city's homeless population. Existing shelter operations did not allow for the physical distancing necessary to prevent the spread of the disease. In March 2020, the City opened multiple temporary shelter operations at schools, hotels and churches which would each house a maximum of 25 people to allow for social distancing. This approach has allowed for physical separation of this vulnerable population. Two of the shelters have been designated for occupants that have tested positive for the virus. Funds will be used for the staffing, supplies and operations of these temporary shelters including city health and medical staffing, shelter sub-recipient operations, staffing, meals, equipment, communication devices, cleaning and other eligible items.

Homelessness Street Outreach and Case Management Services: \$178,666.27 ESG-CV

City of Worcester Department of Health and Human Services

The City's Health and Human Services Division has provided expanded street outreach services to ensure the 200 or more homeless individuals have been able to access COVID-19 shelter services. Additional case management capability is required to ensure housing, medical, nutritional and other basic needs are being met. This funding will provide both of these critical services to the city's homeless population.

Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking

"Over the past 5 years, the City of Worcester's Executive Office of Economic Development

has administered more than \$2 million through various city grants for housing and shelter that target and support women, victims of domestic violence, and victims of sex trafficking.”

<i>Organization</i>	<i>Program</i>	<i>Amount</i>	<i>Term</i>	<i>Grant Type</i>
<i>LIFT</i>	<i>HARBOR program</i>	<i>\$400,000</i>	<i>12/1/20-8/31/22</i>	<i>Emergency Solutions Grants COVID-19 (ESG CV2)</i>
<i>LIFT</i>	<i>Transitional Assistance Program (TAP)</i>	<i>\$41,453</i>	<i>7/1/21-6/30/22</i>	<i>ESG CV2</i>
<i>Abby's House</i>	<i>Rehab and expand their Women's Housing to 55 units</i>	<i>\$550,000</i>	<i>Completed in 2019</i>	<i>HOME funds</i>
<i>Abby's House</i>	<i>Rehab and expand their Women's shelter to 14 units</i>	<i>\$700,000</i>	<i>Committed in 2021</i>	<i>ESG-CV/Community Development Block Grant CARES (CDBG-CV)</i>
<i>YWCA</i>	<i>Rehab and expand their Women's Housing to 45 units</i>	<i>\$440,000</i>	<i>Completed In 2021</i>	<i>HOME funds</i>

LIFT

HARBOR Program: ESG CV funds were awarded to support the operation of a 15 bed shelter and drop-in day program for women. From December 1, 2020, to December 21, 2021, 140 people were served in the HARBOR program. Case Managers provide intense case management services, peer mentorship, access to healthcare and treatment programs, advocacy in the court systems, access to stabilization resources (SNAP, SSI, etc.), and rapid rehousing support. A Nurse Practitioner is provided for medical service to program participants. The HARBOR Program will participate in the Homeless Management Information System and the funds will assist with the cost of payroll and services for both the shelter and day program. The expected outcome is to provide up to 150 people access to intensive case management. The beneficiaries are women experiencing homelessness, in the commercial sex trade, having substance or opioid use disorder, and/or mental health disorders.

Transitional Assistance Program (TAP): ESG funds will serve 10 survivors of the sex trade as they transition into permanent housing. The program will provide participants with up to six months of rental assistance in a step down model: 3 months of 100% rental assistance and 3 months of 40% rental assistance. The outreach and advocacy specialist will provide intensive case management focused on assisting participants in stabilizing their transition and supporting their independence through connections with community-based services and through direct service and by facilitation support groups. The direct service and support groups cover issues like life-management skills, job training, the social-emotional impacts of early recovery, self-advocacy, and the importance of fostering community connections.

Abby's House

Abby's House provides a warm, welcoming and safe place for women who are homeless due to a lack of safe affordable housing, domestic violence, eviction, natural disaster, emotional crisis, economic crisis, or unemployment. They help enable women in need of housing to develop a network of appropriate services and supports to prevent future homelessness. Abby's House is the

largest housing provider of its kind in Worcester. The staff at Abby's House works directly with each woman to provide quality long-term permanent housing and supportive services on-site. The housing and advocacy Abby's provides operates year-round, seven days a week, 24 hours a day. Abby's House also provides outreach services to health and fitness facilities and programs, meals and a food pantry for women who are unable to afford or access food, clothing vouchers for use in its thrift shop, transportation to medical appointments and in-home parenting support for households headed by women.

Rehab and expand their Women's Housing to 55 units: Abby's House's is a valuable resource to low-income women in Worcester. The building previously had 53 Single Room Occupancy Units (SROs) for women, and through the renovation two SROs were added, to create 55 rentable units with one SRO set aside as a manager's unit. Abby's House is an important provider of supportive housing for women in Worcester and this renovation helped them to maintain their stock of housing with supportive services. The existing buildings were structurally sound, but had a number of deferred maintenance items and inefficient building envelopes that were updated with these funds.

Rehab and expand their Women's shelter to 14 units: Over the last two years, Abby's House as done extensive work around trauma-informed care. Trauma-informed care seeks to realize the widespread impact of trauma and understand pathways for recovery, as well as the importance of providing safety, choice, collaboration, trustworthiness and empowerment. Over 80% of the women served by Abby's House have experienced some form of trauma during their lifetime including domestic or family violence, sexual or physical abuse, the unexpected death of a loved one, mental or physical health issues, and more. While these can lead a woman to become homeless a path to permanent supportive housing helps hem pull through and allows them to take steps to begin healing and find a bright, new beginning. The current Abby's House shelter is able to hold up to 9 women, and has remained largely unaltered since the doors first opened. The building needs substantial structural repairs as well as an updated design in order to meet the needs of today's women and children. This will be done in part by making the shelter accessible, as well as incorporating a trauma-informed design throughout the renovation, creating environments that positively affect shelter guest's sense of identity and worth, dignity, and their empowerment. The current shelter will also be expanded in order to create more bedrooms, especially for families of different sizes, along with new play spaces. COVID-19 has also impacted the way that Abby's House provides shelter and this renovation will allow for each guest to have their own room with a door that closes. The renovation will also provide fresh air to the building making the space safer over the long term for guests and staff. The City of Worcester is supportive of the project and has provided the Agency a commitment of funds, which they can use to leverage other State and Federal resources.

YWCA

Rehab and expand their Women's Housing to 45 units: The funding provided by the City of Worcester allowed for the preservation and rehabilitation of the 41 existing units, while also reconfiguring the space to allowed for the addition of four more units for a total of 45 SRO's. The Transitional Housing Program, or THP, provides safe, secure, supportive housing for low-income women. Residents of this program typically have incomes at, or lower than, 30-60% of average median income. The program is designed to help each resident achieve self- sufficiency and permanent, independent housing within two years. In support of this objective, THP was purposeful in its design of SROs with shared kitchens and common areas to encourage and foster

community among residents. THP provides each resident with an individualized service plan, which includes the following: case management, advocacy, job search/ placement, permanent housing search, medical and legal referrals, and transportation support.

In addition to physical infrastructure investment there are also grants provided by the CoC and the City of Worcester for agencies which run programs for this qualifying populations outlined below.

LIFT Supportive Housing Program-LIFT Worcester CoC/City of Worcester

Permanent Housing/Rapid Rehousing DV program with capacity to serve 10 individuals throughout Worcester County.

Living in Freedom Together LIFT, HARBOR Program Outreach and Case Management Services:

\$400,000.00

The **HARBOR** Program will assist by providing emergency shelter and a safe shelter-in-place facility due to the COVID19 Pandemic. This program addresses the immediate needs of women in systems of prostitution that are at heightened risk of exposure to COVID19 due to the chronic homelessness and compromised immune systems. With vital social service organizations closed and resources and services drastically reduced due to the pandemic, many of the participants are in critical need of support. LIFTs Outreach and Advocacy team will provide the community continued street outreach and supporting emergency shelters. Funds will be used for the staffing, supplies and operations of this shelter to prevent the spread of COVID-19

YWCA Housing Advocacy Program-YWCA Central Massachusetts

Permanent Housing/Rapid Rehousing DV program with capacity to serve 5 individuals and 11 families throughout Worcester County.

City of Worcester Department of Health & Human Services (HHS)

Street Outreach ESG funds are used to support homeless outreach and engagement program. Services will include engagement of target populations, case management services, needs assessment evaluation and connecting target population to other community based resources.

At-risk of homelessness and other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability

Affordable Housing Trust Fund \$15,000,000 ARPA

Over the course of the ARPA public outreach sessions, affordable housing issues continually came to the top of the listed priorities. While residents deferred on their priorities within affordable housing, one theme became apparent. The City would benefit from additional tools in the toolbox to create and preserve affordable housing. The Economic Development Office consulted with Massachusetts Housing Partnership that has assisted several municipalities throughout the Commonwealth in developing affordable housing trusts. With this guidance, a public input meeting was held with the community, and the ordinance establishing the AHTF has been created. Specific metrics will be created once the AHTF Commissioners are selected and programmatic priorities are identified. In addition to the \$15 million recommendation of ARPA

funds, the goal is to create a revolving fund that will experience recapitalization, so the measured outputs can continue to grow over time. This new tool in the toolbox will help enhance equity and access to housing opportunities for low- to moderate income residents.

ARPA Sustaining Housing First Solutions \$4,000,000 ARPA

In 2018, the City of Worcester created the Sustaining Housing First Solutions Taskforce. The taskforce was charged with taking an in-depth look at the community needs, assessing valuable resources, and developing a long-term, sustainable plan for permanent supportive housing for the chronically homeless. The hard work and support of our stakeholders and partners led to the "A Place to Live" housing development. The "A Place to Live" project is led by the Worcester Housing Authority with an innovative model to resolve the homelessness crisis. Modular studio-units designed for the chronically homeless will not just address housing, but will include a multitude of services. The proposed building site at 38 Lewis Street will consist of twenty-four studio units featuring bathroom, kitchen, heating and air conditioning. The building itself will feature a shared common room for meetings and counseling, a shared laundry facility and a resident manager unit. The City intends to contribute \$1 .5 million through this funding category in support of the 38 Lewis Street project. The remaining \$2.5 million will fund other projects supported by the Sustaining Housing First Solutions Taskforce. It is expected that at least 75 units will result from this funding.

COVID-19 Emergency Rental Assistance Program: \$ 1,958,524.70

City of Worcester Executive Office of Economic Development, Housing Development Division
The City of Worcester's Executive Office of Economic Development's (EOED) Housing Development Division was awarded \$1,963,247 in HUD CARES Act Community Development Block Grant (CDBG) Round 3 funding. Due to the historic Massachusetts Eviction Moratorium ordered by Governor Baker on April 20, 2020, and expired as of October 17, 2020, the City is aware that many residents and families in Worcester have struggled to keep up with rent and other financial obligations. As a result, EOED proposes to launch a COVID-19 Emergency Rental Assistance Program. This program is funded through the U.S. Department of Housing and Urban Development's (HUD) CDBG Program using CARES Act Round 3. This allocation was authorized by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136, which was signed by President Trump on March 27, 2020, to respond to the growing effects of this historic public health crisis.

COVID-19 Rapid Re-Housing Recovery Fund: \$216,372.63 ESG-CV

City of Worcester Executive Office of Economic Development, Housing Development Division

These funds will be administered by the Housing Development Division of the Executive Office of Economic Development and used for the reintegration of the homeless population to permanent housing solutions by providing housing stability case management and rapid rehousing assistance to homeless households in the City of Worcester.

HOME Tenant Based Rental Assistance (TBRA) \$165,000

The City's TBRA for the Homeless Program is designed to assist unsheltered homeless individuals obtain safe, sanitary housing. Worcester's 3-Year Plan to Address Homelessness identifies the Housing First model as a cost effective and humane alternative to ending homelessness over shelter programs. The need for permanent housing for homeless and

chronically homeless individuals is identified as a high priority in the City's 2020-2024 Consolidated Plan. The TBRA program provides rental assistance payments to make up the difference between local rent standards and the amount that a household can actually afford to pay for housing. Tenant must be able to choose unit in which to live. Rental costs must not be above fair market rent and meet the Rent Reasonableness Test. Eligible costs and requirements are described in more detail at 24 CFR Part 92.209.

THE UNMET HOUSING AND SERVICE NEEDS OF QUALIFYING POPULATIONS:

Homeless as defined in 24 CFR 91.5

In regards to the homeless population the following needs were identified:

- Additional shelter capacity for adult households
- The need for affordable housing cannot be overstated, thousands of affordable housing units
- The homeless system exists within the housing market ecosystem and requires affordable housing as a resource for stabilized clients looking to reenter permanent housing situations.
- The lack of affordable housing prevents clients from being able to exit shelter after brief episodes, increasing the likelihood that their homeless pattern will become chronic.
- Longer stays in shelter and other programming leaves fewer beds available further stressing the homeless service provider's capacity.
- In regards to unaccompanied homeless youth and young adults in Worcester County the top barrier to assistance needed was: being put on a waiting list, followed by transportation, didn't hear back, didn't know where to go, didn't have money, and finally didn't qualify for help.
- In regards to unaccompanied homeless you and young adults the needs included transportation cost assistance, rent and utility support, and holistic wrap-around services. Overwhelmingly, the most commonly unfulfilled need was mental health support. Three out of the eight respondents reported therapy as an ongoing need, and none of the participants knew of affordable, timely, and accessible options for mental health support.

At Risk of Homelessness as defined in 24 CFR 91.5

In regards to the at risk of homelessness category, they are defined by incomes less than 30% of the AMI. With this amount of income finding housing could be a challenge that could be met with additional affordable housing units or with less economic stress a rental assistance program could provide. In addition this group is categorized by not having resources or support network to maintain housing, which supportive services if available could provide. Although there are resources currently for supportive services, TBRA, and development of new affordable housing the needs of this population outweigh the available resources.

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

The pandemic caused a decline or minimal increases in utilization of services. SAFEPLAN had a 13 percent decrease over the prior year, while the WIN program only had 28 new participants during the 2021 fiscal year. However, the level of service utilization is not reflective of the scope of the problem. Firstly, the number of cases tracked only capture the victims who use these intervention services. The total number of cases is estimated to be higher. Secondly, the service utilization does not measure the intensity of the violence. For example, according to the YWCA, with WIN, there were "multiple calls for the same address within a short period of time as well as a quick escalation in

the level and intensity of violence. In a few reports the victims shared that they did not tell the full story the first time the police responded, while they were sheltering in place with the abuser.”

Like other forms of gender-based violence, sexual exploitation is chronically underreported due to shame, guilt, the danger of disclosing, lack of trust from providers and the system in general, and criminalization of prostitution.

Throughout the pandemic, Pathways for Change saw a dip in reporting, disclosing, and coming forward due to child care, food insecurity, housing instability, substance abuse issues, abuser, landlord, work, lack of access, and/or danger. However, the dip in reporting did not mean that sexual violence was not happening.

The number of survivors serviced by Pathways for Change identifying within the LGBTQIA+ community decreased during the pandemic, for the same reasons that reporting overall decreased. However, according to the Center for Disease Control (CDC), LGBTQIA+ people experience sexual violence often at higher rates than straight people.

The Worcester County District Attorney’s Office shared there was a 40% decline in the number of defendants during the COVID pandemic and charges decreased by

Time Period	Defendants	Charges
March 13, 2019 through March 13, 2020	53	116
March 13, 2020 through March 13, 2021	37	51

more than half, which was a reflection in the reduced number of reported incidents of sexual assault, domestic violence, and restraining order violations cases. The DA’s office does not capture demographics and communities most affected by these offenses, as the data is focused on capturing prosecution statistics.

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

In regards to the Other populations requiring services or housing assistance to prevent homelessness category, they are defined as currently receiving emergency assistance without which they may end up becoming homeless. With the COVID pandemic creating new programs and new safety nets for this population, such as the newly eligible CDBG rental assistance program, homeless prevention was achieved. However with these emergency programs expiring or not continually funded to the initial amounts, this population is at risk when the funds become unavailable. With further supportive services and TBRA programs available this gap in funding could be mitigated.

Regarding the Other populations at greatest risk of housing instability, they are categorized by being severely cost burdened (meaning income below 30% of AMI and more than 50% of their income going towards their rental payments) or with incomes at or below 50% AMI and economically stressed. With this amount of income finding housing could be a challenge that could be met with additional affordable housing units or with less economic stress a rental assistance program could provide. In addition this group is categorized by not having economic resources to maintain housing and/or maintain quality housing, which supportive services and rental assistance if available could provide. Although there are resources currently for supportive services, TBRA, and development of new affordable housing the needs of this population outweigh the available resources.

GAPS WITHIN THE CURRENT SHELTER AND HOUSING INVENTORY AS WELL AS THE SERVICE DELIVERY SYSTEM

The current shelter inventory is in need of at least 147 adult shelter beds. However with the creation of more affordable housing, the barriers to permanent housing would be reduced, which would further increase the capacity of the shelter system. In regards to both the at risk and other qualifying populations there are at least 280 units where more than 1.5 people share a room, which is an indication of both economically stressed and one of the indicators of severe housing problems. This doesn't mean that only 280 units are needed, but is just one indicator of the needs of the City of Worcester. From the CHAS data and the report on gender violence which captured the Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking QP, we can clearly see a need for housing in the less than 30% AMI category which is affordable as well as not cost burdening (meaning not more than 30% of income would go towards rental payments).

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

No other characteristics have been identified.

PRIORITY NEEDS FOR QUALIFYING POPULATIONS

When evaluating the needs of the qualifying populations there were many commonalities. From those agencies and entities who currently served the qualifying populations there was needs for every type of program (Affordable housing creation, TBRA, NCS, and Supportive Services). The top priority across all those who we talked to and surveyed was more affordable housing. Even from those who were mainly shelter providers, as this allowed people to exit the shelter system and freed up capacity. For the At Risk of Homelessness; Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking; and Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability qualifying populations the data and those who served these populations showed and relayed a need for more affordable housing units, TBRA, and supportive service dollars. For the homeless qualifying population the data and those who serve the qualifying population show there is a need for more non congregate shelters, supportive services, and more affordable housing.

PJ DETERMINATION OF THE LEVEL OF NEED AND GAPS IN THE PJ'S SHELTER AND HOUSING INVENTORY AND SERVICE DELIVERY SYSTEMS BASED ON THE DATA PRESENTED IN THE PLAN

The first place we started was a survey and meeting with those agencies that serve and work with the four qualifying populations. From there we relied on data from the CoC, various reports, CHAS data, current resources, application data, and a public meeting. The need from the homeless population was explicit based on highly detailed data level provided by the CoC. For the At Risk of Homelessness; Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking; and Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability qualifying populations the data was implicit based on various CHAS data, gender-based violence report, and data on those currently being served. Both

methods of analysis resulted in a very clear picture of the many needs of the QP and based on those needs and gaps the HOME-ARP funds were applied to all the categories with an emphasis on creation of affordable housing that speaks to all needs.

HOME-ARP Activities

Template:

THE METHOD(S) THAT WILL BE USED FOR SOLICITING APPLICATIONS FOR FUNDING AND/OR SELECTING DEVELOPERS, SERVICE PROVIDERS, SUBRECIPIENTS AND/OR CONTRACTORS

An RFP will be created for each category of funding, not including the admin and planning category. Applications for the funds will then occur on a rolling basis. It is anticipated that projects may use multiple categories of funding to best serve the needs of the population to be served. Applicants will be restricted to one project per round and will be eligible to apply again based on a successful completion of original project and availability of funds.

DESCRIPTION OF HOW THE PJ WILL ADMINISTER ELIGIBLE ACTIVITIES

The City of Worcester (PJ) will administer the following activities directly: Non-Profit Operating, Non-Profit Capacity Building, Administration and Planning. For Acquisition and Development of Non-Congregate Shelters, Tenant Based Rental Assistance (TBRA), and Development of Affordable Rental Housing activities, we will RFP funds and will work with a developer (Acquisition and Development of Non-Congregate Shelters and Development of Affordable Rental Housing activities) or subrecipient (Tenant Based Rental Assistance (TBRA)) to administer these funds. For Supportive Services funds there will either be an RFP process with a subrecipient who is just receiving those funds and/or part of the RFP process for the Acquisition and Development of Non-Congregate Shelters, Tenant Based Rental Assistance (TBRA), and Development of Affordable Rental Housing activities.

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

No portion of Worcester's HOME-ARP administrative funds are to be provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation.

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.

USE OF HOME-ARP FUNDING

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 1,052,049.22		
Acquisition and Development of Non-Congregate Shelters	\$ 372,838.57		
Tenant Based Rental Assistance (TBRA)	\$ 550,128.88		
Development of Affordable Rental Housing	\$ 2,845,531.33		
Non-Profit Operating	\$ 126,856.50	2.5 %	5%
Non-Profit Capacity Building	\$ 126,856.50	2.5 %	5%
Administration and Planning	\$ 895,457	15 %	15%
Total HOME ARP Allocation	\$ 5,969,718		

DESCRIPTION OF HOW THE PJ WILL DISTRIBUTE HOME-ARP FUNDS IN ACCORDANCE WITH ITS PRIORITY NEEDS IDENTIFIED IN ITS NEEDS ASSESSMENT AND GAP ANALYSIS

In regard to the distribution of the HOME-ARP dollars, they are in line with the priorities identified through consultation with organizations and agencies who provide support and assistance to the qualifying populations. All activities are funded, but in regards to the need, resources, available, consultation, the Development of Affordable Rental Housing category has been funded the most, as we have evaluated this category as being most in demand. The needs of the qualifying populations exceed the amount of HOME-ARP available, but reviewing the need, the current resources, the HOME-ARP funds will be provided to allow non-congregate shelter, creation of new affordable housing, tenant based rental assistance program, supportive services for the aforementioned programs or standalone, Non-profit operating/capacity building and admin.

DESCRIPTION OF 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

As mentioned above, the needs of the qualifying populations exceed the amount of HOME-ARP available, but addressing the needs of each qualifying population was carefully considered. In regards to the homeless category there will be supportive service dollars available, new units produced, and funds for new non-congregate shelter development. In regards to the at-risk of homelessness; Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking; and Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability there is production of new affordable units, supportive services, and tenant based rental assistance.

HOME-ARP PRODUCTION HOUSING GOALS

ESTIMATE OF THE NUMBER OF AFFORDABLE RENTAL HOUSING UNITS FOR QUALIFYING POPULATIONS THAT THE PJ WILL PRODUCE OR SUPPORT WITH ITS HOME-ARP ALLOCATION

Based on the amount budgeted for development of affordable housing above, it is estimated that at least 28 new units will be developed with the budgeted amount of \$ 2,845,531.33. This estimate is based on the current market conditions and estimated per unit cost of up to \$100,000/unit cost. This amount is based on the current HOME program per unit guide and with the understanding that HOME and HOME-ARP funds are gap financing mechanism. In addition to that the amount budgeted for Tenant Based Rental Assistance is \$550,128.88. It is estimated with these funds that at least 100 individuals would be prevented from homelessness through 12-months of TBRA.

DESCRIPTION OF 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

It is estimated that at least 28 new units will be developed with the budgeted amount of \$2,845,531.33. In addition these funds are provided as gap financing with other Federal, State, local, and private funding in a stack. This allows for the leverage of these dollars to go further with an estimated creation of 70 more units which are restricted to low and moderate clientele, creating further affordable housing.

The homeless system exists within the housing market ecosystem and requires affordable housing as a resource for stabilized clients. With more affordable housing units on the market this will allow the stabilized homeless easier reentry into the permanent housing market. These additional units will allow clients to exit shelter after brief episodes, decreasing the likelihood that their homeless pattern will become chronic.

By getting the homeless out of the shelter system and other related programming in a shorter period of time, this will leave more beds available, which will relieve the homeless service provider's capacity.

Preferences

A preference provides a priority for the selection of applicants who fall into a specific QP or category (e.g., elderly or persons with disabilities) within a QP (i.e., subpopulation) to receive assistance. A *preference* permits an eligible applicant that qualifies for a PJ-adopted preference to be selected for HOME-ARP assistance before another eligible applicant that does not qualify for a preference. A *method of prioritization* is the process by which a PJ determines how two or more eligible applicants qualifying for the same or different preferences are selected for HOME-ARP assistance. For example, in a project with a preference for chronically homeless, all eligible QP applicants are selected in chronological order for a HOME-ARP rental project except that eligible QP applicants that qualify for the preference of chronically homeless are selected for occupancy based on length of time they have been homeless before eligible QP applicants who do not qualify for the preference of chronically homeless.

Please note that HUD has also described a method of prioritization in other HUD guidance. Section I.C.4 of Notice CPD-17-01 describes Prioritization in CoC CE as follows:

“Prioritization. In the context of the coordinated entry process, HUD uses the term “Prioritization” to refer to the coordinated entry-specific process by which all persons in need of assistance who use coordinated entry are ranked in order of priority. The coordinated entry prioritization policies are established by the CoC with input from all community stakeholders and must ensure that ESG projects are able to serve clients in accordance with written standards that are established under 24 CFR 576.400(e). In addition, the coordinated entry process must, to the maximum extent feasible, ensure that people with more severe service needs and levels of vulnerability are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. Regardless of how prioritization decisions are implemented, the prioritization process must follow the requirements in Section II.B.3. and Section I.D. of this Notice.”

If a PJ is using a CE that has a method of prioritization described in CPD-17-01, then a PJ has preferences and a method of prioritizing those preferences. These must be described in the HOME-ARP allocation plan in order to comply with the requirements of Section IV.C.2 (page 10) of the HOME-ARP Notice.

In accordance with Section V.C.4 of the Notice (page 15), the HOME-ARP allocation plan must identify whether the PJ intends to give a preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. **If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan.**

For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ's HOME-ARP allocation plan. Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

Template:

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

No preference will be given to one or more qualifying populations or a subpopulations.

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

None has been identified.

Referral Methods

PJs are not required to describe referral methods in the plan. However, if a PJ intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the PJ must ensure compliance with Section IV.C.2 of the Notice (page10).

A PJ may use only the CE for direct referrals to HOME-ARP projects and activities (as opposed to CE and other referral agencies or a waitlist) if the CE expands to accept all HOME-ARP qualifying populations and implements the preferences and prioritization established by the PJ in its HOME-ARP allocation plan. A direct referral is where the CE provides the eligible applicant directly to the PJ, subrecipient, or owner to receive HOME-ARP TBRA, supportive services, admittance to a HOME-ARP rental unit, or occupancy of a NCS unit. In comparison, an indirect referral is where a CE (or other referral source) refers an eligible applicant for placement to a project or activity waitlist. Eligible applicants are then selected for a HOME-ARP project or activity from the waitlist.

The PJ must require a project or activity to use CE along with other referral methods (as provided in Section IV.C.2.ii) or to use only a project/activity waiting list (as provided in Section IV.C.2.iii) if:

1. the CE does not have a sufficient number of qualifying individuals and families to refer to the PJ for the project or activity;
2. the CE does not include all HOME-ARP qualifying populations; or,
3. the CE fails to provide access and implement uniform referral processes in situations where a project's geographic area(s) is broader than the geographic area(s) covered by the CE

If a PJ uses a CE that prioritizes one or more qualifying populations or segments of qualifying populations (e.g., prioritizing assistance or units for chronically homeless individuals first, then prioritizing homeless youth second, followed by any other individuals qualifying as homeless, etc.) then this constitutes the use of preferences and a method of prioritization. To implement a CE with these preferences and priorities, the PJ **must** include the preferences and method of prioritization that the CE will use in the preferences section of their HOME-ARP allocation plan. Use of a CE with embedded

preferences or methods of prioritization that are not contained in the PJ's HOME-ARP allocation does not comply with Section IV.C.2 of the Notice (page10).

Template:

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):

n/a

If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered.

(Optional):

n/a

If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional):

n/a

If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any.

(Optional):

n/a

Limitations in a HOME-ARP rental housing or NCS project

Limiting eligibility for a HOME-ARP rental housing or NCS project is only permitted under certain circumstances.

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.
- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.
- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may

benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

Template

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

There is no plan to limit eligibility for HOME-ARP rental housing or NCS projects.

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

n/a

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

n/a

Survey Results

Collector: Web Link 1 (Web Link)

Started: Monday, April 18, 2022 11:55:42 AM

Last Modified: Monday, April 18, 2022 12:03:16 PM

Time Spent: 00:07:34

IP Address: 199.46.117.210

Page 1: HOME-ARP Survey for Providers Serving Qualifying Populations

Q1

Which type of provider are you? (Select as many categories as applicable)?

Public housing agency (PHA) serving the jurisdiction's geographic area

Q2

Which Qualifying Populations do you serve? (Select all they apply)

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

Other Populations where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those at greatest risk of housing instability. HUD defines these populations as individuals and households who do not qualify under any of the populations above.

Q3

Please rank the following eligible activities by order of priority in the City of Worcester from 1 to 5 by each category below.

Production or Preservation of Affordable Rental Housing¹

Tenant-Based Rental Assistance (TBRA)³

Supportive Services, Homeless Prevention Services, and Housing Counseling²

Purchase and Development of Non-Congregate Shelter⁵

Nonprofit Operating and Capacity Building Assistance (capped at 5% of grant)⁴

Q4

What funding level Would you provide for each category? (\$5,074,261 is available)

Production or Preservation of Affordable Rental Housing³⁰⁰⁰⁰⁰⁰

Tenant-Based Rental Assistance (TBRA)⁶⁰⁰⁰⁰⁰

Supportive Services, Homeless Prevention Services, and Housing Counseling¹⁰⁰⁰⁰⁰⁰

Purchase and Development of Non-Congregate Shelter³⁷⁰⁰⁰⁰

Nonprofit Operating and Capacity Building Assistance (capped at 5% of grant)¹⁰⁴²⁶¹

Q5

Would you like to provide any comments on the use of HOME-ARP funds for any of the eligible categories?

no

Collector: Web Link 1 (Web Link)

Started: Tuesday, April 19, 2022 1:40:50 PM

Last Modified: Tuesday, April 19, 2022 1:54:01 PM

Time Spent: 00:13:10

IP Address: 96.32.243.154

Page 1: HOME-ARP Survey for Providers Serving Qualifying Populations

Q1

Which type of provider are you? (Select as many categories as applicable)?

Domestic violence service providers

Q2

Which Qualifying Populations do you serve? (Select all they apply)

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

Q3

Please rank the following eligible activities by order of priority in the City of Worcester from 1 to 5 by each category below.

Production or Preservation of Affordable Rental Housing1

Tenant-Based Rental Assistance (TBRA)2

Supportive Services, Homeless Prevention Services, and Housing Counseling3

Purchase and Development of Non-Congregate Shelter5

Nonprofit Operating and Capacity Building Assistance (capped at 5% of grant)4

Q4

What funding level Would you provide for each category? (\$5,074,261 is available)

Production or Preservation of Affordable Rental Housing2000000

Tenant-Based Rental Assistance (TBRA)1500000

Supportive Services, Homeless Prevention Services, and Housing Counseling1074261

Purchase and Development of Non-Congregate Shelter0

Nonprofit Operating and Capacity Building Assistance (capped at 5% of grant)500000

Q5

Would you like to provide any comments on the use of HOME-ARP funds for any of the eligible categories?

n/a

Collector: Web Link 1 (Web Link)

Started: Wednesday, April 20, 2022 2:32:29 PM

Last Modified: Wednesday, April 20, 2022 2:41:32 PM

Time Spent: 00:09:02

IP Address: 174.58.63.75

Page 1: HOME-ARP Survey for Providers Serving Qualifying Populations

Q1

Which type of provider are you? (Select as many categories as applicable)?

Homeless service providers

Public or private organizations that address the needs of persons with disabilities

Q2

Which Qualifying Populations do you serve? (Select all they apply)

Homeless as defined in 24 CFR 91.5

At risk of Homelessness as defined in 24 CFR 91.5

Other Populations where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those at greatest risk of housing instability. HUD defines these populations as individuals and households who do not qualify under any of the populations above.

Q3

Please rank the following eligible activities by order of priority in the City of Worcester from 1 to 5 by each category below.

Production or Preservation of Affordable Rental Housing¹

Tenant-Based Rental Assistance (TBRA)³

Supportive Services, Homeless Prevention Services, and Housing Counseling²

Purchase and Development of Non-Congregate Shelter⁵

Nonprofit Operating and Capacity Building Assistance (capped at 5% of grant)⁴

Q4

What funding level Would you provide for each category? (\$5,074,261 is available)

Production or Preservation of Affordable Rental Housing 3000000

Tenant-Based Rental Assistance (TBRA) 200000

Supportive Services, Homeless Prevention Services, and Housing Counseling 1500000

Purchase and Development of Non-Congregate Shelter 174261

Nonprofit Operating and Capacity Building Assistance (capped at 5% of grant) 200000

Q5

Would you like to provide any comments on the use of HOME-ARP funds for any of the eligible categories?

developing housing and providing needed navigation, case management and homeless prevention services are the most effective tools for helping people who are homeless or at risk of homelessness.

Collector: Web Link 1 (Web Link)

Started: Friday, April 22, 2022 9:58:59 AM

Last Modified: Friday, April 22, 2022 10:05:01 AM

Time Spent: 00:06:02

IP Address: 47.14.106.58

Page 1: HOME-ARP Survey for Providers Serving Qualifying Populations

Q1

Which type of provider are you? (Select as many categories as applicable)?

Homeless service providers

Public or private organizations that address civil rights and fair housing

Public or private organizations that address the needs of persons with disabilities

Developer of housing focused upon a qualifying population

Q2

Which Qualifying Populations do you serve? (Select all they apply)

Homeless as defined in 24 CFR 91.5

At risk of Homelessness as defined in 24 CFR 91.5

Other Populations where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those at greatest risk of housing instability. HUD defines these populations as individuals and households who do not qualify under any of the populations above.

Q3

Please rank the following eligible activities by order of priority in the City of Worcester from 1 to 5 by each category below.

Production or Preservation of Affordable Rental Housing¹

Tenant-Based Rental Assistance (TBRA)²

Supportive Services, Homeless Prevention Services, and Housing Counseling³

Purchase and Development of Non-Congregate Shelter⁴

Nonprofit Operating and Capacity Building Assistance (capped at 5% of grant)⁵

Q4

What funding level Would you provide for each category? (\$5,074,261 is available)

Production or Preservation of Affordable Rental Housing 3000000

Tenant-Based Rental Assistance (TBRA) 1000000

Supportive Services, Homeless Prevention Services, and Housing Counseling 500000

Purchase and Development of Non-Congregate Shelter 500000

Nonprofit Operating and Capacity Building Assistance (capped at 5% of grant) 74261

Q5

Would you like to provide any comments on the use of HOME-ARP funds for any of the eligible categories?

this one time infusion of funds is unprecedented and should be used to build as much new housing as possible in our area.

Collector: Web Link 1 (Web Link)

Started: Friday, April 22, 2022 9:57:49 AM

Last Modified: Friday, April 22, 2022 10:11:59 AM

Time Spent: 00:14:10

IP Address: 68.184.43.4

Page 1: HOME-ARP Survey for Providers Serving Qualifying Populations

Q1

Which type of provider are you? (Select as many categories as applicable)?

Homeless service providers

Public agencies that address the needs of qualifying populations

Public or private organizations that address the needs of persons with disabilities

Q2

Which Qualifying Populations do you serve? (Select all they apply)

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

Other Populations where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those at greatest risk of housing instability. HUD defines these populations as individuals and households who do not qualify under any of the populations above.

Q3

Please rank the following eligible activities by order of priority in the City of Worcester from 1 to 5 by each category below.

Production or Preservation of Affordable Rental Housing¹

Tenant-Based Rental Assistance (TBRA)²

Supportive Services, Homeless Prevention Services, and Housing Counseling⁴

Purchase and Development of Non-Congregate Shelter³

Nonprofit Operating and Capacity Building Assistance (capped at 5% of grant)⁵

Q4

What funding level Would you provide for each category? (\$5,074,261 is available)

Production or Preservation of Affordable Rental Housing 2500000

Tenant-Based Rental Assistance (TBRA) 1250000

Supportive Services, Homeless Prevention Services, and Housing Counseling 250000

Purchase and Development of Non-Congregate Shelter 1000000

Nonprofit Operating and Capacity Building Assistance (capped at 5% of grant) 74261

Q5

Would you like to provide any comments on the use of HOME-ARP funds for any of the eligible categories?

I would like to see majority of the funding go to the production of new affordable housing units, as the need is growing increasingly larger.

Collector: Web Link 1 (Web Link)

Started: Tuesday, April 26, 2022 10:16:04 AM

Last Modified: Tuesday, April 26, 2022 10:34:25 AM

Time Spent: 00:18:20

IP Address: 156.19.88.122

Page 1: HOME-ARP Survey for Providers Serving Qualifying Populations

Q1

Which type of provider are you? (Select as many categories as applicable)?

CoC serving the jurisdiction's geographic area

Homeless service providers

Domestic violence service providers

Public agencies that address the needs of qualifying populations

Public or private organizations that address civil rights and fair housing

Public or private organizations that address the needs of persons with disabilities

Q2

Which Qualifying Populations do you serve? (Select all they apply)

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

Other Populations where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those at greatest risk of housing instability. HUD defines these populations as individuals and households who do not qualify under any of the populations above.

Q3

Please rank the following eligible activities by order of priority in the City of Worcester from 1 to 5 by each category below.

Production or Preservation of Affordable Rental Housing5

Tenant-Based Rental Assistance (TBRA)4

Supportive Services, Homeless Prevention Services, and Housing Counseling3

Purchase and Development of Non-Congregate Shelter2

Nonprofit Operating and Capacity Building Assistance (capped at 5% of grant)1

Q4

What funding level Would you provide for each category? (\$5,074,261 is available)

Production or Preservation of Affordable Rental Housing0

Tenant-Based Rental Assistance (TBRA)0

Supportive Services, Homeless Prevention Services, and Housing Counseling2074261

Purchase and Development of Non-Congregate Shelter0

Nonprofit Operating and Capacity Building Assistance (capped at 5% of grant)3000000

Q5

Would you like to provide any comments on the use of HOME-ARP funds for any of the eligible categories?

The reality is, we would absolutely want to prioritize all categories at the same level. The issue here is that funders make a serious error in trying to distribute funding across all categories. This just makes things weak instead of focusing on one or two game-changing moves and innovative approaches that solve social inequities for the City's most vulnerable community members.

Collector: Web Link 1 (Web Link)

Started: Tuesday, April 26, 2022 11:01:13 AM

Last Modified: Tuesday, April 26, 2022 11:10:14 AM

Time Spent: 00:09:00

IP Address: 96.39.26.218

Page 1: HOME-ARP Survey for Providers Serving Qualifying Populations

Q1

Which type of provider are you? (Select as many categories as applicable)?

CoC serving the jurisdiction's geographic area

Homeless service providers

Public or private organizations that address the needs of persons with disabilities

Q2

Which Qualifying Populations do you serve? (Select all they apply)

Homeless as defined in 24 CFR 91.5

At risk of Homelessness as defined in 24 CFR 91.5

Other Populations where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those at greatest risk of housing instability. HUD defines these populations as individuals and households who do not qualify under any of the populations above.

Q3

Please rank the following eligible activities by order of priority in the City of Worcester from 1 to 5 by each category below.

Production or Preservation of Affordable Rental Housing¹

Tenant-Based Rental Assistance (TBRA)⁴

Supportive Services, Homeless Prevention Services, and Housing Counseling²

Purchase and Development of Non-Congregate Shelter³

Nonprofit Operating and Capacity Building Assistance (capped at 5% of grant)⁵

Q4

What funding level Would you provide for each category? (\$5,074,261 is available)

Production or Preservation of Affordable Rental Housing²⁵⁰⁰⁰⁰⁰

Tenant-Based Rental Assistance (TBRA)⁵⁷⁴²⁶¹

Supportive Services, Homeless Prevention Services, and Housing Counseling¹⁰⁰⁰⁰⁰⁰

Purchase and Development of Non-Congregate Shelter⁷⁵⁰⁰⁰⁰

Nonprofit Operating and Capacity Building Assistance (capped at 5% of grant)²⁵⁰⁰⁰⁰

Q5

Would you like to provide any comments on the use of HOME-ARP funds for any of the eligible categories?

Respondent skipped this question

Collector: Web Link 1 (Web Link)

Started: Tuesday, April 26, 2022 11:47:39 AM

Last Modified: Tuesday, April 26, 2022 11:58:53 AM

Time Spent: 00:11:14

IP Address: 206.40.54.222

Page 1: HOME-ARP Survey for Providers Serving Qualifying Populations

Q1

Which type of provider are you? (Select as many categories as applicable)?

Homeless service providers

Q2

Which Qualifying Populations do you serve? (Select all they apply)

Homeless as defined in 24 CFR 91.5

At risk of Homelessness as defined in 24 CFR 91.5

Other Populations where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those at greatest risk of housing instability. HUD defines these populations as individuals and households who do not qualify under any of the populations above.

Q3

Please rank the following eligible activities by order of priority in the City of Worcester from 1 to 5 by each category below.

Production or Preservation of Affordable Rental Housing⁴

Tenant-Based Rental Assistance (TBRA)⁵

Supportive Services, Homeless Prevention Services, and Housing Counseling¹

Purchase and Development of Non-Congregate Shelter²

Nonprofit Operating and Capacity Building Assistance (capped at 5% of grant)³

Q4

What funding level Would you provide for each category? (\$5,074,261 is available)

Production or Preservation of Affordable Rental Housing⁷⁶¹¹³⁹

Tenant-Based Rental Assistance (TBRA)⁵⁰⁷⁴²⁶

Supportive Services, Homeless Prevention Services, and Housing Counseling²⁰²⁹⁷⁰⁵

Purchase and Development of Non-Congregate Shelter¹⁵²²²⁷⁸

Nonprofit Operating and Capacity Building Assistance (capped at 5% of grant)²⁵³⁷¹³

Q5

Would you like to provide any comments on the use of HOME-ARP funds for any of the eligible categories?

Respondent skipped this question

Collector: Web Link 1 (Web Link)

Started: Tuesday, April 26, 2022 10:49:58 AM

Last Modified: Tuesday, April 26, 2022 1:29:23 PM

Time Spent: 02:39:25

IP Address: 96.39.11.122

Page 1: HOME-ARP Survey for Providers Serving Qualifying Populations

Q1

Which type of provider are you? (Select as many categories as applicable)?

CoC serving the jurisdiction's geographic area

Homeless service providers

Q2

Which Qualifying Populations do you serve? (Select all they apply)

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

Other Populations where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those at greatest risk of housing instability. HUD defines these populations as individuals and households who do not qualify under any of the populations above.

Q3

Please rank the following eligible activities by order of priority in the City of Worcester from 1 to 5 by each category below.

Production or Preservation of Affordable Rental Housing²

Tenant-Based Rental Assistance (TBRA)¹

Supportive Services, Homeless Prevention Services, and Housing Counseling³

Purchase and Development of Non-Congregate Shelter⁵

Nonprofit Operating and Capacity Building Assistance (capped at 5% of grant)⁴

Q4

What funding level Would you provide for each category? (\$5,074,261 is available)

Production or Preservation of Affordable Rental Housing¹⁴⁴⁶¹⁶⁵

Tenant-Based Rental Assistance (TBRA)¹⁴⁴⁶¹⁶⁵

Supportive Services, Homeless Prevention Services, and Housing Counseling¹²⁰⁵¹³⁶

Purchase and Development of Non-Congregate Shelter⁷²³⁰⁸²

Nonprofit Operating and Capacity Building Assistance (capped at 5% of grant)²⁵³⁷¹³

Q5

Would you like to provide any comments on the use of HOME-ARP funds for any of the eligible categories?

As part of the allocation and priorities, funds should be set aside to support shelter and housing for members of the LGBT community. Perhaps, the shelters should be set up in a way to be accommodating of the community.

Collector: Web Link 1 (Web Link)

Started: Thursday, April 28, 2022 2:28:18 PM

Last Modified: Thursday, April 28, 2022 2:33:03 PM

Time Spent: 00:04:44

IP Address: 65.249.135.2

Page 1: HOME-ARP Survey for Providers Serving Qualifying Populations

Q1

Which type of provider are you? (Select as many categories as applicable)?

CoC serving the jurisdiction's geographic area

Homeless service providers

Q2

Which Qualifying Populations do you serve? (Select all they apply)

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

Q3

Please rank the following eligible activities by order of priority in the City of Worcester from 1 to 5 by each category below.

Production or Preservation of Affordable Rental Housing¹

Tenant-Based Rental Assistance (TBRA)⁴

Supportive Services, Homeless Prevention Services, and Housing Counseling²

Purchase and Development of Non-Congregate Shelter³

Nonprofit Operating and Capacity Building Assistance (capped at 5% of grant)⁵

Q4

What funding level Would you provide for each category? (\$5,074,261 is available)

Production or Preservation of Affordable Rental Housing³⁸⁷⁴²⁶¹

Tenant-Based Rental Assistance (TBRA)⁰

Supportive Services, Homeless Prevention Services, and Housing Counseling¹²⁰⁰⁰⁰⁰

Purchase and Development of Non-Congregate Shelter⁰

Nonprofit Operating and Capacity Building Assistance (capped at 5% of grant)⁰

Q5

Would you like to provide any comments on the use of HOME-ARP funds for any of the eligible categories?

We'd like to see most of the dollars go to housing production/preservation and a portion to the system navigator service that has been ESG-CV funded and reduced the duration of homelessness for folks connecting them to available resources. This has been an extremely success service over the last 6 months.

Collector: Web Link 1 (Web Link)

Started: Friday, April 29, 2022 11:37:05 AM

Last Modified: Friday, April 29, 2022 11:54:10 AM

Time Spent: 00:17:04

IP Address: 96.32.244.178

Page 1: HOME-ARP Survey for Providers Serving Qualifying Populations

Q1

Which type of provider are you? (Select as many categories as applicable)?

Public agencies that address the needs of qualifying populations

Public or private organizations that address the needs of persons with disabilities

Q2

Which Qualifying Populations do you serve? (Select all they apply)

At risk of Homelessness as defined in 24 CFR 91.5

Other Populations where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those at greatest risk of housing instability. HUD defines these populations as individuals and households who do not qualify under any of the populations above.

Q3

Please rank the following eligible activities by order of priority in the City of Worcester from 1 to 5 by each category below.

Production or Preservation of Affordable Rental Housing¹

Tenant-Based Rental Assistance (TBRA)²

Supportive Services, Homeless Prevention Services, and Housing Counseling⁴

Purchase and Development of Non-Congregate Shelter⁵

Nonprofit Operating and Capacity Building Assistance (capped at 5% of grant)³

Q4

What funding level Would you provide for each category? (\$5,074,261 is available)

Production or Preservation of Affordable Rental Housing¹²⁶⁸⁵⁶⁵

Tenant-Based Rental Assistance (TBRA)¹²⁶⁸⁵⁶⁵

Supportive Services, Homeless Prevention Services, and Housing Counseling¹⁰¹⁴⁸⁵²

Purchase and Development of Non-Congregate Shelter¹⁰¹⁴⁸⁵²

Nonprofit Operating and Capacity Building Assistance (capped at 5% of grant)⁵⁰⁷⁴²⁷

Q5

Would you like to provide any comments on the use of HOME-ARP funds for any of the eligible categories?

Ensuring safe affordable housing not necessarily shelters is the best way to go to give people dignity and equity in housing.

Collector: Web Link 1 (Web Link)

Started: Friday, April 29, 2022 3:45:29 PM

Last Modified: Friday, April 29, 2022 3:53:42 PM

Time Spent: 00:08:13

IP Address: 96.32.112.190

Page 1: HOME-ARP Survey for Providers Serving Qualifying Populations

Q1

Which type of provider are you? (Select as many categories as applicable)?

Developer of housing focused upon a qualifying population

Q2

Which Qualifying Populations do you serve? (Select all they apply)

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

Other Populations where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those at greatest risk of housing instability. HUD defines these populations as individuals and households who do not qualify under any of the populations above.

Q3

Please rank the following eligible activities by order of priority in the City of Worcester from 1 to 5 by each category below.

Production or Preservation of Affordable Rental Housing²

Tenant-Based Rental Assistance (TBRA)⁵

Supportive Services, Homeless Prevention Services, and Housing Counseling¹

Purchase and Development of Non-Congregate Shelter³

Nonprofit Operating and Capacity Building Assistance (capped at 5% of grant)⁴

Q4

What funding level Would you provide for each category? (\$5,074,261 is available)

Production or Preservation of Affordable Rental Housing¹⁷⁷⁵⁹⁹¹

Tenant-Based Rental Assistance (TBRA)⁵⁰⁷⁴²⁶

Supportive Services, Homeless Prevention Services, and Housing Counseling¹⁷⁷⁵⁹⁹²

Purchase and Development of Non-Congregate Shelter⁷⁶¹¹³⁹

Nonprofit Operating and Capacity Building Assistance (capped at 5% of grant)²⁵³⁷¹³

Q5

Would you like to provide any comments on the use of HOME-ARP funds for any of the eligible categories?

While they are all important I think the City should take into consideration what other sources are coming in to the City to support this population. How can these funds best be used to fill gaps and compliment other sources such as ARPA.

ÿ

ENGLISH

Public Notices

November 8, 2022
CITY OF WORCESTER
PROPOSED SUBSTANTIAL AMENDMENT TO ITS
CONSOLIDATED SUBMISSION FOR COMMUNITY PLANNING
& DEVELOPMENT SECOND YEAR ACTION PLAN
JULY 1, 2021 – JUNE 30, 2022

NOTICE OF 15-DAY PUBLIC COMMENT PERIOD
& PUBLIC HEARING

The City of Worcester is proposing to substantially amend its Consolidated Submission for Community Planning & Development (2020-2024), Second Year Action Plan, July 1st, 2021 – June 30th, 2022, to fund the following activities and programs through use of HOME-ARP funds:

HOME-ARP: \$5,969,718

1.	Supportive Services	\$ 1,052,049.22
2.	Acquisition and Development of Non-Congregate Shelters	\$ 372,838.57
3.	Tenant Based Rental Assistance (TBRA)	\$ 550,128.88
4.	Development of Affordable Rental Housing	\$ 2,845,531.33
5.	Non-Profit Operating and Capacity Building	\$ 253,713
6.	Administration and Planning	\$ 895,457

In accordance with the HOME-ARP Notice: CPD-21-10, PJs must make the proposed substantial amendment public and provide for a 15-day public comment period prior to submission, this proposed Draft Substantial Amendment for use of HOME-ARP funds, is being made available for a 15-day citizen review and comment period from November 9, 2022 through November 23, 2022. The Draft Substantial Amendment is available during regular business hours between 8:30 a.m. and 5:00 p.m., Monday through Friday at the following locations:

- The City of Worcester Department of Housing and Neighborhood Development website- Main Page:
<http://www.worcesterma.gov/housing-neighborhood-development>
- The City of Worcester's Community Development website, Policies & Procedures Page:
<http://www.worcesterma.gov/housing-neighborhood-development/community-development-block-grants/policies-procedures>

Public input, comments, and inquiries may be directed to the City of Worcester's Executive Office of Economic Development as follows:

- By E-mail: Development@worcesterma.gov
- By Phone: (508) 799-1400

Anyone wishing to provide comments should provide their full name and contact information. The final day for accepting public comments will be Wednesday, November 23, 2022.

October 3, 2022
CITY OF WORCESTER
PROPOSED SUBSTANTIAL AMENDMENT TO ITS
CONSOLIDATED SUBMISSION FOR COMMUNITY PLANNING
& DEVELOPMENT SECOND YEAR ACTION PLAN
JULY 1, 2021 – JUNE 30, 2022

NOTICE OF 15-DAY PUBLIC COMMENT PERIOD
& PUBLIC HEARING

The City of Worcester is proposing to substantially amend its Consolidated Submission for Community Planning & Development (2020-2024), Second Year Action Plan, July 1st, 2021 – June 30th, 2022, to fund the following activities and programs through use of HOME-ARP funds:

HOME-ARP: \$5,969,718

1.	Supportive Services	\$ 1,272,049.22
2.	Acquisition and Development of Non-Congregate Shelters	\$ 592,838.57
3.	Tenant Based Rental Assistance (TBRA)	\$ 770,128.88
4.	Development of Affordable Rental Housing	\$ 2,185,531.33
5.	Non-Profit Operating and Capacity Building	\$ 253,713
6.	Administration and Planning	\$ 895,457

In accordance with the HOME-ARP Notice: CPD-21-10, PJs must make the proposed substantial amendment public and provide for a 15-day public comment period prior to submission, this proposed Draft Substantial Amendment for use of HOME-ARP funds, is being made available for a 15-day citizen review and comment period from October 4, 2022 through October 18, 2022. The Draft Substantial Amendment is available during regular business hours between 8:30 a.m. and 5:00 p.m., Monday through Friday at the following locations:

- The City of Worcester Department of Housing and Neighborhood Development website- Main Page:
<http://www.worcesterma.gov/housing-neighborhood-development>
- The City of Worcester's Community Development website, Policies & Procedures Page:
<http://www.worcesterma.gov/housing-neighborhood-development/community-development-block-grants/policies-procedures>

A public hearing will also be held at 5:00 PM, Thursday, October 13, 2022 by the Executive Office of Office of Economic Development to discuss the Draft Substantial Amendment. The hearing will be held in City Hall Room 310B, 3rd Floor, City Hall, 455 Main Street, Worcester, MA 01608.

Public input, comments, and inquiries may be directed to the City of Worcester's Executive Office of Economic Development as follows:

- By E-mail: Development@worcesterma.gov
- By Phone: (508) 799-1400

Anyone wishing to provide comments should provide their full name and contact information. The final day for accepting public comments will be Tuesday, October 18, 2022.

424's and Certifications



The City of
WORCESTER

Executive Office of Economic Development
Housing Development Division
City Hall, 455 Main Street, Worcester, MA 01608
P | 508-799-1400 F | 508-799-1406
development@worcesterma.gov

December 1, 2022

Mr. Robert D. Shumeyko, Director
U.S. Department of Housing and Urban Development
Office of Community Development and Planning
Massachusetts State Office, New England Area
Thomas P. O'Neil Jr., Federal Building
10 Causeway Street – Fifth Floor
Boston, Massachusetts 02222-1092

Dear Mr. Shumeyko,

This letter serves to transmit to you a set of Application for Federal Assistance SF-424 forms and associated certifications with original signatures as required by HUD to complement the electronic submission of the City of Worcester 2020-2025 Consolidated Plan / Second Year Annual Action Plan Amendment (July 1st, 2021 – June 30th, 2022) which includes funding for the HOME American Rescue Plan (ARP) program.

Sincerely,

A handwritten signature in blue ink, appearing to read "Eric D. Batista".

Eric D. Batista

Acting City Manager

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

12/1/22

Date

ACTING CITY MANAGER

Title

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

12/1/22
Date

ACTING CITY MANAGER

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:**

04/28/2021

4. Applicant Identifier:

M-21-MP-25-0210

5a. Federal Entity Identifier:

MA252880 Worcester, MA

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:**

Worcester, MA

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

04-6001418

*** c. UEI:**

ZDFNGC6F65L3

d. Address:

*** Street1:**

455 Main Street

Street2:

4th Floor

*** City:**

Worcester

County/Parish:

Worcester

*** State:**

MA: Massachusetts

Province:

*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

01608-1891

e. Organizational Unit:

Department Name:

Economic Development

Division Name:

Housing Division

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

Prefix:

Mr.

*** First Name:**

Andrew

Middle Name:

G.

*** Last Name:**

Taylor

Suffix:

Title: Assistant Chief Development Officer

Organizational Affiliation:

City Manager's Executive Office of Economic Development

*** Telephone Number:** 508-799-1400 X31409

Fax Number: 508-799-1406

*** Email:** taylora@worcesterma.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:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 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:

n/a

* Title:

n/a

13. Competition Identification Number:

Title

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

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

Second Year Action Plan Amendment (July 1st, 2021 - June 30th, 2022) 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 * b. Program/Project

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

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="5,969,718.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="5,969,718.00"/>

*** 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:

Middle Name:

* Last Name:

Suffix:

* Title: * Telephone Number: Fax Number: * Email:

* Signature of Authorized Representative:

* Date Signed:

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:**

04/28/2021

4. Applicant Identifier:

M-21-MP-25-0210

5a. Federal Entity Identifier:

MA252880 Worcester, MA

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: Worcester, MA

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

04-6001418

*** c. UEI:**

ZDFNGC6F65L3

d. Address:

*** Street1:**

455 Main Street

Street2:

4th Floor

*** City:**

Worcester

County/Parish:

Worcester

*** State:**

MA: Massachusetts

Province:

*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

01608-1891

e. Organizational Unit:

Department Name:

Economic Development

Division Name:

Housing Division

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

Prefix:

Mr.

*** First Name:**

Andrew

Middle Name:

G.

*** Last Name:**

Taylor

Suffix:

Title:

Assistant Chief Development Officer

Organizational Affiliation:

City Manager's Executive Office of Economic Development

*** Telephone Number:**

508-799-1400 X31409

Fax Number:

508-799-1406

*** Email:**

taylora@worcesterma.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:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 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:

n/a

* Title:

n/a

13. Competition Identification Number:

Title:

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

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

Second Year Action Plan Amendment (July 1st, 2021 - June 30th, 2022) 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 * b. Program/Project

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

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="5,969,718.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="5,969,718.00"/>

*** 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:

Middle Name:

* Last Name:

Suffix:

* Title: * Telephone Number: Fax Number: * Email:

* Signature of Authorized Representative:

* Date Signed:

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.

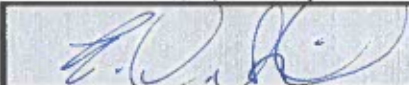
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

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 Acting City Manager
APPLICANT ORGANIZATION Worcester, MA	DATE SUBMITTED 12/1/22

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.
14. Will comply 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.
15. 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).
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.
17. 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).
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 Acting City Manager
APPLICANT ORGANIZATION Worcester, MA	DATE SUBMITTED 12/1/22

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 Acting City Manager
APPLICANT ORGANIZATION Worcester, MA	DATE SUBMITTED 12/1/22

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.
14. Will comply 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.
15. 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).
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.
17. 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.).
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 Acting City Manager
APPLICANT ORGANIZATION Worcester, MA	DATE SUBMITTED 12/1/22

Public Meeting Sign-in Sheet



**THE CITY OF WORCESTER
HOME-ARP**

5:00 PM, Thursday, October 13, 2022 discuss the Draft Substantial Amendment City Hall Room 310B, 3rd Floor, City Hall, 455 Main Street, Worcester, MA 01608
SIGN-IN

NAME/AGENCY	ADDRESS	PHONE	EMAIL
Timothy Harker	1455 main	508-259-1400	harker52@hotmail.com
My Lien Nguyen		508 615 9979	linny.N@gmail.com
McMullen, Doreen	West Central St.	774-441-3457	McMullen.doreen@gmail.com
Tempe Stupres Ed		978 764 0679	Tempe@LIFEWORCESTER.org
Affra Abouagtwao	31 Quabog St	763-732-9925	bethra2969@gmail.com