

# DRAFT 2020 ACTION PLAN WITH CDBG AMENDMENT FOR CV FUNDING

The contents of this document are presented in the exact format as required by the U.S. Department of Housing and Urban Development's (HUD) Integrated Disbursement and Information System (IDIS). This is a nationwide database and provides HUD with current information regarding the program activities underway across the Nation, including funding data. HUD uses this information to report to Congress and to monitor grantees. Each funding partner must enter their information directly into IDIS. Each section requires specific information from the various programs in New Hampshire. *Grantees must submit this plan as their application to HUD. This content is downloaded directly from IDIS to allow for citizens participation and public comments.*

## Executive Summary

### AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

#### 1. Introduction

New Hampshire's Consolidated Plan is developed by the Housing and Community Development Council, which was established by New Hampshire Executive Order and is staffed by New Hampshire Community Development Finance Authority (CDFA), New Hampshire Housing Finance Authority (NHHFA), and the Department of Health and Human Services, Bureau of Housing Supports (DHHS-BHS). In order to receive allocations of Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), National Housing Trust Fund (HTF) and Emergency Solutions Grant (ESG) funds from the US Department

of Housing and Urban Development (HUD), the state is required to submit a Consolidated Plan. Among other things, the plan must assess the state's housing, homeless, and community development needs, establish priority needs, and explain how they will be addressed with HUD and other funding. This Action Plan describes how the above-mentioned resources, will be applied for, distributed and utilized to address New Hampshire's housing, homeless, and community development needs during calendar year 2020.

The CARES Act was signed into law on March 27, 2020 to help the Nation respond to the coronavirus outbreak. The funds may be used to cover or reimburse allowable costs incurred by a State or locality before the award of funding (including prior to the signing of the CARES Act) to prevent, prepare for, and respond to COVID-19. The CDBG-CV and ESG-CV are included in this action plan. This action plan describes how these funds along with the 2020 annual allocations for CDBG, HOME, HTF and ESG funds will be applied for, distributed and utilized to address New Hampshire's community and economic development, housing and homeless needs during this calendar year 2020.

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

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

The CDBG program, funded at \$9,219,385 this year, helps address multiple community development needs. Community Development priorities for the 2020 include:

High Priority: Housing, Revitalization, Economic Development, Water and Wastewater Facilities, Childcare Facilities

Medium Priority: Center Facilities, Other Public Facilities

The Community Development Block Grant will fund priorities listed above based on the attached Table.

The \$14,311,183 in CDBG-CV funds in addition to future CV allocations will be used to address the rapidly emerging situation related to the COVID-19 virus. CDFA will expeditiously deploy CDBG-CV resources to meet emerging needs and to implement more flexibility with existing CDBG allocations to address the need for rebuilding to meet longer term needs included but not limited to, permanent supportive housing, public services, economic development including microenterprise technical assistance and direct grants, public facilities adaptations and buildings, housing and meeting other necessary needs. CDFA has been actively working with partners across the state to assess the needs of municipalities, nonprofits and businesses as they support the evolving needs of New Hampshire's residents and to ensure that our response is both aligned with current needs and prioritizes the unique

needs of low and moderate income persons. CDFA will continue to work with the local and state health networks to identify critical needs and to assure that CDBG-CV funds do not duplicate other funding sources.

HOME Investment Partnerships Program funded at \$3,839,240, will be used to contribute to the development of 350 units of new affordable housing, with \$1,900,000 of this amount to be used for the preservation of 200 affordable housing units. This annual grant plus program income and uncommitted funds from previous years provide a total of \$6,300,000 to invest in communities of NH.

New Hampshire is receiving the small state allocation of \$3,000,000 in National Housing Trust Funds. These funds will be used as gap financing in projects that receive Low Income Housing Tax Credits and as funding for supportive housing through a competitive Notice of Funding Availability (NOFA) to serve the homeless and supportive housing community.

ESG funding of \$930,879 will be used for short term rental assistance- rapid rehousing for 400 literally homeless individuals, prevention for 100 at risk individuals, and housing relocation and stabilization services for all 500 persons to receive case management and maintain housing.

The \$8,007,424 in ESG-CV funds in addition to future allocations will be used to provide short term rental assistance for rapid rehousing for 150 literally homeless individuals, and prevention for 400 at risk individuals to prevent the spread of COVID-19, and to mitigate against the economic impact caused by COVID. Housing relocation and stabilization services will be provided to all households to secure and maintain permanent housing outcomes. 2000 individuals will be served through Emergency Shelter to support additional homeless assistance to help prevent, prepare for, and respond to the coronavirus pandemic.

Annual Allocation From HUD	Target %
Housing	30%
Public Facilities	30%
Economic Development	30%
Emergency	5%
Planning	2%
Technical Assistance/Administration	3%

**Table 1 -**

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

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

Although it is impossible to estimate exact numbers of homeless households to be served, housing units completed, and community development projects to be completed in a given year, production and performance under all four of these programs has been steady and reliable over time.

ESG utilizes project monitoring via site visits, CAPER reporting, System Performance Measures and Contract compliance as methods to evaluate performance. DHHS-BHS also hosts quarterly ESG meetings to review best practices, and offer training or support to all ESG sub-recipients.

Neither CDFA, NHHFA, nor DHHS-BHS have ever been required to return CDBG, HOME, HTF or ESG funds to HUD.

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

Summary from citizen participation section of plan.

In addition to solicitation of public input from partners, grantees, and other interested parties, the development of the Action Plan was discussed with the Housing and Community Development Planning Council and a draft reviewed with them. Citizen participation was solicited through emails to grantees, constituents, and interested parties of CDFA, NHHFA and DHHS-BHS through posting of the public hearings on each agency's website and in the statewide newspaper, and as an announcement for board posting. CDFA and NHHFA also seek approval from their respective Boards of Directors.

During calendar year 2019, CDFA worked with state leaders, legislators, and partners on an important measure to streamline CDBG program administration by exempting CDFA from the New Hampshire Administrative Procedures Act and other rulemaking provisions. The bill exempting CDFA from the rules process was signed by the Governor in late July 2019. CDFA public meetings of the Community Development Advisory Committee and community development meetings to solicit feedback during the year regarding CDBG.

NHHFA uses the yearly LIHTC process and Supportive Housing meetings to solicit feedback during the year regarding HOME and HTF.

ESG-CV solicited feedback from current subrecipients, emergency shelters and other community providers through email, virtual meetings and telephone interviews- abiding by social distancing and the stay at home orders to minimize spread of COVID-19.

To establish goals for the 2020 CDBG program year and ensure proposed changes were based on data, trends and public participation, CDFA undertook the following process:

- Hosted listening sessions across the state in August 2019;
- Conducted a survey of municipalities and other stakeholders;
- Solicited public input through one-on-one outreach; and
- Researched and evaluated best practices and program models.

The goals identified through the outreach efforts include increasing funds available to municipalities, building capacity and providing support for downtown revitalization and redevelopment. **Additional Background on the Community Development Block Grant Program in New Hampshire**

CDFA has administered the annual allocation of federal CDBG funds on behalf of the State since 2003, coordinating the investment of more than \$140 million into New Hampshire communities. These critical resources have been deployed across the state and have made a significant impact on economic development, housing and community-based projects in dozens of municipalities. CDFA administers the CDBG program to provide benefits primarily for low-and-moderate-income individuals, create the greatest possible community-driven impacts and adapt to the needs of New Hampshire communities.

Over 40 people attended the virtual public hearings held on May 5th, 2020. The hearings on May 5th including the Substantial Amendment for the 2016-2020 Consolidated Plan AND the 2020 Action Plan. A previous hearing on the 2020 Action Plan was held in October of 2019, comments from that hearing are summarized above. The May 5th virtual hearings included both the NH Department of Health and Human Services (DHHS) ESG funding and NH Community Development Finance Authority (NHCDF) CDBG funding.

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

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

Comments were received only from LRCD and included concerned that the proposed % split between the three programs (housing/public facilities/ED) may leave less money available for Housing grants. Noted that it actually increases funding for housing and further funds can be moved between programs. Concern that CDFA has not established how they will be designating CBDs for new housing construction, suggestion to utilize the same process as NHH. Concern that locating new housing in a downtown or other municipally designated area might be too restrictive however CDFA noted that this

was based on community input and, that CDBG is generally prioritized for housing rehab, not new housing construction. Suggested that CDFA should incentivize its priorities but not prohibit other housing options as opportunities arise -noted. Noted that data for rural areas can be very hard to quantify. If such data existed, they would be willing to use it but noted that vibrancy data could potentially turn focus away from more vibrant communities that do not show a need for housing. New energy audit requirement may not produce the results intended and could level additional, unnecessary costs on a project, energy audits do not necessarily lead to healthy housing, LIHTC already has requirements for energy conservation through their construction standards. CDFA should consider looking at those construction standards. Noted that an energy audits are not necessarily required are something similar can be substituted as the rule says something similar to an audit can be used. LRCB said they had not used emergency funds. Noted that CDFA considering rolling extra ED funds into the Emergency Program if it was depleted. LCRD said this sounded like a good idea. LRCB suggested that grant amounts for public facilities (only) be raised due to the high costs of rehabbing daycare centers, which is a high priority in NH at the moment.

No comments were offered on the proposed ESG program. Written comments on the both the Substantial Amendment (CDBG) and the 2020 Action Plan (CDBG) were received from the Alliance of Rural Development Councils, Southwest Regional Planning Commission, City of Concord, Fit-NH, Monadnock Economic Development Corporation, Families in Transition (FIT-NH), CDBG Consultant, Belknap County EDC, City of Keene and NH Legal Assistance. All written comments that were received prior to the public hearing on May 5th, 2020 and focused on the availability, eligibility of projects and applicants, potential uses, application amounts, and pre-award costs for the COVID-19 CDBG-CV funding. In particular requests included granting CDBG-CV funds directly to nonprofits, use of CDBG-CV for rental assistance payments and for support for small business and downtown recovery efforts. There were no additional questions relating to the regular 2020 allocations of either ESG or CDBG.

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

None.

#### **7. Summary**

The HUD resources of CDBG, HOME, and ESG make valuable contributions to New Hampshire's cities, towns, and citizens in many ways as will be seen in the remainder of this plan. Programmatic changes in Emergency Solutions Grant have been helpful, and although ESG and CDBG funding have been increased slightly, housing affordability remains a growing concern that is clearly tied to homelessness. The HOME program provides one of the few needed subsidies to affordable housing projects. However, since NH is a small state it therefore receives the "small state minimum" of \$3,000,000 annually. Public and partner input have always been important in helping to shape how these resources are deployed.

**PR-05 Lead & Responsible Agencies - 91.300(b)**

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

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

Agency Role	Name	Department/Agency
Lead Agency	NEW HAMPSHIRE	
CDBG Administrator		Community Development Finance Authority
HOPWA Administrator		
HOME Administrator		New Hampshire Housing Finance Authority
ESG Administrator		DHHS-Bureau of Housing Supports
HOPWA-C Administrator		
		New Hampshire Housing Finance Authority

**Table 2 – Responsible Agencies**

**Narrative**

New Hampshire Housing Finance Authority is the lead agency in New Hampshire's Consolidated Planning.

**Consolidated Plan Public Contact Information**

Gloria Paradise

Director Federal Housing Programs

New Hampshire Housing Finance Authority

32 Constitution Drive

Bedford, NH 03110

603-310-9315

[gparadise@nhhfa.org](mailto:gparadise@nhhfa.org)

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## **AP-10 Consultation - 91.110, 91.300(b); 91.315(l)**

### **1. Introduction**

#### **Provide a concise summary of the state's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies**

The Housing and Community Development Planning Council exists to obtain consultation from the above-mentioned groups regarding the use of state CDBG, HOME, HTF, and ESG funds, but in addition to that it serves to increase understanding and communication between housing and service providers as well as governmental agencies. New Hampshire Housing's frequent conferences and trainings also serve to bring diverse audiences with related interests together. New Hampshire has the benefit of being a small state therefore communication between the housing and service providers is comprehensive and participation in Boards, Councils, and other planning and advisory groups is inherent. For example, NHHFA and BHS are both represented on the NH Behavioral Health Advisory Council, NHHFA serves on the Housing Committee of the Balance of State Continuum of Care and the CDBG Advisory Council, BHS participates in the Workforce Housing Council that NHHFA sponsors, and we typically co-sponsor each other's conferences and training events.

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

NH has 3 Continuums of Care (CoC), The Greater Nashua (GNCoC), Manchester (MCoC) and Balance of State (BoSCoC). The Bureau of Housing Supports (BHS) is the NH State recipient for ESG funding, and the BHS administrator is the Co-Chair of the BoSCoC, which ensures a high degree of collaboration and coordination of services between the ESG program and BoSCoC programs. The BoSCoC has subcommittees that focus on Youth Homelessness, Veteran Homelessness, Coordinated Entry and Data Integration. The state also funds homeless services at a level of \$4.1 million annually, and oversees the administration of the federal Health and Human Services (HHS) Substance Abuse and Mental Health Services Administration (SAMHSA) funded Projects for Assistance in Transition from Homelessness (PATH) outreach program, and the state (Housing Opportunities for Person's with Aids) HOPWA program grants. This allows the BHS to ensure coordination of services and communications among outreach, shelter and transitional and Permanent Supportive Housing Programs. The BHS mission, in addition to coordinating funding, is to ensure collaboration between all of NH's homeless assistance programs, ensuring alignment with common goals and efficient utilization of resources. BHS coordinates regular meetings for statewide Outreach staff, Shelter Directors, and Permanent Supportive Housing case managers to share information on various initiatives, provide TA and foster

communication and coordination of services. BHS staff co-chair or participate in a number of community task forces and committees including the NH Homeless Veterans Committee, North Country Veterans Committee, and the Homeless Teen Task force which are each focused on addressing the needs among each of these groups. BHS has also worked with providers to increase the number of CoC and ESG funded rapid rehousing programs across the state to better reduce and shorten homelessness.

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

NH has 3 Continuums of Care (CoC), The Greater Nashua (GNCoC), Manchester (MCoC) and Balance of State (BoSCoC). BHS staff conduct presentations at statewide CoC and ESG provider meetings to openly discuss performance standards and policies. This includes review of the current NH ESG program design; policies and procedures; expected available funds and examples of how to allocate funds; the process for evaluating outcomes; and performance standards. HMIS policy and standards are reviewed by the HMIS Advisory board consisting of local end users and administrative staff. HMIS Advisory board also reviews the HMIS Governance Model as well as solicitation of feedback and discussion regarding information presented. Allocation of ESG funds is subject to an open procurement process where any and all parties can apply for funding.

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

**Table 3 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	Neighborworks Southern New Hampshire
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy Housing Trust Fund
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Membership and participation in Housing and Community Development Planning Council
2	<b>Agency/Group/Organization</b>	FAMILIES IN TRANSITION
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-Persons with Disabilities Services-homeless

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy Housing Trust Fund
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Membership and participation in Housing and Community Development Planning Council
3	<b>Agency/Group/Organization</b>	New Hampshire Legal Assistance
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Elderly Persons Services-Victims of Domestic Violence Services-homeless Service-Fair Housing Services - Victims

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy Housing Trust Fund
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Membership and participation in Housing and Community Development Planning Council
4	<b>Agency/Group/Organization</b>	KEENE HOUSING AUTHORITY
	<b>Agency/Group/Organization Type</b>	PHA

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy Housing Trust Fund
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Membership and participation in Housing and Community Development Planning Council.
5	<b>Agency/Group/Organization</b>	COOS ECONOMIC DEVELOPMENT CORP
	<b>Agency/Group/Organization Type</b>	Regional organization Business Leaders Civic Leaders Community Development Financial Institution Private Sector Banking / Financing

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy Housing Trust Fund
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Membership and participation in Housing and Community Development Planning Council.
6	<b>Agency/Group/Organization</b>	EASTER SEALS SOCIETY OF NEW HAMPSHIRE
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Persons with Disabilities Services-Health Services-Employment

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy Housing Trust Fund
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Membership and participation in Housing and Community Development Planning Council.
7	<b>Agency/Group/Organization</b>	Town of Littleton
	<b>Agency/Group/Organization Type</b>	Government - Local Planning organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Non-Homeless Special Needs Market Analysis Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Membership and participation in Housing and Community Development Planning Council.



8	<b>Agency/Group/Organization</b>	NH Coalition Against Domestic and Sexual Violence
	<b>Agency/Group/Organization Type</b>	Services-Victims of Domestic Violence
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Membership and participation in the Housing and Community Development Planning Council
9	<b>Agency/Group/Organization</b>	STRAFFORD COUNTY
	<b>Agency/Group/Organization Type</b>	Regional organization Planning organization
	<b>What section of the Plan was addressed by Consultation?</b>	Regional Planning Services
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Membership and participation in the Housing and Community Development Planning Council.
10	<b>Agency/Group/Organization</b>	NH COMMUNITY LOAN FUND
	<b>Agency/Group/Organization Type</b>	Housing Community Development Financial Institute Community Development Financial Institution
	<b>What section of the Plan was addressed by Consultation?</b>	Services - Housing
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Membership and participation in the Housing and Community Development Planning Council.
11	<b>Agency/Group/Organization</b>	HANNAH GRIMES CENTER
	<b>Agency/Group/Organization Type</b>	Business Leaders

<b>What section of the Plan was addressed by Consultation?</b>	Business leaders - Regional Organization
<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Membership and participation in the Housing and Community Development Planning Council.

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

None

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

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care	DHHS-BHS	Continuum goals are the Strategic Plan Homeless goals
NH Qualified Allocation Plan 2020	NHHFA	Qualified Allocation Plan establishes and promotes housing priorities for affordable housing development and preservation.
Biennial Housing Plan 2019-2020	Nhhfa	Biennial Housing Plan goals are Strategic Plan goals
NH Plan to End Homelessness	DHHS-BHS	Goals overlap Strategic Plan goals.
NH Plan to End Homelessness Among Veterans	DHHS-BHS	Veteran Homeless goals incorporated into Strategic Plan goals.
FY-2019 - 2020 Strategic and Program Plan	NHHFA	Plans the use of HOME and HTF along with other resources to develop affordable housing.

**Table 4 - Other local / regional / federal planning efforts**

**Narrative**

The Housing and Community Development Planning Council meets four or five times each year to obtain input from members representing the interests required by the New Hampshire Executive Order and the consolidated plan regulation for consultation. Each of the meetings includes

presentations on current issues within Housing, Homelessness, or Community Development as well as discussions regarding potential uses of CDBG, HOME, HTF and ESG funds, with each meeting cycle culminating in review of all Consolidated Plans and Action Plans prior to Board Approvals and submission to HUD. The membership is as above in Table 2. In order to promote broader understanding of how all four grants are utilized, consultation occurs in the context of the periodic meetings of the group as a whole. The CDBG, HOME, HTF and ESG components of the 2020 Action Plan were discussed with the Housing and Community Development Planning Council on September 19, 2019 in anticipation of a November 15, 2019 Action Plan due date.

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## **AP-12 Participation - 91.115, 91.300(c)**

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

The citizen participation process is designed to ensure that the public is given the required time to review any and all actions being taken on or under the 5-year Consolidated Plan. Additionally, the public is invited to attend hearings to voice any concerns or questions they may have concerning these actions.

All four programs operate on the same program year, January 1-December 31. According to HUD regulations, an Action Plan submission is due at HUD 45 days prior to the beginning of a program year, however an Action Plan lacking formula grant amounts is considered incomplete and cannot be accepted by HUD. For the last several years, federal budgets have been passed months after the beginning of each federal fiscal year, delaying Action Plan submissions until formula grants are calculated, typically between 30 and 60 days following the passage of a federal budget. Agencies have changed from a calendar year to Fiscal Year start July 1.

**Citizen Participation Outreach**

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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
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1	30 Day public comment period and public hearing	Non-targeted/broad community	A 30 day public comment period for CDBG, HOME, HTF and ESG components of Action Plan beginning August 30, 2019 publicized via newspaper ad and website post. Notice also emailed to NHHFA, CDFA, and BHS email lists of business partners, stakeholders, interested parties, etc. Draft Plan based upon projected program funding levels similar to those of FY 2019 beginning August 30, 2019 publicized via newspaper ad and website post. 2020 Action Plan drafted with actual awards was published. Over 40 people attended the virtual public	Public hearing held October 1, 2019. Comments were received only from LRCD and included concerned that the proposed % split between the three programs (housing/public facilities/ED) may leave less money available for Housing grants. Noted that it actually increases funding for housing and further funds can be moved between programs. Concern that CDFA has not established how they will be designating CBDOS for new housing construction, suggestion to utilize the same process as NHH. Concern	None.	
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			<p>hearings held on May 5th, 2020. The hearings on May 5th including the Substantial Amendment for the 2016-2020 Consolidated Plan AND the 2020 Action Plan. The May 5th virtual hearings included both the NH Department of Health and Human Services (DHHS) ESG funding and Community Development Finance Authority (CDFA) CDBG funding for COVID-19 funds. The February 11, 2021 virtual public hearing for the Substantial Amendment CDBG for the 2020 Action Plan was attended by 8 people. A previous hearing on the 2020</p>	<p>that locating new housing in a downtown or other municipally designated area might be too restrictive however CDFa noted that this was based on community input and, that CDBG is generally prioritized for housing rehab, not new housing construction. Suggested that CDFa should incentivize its priorities but not prohibit other housing options as opportunities arise -noted. Noted that data for rural areas can be very hard to quantify. If such data existed, they would be willing to</p>		
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			<p>Action Plan was held in October of 2019, comments from that hearing are summarized above.</p>	<p>use it but noted that vibrancy data could potentially turn focus away from more vibrant communities that do not show a need for housing. New energy audit requirement may not produce the results intended and could level additional, unnecessary costs on a project, energy audits do not necessarily lead to healthy housing, LIHTC already has requirements for energy conservation through their construction standards. CDFA should consider looking at those construction</p>		
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				<p>standards. Noted than an energy audits are not necessarily required are something similar can be substituted as the rule says something similar to an audit can be used. LRCD said they had not used emergency funds. Noted that CDFA considering rolling extra ED funds into the Emergency Program if it was depleted. LCRD said this sounded like a good idea. LRCD suggested that grant amounts for public facilities (only) be raised due to the high costs of rehabbing daycare centers, which is a high priority in NH</p>	
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				<p>at the moment.No comments were offered on the proposed ESG program. Written comments on the both the Substantial Amendment (CDBG) and the 2020 Action Plan (CDBG) were received from the Alliance of Rural Development Councils, Southwest Regional Planning Commission, City of Concord, Fit-NH, Monadnock Economic Development Corporation, Families in Transition (FIT-NH), CDBG Consultant, Belknap County EDC, City of Keene</p>	
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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
				and NH Legal Assistance. All written comments that were received. There were no written comments received from the February 11 public hearing.		

**Table 5 – Citizen Participation Outreach**

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## Expected Resources

### AP-15 Expected Resources – 91.320(c)(1,2)

#### Introduction

FFY 2020 formula grant amounts are not significantly different from FFY 2019 levels. COVID-19 - 1,2 & 3 Funds are included for CDBG and ESG

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	9,219,385	139,379	3,868,647	13,227,411	13,086,307	CDBG funds will be used for activities as outlined in the Consolidated Plan. Program income was received based on a payback from a Neighborhood Stabilization Program (NSP) project.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	3,840,567	1,800,000	5,242,792	10,883,359	10,042,792	HOME funds will be utilized for Multifamily Rental Production in the form of both new construction and rehab as well as rehabilitation of existing affordable housing stock in order to preserve and extend affordability. Prior resources and on-hand program income will be committed to low-income housing tax credit projects before the deadlines.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	903,879	0	0	903,879	903,879	ESG funds will be used to fund Rapid ReHousing and Homeless Prevention Rental Assistance, Housing Stability Case Management, HMIS, and admin to prevent, prepare for and respond to coronavirus.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HTF	public - federal	Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership	3,000,000	0	2,700,000	5,700,000	5,700,000	Allocation published April, 2020, small state minimum.
Continuum of Care	public - federal	Admin and Planning Housing Rapid re-housing (rental assistance) Rental Assistance TBRA Transitional housing	4,067,295	0	0	4,067,295	12,201,885	There are three CoC's in NH which fund Transitional Housing, Permanent Supportive Housing, Rapid ReHousing and planning and service coordination activities.



Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
General Fund	public - federal	Admin and Planning Overnight shelter Services	4,000,000	0	0	4,000,000	12,000,000	The State of NH General Funds support Homeless assistance Services in NH at a level of approximately 4 million dollars annually.
HUD-VASH	public - federal	TBRA	1,494,060	0	0	1,494,060	1,494,060	New Hampshire Housing administers 185 HUD-VASH vouchers including 25 project based and 160 tenant based.
LIHTC	public - federal	Acquisition Multifamily rental new construction Multifamily rental rehab	3,851,927	0	0	3,851,927	3,851,927	Low Income housing tax Credits are administered by the Internal Revenue Service and are used for both development and preservation of affordable rental housing inventory.
Section 811	public - federal	Rental Assistance	672,000	0	0	672,000	672,000	Section 811 PRA blends small numbers of persons with disabilities into new or existing affordable housing and provides project based rental assistance.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other	public - federal	Acquisition Admin and Planning Multifamily rental new construction Multifamily rental rehab	300,000	0	0	300,000	600,000	{This category is now incorporated in the above template} The Housing Trust Fund will provide extremely low income households with housing that is affordable for a minimum of 30 years. New Hampshire's allocation will be used to provide development subsidy. Additional funds from other sources will provide project-based rental assistance.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other	public - federal	Admin and Planning Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Other	8,007,242	0	0	8,007,242	8,007,242	ESG-CV 1 & 2 funds are to be used to prevent, prepare for, and respond to the coronavirus pandemic (COVID-19) among individuals and families who are homeless or receiving homeless assistance; and to support additional homeless assistance and homelessness prevention activities to mitigate the impacts of COVID-19. Activities will include Rapid Rehousing, Homelessness Prevention, Emergency Shelter, Street Outreach, HMIS, Administration.

Other	public - federal	Other							NH has been allocated two awards under CV-1 and a further allocation under CV-2, totaling \$10,107,238. Further allocations may be forthcoming. Grantees must identify the proposed use of all funds and how the funds will be used to prevent, prepare for and respond to coronavirus. Grantees may use CDBG-CV funds for a range of eligible activities that prevent and respond to the spread of infectious diseases such as the coronavirus disease 2019 (COVID-19). CDBG-CV funds will be distributed based on the results of public input and based on needs as they arise. The first allocation (CV-11) will be split between primarily between Public Services (70%) and Economic development (25%) with an emphasis on supporting Microenterprise technical assistance and grants with 5% reserved for Administration and technical assistance. Future allocations and any unused resources from CV-1 will be
			10,107,238	0	0	10,107,238	10,107,238		

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
								allocated based on needs as they arise and which are consistent with HUD guidance and the CARES Act.
Other	public - state	Acquisition Admin and Planning Conversion and rehab for transitional housing Economic Development Housing Multifamily rental new construction Multifamily rental rehab Overnight shelter Public Services Transitional housing	5,000,000	0	0	5,000,000	5,000,000	With the Community Development Investment Program (CDIP), CDFA gives a 75% state tax credit against a donation made to any approved community development project consistent with legislation in State RSA 162-L. The tax credit may be applied against the New Hampshire business profits tax, business enterprise tax, and/or the insurance premium tax. Tax Credits may only be issued to nonprofits.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other	public - state	Acquisition Conversion and rehab for transitional housing Multifamily rental new construction Multifamily rental rehab Transitional housing	5,000,000	0	0	5,000,000	9,050,000	The State of New Hampshire allocated \$5m to the Affordable Housing Fund administered by NHHFA.

Table 6 - Expected Resources – Priority Table

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

HOME funds will be invested in new projects as development subsidy to "buy" deeper income targeting, leveraging private equity raised with Low Income Housing Tax Credits along with additional subsidy raised through a variety of sources including the Federal Home Loan Bank of Boston, private donations, and perhaps even State or local CDBG. Preservation activities accomplished with HOME will be used for rehabilitation activities to upgrade and replace building components and systems that will be required during the next contracted affordability period, and will leverage 4% Low Income Housing Tax Credits and Tax-Exempt Bond financing.

Housing Trust Fund (HTF) has no match requirement, but nonetheless resources will be available for use in Low Income Housing Tax Credit projects which target units affordable to extremely low-income households. Scoring incentives will favor further restriction of those units to

serve particular populations. HTF units developed without Low Income Housing Tax Credits may leverage HOME or non-federal funds and scoring incentives will be available proportional to the leveraging of other funds. HTF funding will remain at the small state minimum of \$3,000,000.

ESG Annual funds not used for the prevention, preparation for and response to COVID-19 are matched 75% at the state level and 25% at the local level to leverage funds and resources.

New Hampshire's allocation for 2020 includes approximately \$9.2 million in CDBG funds to be used for housing, economic development, public facilities and planning. In addition, CDBG, HOME and ESG will be used strategically to address priority needs and leverage other federal, State and local resources. These include federal low-income housing tax credits. The State's LIHTC program is administered by the NH Housing Finance Authority in accordance with New Hampshire's Qualified Allocation Plan (QAP). The QAP closely reflects the priorities, goals and strategies of the Consolidated Plan. Additional resources that may be leveraged to support the goals of the Consolidated Plan include Section 8, McKinney-Vento, and New Market Tax Credits.

CDBG funds will leverage additional funding resources depending on the type of project being funded. Water/Wastewater infrastructure will be leveraged with State Revolving Loan funds (SRF) and the Drinking Water Grounding Trust Fund (DWGTF) from the Department of Environmental Services, USDA and municipalities. Housing rehabilitation and related activities might include LIHTC, HOME, the New Hampshire Community Loan Fund, private equity, weatherization, FHLB and other funders. Economic development could leverage private equity, banks, regional development corporation revolving loan funds, USDA, SBA, Northern Borders Regional Commission (NBRC) and others.

The formula allocation of HUD HEARTH Emergency Solutions Grant (ESG) funds to the state is expected to be \$870,215 for 2020. Of this amount, 75% will be matched with State Grant-in-Aid funds and 25% at the local level. New Hampshire (NH) funds Emergency Shelter Operations, and Homelessness Intervention at an annual level of approximately \$4 million. The leveraging of CoC Funded services completes NH's comprehensive continuum of Homeless assistance services. The matching requirements for ESG-CV funds have been waived by HUD.

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

None known to be available at this time.

**Discussion**

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## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives – 91.320(c)(3)&(e)

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Promote Housing Stability	2016	2020	Affordable Housing Homeless	New Hampshire	Homeless prevention Rapid Re Housing Services	ESG: \$930,879 Continuum of Care: \$4,067,295 General Fund: \$1,000,000	Tenant-based rental assistance / Rapid Rehousing: 600 Households Assisted Homelessness Prevention: 516 Persons Assisted
2	Preservation of Affordable Rental Properties	2016	2020	Affordable Housing	New Hampshire	Preservation of Affordable Housing	CDBG: \$2,066,267 HOME: \$1,900,000	Rental units rehabilitated: 200 Household Housing Unit
3	Multifamily Affordable Rental Production	2016	2020	Affordable Housing	New Hampshire	Production of Affordable Rental Housing	CDBG: \$500,000 HOME: \$6,300,000 HTF: \$2,700,000	Rental units constructed: 350 Household Housing Unit
4	Microenterprise Development Assistance	2016	2020	Non-Housing Community Development	New Hampshire	Economic Development	CDBG: \$850,000	Businesses assisted: 267 Businesses Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Planning Grants	2016	2020	Non-Housing Community Development	New Hampshire	Economic Development Public Facilities Grants for Public Property Public Facilities Grants for Public Services Public Facilities Grants for Water and Sewer	CDBG: \$300,000	Other: 8 Other
7	Community Development (Public Facilities) Grants	2016	2020	Non-Housing Community Development	New Hampshire	Economic Development Housing Grants Preservation of Affordable Housing Production of Affordable Rental Housing Public Facilities Grants for Public Property Public Facilities Grants for Public Services Public Facilities Grants for Water and Sewer	CDBG: \$2,566,267	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 273 Households Assisted Public service activities other than Low/Moderate Income Housing Benefit: 587 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	Emergency Grants	2016	2020	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	New Hampshire	Economic Development Housing Grants Public Facilities Grants for Public Property Public Facilities Grants for Public Services Public Facilities Grants for Water and Sewer	CDBG: \$500,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 200 Persons Assisted Public service activities other than Low/Moderate Income Housing Benefit: 142 Persons Assisted
9	TBRA for Homeless Veterans	2016	2020	Affordable Housing	New Hampshire	Rapid Re Housing Services	HUD-VASH: \$62,976	Tenant-based rental assistance / Rapid Rehousing: 142 Households Assisted
10	Project Based Rental Assistance for Disabled	2016	2020	Affordable Housing	New Hampshire	Rental Housing Affordable to Extremely Low Income	Section 811: \$500,000	Tenant-based rental assistance / Rapid Rehousing: 75 Households Assisted
11	Emergency Shelter	2016	2020	Homeless	New Hampshire	Emergency Shelter	General Fund: \$3,000,000	Homeless Person Overnight Shelter: 4300 Persons Assisted

Table 7 – Goals Summary

## Goal Descriptions

1	<b>Goal Name</b>	Promote Housing Stability
	<b>Goal Description</b>	Prevent homelessness and shorten the length of time people experience homelessness.
2	<b>Goal Name</b>	Preservation of Affordable Rental Properties
	<b>Goal Description</b>	HOME funds will be used for necessary rehabilitation of properties refinanced with 4 % Low Income Housing Tax Credits(not included in budget due to unknown utilization) to extend affordability. CDBG funds will be used to rehab single and multifamily housing units occupied by low and moderate income persons as well as the infrastructure supporting these properties. As CDBG applications are accepted on a competitive basis so there is no way to provide an accurate estimate of how many units will benefit in 2020. Please note that CDBG housing grant funding is used to provide private infrastructure upgrades to Manufactured Home Cooperatives. For the purposes of this Action Plan, it will be placed under the Strategic Plan goal of Community Development Grants.
3	<b>Goal Name</b>	Multifamily Affordable Rental Production
	<b>Goal Description</b>	Multiple resources are needed to finance affordable rental housing as reflected below.
4	<b>Goal Name</b>	Microenterprise Development Assistance
	<b>Goal Description</b>	CDBG funds are granted to non-profit economic development organizations that offer services, education and programs for micro-businesses. CDFA has allocated \$850,000 to Microenterprise Development Assistance for program year 2020.
6	<b>Goal Name</b>	Planning Grants
	<b>Goal Description</b>	The Objective of CDBG Planning/ Feasibility Grants are to determine whether or not a proposed CDBG project is feasible and/or to recommend specific action(s) to be undertaken.

7	<b>Goal Name</b>	Community Development (Public Facilities) Grants
	<b>Goal Description</b>	CDBG allocates approximately 30% of its Community Development Grant funding under the category of Public Facilities. That means CDBG funds will be used for community development activities including public facilities like homeless shelters, neighborhood facilities, child care centers, water, sewer, streets and other eligible public facility activities. For 2020 CDFA has allocated \$2,566,267 for Community Development Grants for Public facilities. Included under the Community Development Strategic Goal plan is the repair and upgrade of water, wastewater and electric infrastructure in New Hampshire's Manufactured Home Cooperatives. Well over 100 investor owned manufactured home parks have been purchased by park residents and converted to cooperatives with financing and technical assistance from the New Hampshire Community Loan Fund. With the coops, low- and moderate-income households are often the majority of residents who, after purchasing the property, often lack the financial resources to upgrade an outdated and failing infrastructure. While CDFA does not specifically set aside funds for coops municipalities have successfully applied for funds on behalf of these coops for many years and CDFA expects this will continue in 2020.
8	<b>Goal Name</b>	Emergency Grants
	<b>Goal Description</b>	CDFA allocates \$500,000 to emergency grants annually. Funds are awarded to applicants whose projects shall provide immediate relief because of:  (1) Emergencies resulting from natural disasters; (2) Unanticipated events which have a serious and immediate threat to public health and safety; or (3) Unanticipated actions which have resulted in plant closures or permanent layoffs of employees jeopardizing the economic stability of the community.
9	<b>Goal Name</b>	TBRA for Homeless Veterans
	<b>Goal Description</b>	Tenant based rental assistance is provided to homeless veterans through a HUD VA collaboration. The VA provides services and HUD contributes tenant based rental assistance administered by New Hampshire Housing.

<b>10</b>	<b>Goal Name</b>	Project Based Rental Assistance for Disabled
	<b>Goal Description</b>	Section 811 PRA blends small numbers of persons with disabilities into new or existing affordable housing and provides project based rental assistance.
<b>11</b>	<b>Goal Name</b>	Emergency Shelter
	<b>Goal Description</b>	Emergency shelter is provided to homeless individuals and families via state grant in aid funding.

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## **AP-25 Allocation Priorities – 91.320(d)**

### **Introduction:**

The planned utilization of the 2020 ESG funds will allow NH to continue to build on and expand initiatives to prevent homelessness and rapidly re-house homeless persons.

The special ESG-CV funds will be used to prevent, prepare for, and respond to the coronavirus pandemic (COVID-19) among individuals and families who are homeless or receiving homeless assistance; and to support additional homeless assistance through street outreach, emergency shelter, Rapid Rehousing and Homelessness Prevention activities to mitigate the impacts of COVID-19. Prevention activities to mitigate the impacts of COVID-19. The planned utilization of HOME funds will provide both the production of new affordable rental units and the preservation of existing units at risk of loss from the affordable housing inventory due to expiring affordability restrictions.

Housing Trust Fund resources will contribute to new production exclusively for extremely low-income households.

The planned utilization of CDBG funds is prioritized based on the results of outreach by CDFA, evaluation of previous allocations and through surveys of municipalities, state agencies and nonprofits and public hearings. The funds will provide direct benefit to primarily low- and moderate-income persons in the form of improving and increasing access to affordable housing, revitalizing downtowns, improving public facilities and infrastructure, access to community facilities, creating employment opportunities to low- and moderate-income individuals and households and supporting micro enterprises through training and technical assistance. For Action Plan year 2020, CDFA has split the majority of funds across three major categories, Housing, Public Facilities and Economic Development (includes micro enterprise).

CDBG-CV will be used to prepare for, prevent and respond to COVID-19. CDFA is working on plans to expeditiously deploy CDBG-CV resources to meet emerging needs; and, to develop more flexibility within our existing CDBG program to address the need for rebuilding and strengthening our communities to meet the longer term recovery goals. The planned utilization of annual CDBG program funds is prioritized based on the results of outreach by NH CDFA and evaluation of previous allocations. Since the COVID-19 outbreak, CDFA has reached out to its extensive network of community development partners to identify the most immediate and short term needs. This has included multiple surveys reaching out to municipalities, grantees, subrecipients and non-profits. Public hearings to invite citizen participation on this 2020 Action were held on October 1, 2019 and May 5th ,2020, and February 11, 2021. CDBG funds will provide direct benefit in the form of improving and increasing

access to affordable housing, revitalizing downtowns, improving public facilities and infrastructure, providing access to community facilities, creating employment opportunities to low- and moderate-income individuals and households and supporting micro businesses through training and technical assistance. The CDBG-CV funds will be used to support needs emerging as a result of the COVID-19 pandemic and will include new and significantly increased eligible public services, microenterprise and business technical assistance and micro loans, permanent supportive housing, and other needs as they emerge.

### Funding Allocation Priorities

	Promote Housing Stability (%)	Preservation of Affordable Rental Properties (%)	Multifamily Affordable Rental Production (%)	Microenterprise Development Assistance (%)	Planning Grants (%)	Community Development (Public Facilities) Grants (%)	Emergency Grants (%)	TBRA for Homeless Veterans (%)	Project Based Rental Assistance for Disabled (%)	Emergency Shelter (%)	Total (%)
CDBG	0	24	6	10	3	31	6	0	0	0	80
HOME	0	20	80	0	0	0	0	0	0	0	100
ESG	100	0	0	0	0	0	0	0	0	0	100
HTF	0	0	100	0	0	0	0	0	0	0	100
Continuum of Care	100	0	0	0	0	0	0	0	0	0	100
General Fund	0	0	0	0	0	0	0	0	0	100	100
HUD-VASH	0	0	0	0	0	0	0	87	13	0	100
LIHTC	0	0	100	0	0	0	0	0	0	0	100
Section 811	0	0	0	0	0	0	0	0	100	0	100
Other Affordable Housing Fund	0	50	50	0	0	0	0	0	0	0	100



Other CDBG-CV 1 & 2	0	0	0	0	0	0	0	0	0	0	0
Other ESG-CV	0	0	0	0	0	0	0	0	0	0	0
Other Housing Trust Fund	0	0	0	0	0	0	0	0	0	0	0
Other State Community Development Tax Credits	0	20	50	0	0	30	0	0	0	0	100

**Table 8 – Funding Allocation Priorities**

**Reason for Allocation Priorities**

The planned utilization of the 2020 ESG funds will allow NH to build on and expand initiatives to prevent homelessness and rapidly re-house homeless persons. These objectives and priorities are in alignment with the Federal Strategic Plans to Prevent and End Homelessness.

Individuals experiencing homelessness are at greater risk of exposure to a variety of infectious diseases including influenza and coronavirus. Taking effective sanitation measures can reduce the spread of infectious disease for people who are unsheltered or living in emergency shelters. ESG- CV Program sub-recipients may use ESG Street Outreach, Emergency Shelter, Rapid Rehousing and Preventions funds for essential supplies and services to reduce the spread of infectious disease in their programs and support infectious disease preparedness while supporting housing goals.

The need for housing affordable to low, very low, and extremely low income households continues to exceed supply by two thirds, so development of new inventory is critical as is the avoidance of losing existing inventory through expiring use. Homeless veterans served by HUD-VASH tenant based rental assistance and extremely low income households with severe mental illness (SMI) served by project based rental assistance are high priority.

Housing Trust Fund resources are targeted solely to assist extremely low-income households.

The allocation for CDBG funds differs from the previous 2019 Action Plan in that it is allocated more heavily towards housing and public facilities while reducing the economic development allocation. This change is based on multiple factors including the extensive public outreach process which established affordable housing, downtown revitalization and redevelopment, better access to community facilities and childcare as the most pressing community needs. CDFA is allocating more of the economic development funding to microenterprise because of demand. Further, for most of the past 5 years, the total amount of economic development funds allocated have not be utilized and the funds have been reallocated to housing and public facilities where the demand for funding far outstrips the available resources. Additional incentives will be provided to projects creating jobs in Opportunity Zones and eligible New Market Tax Credit locations.

**How will the proposed distribution of funds will address the priority needs and specific objectives described in the Consolidated Plan?**

ESG Grant funds will be allocated to each category as follows: 3% HMIS; 7.5% Administrative Activities; 39.5% Prevention; and 50 % Rapid re-Housing. All of NH state homeless assistance funding and CoC funding is dedicated to preventing homelessness and assisting homeless households regain stability and is used for planning, administration, coordination of services, homeless prevention and intervention, transitional housing and permanent supportive housing.

ESG-CV Funds will be allocated to each category as follows: 55% to Emergency Shelter, 4% Adminstrative Activities, 25% Prevention, 16% Rapid Rehousing.

CDBG funds will be allocated as described above to address the priority needs and specific objectives detailed in the consolidated plan and supported by the results of community and public outreach efforts conducted by CDFA in 2019. Consistent with these identified priorities CDBG will be used to upgrade municipal and private infrastructure, improve housing stock through rehabilitation of existing units and support for new units in targeted downtowns, downtown revitalization, to support low- and moderate-income households, job creation and microenterprise skills training.

Applications for CDBG-CV will be accepted through the online grants management system (GMS) and must address how the proposed use of funds is a response to the COVID-19 pandemic. Applications will be considered for Public Services and Economic Development (includes Microenterprise), Permanent Supportive Housing and other activities.

HOME funds will be awarded to projects that will address the needs of low and moderate income households, comprised of families, elderly, and those with special needs.

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## AP-30 Methods of Distribution – 91.320(d)&(k)

### Introduction:

DHHS-BHS conducts separate competitive procurement processes for the ESG Rapid Re-Housing and Prevention Programs, state funded Emergency Shelter and Homeless Intervention Programs. The CoC program is primarily renewal funding and the process is governed by HEARTH regulations and the parameters HUD sets forth in each year's NOFA competition. These objectives and priorities are in alignment with the Federal Strategic Plans to prevent and end homelessness.

New Hampshire Housing distributes HOME Investment Partnerships funds in accordance with HUD 24CFR Part 92, cross cutting federal regulations and New Hampshire Qualified Allocation Plan.

New Hampshire Housing distributes the Housing Trust Funds allocation in accordance with HUD 24CFR Part 93, cross cutting regulations and the New Hampshire Qualified Allocation Plan and supportive housing NOFA.

State CDBG investments are not allocated on a geographic basis. Investments are awarded on a competitive basis based on along established criteria adopted pursuant to the state Administrative Procedures Act. This process was amended beginning in 2020. In 2019, CDFA, which administers the NH small cities program (balance of state) on behalf of the state, was exempted from the state Administrative Procedures Act. CDFA developed a program and application guide which now governs how CDBG funds are allocated. The guide is available online at <https://resources.nhcdfa.org/wp-content/uploads/2020/04/CDFA-CDBG-Application-and-Program-Guide-FY20.pdf>

### Distribution Methods

Table 9 - Distribution Methods by State Program

1	<b>State Program Name:</b>	Community Development Block Grant Program
	<b>Funding Sources:</b>	CDBG Affordable Housing Fund

<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>CDFA distributes CDBG based on its 2020 Program and Application Guide.</p> <p>The primary purpose of the CDBG program is the development of viable communities by providing decent housing, suitable living environments, and expanding economic opportunities, principally for low- and moderate-income people. The program is sponsored by the US Department of Housing and Urban Development (HUD). CDFA distributes CDBG grants to New Hampshire's non-entitlement cities, towns, and counties. A nonprofit agency may also apply through its municipality or county as a subrecipient of CDBG money. All eligible municipalities and counties can apply for up to \$500,000 in CDBG funds per year each of the following three categories - housing, public facilities and economic development. Municipalities are also eligible to apply for emergency funds, funds to meet a gap due to COVID and planning grants depending upon availability. Grants may be applied for under the following categories.</p> <ul style="list-style-type: none"> <li>• Economic Development Housing Public Facilities Emergencies and Unanticipated Events Planning Grants Public Services (CDBG-CV) Other eligible CDBG-CV eligible activities</li> </ul>
<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p>&lt;p style="margin: 5pt 0in 0pt;"&gt;&lt;span&gt;CDFA selects projects for funding based on the priorities noted above and through its CDBG Application and Program Guide which includes detailed selection criteria. This Application and Program Guide can be found on the CDFA website at nhcdfa.org. New Hampshire's 229 incorporated municipalities and the ten county governments are eligible for the State CDBG Program. CDFA requires that at least 51% of the funds requested for either Housing or Public Facilities and 60% for Economic Development shall be used for direct benefit to low- and moderate-income persons&lt;/span&gt;.&lt;/p&gt;</p>

<p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	<p>All applications are submitted online through the CDFA Grants Management System (GMS). After registration, municipalities and their representatives can access application materials and complete their applications online. CDFA also runs two application workshops annually throughout the State. In 2019, CDFA released a new, online implementation guide that is available to all applicants. The implementation guide includes online webinars for each section. Staff also provides one-on-one pre-application meetings with any potential applicants, post-application meetings with awardees and technical assistance to grantees and subrecipients.</p> <p>Applications for CDBG-CV allocations will be accepted through the online grants management system (GMS) or a comparable system if accepted in partnership with another funding organization and must address how the proposed use of funds is consistent with the CARES Act by preparing for, responding to or recovering from the COVID pandemic. Applications will be considered for Public Services, Economic Development, Microenterprise and other activities based on needs as they arise and which are deemed consistent by CDFA with the forthcoming guidance provided by HUD and the CARES Act.</p>
<p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p>	<p>CDBG eligible applicants include all non-entitlement units of local government (Towns, Cities, Counties). Units of Local Government (UGLGs) may subgrant funds to nonprofit and/or faith-based organizations. Funds are made available through competitive grant rounds for the various program areas. A NOFA is published to notify potential applicants. Submitted applications are ranked based on criteria published in the CDFA CDBG Program and Application Guide available on the CDFA website. Grants are awarded based on ranking of projects and funds availability. An administrative review process is available to any project that seeks to determine how their project was scored.</p>

<b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b>	
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<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>The CDBG allocation for the year 2020 is \$9,219,385. Consistent with the priorities noted above, the funds will be allocated as follows: Administration/TA: \$376,529; Planning Grants: \$300,000; Emergency Grants: \$500,000; Housing Grants: \$2,680,380; Public Facility Grants: \$2,680,380; and Economic Development Grants: \$2,680,380 (Includes \$850,000 for Microenterprise). Program Income shall be distributed in the Community Development Grants round immediately following its receipt. Other funds carried forward from previous federal fiscal years (including unused Emergency Grant and Economic Development Grant funds, Housing and Public Facility Grant funds, and recaptured funds returned to the state) shall be distributed in the Community Development Grants round immediately following its receipt, but a portion may be held and distributed in the second application round following its receipt for the purpose of balancing the amounts available in each application round. In addition, uncommitted Economic Development Grant funds may also be held for projects under consideration at the end of the year or carried forward to be distributed in the next Economic Development Grant program year at the discretion of the Executive Director of CDFA. Administrative or Technical Assistance funds carried forward from previous federal fiscal years shall remain in their respective categories.</p> <p>CDFA reserves the right to increase or decrease the allocation of a program component. In the event that there may be extreme demand for one program component; or there may be minimal demand for one component, CDFA may reallocate funds depending on the timing of other components and the apparent demand for funds or to address emergency situations during the program year in the event that the funding allocated for emergencies is not adequate and needs to be replenished. When these cumulative changes meet the threshold criteria of an amendment, CDFA will follow the process in accordance with the State’s Consolidated Plan and regulations at 24 CFR 91.505.</p> <p>NH has been allocated \$14,311,183 under CV-1, CV-2 and CV-3. Grantees must use CDBG-CV to prepare, prevent and respond to COVID-19. Grantees may use CDBG-CV funds for a range of eligible activities that prevent and respond to the spread of infectious diseases such as the coronavirus disease 2019 (COVID-19). CDBG-CV funds will be distributed based on the results of</p>
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	<p>public input and based on needs as they arise. The first a round of applications supported Economic development with an emphasis on supporting Microenterprise technical assistance and grants with 5% reserved for Administration and technical assistance. The second round of applications supported Public Services through non-Entitlement Grantees. Future funding allocation and round will be allocated based on needs as they arise and which are consistent with HUD guidance and the CARES Act. Further guidance can be found in the CDBG and CDBG-CV Program and Application Guide at <a href="http://nhcdfa.org">nhcdfa.org</a>.</p>
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<p><b>Describe threshold factors and grant size limits.</b></p>	<p>Grant size limits are as follows: Planning Grants: \$25,000; Emergency Grants: up to \$350,000 (under 10,000 population) or \$500,000 (over 10,000 population); Housing Grants - up to \$500,000 per eligible community annually; Public Facility Grants - up to \$500,000 per eligible community annually; Economic Development Grants - up to \$500,000 per eligible community annually; Microenterprise Grants - up to \$500,000 per eligible county annually. Who is eligible to apply: All non-entitlement communities (200 +) in New Hampshire plus all 10 New Hampshire counties. Entitlement communities Manchester, Nashua, Portsmouth, Rochester and Dover may not apply. Threshold application requirements are outlined in the CDFA Program and Application Guide located on nhcdfa.org.</p> <p>Requests for CDBG-CV funds are separate from the annual allocation and apply solely to allocations awarded through the CARES Act and any additional Cares Act funds. CDBG - CV funds for Public Services will be allocated grants up to \$500,000 consistent with a demonstrated need, with the CARES Act criteria, HUD guidance. Applications will be submitted on the GMS and will be scored using the criteria set forth in the CDBG and CDBG-CV Program and Application Guide. CV funds will support Economic Development to existing Microenterprise subgrantees, up to \$850,000; and Economic Development to an existing subgrantee. Further allocations of CV funds will be distributed based on needs as they arise. All CDBG requirements apply to CDBG-CV awards unless a Waiver has been granted by HUD.</p>
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	<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	<p>Grants are issued on a competitive basis and the estimated number and type of beneficiaries is not known until applications are approved. Generally, CDBG funds will create or retain jobs with additional incentives offered for jobs created in Opportunity Zones and New Market Tax Credit eligible areas, provide training and technical assistance to micro businesses, rehabilitate housing units and support the creation of additional units in community designated downtowns, support rehabilitation of public facilities and support planning for potential implementation projects and provide funds to address emergencies within the last 18 months. Outcome measures will be reported in the CAPER.</p>
2	<p><b>State Program Name:</b></p>	<p>Continuum of Care Program</p>
	<p><b>Funding Sources:</b></p>	<p>Continuum of Care</p>
	<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>DHHS-BHS conducts separate competitive procurement processes for the ESG Rapid Re-Housing and Prevention Programs, state funded Emergency Shelter and Homeless Intervention Programs. The CoC program is heavily regulated by HUD and the funding process is governed by HEARTH regulations and the parameters HUD sets forth in each year's NOFA competition. These objectives and priorities are in alignment with the Federal Strategic Plans to prevent and end homelessness. The NH Homeless service system consists of the CoC program, ESG and NH's Emergency Shelter and Homeless Intervention Services and BHS distributes these funds in accordance with HUD NOFA standards.</p>

<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p>The Continuum of Care (CoC) program application criteria are established by HUD in each year's CoC program NOFA.</p>
<p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	<p>Notifications are posted on the DHHS-BHS website and the DHHS-BHS Facebook account with detailed application processes, manuals and other ranking criteria. Communications with current grantees on the application process and requirements are frequent and distributed verbally at meetings as well as email, website and through newsletters.</p>
<p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p>	<p>The CoC program is primarily renewal funding. When new funding, or reallocated funds are available the BHS distributes notifications to stakeholders and other interested parties regarding the availability of funding. The CoC supports any new interested parties to apply for HUD funding through the HUD NOFA process. Funds are distributed to subrecipients based on HUD's criteria, with BHS as the grantee/recipient.</p>

<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	
<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>Funds are used primarily to support permanent supportive housing. Other programs include transitional housing and Rapid Re-Housing, as well as HMIS.</p>
<p><b>Describe threshold factors and grant size limits.</b></p>	<p>Threshold and grant size change annually with each competition and are based on scoring according to HUD criteria and past performance.</p>

	<b>What are the outcome measures expected as a result of the method of distribution?</b>	Outcome measures, established by HUD, include housing stability, reduction in the number of families and veterans experiencing homelessness, and increased income.
3	<b>State Program Name:</b>	ESG and State funded Emergency Shelter and Homeless Intervention Programs
	<b>Funding Sources:</b>	ESG General Fund

<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>The Bureau of Housing Suports,ESG program receives HUD funding for 3 types of services;</p> <ul style="list-style-type: none"> <li>* Homelessness Prevention</li> <li>* Rapid Re Housing</li> <li>* Housing relocation and stabilization services</li> </ul> <p>These services are essential to provide permanent housing, reducing first time homeless and preventing evictions so individuals and families do not enter the system. Vendors are subject to determining eligibility by ESG policies,disburse funds,provide housing stability and case management and conduct housing search and placement activities. Vendors from across the state are eligible to give access to individuals and families statewide. The benefit of these services is to reduce homelessness and the financial burden on emergency shelters, increase the wellbeing and health of NH citizens and increase successful placements to permanent housing.</p> <p>Emergency Shelters are the saftey net for homlesness in NH and are funded by General Funds. Funding is subject to the state's procurement process that is an open competitive process using ranking and scoring to distribute funds across the state.</p>
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<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p>ESG and Shelter Proposals were evaluated and ranked by a review committee comprised of New Hampshire Department of Health and Human Services staff from multiple divisions and non-applicant stakeholders. Proposals were reviewed and ranked based on: consistency with the RFP requirements and review criteria, including how effective the proposed activity will be in providing homeless prevention and/or Rapid Re- Housing services; alignment with goals in the NH Consolidated Plan 5-Year Plan and the 2020 Action Plan; Continuum of Care strategic goals; and the national goals and objectives outlined in Opening Doors: Federal Strategic Plan to End Homelessness; agency capacity; cost effectiveness; and coordination with local CoC. The specific scoring criteria that were used are outlined below: Experience &amp; Capacity (Q1) 20 Points Extent/Need/Region/Number Served (Q2) 30 Points Start Up (Q3) 45 Points Collaboration (Q4) 20 Points Staffing (Q5) 20 Points Compliance (Q6) 10 Points Budgets (Q7) 20 Points Selected sub-recipients were contracted for 2 years, with an option to renew at the end of their contract term.</p>
<p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	<p>ESG applications are posted online through the NH.gov procurement website, which lists all available applications. This link is shared with the Balance of State Continuum of Care mailing list, as well as all provider mailing lists available through BHS.</p>



<p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available</b></p> <p><b>to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p>	<p>Eligible applicants include units of local government and nonprofit organizations including community and faith-based organizations. The Request for Applications (RFA) was released in January 2016 for ESG Rapid Re-Housing and Prevention and renewed until 2021. Proposals were evaluated and ranked by a review committee comprised of New Hampshire Department of Health and Human Services staff from multiple divisions and non-applicant stakeholders. Proposals were reviewed and ranked based on: consistency with the RFA requirements and review criteria, including how effective the proposed activity will be in providing homeless prevention and/or Rapid Re- Housing services; alignment with goals in the NH Consolidated Plan 5-Year Plan and the previous Action Plan; and Continuum of Care strategic goals.</p> <p>Applications for funding include a summary of the activities proposed, including the dollar amount requested for each, whether the initiative is new or a continuation, the projected number of persons served, and the types of populations served. Applications also include: narrative describing the activities and use of funds; identification of the Continuum of Care existing in the community and the relationship of proposed activities to the Continuum of Care; and a budget which outlines ESG funds, State and local funding, full operating budget and matching resources.</p> <p>Selected programs are contracted for 2 years, with an option to renew at the end of the grant term.</p>
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<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	
<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>ESG Grant funds will be allocated to each category as follows: 3% HMIS; 7.5% Administrative Activities; 39.5% Prevention; and 50% Rapid Re-Housing. These are estimate amounts as agencies can reallocate funds to meet the needs of the community served as long as they stay within the following thresholds. Budgets are allocated to include no more than 35% Housing Stabilizations and Relocation services, 65% has to go to direct seVICES with at least 60% going to Rapid Re-Housing.</p>
<p><b>Describe threshold factors and grant size limits.</b></p>	<p>ESG Grant funds will be allocated to each category as follows: 3% HMIS; 7.5% Administrative Activities; 39.5% Prevention; and 50% Rapid Re-Housing. BHHS intends to ensure statewide availability of ESG funds for Homeless Prevention and Rapid Re-Housing Activities. BHHS anticipates funding up to 8 regional projects across the state with grants ranging from \$65,000 - \$100,000, based on demonstrated need.</p>

	<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	<p><b>Housing Stability</b></p> <p><i>Goal:</i> 70% of program participant households will achieve housing stability for six months following the end of rental assistance.</p> <p><i>Measurement:</i> Housing Stability will be measured by the percentage of program households who maintain their tenancy for six months following the end of rental assistance.</p> <p><b>Increased Income</b></p> <p><i>Goal:</i> 50% of program participant households will increase income (employment, cash benefits or other income) prior to program exit, demonstrating sufficient income to maintain housing. (Expectation is not all households will need to increase income, or have capacity to due to disability).</p> <p><i>Measurement:</i> Income measurements will be measured by the percentage of program participant households whose income is higher at exit than at program entry.</p> <p><b>Recidivism</b></p> <p><i>Goal:</i> 70% of program participant households will experience housing stability as evidenced by no subsequent episode of homelessness.</p> <p><i>Measurement:</i> Recidivism will be measured by the total number of adult program participants with successful exits from the program (with a successful housing outcome), that did not have an emergency shelter stay of at least one night within six months of exiting the program.</p>
4	<p><b>State Program Name:</b></p>	<p>HOME Investment Partnerships Affordable Rental Production and Preservation</p>
	<p><b>Funding Sources:</b></p>	<p>HOME HTF LIHTC</p>

<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>HOME funds are generally utilized as development subsidy in Low Income Housing Tax Credit projects. To qualify as a HOME project, a project must maintain a minimum set-aside of rent-restricted units for tenants in a targeted income group. At a minimum, at least 20% of the HOME-assisted units must be rented to very low-income households, defined as households with incomes at or below 50% of Area Median Income (AMI). All other HOME-assisted units must be rented to households earning at or below 60% of AMI.</p> <p>HOME funds, when available, may be used for non-LIHTC rental production, such as units built to serve a special needs population.</p> <p>Housing Trust Fund (HTF) has no match requirement, but nonetheless resources will be available for use in Low Income Housing Tax Credit projects which target units affordable to extremely low-income households. Scoring incentives will favor further restriction of those units to serve particular populations. HTF units developed without Low Income Housing Tax Credits may leverage HOME or non-federal funds and scoring incentives will be available proportional to the leveraging of other funds. HTF funding will remain at the small state minimum of \$3,000,000.</p> <p>HOME funds are also utilized to pay for a portion of necessary rehabilitation of projects being refinanced in order to preserve affordability. The need for such rehabilitation will be determined by a capital needs assessment which is compared to the term of the refinancing agreement.</p>
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<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p>Criteria used for scoring projects for awards of Low Income Housing Tax Credits (LIHTC) are found in the Qualified Allocation Plan (QAP) which is developed each year with input from the Housing and Community Development Planning Council as well as the public, and approved by NHHFA's Board of Directors and the Governor. LIHTC preliminary applications are required and due annually in June. The full applications are due in August so that formal scoring can be completed before winter so that projects can close on financing and be ready to proceed early in spring. However due to the current situation with COVID-19, we have extended the application due dates for the upcoming LIHTC round as follows:</p> <p>Preliminary applications are due no later than Monday, July 6, 2020.</p> <p>Final applications are due no later than Friday, September 25, 2020.</p> <p>Special Needs housing projects are scored based upon criteria established in a Notice of Funding Availability soliciting project applications.</p> <p>The 2020 QAP, which details project threshold and scoring criteria as well as all applicable rules and standards can be found at <a href="https://www.nhhfa.org/low-income-housing-tax-credits">https://www.nhhfa.org/low-income-housing-tax-credits</a>. In addition to publishing the QAP, the rental production program rules, construction standards, and underwriting standards can be found on New Hampshire Housing's website at <a href="https://www.nhhfa.org/forms-publications-for-developers">https://www.nhhfa.org/forms-publications-for-developers</a>.</p>
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<p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	<p>The 2020 Qualified Allocation Plan, which details project threshold and scoring criteria as well as all applicable rules and standards can be found at <a href="http://www.nhhfa.org/low-income-housing-tax-credits">http://www.nhhfa.org/low-income-housing-tax-credits</a>.</p> <p>In addition to scoring criteria, each Notice of Availability of Funding for Special Needs Housing included full details of types of projects desired, bidder conference dates, how to obtain applicant technical assistance, and application deadlines.</p>
<p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p>	<p>For HOME/LIHTC projects, HOME funds are awarded in conjunction with the Low Income Housing Tax Credit round. These funds are used as subsidy to projects that receive tax credit financing, to ensure the financial stability of the project. Cost reasonableness and subsidy limits are taken into consideration when evaluating the use of HOME funds.</p> <p>For HOME-funded Special Needs housing, funds are awarded on the basis of the scoring criteria in the applicable Notice of Funding Availability.</p>
<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	

<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p><u>HOME funds are anticipated to be split as \$5,550,000 for rental production and \$450,000 for preservation rehab.</u></p> <p>If excess HOME funds are available, they may be committed to Special Needs housing projects that compete favorably in response to a Notice of Funding Availability.</p> <p>HOME program rules require a setaside of at least 15% of the annual allocation for projects owned, developed, or sponsored by Community Housing Development Organizations (CHDOs), non-profit housing organizations meeting very stringent criteria defined by HUD in their HOME Investment Partnerships Final Rule. Due to the COVID-19 pandemic, NHHFA will request a waiver of this set-aside.</p> <p>For-profit developers in New Hampshire play a significant role in the development of affordable housing projects, and they score competitively.</p>
<p><b>Describe threshold factors and grant size limits.</b></p>	<p>The following are threshold criteria for LIHTC which incorporates HOME funds:</p> <p>Feasibility and Appropriateness; Market Demand; Capacity; Completion of Prior Phase; Site Control; Cost Reasonableness; Readiness; Services and Environmental. LIHTC staff underwrite projects using the most current HOME and LIHTC subsidy limits. (For further details see the 2020 QAP).</p>

	<b>What are the outcome measures expected as a result of the method of distribution?</b>	We anticipate 590 units of rental production during 2020 through the low-income housing tax credit program using HOME and HTF. Additionally, NHHFA expects to fund 3-4 supportive housing projects using HTF funds through a NOFA.
5	<b>State Program Name:</b>	Project Based Rental Assistance for Disabled
	<b>Funding Sources:</b>	Section 811
	<b>Describe the state program addressed by the Method of Distribution.</b>	Section 811 provides project based rental assistance to persons who are severely mentally ill and extremely low income; utilizing units in either new or existing affordable housing stock that does not otherwise provide project based rental assistance. Tenants are assisted with the search for an available section 811-subsidized apartment in their community of choice as well as connection with local community based mental health services. Extremely low income households with a severely mentally ill member are screened for eligibility by the Bureau of Behavioral Health and referred directly to available Section 811 units, to be screened by the owner for suitability for the project.



<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p>The owners or property management agents of existing affordable housing are solicited for participation in the section 811 program. Qualified Application Plan awards scoring points in the LIHTC annual application. The criteria for an eligible property are: five units or more, not age-restricted or already designated for persons with disabilities, must have received federal, state or local financing in the development of the property and may not already be a fully subsidized property.</p>
<p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	<p>Information about the 811 program, its requirements and regulations, can be found at this website;<a href="https://www.nhhfa.org/811-project-rental-assistance">https://www.nhhfa.org/811-project-rental-assistance</a> .</p>
<p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p>	<p>N/A</p>

<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	
<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>These funds are utilized for project based rental assistance only.</p>
<p><b>Describe threshold factors and grant size limits.</b></p>	<p>A landlord must be agreeable to following all program rules and maintaining their rental property in good repair. Rent limits are established by New Hampshire Housing according to our HUD Cooperative Agreement.</p>

	<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	<p>Extremely low income individuals or households with severe mental illness will be provided needed long-term project based rental assistance, making their housing affordable.</p>
6	<p><b>State Program Name:</b></p>	<p>State Community Development Tax Credits</p>
	<p><b>Funding Sources:</b></p>	<p>Housing Trust Fund</p>
	<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>CDFA grants state tax credit awards on a competitive basis to qualified nonprofit organizations for specific community development projects or programs. CDFA is attracted to innovative projects that show a high degree of community support, build partnerships, and leverage other funds. CDFA gives a 75% state tax credit against a donation made by a business to any approved project. The tax credit may be applied against the New Hampshire business profits tax, business enterprise tax, and/or the insurance premium tax.</p>

<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p>The Tax Credit Program first uses a Letter of Intent to determine applicant eligibility and then a full application process. Staff reviews full applications including site visits as needed. After this process the staff and a subcommittee of the CDFA Board of Directors evaluate projects for conformance with the State RSA 162-L which governs the program and funds available. After this process is complete, awards are made to successful applicants.</p>
<p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	<p>CDIP Application can be found at <a href="http://nhcdfa.org/tax-credits/">http://nhcdfa.org/tax-credits/</a> Applicants need to register on the CDFA Grants Management System in order to access application materials.</p>
<p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p>	

<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	
<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>The resources are not allocated among funding categories. The tax credit program is a separate source of state funding although it is not unusual to see these funds combined with CDBG, HOME and LIHTC funds.</p>
<p><b>Describe threshold factors and grant size limits.</b></p>	<p>The Tax Credit Program receives an annual allocation of \$5,000,000. There are no grant size limits but it is typical to see requests between \$300,000 and \$500,000.</p> <p>Nonprofits, municipalities and cooperatives are eligible for application.</p>

	<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	<p>Outcome measures will vary by project funded. The program is very flexible in what is eligible to be funded.</p>
7	<p><b>State Program Name:</b></p>	<p>TBRA for Homeless Veterans</p>
	<p><b>Funding Sources:</b></p>	<p>HUD-VASH</p>
	<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>HUD VASH is a collaborative effort between the Veterans Administration and the US Department of Housing and Urban Development providing tenant based and project based rental assistance to homeless veterans who are receiving VA services.</p>
	<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p>Beneficiaries are referred by the Veterans' Administration. New Hampshire Housing completes applicant household application for housing assistance and administers the housing assistance in the form of Housing Assistance Program payments.</p>

<p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	<p>Clients are referred to us directly from the Veterans' Administration. If we are contacted directly by a veteran we explain the process and refer them to the VA.</p>
<p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p>	<p>This is an ongoing partnership arrangement with the VA referring homeless veterans and New Hampshire Housing providing tenant-based rental assistance for eligible veterans.</p>
<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	

<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>Tenant based rental assistance is the only funding category in this program.</p>
<p><b>Describe threshold factors and grant size limits.</b></p>	<p>No grant application at the user level, simply the agreement of a landlord to rent to a particular veteran and accept VASH voucher.</p>
<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	<p>143 homeless extremely low income homeless veterans to receive rental assistance each year, leading to greater housing affordability.</p>



**Discussion:**

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## AP-35 Projects – (Optional)

### Introduction:

Projects are to be solicited, ranked and funded following receipt of formula allocations. They are to be added to this action plan after funding commitments are made.

#	Project Name
1	ESG-CV

Table 10 – Project Information

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

Allocation priorities for all three programs are based upon a combination of relevant need data including US Census, ACS, CHAS, New Hampshire Housing's Annual Rental Cost Survey, input on priorities from partners, the general public, state and local government, consultation with the members of the Housing and Community Development Planning Council (see PR 10). Priorities are also established within BHS, CDFA, and New Hampshire Housing respective program rules which include competitive scoring systems that reflect our priorities.

The greatest obstacles to addressing underserved needs are related to the resource limitations that allow us to satisfy only fractions of various needs. The state of New Hampshire receives limited state funding.

## AP-38 Project Summary

### Project Summary Information

<b>1</b>	<b>Project Name</b>	ESG-CV
	<b>Target Area</b>	
	<b>Goals Supported</b>	Promote Housing Stability Emergency Shelter
	<b>Needs Addressed</b>	Rapid Re Housing Services Homeless prevention Emergency Shelter Rental Housing Affordable to Extremely Low Income
	<b>Funding</b>	ESG-CV: \$8,007,242
	<b>Description</b>	These special ESG-CV funds are to be used to prevent, prepare for, and respond to the coronavirus pandemic (COVID-19) among individuals and families who are homeless or receiving homeless assistance; and to support additional homeless assistance and homelessness prevention activities to mitigate the impacts of COVID-19. These federal funds will be used to: (1) engage individuals and families experiencing homelessness- living on the street or place not meant for human habitation; (2) rapidly re-house homeless individuals and families; (3) help operate and provide essential services in emergency shelters for individuals and families experiencing homelessness; and (4) prevent individuals and families from becoming homeless.
	<b>Target Date</b>	6/30/2022

<b>Estimate the number and type of families that will benefit from the proposed activities</b>	ESG-CV is expected to provide case management and short to medium term rental assistance Rapid Rehousing and Prevention funds to 650 either literally homeless or individuals at risk of homelessness at 50% AMI or less to prevent and end homelessness. ESG-CV is expected to provide 2000 individuals under the emergency shelter activity to support additional homeless assistance activities to mitigate the impacts of COVID-19. Additional estimations will be verified upon receipt of HUD guidance for the funds.
<b>Location Description</b>	
<b>Planned Activities</b>	Rapid Rehousing, Homelessness Prevention, Street Outreach, Emergency Shelter, Administration

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**AP-40 Section 108 Loan Guarantee – 91.320(k)(1)(ii)**

**Will the state help non-entitlement units of general local government to apply for Section 108 loan funds?**

No

**Available Grant Amounts**

N/A

**Acceptance process of applications**

N/A

**AP-45 Community Revitalization Strategies – 91.320(k)(1)(ii)**

**Will the state allow units of general local government to carry out community revitalization strategies?**

Yes

**State’s Process and Criteria for approving local government revitalization strategies**

The State of New Hampshire does not have a role in approving local government revitalization strategies. CDBG, HOME and HTF funds are awarded to projects that are part of a greater effort to revitalize neighborhoods, and competitive scoring systems for both programs favor this type of activity.

## **AP-50 Geographic Distribution – 91.320(f)**

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

ESG-funded Rapid Re-Housing and Homeless prevention services will be distributed statewide through a competitive procurement process. Funding will be present in all counties across the state to ensure access to preventative and Rapid Re-Housing services. Eligible participants are required to meet HUD's homeless definition or at-risk definition including the 30% AMI income limit.

CDBG, HOME and HTF are also distributed statewide through competitive processes which send funds where they are needed throughout the state. New Hampshire's CDBG entitlement communities (Dover, Manchester, Nashua, Portsmouth, Rochester) are ineligible to apply for state CDBG as they receive their own allocation directly from HUD. CDBG scoring criteria provide added weight to communities with higher low moderate-income populations.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
New Hampshire	100

**Table 11 - Geographic Distribution**

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

N/A.

### **Discussion**



## Affordable Housing

### AP-55 Affordable Housing – 24 CFR 91.320(g)

**Introduction:**

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	696
Non-Homeless	430
Special-Needs	55
Total	1,181

**Table 12 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	741
The Production of New Units	390
Rehab of Existing Units	200
Acquisition of Existing Units	0
Total	1,331

**Table 13 - One Year Goals for Affordable Housing by Support Type**

**Discussion:**

HOME funds will not be used for rental assistance, but Section 811 PRA and VASH will be used for long-term rental assistance. ESG funding is expected to provide short to medium term rental assistance to 400 households and Housing Stabilization Services and case management to 500 individuals as well as Prevention services to 100 Households.

These numeric goals are an educated guess. The new goals are a projected target based on historical information however, construction project completion timing can be unpredictable making end of the year beneficiary counts uncertain. Averaged over time, these projections have proven reliable.

## **AP-60 Public Housing - 24 CFR 91.320(j)**

### **Introduction:**

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

Public Housing Authorities are designated as eligible entities to apply for Low Income Housing Tax Credits, HOME Investment Partnerships, and other affordable housing subsidy and financing resources in New Hampshire. Several of New Hampshire's Public Housing Authorities have successfully competed for and utilized these resources in order to increase the inventory and thus availability of affordable housing within their locality. This has been especially important since no new public housing has been created for decades.

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

New Hampshire Housing continues to operate a Voucher Assisted Mortgage program, and also offers financial literacy training and coaching to Housing Choice Voucher Holders.

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

No New Hampshire PHAs are designated as troubled.

### **Discussion:**

## **AP-65 Homeless and Other Special Needs Activities – 91.320(h)**

### **Introduction**

The CoC, ESG, and state funded homeless assistance programs have coordinated efforts to both reduce the amount of time persons experience homelessness and increase exits from shelter to permanent housing . ESG continues to collaborate with emergency shelters to reduce the average length of stay and requires state funded programs to identify goals related to both reducing the overall average length of stay and increasing exits to permanent housing. This effort combined with an increase in ESG and CoC funding dedicated to Rapid Re-Housing has been key in achieving this. BoSCoC intends to continue efforts in this area and believes the implementation of coordinated entry and the use of a statewide By Name List that prioritizes the most vulnerable individuals or families for open permanent supportive housing beds will strengthen the system and assist in prioritizing need and assisting homeless households who have spent the longest time homeless move more quickly into permanent housing.

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

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

The BoSCoC HUD-funded Coordinated Entry Outreach and PATH Outreach, in collaboration with the statewide NH 211 information and referral program, work to identify unsheltered homeless and at-risk persons. BoSCoC funded outreach also collaborates with non CoC funded outreach including Runaway and Homeless Youth outreach, Supportive Services for Veteran Families outreach, other substance abuse mental health services administration (SAMHSA) funded outreach, and Healthcare for the Homeless outreach to ensure that the entire geography of NH is covered. Their work includes field outreach to identify unsheltered homeless persons and developing a rapport to engage these individuals and families. Outreach workers assess homeless individuals and families for both immediate basic needs such as food and shelter, as well as additional needs such as healthcare, treatment, housing, income, etc. and provide assistance in accessing these services. DHHS-BHS has also implemented a statewide Coordinated Entry Process effective 8/1/15, which utilizes a standardized assessment tool and HMIS, as well as current infrastructure such as NH 211, to assess individual needs of persons seeking assistance. This system continues to improve as quality improvements are made, and systematic

advancements are standardized such as evidence informed screening tools and diversion techniques.

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

The BoSCoC HUD-funded Coordinated Entry Outreach and PATH Outreach, in collaboration with the statewide NH 211 information and referral program, work to identify unsheltered homeless and at-risk persons. BoSCoC funded outreach also collaborates with non CoC funded outreach including Runaway and Homeless Youth outreach, Supportive Services for Veteran Families outreach, other SAMHSA funded outreach, and Healthcare for the Homeless outreach to ensure that the entire geography of NH is covered. Their work includes field outreach to identify unsheltered homeless persons and developing a rapport to engage these individuals and families. Outreach workers assess homeless individuals and families for both immediate basic needs such as food and shelter, as well as additional needs such as healthcare, treatment, housing, income, etc. and provide assistance in accessing these services. DHHS-BHS has also implemented a statewide Coordinated Entry Process effective 8/1/15, which utilizes a standardized assessment tool and HMIS, as well as current infrastructure such as NH 211, to assess individual needs of persons seeking assistance. State general funds support emergency shelter resources, agencies are provided training and support to meet the needs of residence. Trainings offered include a yearly free conference with trainings such as; Motivational Interviewing, trauma informed care, standardized assessment training and program/policy administrative reviews.

The addition of activities through the ESG-CV funding will allow emergency shelter funds for essential supplies and services to reduce the spread of infectious disease in their programs and support infectious disease preparedness.

### **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**

The BoS CoC reviews Chronic Homelessness (CH) in the Coordinated Entry committee meetings and is working on a number of strategies to address chronic homelessness. Strategies include: encouraging the prioritization of beds/units for CH in CoC funded supportive housing by tying prioritization of beds to a point structure used to rank projects for renewal; prioritization of a housing first approach by tying low threshold entry requirements and high threshold termination procedures to a point structure to rank projects for renewal; prevention and diversion tools; regional hubs for walk in and referral resources; a referral system coordinated by DHHS-BHS linking available units prioritized for CH to service providers working with CH; and through promotion of housing first strategies at various stakeholder and

community meetings.

CoC and ESG funding have allowed NH to create new Rapid Re-Housing programs to assist homeless individuals and families (including veterans and youth) move quickly out of homelessness into housing stability. The key to this housing stability will be the household's ability to maintain the housing once the financial assistance ends. NH's ESG and BoSCoC-funded RRH programs include a housing stability case management component which is available during the time financial assistance is provided, and for six months following the end of financial assistance. COC and ESG funded RRH and ESG funded homeless prevention programs have service plans individualized to the household's needs. This includes ensuring the housing is affordable to the family after the assistance is over, budgeting skills, increasing household income through employment or job training and mainstream benefits, and an overall self-sufficiency plan to exit the program. As the household stabilizes, the case management services typically lessen in intensity. At a minimum, at any stage the household is encouraged to meet with the case manager at least monthly. Other state and local case management funds are then leveraged to follow up with the family after 12 months to ensure they do not fall back into homelessness. The additional leveraged case management funds are not only used to track previously served clients, but also to help connect or link to additional resources if the family is becoming unstable in their housing.

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

DHHS-BHS has worked on discharge planning with the CoC's and state facilities including NH State MH Hospital, Department of Children Youth and Families, and the Department of Corrections to develop plans to minimize discharges to homelessness to the greatest extent possible. Within the BoSCoC are Local Service Delivery Areas (LSDAs) which consist of service agencies and stakeholders in a specific geographic area within the state. LSDA's are comprised of both homeless service organizations and mainstream organizations including municipal welfare, food pantries, community action agencies, veteran service organizations, community mental health centers, hospitals, health clinics, law enforcement, housing providers and others. These organizations work together with discharge planners to identify all available resources to prevent homeless discharges. LSDAs provide local, grassroots homelessness planning and programming within a geographic region that usually covers one county. This makes up a seamless delivery system that provides a comprehensive array of housing and supportive services that assist the homeless.

DHHS-BHS has moved into the Division of Economic and Housing Stability within DHHS. Included in this

Division are upstream services designed to help individuals move out of poverty into self-sufficiency. This organizational change has allowed for more in depth collaboration between service providers, taking a Whole Family approach to service delivery.

NH has a broad array of services available to meet the needs of people experiencing homelessness. NH 211 operates a homeless hotline offering information, referrals, and if needed, transportation to shelter 24 hours a day. The continuum of services includes: homeless outreach; homeless intervention and prevention services; emergency shelter; transitional housing for individuals, families, veterans and youth; and Permanent Supportive Housing (prioritizing chronically homeless and families). In addition to CoC, ESG and Emergency Shelter projects the CoC has 3 Support Services to Veteran's Families Programs (SSVF), VA funded Transitional housing for veterans and their families, and Runaway and Homeless Youth (RHY) Act and CoC funded transitional housing programs for unaccompanied youth.

## **Discussion**

NONE

## **AP-75 Barriers to affordable housing – 91.320(i)**

### **Introduction:**

Land use regulation is under the control of local governments through planning and zoning boards. Local ordinances that seek to preserve the character of a town and a quality of life associated with it can sometimes create barriers to the development of affordable housing or taken to an extreme virtually any new housing. Restrictions on things like minimum lot sizes and minimum setbacks can require that a house lot be so large and costly that only the very largest and most expensive homes will be built on them.

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

The Housing Awareness Program continues to provide tools and resources to support ongoing education and advocacy efforts:

### **Operating support to four regional workforce housing coalitions:**

New Hampshire Housing provides funding up to \$20,000 annually to support the operations of these coalitions. The coalitions, in turn, use the funds for programmatic activities designed to educate and advocate for the affordability of housing. Some activities that are planned for 2020 include: **Design Charrette** in Barrington, NH which will tackle housing creation in a visual way involving local citizens and planning and design experts. **Housing Summit**, in coordination with 7 seacoast area chambers of commerce and in partnership with local municipalities, a housing summit will be conducted that will draw on a diverse audience to discuss our current housing challenges and propose solutions and dispel myths commonly associated with affordable housing. Two **Business Lender Breakfasts** will be conducted in the upper valley that will draw local employers, state and local elected officials and the general public. **Municipal Technical Assistance Grants:** In partnership with Plan NH, we will provide grants to municipalities to audit existing land use regulations to determine barriers to housing diversity or to research and propose local land use regulations that reduce barriers to affordable housing creation. \$45,000 is available. The **Mini Grant** program provides funds to local grass roots organizations for the development of informational materials, targeted advertising and locally focused research and other innovative activities and methods aimed at reducing community resistance to housing development. These grants of up to \$5,000 each have been instrumental in local dialogue and awareness of housing efforts. For 2020, we have expanded grant eligibility for municipal technical assistance that will help

produce more housing friendly land use regulations and processes.

**Discussion:**

**(Continuation of Actions text box above) Visualizing Density Database and Awards:** We will seek submission of excellent examples of compact development whether new or old for inclusion in our Visualizing Density Database. Currently the database houses 50 projects that represent excellent examples of compact development. The purpose of the database is to provide pictures and data reflecting good development which will challenge the current negative perception of higher density development. The database will be unveiled to the general public in 2020 and will be a free and downloadable database for anyone to use. **Housing Conference:** Each year New Hampshire Housing produces three Housing Conferences. In 2020 NHHFA held its homeownership conference in March. Additionally, NHHFA will host two conferences that will cover the topics of development of tax credit projects and an economic and housing market update on October 15. NHHFA to commission **Housing Related Studies** The opportunity to conduct various Housing Related Studies (\$95,000) throughout the year allows the Authority to be a leader in providing information on housing related issues. Topics that could be explored include: a study of the fiscal impact on municipalities of housing and other land uses (the Society for the Protection of New Hampshire Forests has expressed interest in updating the currently used model), a study of municipal ordinances that have been adopted pursuant to the Workforce Housing Law (10th anniversary), and study of the impact (benefits and issues) related to higher density development in smaller municipalities.



## **AP-85 Other Actions – 91.320(j)**

### **Introduction:**

*See discussion section below for 2020 Fair Housing Goals*

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

The Governor's Interagency Council on Homelessness has recently reactivated under the direction of Governor Sununu. Three workgroups are being organized with the individual goals of a) Integrating Supportive Housing into State Medicaid Policy, b) Ending Homelessness for People Living in Encampments, and c) Integrating Employment and Housing to End Homelessness.

The shrinkage of HUD-funded rental assistance and affordable housing development subsidy in the federal budget is counter-productive in efforts to better meet underserved needs as the gaps between resources and needs steadily grow larger. The private nonprofit sector shoulders a large burden but can't offset federal funding reductions.

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

NHHFA will continue to support local and regional workforce housing efforts to help municipalities eliminate barriers to affordable housing development, and will continue to track expiring land use agreements and try to refinance properties that could be at risk of being lost as affordable housing inventory. The method of distribution for Low Income Housing Tax Credits, HOME and HTF resources is reexamined and tweaked annually so that the most compelling needs are addressed.

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

The City of Nashua, City of Manchester and New Hampshire Housing (state-wide) Lead Hazard Control Grants, all have numerical annual production goals, training and education goals provided through all three of these grants that will continue as well. This produces steadily increasing lead-safe rental housing inventory available to low, very low, and extremely low income households with children under six years old, greater public awareness of residential lead-based paint hazards and how to control them, and a growing maintenance and repair workforce with knowledge and skills that will lower the risk of accidental lead poisoning from repair and remodeling work. NHHFA's design and construction standards

require the federal and state lead regulations be adhered to on all rehabilitation projects.

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

Economic Development activities funded by Community Development Block Grant are expected to create or preserve 542 jobs for low to moderate income individuals.

The GOAL/Resident Self-Sufficiency Program will make online educational and training resources available to participants in New Hampshire Housing's Section 8 Housing Choice Voucher program.

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

CDFA, DHHS-BHS, and NHFA make efforts to participate in each other's planning and advisory groups. For example, NHHFA participates in the Balance of State Continuum of Care and its Housing subcommittee, as well as the Mental Health Planning and Advisory Committee. CDFA and DHHS-BHS are on the steering committee for the Housing and Community Development Planning Council. These relationships will continue to grow and advance a comprehensive approach to housing, homelessness, and community economic development.

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

The Housing and Community Development Planning Council brings these three groups together to plan for the next year's use of CDBG, HOME, HTF and ESG and reviews those accomplishments the following year. Other planning efforts including the annual update of the Qualified Allocation Plan, changes to the Housing Choice Voucher Program Admin Plan, and similar efforts actively solicit input and participation from partners and interested parties. Many of us serve on multiple committees and advisory groups, which also brings about more thorough knowledge and understanding of each other's programs and

goals.

**Discussion:**

**NEW HAMPSHIRE FAIR HOUSING GOALS 2020 ACTION PLAN**

Impediment 1 – Lack of Affordable Housing

Planned Actions:

1. Follow Consolidated Plan strategies
2. Convene annual statewide summit October 2020 to promote new and additional affordable housing strategies
3. Oversee actions taken under Affirmative Marketing Plans

Impediment 2- Source of Income Discrimination

Planned Actions:

1. Monitor opportunities to support legislation concerning source of income discrimination

Impediment 3 – Discrimination Against Domestic Violence Survivors

Planned Actions:

1. Continue to monitor opportunities to support legislation concerning discrimination against domestic violence survivors

Impediment 4 – Municipal Ordinances

1. Plan and begin review of efficacy of Workforce Housing Law compliance

#### Impediment 5 – Age-restricted Housing

1. Meet with partners to determine viable strategy for proceeding with assessing impact and prevalence

#### Impediment 6 – Noncompliance with LEP

1. Reassess prevalence and continue to partner with NH Legal Assistance on conducting LEP training

#### Impediment 7 – Lending Practices

1. Further data research has made us question earlier belief that HMDA data was showing discriminatory mortgage lending. Sample sizes for minorities are comparatively quite small and appear to be skewed by that. We will continue to watch annual data and proceed further if warranted.

#### Impediment 8 – Lack of Substantial Equivalency

1. We will continue to watch for opportunities to support legislation, but the barriers to this are significant and we are skeptical this will move forward for now

#### Impediment 9 –No Gender Identity Protections

1. We will continue to monitor opportunities to support legislation

#### Impediment 10 – Lack of Knowledge About Fair Housing Laws

1. We will continue to partner with NH Legal Assistance and others to provide meaningful fair housing training.

## Program Specific Requirements

### AP-90 Program Specific Requirements – 91.320(k)(1,2,3)

#### Introduction:

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

##### Reference 24 CFR 91.320(k)(1)

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

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

#### Other CDBG Requirements

1. The amount of urgent need activities	500,000
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	75.00%

#### HOME Investment Partnership Program (HOME)

##### Reference 24 CFR 91.320(k)(2)

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

None.

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

HOME funds are not used for any homebuyer activities.

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

HOME funds will not be used for any homebuyer activities.

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

The Preservation Program will rehabilitate 50 units statewide to preserve as affordable housing through long term restrictions primarily benefitting households with income below 60% of the median area income. Continuing relatively high tax-exempt interest rates are an impediment to significant multi-family bond activity. To help encourage preservation using Tax Exempt Bond Financing New Hampshire Housing will provide partial subsidy for eligible HOME housing rehabilitation activities. The minimum level of rehabilitation required for each unit will vary based upon thorough analysis of the capital needs for each property, but the amount of rehabilitation funds needed to address capital needs in each unit will exceed HOME funds made available. Other subsidy in the form of Operating Funds will also be available for leveraging and can also be utilized to address rehab needs in rental properties that are currently under HOME obligations.

- The aging of the entire portfolio requires a continuous review of management practices to ensure that disinvestment in any given property has not and will not occur. On an annual basis the Asset Management team at New Hampshire Housing conducts both a physical and management practice inspection as well as reviewing the financial sustainability of the property.
- New Hampshire Housing will set aside \$750,000 in HOME funds over each of the next two years to be used in rehabilitation and new construction under this preservation initiative.
- For new or existing stock affordability restrictions will be established or extended, thus preserving affordability for a minimum of 20 years.
- Unit subsidy limits will be set in accordance with New Hampshire Housing's Underwriting Standards, Subsidy Layering and Policies and at no time will exceed the HOME requirements 24 CFR 92.250. Funds will be provided in the form of a 0% non-amortizing loan that will be payable upon

sale, refinance, or in the event of non-compliance with program requirements.

- Additionally, repayment of the deferred payment loan will be made from 50% of the annual surplus cash from the project as available, except that any other Authority program that has a claim on a project's surplus cash will have priority repayment position.
- This program will be carried out in accordance with HOME guideline's found at 24 CFR 92.206 (b). Additionally these funds will not under any circumstances provide refinancing of multi-family loans made or insured by any federal programs, including the CDBG program.

### **Emergency Solutions Grant (ESG) Reference 91.320(k)(3)**

1. Include written standards for providing ESG assistance (may include as attachment)

See ESG Standards document in Grantee Specific Appendices.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

See Coordinated Entry document in Grantee Specific Appendices.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

DHHS-BHS conducts separate and distinct application processes for the ESG Rapid Re-Housing and Prevention. Eligible applicants include units of local government and nonprofit organizations including community and faith-based organizations.

DHHS-BHS utilizes a competitive Request for Proposals (RFP) process to solicit applications for the funding of the ESG Rapid Re-Housing and Prevention program. The RFP for ESG Rapid Re-Housing and Prevention was released in January 2016. The RFP was widely distributed through email lists to the Balance of State, Manchester and Nashua Continuums of Care, as well as all known stakeholders (which includes faith based organizations). Stakeholders were encouraged to forward the announcement as appropriate. Additionally, the RFP is posted on the NH Department of Health and Human Services (NH DHHS website)

Proposals were evaluated and ranked by a review committee comprised of New Hampshire

Department of Health and Human Services staff from multiple divisions and non-applicant stakeholders. Proposals were reviewed and ranked based on: consistency with the RFP requirements and review criteria, including how effective the proposed activity will be in providing homeless prevention and/or Rapid Re- Housing services; alignment with goals in the NH Consolidated Plan 5-Year Plan; Continuum of Care strategic goals; and the national goals and objectives outlined in Opening Doors: Federal Strategic Plan to End Homelessness.

The specific scoring rubric is outlined below:

#### PROPOSAL EVALUATION

##### 5.1. Technical Proposal

- a. Consistency (Q1, Q2) 13 Points
- b. Documentation (Q3) 10 Points
- c. Homeless Need (Q4 - Q6) 20 Points
- d. Staff inspections (Q9) 13 Points
- e. Project Description (Q7, Q8, Q10, Q11) 15 Points
- f. Successful Outcomes (Q12) 14 Points
- g. Rental Assistance (Q13 - Q15) 5 Points
- h. Federal Cost Principles (Q17) 15 Points
- i. HUD Reporting Standards (Q18) 15 Points
- j. Management of Funding (Q19) 15 Points
- k. Timely Start Up (Q20) 10 Points
- l. Participation in Coordinated Assessment (Q21) 10 Points
- m. Policies/Procedures (Q22) 6 Points
- n. Performance measures (Q23) 9 Points



Cost Proposal

Budget (Appendix C) 30 Points

Budget Narrative – 30 Points

Total Maximum number of points to be awarded is 230 Points.

Recipients were contracted for 2 years with an option to renew.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The state of NH is able to meet the homeless participation requirement in 24 CFR 576.405(a). The ESG Administrator consults with the Balance of State CoC which has a formerly homeless person on its board. Additionally outreach in the form of listening sessions with both the Manchester and Nashua Continuums of Care which both have members who are homeless or formerly homeless are conducted.

5. Describe performance standards for evaluating ESG.

**ESG Program Performance Standards**

Program performance will be evaluated based on the following Performance Measurements:

**Interim Housing Stability**

**Goal:** 80% of program participant households will gain housing stability within 45 days of program entry.

**Measurement:** Percentage of program participant households who either maintain or obtain housing within 45 days of program entry.

## Housing Stability

**Goal:** 70% of program participant households will achieve housing stability for six months following the end of rental assistance.

**Measurement:** Housing Stability will be measured by the percentage of program households who maintain their tenancy for six months following the end of rental assistance.

## Recidivism

**Goal:** 70% of program participant households will experience housing stability as evidenced by no subsequent episode of homelessness.

**Measurement:** Recidivism will be measured by the total number of adult program participants with successful exits from the program (with a successful housing outcome), that did not have an emergency shelter stay of at least one night within six months of exiting the program.

### Housing Trust Fund (HTF) Reference 24 CFR 91.320(k)(5)

1. How will the grantee distribute its HTF funds? Select all that apply:

Applications submitted by eligible recipients

2. If distributing HTF funds through grants to subgrantees, describe the method for distributing HTF funds through grants to subgrantees and how those funds will be made available to state agencies and/or units of general local government. If not distributing funds through grants to subgrantees, enter "N/A".

N/A

3. If distributing HTF funds by selecting applications submitted by eligible recipients,
- a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2). If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

The following are eligible to apply for project specific assistance under the Housing Trust Fund program:

1. Non-profit corporations with an approved 501(c)3 tax-exempt status.
2. Local Public Housing Authorities.
3. Limited partnerships, general partnerships, corporations, limited liability companies, proprietorships, and other business organizations.

The following are not eligible to receive HTF funds:

1. Primarily religious organizations, where residency would be limited to an exclusive denomination.
2. Any person who is an employee, agent, consultant, officer, elected official, or appointed official of the state of New Hampshire, the Authority, or state recipient or sub-recipient receiving HTF funds (collectively Non-Eligible Persons). This includes partnerships and corporations where the controlling partner, controlling member, or person(s) in control of such entity is a Non-eligible Person or Persons.

- b. Describe the grantee’s application requirements for eligible recipients to apply for HTF funds. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

Projects blending some HTF units into LIHTC projects will utilize New Hampshire Housing's Low Income Housing Tax Credit Program Multifamily Rental Housing Financing Application found at <https://www.nhhfa.org/developer-financing/low-income-housing-tax-credits-lihtc/>. This application is used for all projects seeking Low Income Housing Tax Credits and various forms of capital subsidy from New Hampshire Housing including but not limited to Housing Trust Fund, HOME, the State Affordable Housing Fund and other subsidy resources. This application is very thorough, requiring the applicant to provide detailed information concerning the description of the proposed project, sources and uses of all funds, rents and operating expenses, LIHTC scoring, a project pro forma, analysis of funding gaps to determine subsidy needs and a management questionnaire to assess management capacity. The

Qualified Allocation Plan (QAP) <https://www.nhhfa.org/developer-financing/low-income-housing-tax-credits-lihtc/> for the 2019-2020 Low Income Housing Tax Credit Program provides scoring incentives to reserve 10% or more (but less than all) units affordable to extremely low income households, and also encourages through scoring incentives the provision of supportive housing for the homeless, those at imminent risk of homelessness, and veterans. Other incentives in the scoring system may also encourage applicants to apply for HTF funding. The project scoring criteria in the 2020 Qualified Allocation Plan contain the elements required by HUD and considerably more.

Projects not seeking Low Income Housing Tax Credits projects will use a separate RFP released in late 2019 and NHHFA will make awards in accordance with the priorities which form the basis of the Threshold Requirements and Scoring Criteria for the Housing Trust Fund Request For Proposals.

NHHFA will require that all recipient applications contain a description of the eligible activities to be conducted with HTF funds as required in § 93.200 Eligible Activities.

NHHFA will require that each eligible recipient certify that housing assisted with HTF funds will comply with all HTF requirements.

c. Describe the selection criteria that the grantee will use to select applications submitted by eligible recipients. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

See HTF threshold and scoring criteria at <https://www.nhhfa.org/publications-data/nh-consolidated-planning-for-hud/>

d. Describe the grantee's required priority for funding based on geographic diversity (as defined by the grantee in the consolidated plan). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

New Hampshire does not target CPD block grants geographically per se, but makes substantial efforts to distribute funds throughout the state as fairly as possible. In an effort to do this for Housing Trust Fund

resources, a mechanism is in place to ensure that funded projects are not concentrated.

In addition to submission of a complete application form, all applications will be reviewed under the following Threshold Criteria. Failure to comply with any of the Threshold Criteria may, at the sole discretion of the Authority, result in the rejection of the application.

Requirements for geographical distribution will be triggered if more than two projects are funded through this RFP.

Projects may be selected over higher scoring applicants to meet this requirement. However, the Authority will not consider applications which fail to meet threshold requirements regardless of whether funding those projects would allow this requirement to be met.

e. Describe the grantee's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

See Threshold Criteria

f. Describe the grantee's required priority for funding based on the extent to which the rental project has Federal, State, or local project-based rental assistance so that rents are affordable to extremely low-income families. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

In addition to scoring categories titled i. Matching Non-Federal Resources and j. Matching Federal Resources in the Threshold Requirements and Scoring Criteria for Housing Trust Fund Request For Proposals, rent subsidy, if needed, is provided by New Hampshire Housing.

g. Describe the grantee's required priority for funding based on the financial feasibility of the project beyond the required 30-year period. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

See scoring criteria

h. Describe the grantee's required priority for funding based on the merits of the application in meeting the priority housing needs of the grantee (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

See Threshold Criteria

i. Describe the grantee's required priority for funding based on the extent to which the application makes use of non-federal funding sources. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

See scoring Criteria

4. Does the grantee's application require the applicant to include a description of the eligible activities to be conducted with HTF funds? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes

5. Does the grantee's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes

**6. Performance Goals and Benchmarks.** The grantee has met the requirement to provide for performance goals and benchmarks against which the grantee will measure its progress, consistent with the grantee's goals established under 24 CFR 91.315(b)(2), by including HTF in

its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

Yes

**7. Maximum Per-unit Development Subsidy Amount for Housing Assisted with HTF Funds.**

Enter or attach the grantee's maximum per-unit development subsidy limits for housing assisted with HTF funds.

The limits must be adjusted for the number of bedrooms and the geographic location of the project. The limits must also be reasonable and based on actual costs of developing non-luxury housing in the area.

If the grantee will use existing limits developed for other federal programs such as the Low Income Housing Tax Credit (LIHTC) per unit cost limits, HOME's maximum per-unit subsidy amounts, and/or Public Housing Development Cost Limits (TDCs), it must include a description of how the HTF maximum per-unit development subsidy limits were established or a description of how existing limits developed for another program and being adopted for HTF meet the HTF requirements specified above.

NHHFA uses the statewide HOME Investment Partnerships Program Maximum Per-Unit Subsidy Limits, which are currently based upon HUD Section 235 -Condominium Housing Mortgage Limits for Elevator Type Projects. Originally established by the Down Payment Simplification Act of 2002 and amended by the National Housing Act of 2004, HUD's Office of Multifamily Housing updates the Section 235 mortgage limits annually, applying each year's Consumer Price Index, and also separately calculates high cost percentage exceptions, of which New Hampshire has none. We thought it was particularly important to adopt the existing HOME maximum subsidy limits for the sake of uniformity, the built-in annual adjustment mechanism, and the fact that we are accustomed to using it in our projects and find them reasonable. NHHFA adopted the existing and accepted HOME standard.

Through the experience gained by financing the development of approximately 14,700 units of affordable housing throughout the state, we find the HOME limits compatible with New Hampshire affordable multifamily housing development costs. NHHFA has served as the allocating agency for the Low Income Housing Tax Credit program and the HOME program since the inception of each. In this capacity, NHHFA has always used subsidy per unit limits to allocate federal and state resources. Analysis of the most recent five years of HOME subsidy amounts demonstrates an average HOME subsidy of \$66,517 based upon underwriting standards, the Qualified Allocation Plan, as well as subsidy layering review including bedroom configuration. We don't anticipate higher subsidy amounts, but the HOME limits will give us some breathing room and allow us to respond to unique situations and opportunities. Although land acquisition and construction costs can vary within the state, overall development costs are consistent throughout the state, and this is confirmed by periodic analysis of

development costs taking location into account. Appendix E includes an analysis of development costs, after excluding unique features, of recent projects in the southern and northern parts of the state. It is likely that New Hampshire's relatively small geographic size contributes to this. It is also likely that New Hampshire Housing's Design and Construction Policy Rules and Standards as well as their Underwriting Standards and Development Policies for Multi-Family Finance drive considerable uniformity to design features in the projects we finance that likely drives similarity in cost.

**8. Rehabilitation Standards.** The grantee must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The grantee's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The grantee must attach its rehabilitation standards below.

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; and Capital Needs Assessments (if applicable).

<https://www.nhhfa.org/developer-financing/design-and-construction/>

**9. Resale or Recapture Guidelines.** Below, the grantee must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-



time homebuyers. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

N/A

**10. HTF Affordable Homeownership Limits.** If the grantee intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the grantee must not limit or give preferences to students. The grantee may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303(d)(3) only if such limitation or preference is described in the action plan.

N/A

**12. Refinancing of Existing Debt.** Enter or attach the grantee's refinancing guidelines below. The guidelines describe the conditions under which the grantee will refinance existing debt. The grantee's refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the grantee will not refinance existing debt, enter "N/A."

N/A

**Discussion:**

