Community Development Block Grant Program

Consolidated Annual Performance and Evaluation Report (CAPER)



City of Rochester, New Hampshire July 1, 2015—June 30, 2016

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CR-05 - Goals and Outcomes

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

This FY 2015-2016 Consolidated Annual Performance Evaluation Report (CAPER) summarizes the accomplishments and financial expenditures of Year 1 of the FY 2015-2020 Consolidated Action Plan (FY 2014-2015 Annual Action Plan) of the City of Rochester.

The City of Rochester develops the Five-Year Consolidated Plan, annual Action Plan, and annual CAPER to provide a strategy for investment of federal Community Development Block Grant (CDBG) funds and review of program achievements, as required by the U.S. Department of Housing and Urban Development (HUD). The Consolidated Plan is a living document designed to identify the needs of the community, especially the low- to moderate-income residents of the City. The Consolidated Plan is the result of an eighteen-month collaborative process that includes extensive public outreach, multiple public hearings, and consultation with community agencies, neighborhood groups, and other relevant organizations. The Annual Action Plan is developed each fiscal year to describe the projects that have been funded for that year as they relate to the five-year Consolidated Plan program goals.

The Consolidated Plan under which this year's CAPER falls started July 1, 2015 and will end June 30, 2020, comprising five Annual Action Plan or program years. Programs and activities described in this report were intended to primarily benefit low- and moderate-income residents of the City of Rochester, neighborhoods with high concentrations of low- and moderate-income residents, and the City as a whole. The Community Development Block Grant award for the City of Rochester for FY 2015-2016 was \$\$227,062.00.

All Annual Action Plans must address the needs of the community, primarily benefiting the needs of low- to moderate- income persons (defined as those with household incomes below 80% of the area median income). For FY 2015-2016, the median income for the Portsmouth-Rochester Metropolitan Fair Market Rent Area was \$86,100.00. In addition, Consolidated Plans and Annual Action Plans must address the three national objectives set forth by HUD: (1) to provide decent housing, (2) to provide a suitable living environment, or (3) to expand economic opportunities.

All CDBG activities undertaken during FY 2015-2016 advanced one or more of the three national HUD objectives. Public service activities included funding for the region's three homeless shelters, rental assistance for low-income families, educational programs for low-income residents, and non-medical mental health supportive services. Also, for the first time, Rochester supported fair housing law activities through CDBG public service activities funds. Most of these activities were aimed at providing a suitable living environment or to provide decent housing.

Economic development activities included loans to two Rochester businesses through the CDBG-funded Job Opportunity Benefit (JOB) revolving loan fund, which promotes the retention and creation of jobs for low- and moderate-income residents, and funding for technical assistance

for micro-businesses through the Rochester's Office of Economic Development. These activities were aimed at expanding economic opportunities.

Housing rehabilitation funding supported the Community Action Partnership for Strafford County's weatherization assistance program, which weatherizes the homes of low-income residents, as well as funding through the Handicap Accessibility Improvements Microgrants Program to install handicap-accessible shower facilities in several Rochester Housing Authority housing units. These activities were aimed at providing decent housing.

Public facilities funding supported the installation of handicap-accessible doors at the main entrance of the Rochester Public Library, a new roof on a transitional housing unit used by the Homeless Center for Strafford County, fire-safety upgrades to door hardware at the Rochester Child Care Center to bring the facility up to code, security upgrades at Community Action Partnership for Strafford County's Head Start center to bring the facility into alignment with state law, the installation of bicycle racks at key city locations, and the beginning phase of new elevator installation at Spaulding High School, which is currently scheduled to be fully complete in August 2016. The completion of a new HVAC installation at the Rochester Public Library, originally planned for FY 2013-2014, also occurred during FY 2015-2016. The library is used as a cooling center in summer months and a heating center in winter months, which is an especially vital resource for homeless residents in the city. All facilities projects occurred in neighborhoods identified as 51% or greater low-moderate income by HUD for FY 2015-2016. These projects were aimed at providing a suitable living environment.

This past fiscal year also saw a number of new community development initiatives undertaken by the City of Rochester's Community Development Coordinator, as well as renewal of previous community development initiatives. These include facilitation of potential partnership meetings between the Rochester Housing Authority and regional housing-focused non-profit organizations, entering into a memorandum of understanding with the Rochester Housing Authority to submit a joint Assessment of Fair Housing, and attendance of the statewide New Hampshire Conference on Homelessness.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

As in previous years, CDBG priorities were for public services and facilities projects serving homeless residents, rental assistance and housing rehabilitation to preserve affordable housing stock, and activities and projects located in low- to moderate-income city census tracts. FY 2015-2016 funding reflected these priorities.

In many categories of funding, goals were met or exceeded, such as "Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit" and "Public service activities for Low/Moderate Income Housing Benefit" categories. In other categories, the goals came very close to the target goal, such as the "Homeless Person Overnight Shelter" and "Public service activities other than Low/Moderate Income Housing Benefit" categories. Overall, significant and substantial progress was made across all funding categories to provide decent housing, to provide a suitable living environment, and to expand economic opportunities for residents of the City of Rochester. In a few categories, there are low goal performance numbers reported, but in most cases there are reasons for the low numbers that are unrelated to actual performance. The "Jobs created/retained" category under "Small Business Establishment and Expansion" represents the City of Rochester's Job Opportunity Benefit (JOB) Revolving Loan Fund program. The jobs created or retained through previous loans have been reported in previous CAPERs, and the two new loans entered into during FY 2015-2016 have not yet started reporting on job creation and retention.

For "Public service activities other than Low/Moderate Income Housing Benefit," the performance goal for the New Hampshire Legal Assistance (NHLA)'s Housing Justice Project activity was based on an error; in its CDBG grant application, NHLA provided target goals for both residents to be served directly through CDBG-funded activities as well as all services to Rochester residents. In addition to the residents served directly through CDBG-funded activities, NHLA reported services provided through other funding sources to an additional 34 Rochester residents. (The target goal for FY 2015-2016 in Table 1 was corrected to the actual target goal.)

In some instances, however, the data reflects actual challenges in meeting target goals, although fewer than reported in FY 2014-2015. In particular, the Office of Economic Development's Small Business Development Center ("Small Business Establishment and Expansion") failed to meet CDBG program goals. While this activity exceeded the number of persons anticipated (23 residents served, versus the 13 projected to be served), well over 49% of these residents were non-low-moderate income. Also, of the \$12,000.00 budgeted for the program, only \$360.00 was actually spent during FY 2015-2016.

Most of these issues can be attributed to the facts that this was a new program and implemented by a City department somewhat unfamiliar with the details and requirements of implementing of CDBG activities. (This program replaced the New Hampshire Small Business Development Center, which was, as reported in the FY 2014-2015 CAPER, defunded due to multiple years of uncorrected performance issues.) The Community Development Coordinator met with Office of Economic Development personnel at least monthly to discuss performance, provide technical assistance, and otherwise help in implementing the new program, but the challenges persisted throughout the fiscal year.

Due to these issues, no CDBG funding for the Office of Economic Development's Small Business Development Center was awarded for FY 2016-2017. Instead, the Office of Economic Development will continue to small business development activities using other, more compatible funding sources.

On a more positive note, the Community Action Partnership of Strafford County's weatherization assistance program has shown significant improvement since being put on a corrective action plan at the beginning of the fiscal year. Performance goals for the program have been exceeded for FY 2015-2016. Also, in comparison with FY 2014-2015, where only about half of the awarded grant funds were spent during the fiscal year, grant funds in FY 2015-2016 were spent in a much more timely fashion. The Community Development Coordinator will

maintain increased levels of involvement with the weatherization assistance program and anticipates that performance will improve even further in FY 2016-2017.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual– Program Year	Percent Complete
Affordable Housing for Homeless Persons	Affordable Housing Homeless	CDBG: \$5,000.00	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	250	0	0.00%	N/A	0	N/A
Affordable Housing for Homeless Persons	Affordable Housing Homeless	CDBG: \$19,619.83	Homeless Person Overnight Shelter	Persons Assisted	675	118	17.48%	126	118	93.65%
Affordable Housing for Homeless Persons	Affordable Housing Homeless	CDBG: \$0.00	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	15	0	0.00%	N/A	0	N/A
Affordable Housing for Homeless Persons	Affordable Housing Homeless	CDBG: \$0.00	HIV/AIDS Housing Operations	Household Housing Unit	115	0	0.00%	N/A	0	N/A

Improving the Safety/Livability of Neighborhoods	Non- Housing Community Development	CDBG: \$14,409.05	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	4720	8878	188.09%	8878	8878	100.00%
Improving the Safety/Livability of Neighborhoods	Non- Housing Community Development	CDBG: \$2,500	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0	N/A	185	156	84.32%
Increase Access to Affordable and Quality Housing	Affordable Housing Non- Homeless Special Needs	CDBG: \$5,000.00	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	1400	87	6.21%	60	87	145.00%
Increase Access to Affordable and Quality Housing	Affordable Housing Non- Homeless Special Needs	CDBG: \$0.00	Rental units constructed	Household Housing Unit	0	0	0.00%	N/A	0	N/A

Increase Access to Quality Facilities and Services	Non- Homeless Special Needs Non- Housing Community Development	CDBG: \$0.00	Facade treatment/business building rehabilitation	Business	10	0	0.00%	N/A	0	N/A
Increasing the Supply of Supportive Housing	Affordable Housing Non- Homeless Special Needs	CDBG: \$0.00	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	60	0	0.00%	N/A	0	N/A
Public Services Concerned with Employment	Non- Housing Community Development Economic Development	CDBG: \$10,000.00	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	130	241	185.38%	270	241	89.26%

Reducing Substance Abuse (Especially Heroin)	Non- Homeless Special Needs Non- Housing Community Development Substance abuse	CDBG: \$0.00	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	150	0	0.00%	N/A	0	N/A
Retention of Affordable Housing Stock	Affordable Housing	CDBG: \$99,500.00	Homeowner Housing Rehabilitated	Household Housing Unit	200	44	22.00%	50	52	104.00%
Small Business Establishment and Expansion	Non- Housing Community Development Economic Development	CDBG: \$90,000.00 (revolving loan fund)	Jobs created/retained	Jobs	75	0	0.00%	0	0	0.00%
Small Business Establishment and Expansion	Non- Housing Community Development Economic Development	CDBG: \$360.00	Businesses assisted	Persons Assisted	13	23	37.50%	13	23	176.92%

Table 1 - Accomplishments - Program Year & Strategic Plan to Date

Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

As in previous years, CDBG priorities focused on housing and were for public services and facilities projects serving homeless residents, rental assistance and housing rehabilitation to preserve affordable housing stock for low-moderate income residents, and activities and projects located in low- to moderate-income city census tracts. FY 2015-2016 funding reflected these priorities. Nearly half of all available public service funding went to direct services for homeless residents, and another \$3,000.00 went to facility improvements for the Homeless Center for Strafford County.

For maintaining affordable housing for low-moderate income residents, \$5,000 was spent by the SHARE Fund to provide rental assistance, as the rental market remains a large provider of affordable housing for Rochester residents, and \$55,293.60 was spent by the Community Action Partnership of Strafford County to provide weatherization for homes owned by low-moderate income residents.¹ For most residents, this greatly reduces energy costs for the home, thereby keeping the home affordable for the owner. Another \$49,500 was spent by the Rochester Housing Authority to install accessible shower facilities in eight of its residential units, seven of which are currently occupied, making those units accessible to residents with physical disabilities. All seven of the residents in the currently-occupied units are elderly.

With only a few exceptions, all activities and projects took place and/or served residents in census tracts classified by HUD as \geq 51% low-moderate income. The exceptions were for the Homeless Center for Strafford County, My Friend's Place, and Cross Roads House, which are all homeless shelters serving extremely low income homeless residents, and the Community Action Partnership for Stafford County's weatherization assistance program, which serves exclusively low-moderate income residents, usually extremely low or low-income.

Other priorities, aligned with the needs identified in the FY 2015-2020 Consolidated Plan and FY 2015-2016 Annual Action Plan, focused on providing for the basic needs of Rochester residents. Such activities included facilities improvements to the Rochester Public Library, which serves as a cooling/heating center during extreme temperatures for homeless and other vulnerable residents; High School Equivalency Testing assistance through the Dover Adult Learning Center, which provides for a basic level of education for low-moderate income residents; and facilities improvements to the Rochester Child Care Center and Rochester Head Start offices, which provide essential child care and educational services to low-moderate income families.

¹ The FY 2015-2016 grant to the Community Action Partnership of Strafford County for weatherization assistance work was \$50,000.00, but the City of Rochester allowed for unexpended FY 2014-2015 weatherization funds to be "rolled over" into FY 2015-2016.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted). 91.520(a)

	CDBG
White	611
Black or African American	27
Asian	30
American Indian or American Native	4
Native Hawaiian or Other Pacific Islander	1
Total	673
Hispanic	26
Not Hispanic	647

Table 1 – Table of assistance to racial and ethnic populations by source of funds

Narrative

During FY 2015-2016, approximately 90% of the residents of the City of Rochester served were white, and approximately 10% of the residents served were of non-white races and/or ethnicities (predominantly Black or African-American and Asian). According to U.S. Census data, the City of Rochester is 95.4% white, 0.8% Black or African-American, 0.3% American Indian or Alaska Native, 1.2% Asian, 0.1% Native Hawaiian or other Pacific Islander, 1.8% Hispanic, and 1.7% two or more races. There have not been disproportionate services provided to white residents over residents belonging to racial/ethnic minorities.

Please note that there may be slight discrepancies in the number provided, as several multi-racial categories were included in the demographic questionnaires provided to recipients of CDBG-funded public services. Many residents identified as belonging to two races/ethnicities and/or as "Other/Multiracial."

CR-15 - Resources and Investments 91.520(a)

Source of Funds	Source	Resources Made	Amount
		Available	Expended During
			Program Year
CDBG	HUD	\$227,062.00	\$190,115.86
Other	Economic Development	\$744,000.00	N/A
	N.H. Dept. of Environmental		
Other	Services	\$0.00	N/A
Other	SAMHSA	\$375,000.00	N/A

Identify the resources made available

Table 2 – Resources Made Available

Narrative

During FY 2015-2016, \$227,062.00 in CDBG grant funds, plus \$57,481.64 in prior year unexpended CDBG funds, were made available to the City of Rochester. During this same time period, \$1,695,782.64 was also made available in leveraged funds provided by the public service agencies that received CDBG funding. The source of these leveraged funds is various and includes other federal grants, state grants, and private donations received by the public service agency CDBG subrecipients. (Note: In processing expended funds in the Integrated Disbursement and Information System in the beginning of the fiscal year, FY 2014-2015 administrative expenses were incorrectly attributed to FY 2015-2016 instead of FY 2014-2016. This has been corrected in the system through voucher revision and adjustments to the PR-26 CDBG Financial Summary Report, and the corrected administrative expenses for FY 2015-2016 fall within the 20% planning and administrative cap.)

During FY 2015-2016, \$201,996.55 was expended on programs and activities, and \$45,412.00 was spent on planning and administration of the CDBG program, for a total expenditure of \$247,408.55 for FY 2015-2016. (Due to the grant year reporting set-up in Integrated Disbursement and Information System, the amount that appears expended for FY 2015-2016 is \$190,115.86. This does not account for prior year funds.)

In the annual grant application developed by Community Development staff, CDBG applicants must state both the amount and the percentage of leveraged funds relative to the CDBG funds being requested. The percentage and amount of leveraged funds available are taken into account when grant applications are analyzed and funding decisions made.

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Rochester Low-			HUD-determined census tracts of 51%
Moderate Income			or greater low-moderate income
Census Tracts	60%	63%	residents

Identify the geographic distribution and location of investments

Table 3 - Identify the geographic distribution and location of investments

Narrative

FY 2015-2016 marked a change from prior years, in which all census tracts within the City of Rochester were determined by to be \geq 51% low-moderate income residents. Prior to FY 2015-2016, therefore, CDBG-funded activities occurred within low- to moderate-income census tracts. In FY 2015-2016, \$127,083.12 was spent on activities in \geq 51% low-moderate income census tracts, and \$74,913.43 was spent on activities in \leq 51% low-moderate income census tracts. All activities in non-low-moderate income census tracts, however, were based on served clients' homeless and/or low-income status.² This equals about 63% of all non-administrative CDBG funds spent in \geq 51% low-moderate income census tracts, which exceeds the 60% allocation anticipated in the FY 2015-2016 Annual Action Plan.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

During FY 2015-2016, \$1,695,782.64 was provided in leveraged funds by the public service agencies that received CDBG funding. The source of these leveraged funds is various and includes other federal grants, state grants, and private donations received by the public service agency CDBG subrecipients. The Community Action Partnership of Strafford County's weatherization assistance program, for example, receives leveraged funds through regional utility companies and the state Department of Energy. The United Way of the Greater Seacoast also provides significant funding for multiple public service agencies that receive Rochester CDBG funds, especially homeless services providers.

In the annual grant application developed by Community Development staff, CDBG applicants

² These activities were the Homeless Center for Stafford County, My Friend's Place, Cross Roads House, and the Community Action Partnership for Strafford County's weatherization assistance program.

must state both the amount and the percentage of leveraged funds relative to the CDBG funds being requested. The percentage and amount of leveraged funds available are taken into account when grant applications are analyzed and funding decisions made.

Public facilities funding supported security upgrades at the Head Start offices located in the Rochester Community Center; installation of bicycle racks at several city locations, including the community center, Hanson Pines Pool, Central Square, and the Rochester Commons; installation of handicap-accessible doors at the Rochester Public Library; and an in-progress installation of a new elevator at Spaulding High School. All of these facilities/locations are owned and maintained by the City of Rochester, and all are located within \geq 51% low-moderate income census tracts.

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of homeless households to	126	118
be provided affordable housing units		
Number of non-homeless households	0	0
to be provided affordable housing		
units		
Number of special-needs households	0	0
to be provided affordable housing		
units		
Total	126	118

Table 4- Number of Households

	One-Year Goal	Actual
Number of households supported	60	87
through rental assistance		
Number of households supported	0	0
through the production of new units		
Number of households supported	50	52
through the rehab of existing units		
Number of households supported	0	0
through the acquisition of existing		
units		
Total	110	139

Table 5 - Number of Households Supported

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

Overall, performance for FY 2015-2016 was solid. The goal for rental assistance and housing rehabilitation was exceeded by a robust margin, while the goal for homeless households felt slightly under the mark. Since the Seacoast region has transitioned to a Coordinated Entry system for managing intakes into the regional homeless services system, the three individual homeless shelters that receive Rochester CBDG funding (Homeless Center for Strafford County, My Friend's Place, and Cross Roads House) have found it challenging to accurately estimate how many clients will be served within the next year since all homeless clients are now funneled through the same organizational point of contact.

These challenges have been exacerbated by shifts in homelessness trends in the region; currently,

there are more homeless families compared to homeless single residents, while in the past the opposite was the case. As each of the three shelters serves slightly different demographics, such as the Homeless Center for Strafford County's restriction to serving families and single women, this also makes it difficult for the shelters to predict client numbers a year in advance.

Discuss how these outcomes will impact future annual action plans.

Over the last few years, Cross Roads House has exceeded its estimates, while the Homeless Center for Strafford County and My Friend's Place have fallen short of their estimates. In both FY 2014-2015 and FY 2015-2016 subrecipient site visit interviews, the Community Development Coordinator provided counseling and suggestions on how to better reconcile projected goals with actual performance. Revised goals were then included in the FY 2016-2017 Annual Action Plan. Prior to the FY 2017-2018 CDBG grant application period, the Community Development Coordinator will consult with all three homeless shelters to discuss current client trends and to provide directives on how to accurately estimate projected goals for FY 2017-2018.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Persons Served	CDBG Actual	HOME Actual
Extremely Low Income	543	0
Low Income	235	0
Moderate Income	79	0
Total	857	0

Table 6 – Number of Persons Served

Narrative Information

The overwhelming majority of Rochester residents assisted with CDBG funds during FY 2015-2016 were extremely low income (30% of area median income). Very few residents were moderate income, and in addition to the numbers in Table 8, there were 19 non-low-moderate income residents assisted with CDBG funds by the Office of Economic Development's Small Business Development Center program, 34 non-low-moderate income residents served by the Rochester Child Care Center fire safety upgrades project, three non-low-moderate income residents served by the Dover Adult Learning Center, and three non-low-moderate income residents served by the New Hampshire Legal Assistance Housing Justice Project.

There is not a situation in which moderate-income residents are being assisted at disproportionate levels compared to low-income residents. The opposite is the case, with most residents served by CDBG-funded activities falling into the extremely low income category, followed by low income and moderate income. A little under 94% of all residents served with FY 2015-2016 CDBG funds were low-moderate income, nearly 85% of all residents served were low or extremely low income, and a nearly 60% of all residents served were extremely low

income. This reflects the City of Rochester's focus on providing basic needs and ensuring services are available for its most vulnerable residents.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

Activities to address homelessness this year included public service agency grants to the three regional homeless shelters that provide services to Rochester residents (Homeless Center for Strafford County, My Friend's Place, Cross Roads House), rental assistance for families who are threatened by homelessness via funding the SHARE Fund's rental assistance program, and participation by Community Development staff in multiple events and coalitions addressing homelessness issues. For example, this year the Community Development Coordinator attended most Balance of State Continuum of Care meetings, continued participation on the steering committee of the Greater Seacoast Coalition to End Homelessness, organized several regional meetings regarding upcoming potential loss of affordable housing, and extensive consultations with homeless services and allied providers.

The region's three homeless shelters, along with Coordinated Entry staff housed within the Community Action Partnership of Strafford County, provide individual assessment for each homeless person or person at risk for homelessness. Based on these assessments, the person is placed with a homeless shelter that best fits their needs, referred to an organization that can provide rental assistance, or provided other relevant referrals. The continued implementation of the Coordinated Entry system for the entire Seacoast region has formalized this intake process and ensured that the provided resources are a good match for the individual's particular situation and needs.

Addressing the emergency shelter and transitional housing needs of homeless persons

During FY 2015-2016, CDBG public services grants were awarded to the three regional homeless shelters that provide services to Rochester residents. In fact, this made up approximately half of the available public service grant funds awarded for the fiscal year. All three shelters provide emergency shelter and supportive services to residents, including financial counseling, educational and vocational training, child care, and health clinics. Two of the three shelters have transitional housing units available. Cross Roads House, the regional homeless shelter with the largest capacity, also started implementing Housing First initiatives.

In addition, a facilities grant was awarded to the Homeless Center for Strafford County to fund a new roof for the organization's transitional housing unit. As federal funding priorities have shifted from transitional housing to rapid rehousing and Housing First models, it has become even more important to maintain existing transitional housing resources, as no new resources are being added in the region.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become

homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

During FY 2015-2016, CDBG funds supported a rental assistance programs for families who are threatened by homelessness, via a public service grant to the SHARE Fund; housing rehabilitation via funding for the Community Action Partnership of Strafford County's weatherization assistance program; and accessibility improvements via funding for the Rochester Housing Authority. Without this assistance, it is likely that these Rochester residents would have been placed at risk of losing their current housing and becoming homeless.

In addition, CDBG funding has supported Tri-City Co-op, which provides peer-to-peer mental health support services; the Rochester Child Care Center, which serves a large number of low-moderate income families; and the Rochester Head Start program, which provides educational services to low-income families. All of these services help support stable housing situations and increased quality of life.

In addition, the Community Development Coordinator has been active in multiple coalitions and groups, including the Greater Seacoast Coalition to End Homelessness and the Rochester Area Family Support Team. During FY 2015-2016, the Greater Seacoast Coalition to End Homelessness has continued its Community Care Teams initiative, which particularly supports residents who are chronically homeless and/or have a mental illness and/or substance use disorder. The Rochester Area Family Support Team, which is a coalition comprised of representatives from multiple regional non-profit agencies, provides cross-agency support and coordination for Rochester's most vulnerable residents. This includes low-income youth and victims of domestic violence.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

During FY 2015-2016, CDBG public services grants were awarded to the three regional homeless shelters that provide services to Rochester residents. Two of the three shelters have transitional housing units available, and all three shelters provide supportive services to residents, including financial counseling, educational and vocational training, child care, and health clinics. Cross Roads House, the regional homeless shelter with the largest capacity, also started implementing Housing First initiatives.

In addition, CDBG funding has supported Tri-City Co-op, which provides peer-to-peer mental health support services; the Rochester Child Care Center, which serves a large number of low-moderate income families; and the Rochester Head Start program, which provides educational

services to low-income families. While these services are not homeless-specific, there is considerable overlap between these served populations and homeless populations in Rochester, and all of these services help support the transition to permanent housing and independent living.

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

Actions taken to address the needs of public housing

The most recent Five Year Plan prepared by the Rochester Housing Authority (RHA) reports its goals and objectives as including reduction of public housing vacancies, increase in affordable housing units, the creation of workforce housing, and the promotion of economic opportunities and an increase in affordable healthcare access to low-income families. Also, RHA is in the beginning stages of building new housing units specifically for elderly residents, as the continued "aging of New Hampshire" makes appropriate housing for elderly residents a key priority.

During FY 2015-2016, CDBG housing rehabilitation funding went to accessibility improvements in eight RHA units, seven of which are currently occupied. All of the residents in the seven occupied units are elderly residents, which is a key demographic for both RHA and the City of Rochester's CDBG program. In addition, the City of Rochester has entered into a memorandum of understanding with RHA to draft and submit a joint Assessment of Fair Housing, and Rochester Community Development staff has arranged to have all CDBG project bids posted at RHA housing units to encourage the hiring of public housing residents for CDBG-funded projects.

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

The Rochester Housing Authority maintains a Resident Advisory Board, including representatives from each of the RHA's housing sites, that meets to review RHA annual and five year plans. The Resident Advisory Board also provides input on general RHA operations. During the FY 2016-2017 Annual Action Plan citizen participation project, the City of Rochester's Community Development staff arranged for an outreach and feedback meeting specifically for RHA residents. RHA management staff, including the executive director, also participated in this meeting, and several items of resident concern were referred to RHA management for appropriate follow-up and action.

Actions taken to provide assistance to troubled PHAs

N/A. The Rochester Housing Authority is not designated as a troubled agency by HUD.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

The City of Rochester's Community Development staff has attended a landlord-tenant law "know your rights" training organized by the New Hampshire Legal Assistance Housing Justice Project and funded through Rochester CDBG funds. Community Development staff has also carefully monitored proposed City ordinances and legal actions that might impact affordable housing, including extensive consultation with the City's Legal Department, Welfare Office, and City Manager's Office regarding litigation involving a facility zoned as a campground but used as a permanent residence by many low-income Rochester residents. This has involved Community Development staff reaching out to many regional non-profit partners to help coordinate and plan, and it has been an especially difficult situation to address due to reported poor conditions of the trailers at the campground and health and safety concerns.

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

Some of the top underserved needs within the City of Rochester are supportive services and housing for residents with mental illnesses and substance abuse issues. During the FY 2015-2016 and FY 2016-2017 Annual Action Plan research and consultation process, the need for more services for those with mental illnesses and substance use disorders came up time and time again.

The main obstacles to serving these underserved needs are lack of funding and lack of organizational capacity. These obstacles have been addressed through a variety of means. CDBG funding was awarded in FY 2015-2016 to the Tri-City Consumers' Action Co-Operative, a public service agency that provides non-medical peer-to-peer support services to residents of the City with mental illnesses. The Community Development Coordinator also has been active in the Greater Seacoast Coalition to End Homelessness, which has been spearheading the creation of Community Care Teams, which will support residents who are chronically homeless, many of whom have mental illness and/or substance use disorders. Significant success has already been reported from the Community Care Team that meets at Frisbie Memorial Hospital, which is located in Rochester and is the largest health care provider for city residents.

Substance use disorder support services remain an underaddressed need, but Community Development staff has taken actions to change that. During the FY 2016-2017 Annual Action Plan planning processes, Community Development staff conducted targeted outreach to substance use disorder service providers to encourage submission of CBDG grant applications in this area. Three agencies submitted grant applications for FY 2016-2017, and one project was approved for funding in FY 2016-2017.

Also, throughout FY 2015-2016, the City of Rochester continued its fiscal agent responsibilities for Bridging the Gaps: The Rochester Community Coalition for Alcohol and Drug Prevention. Bridging the Gaps receives federal funding through the Substance Abuse and Mental Health

Services Administration to enact community-level change and reduction in substance abuse by the City's youth population. Community Development staff is involved in the fiscal management of the federal grant, identification of funding opportunities, and in coalition planning and programming.

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

The weatherization assistance program run by the Community Action Partnership of Strafford County, which expended \$55,293.60 in CDBG funding during FY 2015-2016, provides weatherization assistance to low-income residents of the City of Rochester. This includes updating heaters and boilers, replacing inadequate insulation, and other related rehabilitation activities. While performing this rehabilitation work, the weatherization assistance program also provides lead evaluation, containment, and/or abatement services when circumstances, such as the age of the home in question, indicate the need for such. This was also the case for the eight housing units owned and managed by the Rochester Housing Authority that received accessibility improvements. In FY 2015-2016, a total of 51 housing units received housing rehabilitation assistance, including nine units constructed prior to 1978.

In addition, the Community Development Coordinator presented the opportunity of HUD lead hazard control grant funding to the Community Development Committee and City Council, encouraging the city to apply for funding. The City Council voted to approve submission of an application for the 2017 grant round.

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

The City of Rochester engages in a multi-faceted approach to reducing poverty among city residents. One prong of this approach is the provision of direct services aimed at addressing basic and immediate needs of our most vulnerable, lowest-income residents. This includes emergency housing assistance, in the forms of funding for the region's homeless shelters and for the SHARE Fund's rental assistance program. Another prong involves investment in activities and programs that will help prevent poverty and/or address poverty over a longer period of time. This includes funding for educational services, such as the Dover Adult Learning Center's High School Equivalency Testing program, and funding for the mental health peer-to-peer support services provided by the Tri-City Consumers' Action Co-operative.

A third prong involves investing funds to create and broaden economic opportunities within the City of Rochester. The City maintains a revolving loan fund, the Job Opportunity Benefit (JOB) loan program, to provide funding to local businesses that commit to retaining at-risk jobs or creating new jobs specifically for low- to moderate-income residents. Two JOB loans were entered into during FY 2015-2016, with Seacoast Gymnastics and Rochester Eye Care. Also, vocational and internship services were provided through CDBG public services funding of MY-TURN (formerly Project PRIDE).

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

The City of Rochester is a public entity that engages in municipal activities such as planning and

financing of economic development projects, code enforcement, planning and zoning review, financial relief assistance, and community development. Community Development staff regularly coordinates with various city departments, such as the Planning Department and Department of Public Works, and a multitude of public service agencies, including both agencies that receive CDBG funding subgrants and agencies that do not. This coordination has enabled the time- and cost-efficient provision of supportive services, housing rehabilitation, and public facilities improvements to low-moderate income Rochester residents. This coordination also identifies specific program and activity needs within the City, as well as other funding sources for City projects that may not qualify under CDBG.

The Community Development Coordinator participates also as a member of the Balance of State Continuum of Care, a member of the Rochester Area Family Support Team, and a steering committee member of the Greater Seacoast Coalition to End Homelessness. The involvement of Community Development staff in these organizations and coalitions provides for the development and strengthening of cross-agency relationships and projects.

In addition, Community Development staff has undertaken the process of formalizing policies and procedures relevant to the city's CDBG program. This will enable other city departments to quickly understand and implement CDBG-relevant policies, as well ensuring smooth transition of responsibility should the current Community Development Coordinator leave the position. Such policy formalization efforts include researching and drafting a Section 3 policy, researching and drafting a Language Access Plan, and the drafting of monthly Community Development reports that are submitted to the City Manager as well as the Community Development Committee.

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

Community Development staff have engaged in a broad range of outreach and networking activities, including regularly forwarding relevant HUD, New Hampshire Bureau of Homeless and Housing Services, New Hampshire Housing Finance Authority, and other housing- and homelessness-related training opportunities to public service agency and local government contacts who might be interested. The Community Development Coordinator also participates as a member of Balance of State Continuum of Care, a member of the Rochester Area Family Support Team, and a steering committee member of the Greater Seacoast Coalition to End Homelessness are comprised of mixes of local government staff and public service agency staff, including community development, welfare, housing, health care, education, and mental health services staff.

In addition, the Community Development Coordinator has initiated and led several regional meetings regarding affordable housing issues and the actual and potential loss of affordable housing in the region. These meetings have, in many cases, brought together individuals who had not previously worked with one another and have encouraged better coordination of regional efforts in addressing affordable housing issues.

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

During FY 2015-2016, CDBG funds paid for a landlord-tenant law "know your rights" workshop hosted by New Hampshire Legal Assistance's Housing Justice Project staff. This workshop provided an important resource to the Rochester community, and several important connections between landlords, tenants, city staff, and legal assistance staff were made during the workshop.

In addition, Community Development staff has drafted and posted a fair housing webpage to the city's Community Development website. This page, which can be found online at http://www.rochesternh.net/community-development-division/pages/fair-housing, provides links to the texts of the federal Fair Housing Act and New Hampshire state anti-discrimination protections, to several HUD fair housing resources, to HUD housing demographics data for the city, and to the New Hampshire Legal Assistance's Housing Justice Project webpage. Drafts of the City of Rochester's Assessment of Fair Housing will also be posted to this page, and the draft Citizen Participation and Consultation Process in the Assessment of Fair Housing is currently posted.

CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

During the FY 2015-2016 and FY 2016-2017 subrecipient CDBG grant application processes, the City of Rochester required information as to the applicant organization's experience with federal grant requirements, prior CDBG funding history, and ability to comply with federal and local regulations. The applicants certified that they would comply with the City of Rochester's anti-displacement and relocation policy and, in the FY 2016-2017 application, applicants also certified that they would not award any subcontracts, commit any funds, or begin any construction prior to a HUD Release of Funds.

Applications from previously-funded organizations were analyzed for prior compliance and demonstrated ability to carry out program activities as promised. During the FY 2016-2017 CDBG grant cycle, the Community Action Partnership of Strafford County's weatherization assistance program was awarded only half of the funds requested, due to the inability of the organization to expend approximately half its grant in both FY 2014-2015 and FY 2015-2016.

The City of Rochester continues to collect both quarterly and annual reports from its FY 2015-2016 CDBG subrecipients. These reports include racial/ethnic, sex, income, and other demographical information of clients served, as well as expense details. In cases where the quarterly reports indicated that performance goals likely would not be met, Community Development staff reached out to the subrecipients to discuss the shortfalls, any challenges the organization was facing, and ways to improve performance. For the Community Action Partnership of Strafford County's weatherization assistance program, this included a formal corrective action plan with quarterly progress meetings.

In June 2016, Community Development staff performed annual site visits to the offices of all FY 2015-2016 CDBG grant subrecipients, with the exception of New Hampshire Legal Assistance. (This exception was granted due to the extended absence of a key New Hampshire Legal Assistance staff person due to medical issues.) During each visit, Community Development staff interviewed key agency personnel, reviewed program and financial documents, and discussed performance successes and challenges. While in a few cases performance difficulties were identified, which have been discussed previously, overall the FY 2015-2016 CDBG grant subrecipients were found to be in compliance with HUD regulations and CDBG objectives and to be meeting or exceeding established program performance goals.

During FY 2015-2016, Community Development staff also performed environmental reviews for all CDBG-funded projects and Davis-Bacon Act wage rate compliance monitoring for all CDBG-funded construction projects. For environmental reviews, this included field site visits to each project site and consultations with the New Hampshire Division of Historical Resources. Community Development staff also discussed environmental review procedures with all FY 2015-2016 CDBG subrecipients prior to the beginning of the fiscal year to ensure that all

subrecipients understood that work on the projects could not begin until the completion of the environmental review.

For Davis-Bacon Act compliance, this included site visits to the construction project sites and interviews with project workers. During FY 2015-2016, Community Development staff performed a site visit and laborer interviews for the Homeless Center for Strafford County new roof project, Head Start security upgrades project, Rochester Child Care Center fire safety upgrades project, Handicap Accessibility Improvements Microgrants program/Rochester Housing Authority accessibility improvements project, Spaulding High School elevator project, and Rochester Public Library handicap-accessible doors project. (The Community Action Partnership of Strafford County's weatherization assistance program and the bicycle racks project were both exempt from Davis-Bacon Act requirements.) Full Davis-Bacon Act compliance has been documented for all FY 2015-2016 construction projects.

In addition, Community Development staff has maintained regular contact with the City's HUD representative and has maintained active membership on all relevant HUD email list-servs. Relevant updates and notices from HUD have been forwarded to CDBG subrecipients. Community Development staff also has attended a number of relevant trainings during FY 2015-2016, including Davis-Bacon Act and environmental review trainings presented by regional HUD officials.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

The final draft of the Consolidated Annual Performance and Evaluation Report (CAPER) is made available to the public through a variety of means. Hard copies of the report are provided for public viewing at City Hall, the Rochester Public Library, and the Office of Economic and Community Development. Electronic copies of the report are provided for public viewing and download on the City of Rochester's Community Development website. Notice of the public comment opportunity is posted in a local newspaper of general circulation, as well as at City Hall, the Rochester Public Library, and the Rochester Community Center. Notice is provided via electronic means, as well, including but not limited to postings to the Community Development Division webpage and postings to the Office of Economic and Community Development's social media accounts.

Non-finalized drafts of the CAPER will be posted to the City of Rochester's Community Development website.

Notice will be posted no later than 15 days prior to the submission of the CAPER to HUD, with an ideal goal of providing 30 days notice prior to submission of the CAPER to HUD. All public comments will be forwarded to HUD after the public comment period has ended.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

There have not been any changes in the City of Rochester's program objectives during FY 2015-2016. The City of Rochester would, and has, changed its activities as a result of its experiences in implementing CDBG programs and activities, however. For example, in FY 2015-2016, the City of Rochester has discontinued CDBG funding to the New Hampshire Small Business Development Center due to ongoing performance issues and after counseling and other attempts to improve performance were unsuccessful. In FY 2016-2017, the City of Rochester is discontinuing CDBG funding to the Office of Economic Development's Small Business Development Center due to performance issues and assessed mismatch between program activities and CDBG program restrictions.

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

The City of Rochester does not have any open Brownfields Economic Development Initiative grants.

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

N/A. The City of Rochester is not a BEDI grantee.