

# Barnstable County HOME Consortium Program Year 2022 Annual Action Plan

JULY 1, 2022

Annual Action Plan PY 2022

## AP-05 Executive Summary

#### 1. INTRODUCTION

The Barnstable County HOME Consortium (BCHC) includes each of the fifteen communities on Cape Cod: Barnstable, Bourne, Brewster, Chatham, Dennis, Eastham, Falmouth, Harwich, Mashpee, Orleans, Provincetown, Sandwich, Truro, Wellfleet, and Yarmouth. Barnstable and Yarmouth are also Community Development Block Grant (CDBG) Entitlement Communities. The BCHC was created so Barnstable County could be a Participating Jurisdiction of the federal HOME Program. The Consortium is a way for local governments that would not otherwise qualify for funding to join with other contiguous units of local government to directly participate in the HOME Investment Partnership Program. The Barnstable County Commissioners initially designated the Cape Cod Commission, the regional planning agency, to act as BCHC's lead agent responsible for reporting all administrative functions related to the operation of BCHC to HUD. In 2015, Barnstable County designated the Human Services Department to act as the program's lead agent. The Department of Human Services also administers the regional Continuum of Care (CoC) program under the McKinney-Vento Homeless Assistance Act. The consolidation of responsibility for these programs and services has resulted in greater efficiency and coordination in managing affordable housing and human services in the region. The priorities that the BCHC has established for this Five-Year (2020-2024) Consolidated Plan are:

- Develop and maintain an adequate supply of safe, decent rental housing that is affordable and accessible to residents with a range of incomes and household needs,
- Preserve and maintain the existing affordable housing stock for extremely low-, low-, and moderate-income households,
- Reduce individual and family homelessness by providing a viable continuum of care that implements a "Housing First" strategy for permanent supportive housing and to help people transitioning out of homelessness to remain in permanent housing, and
- Ensure that Barnstable County residents with long-term support needs have accessible, safe, affordable housing options in the community.

#### 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, and/or the strategic plan.

The BCHC's primary objectives are providing affordable rental housing, growing the number of year-round households, diversifying the housing stock to provide more options for all ages and household types, and increasing job opportunities. The outcomes being sought are affordability, availability /accessibility, and sustainability. Specific, yet common, indicators will subsequently be used to measure progress toward outcome achievement. Based on the above, the BCHC has adopted the following:

- Affordable Rental Unit Creation: Develop and maintain an adequate supply of safe, decent rental housing that is affordable and accessible to households with a range of income levels and needs.
- Fund a Community Housing Development Organization ("CHDO"): Develop and maintain an adequate supply of safe, decent rental housing that is affordable and accessible to households with a range of income levels and needs by funding a CHDO.

#### 3. EVALUATION OF PAST PERFORMANCE

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

**Rental Housing Development Activity July 1, 2021 through June 30, 2023:** one project completed and leased, two projects under-construction, two projects with pending applications, and three pipeline projects for a total of 80 HOME Units and 281 total units:

- Terrapin Ridge, Sandwich eleven HOME Units, thirty total units completed and leased
- Yarmouth Gardens, Yarmouth eleven HOME Units, forty total units substantially constructed
- Brewster Woods, Brewster eleven HOME Units, thirty total units under construction
- HAC/POAH Falmouth Road, Mashpee eleven HOME Units, thirty-nine total units application pending
- Scranton Main, Falmouth eleven HOME Units, forty-eight total units application pending
- Cloverleaf, Truro eleven HOME Units, thirty-nine total units notice of intent to apply (pipeline)
- Paine Hollow, Wellfleet three HOME Units, eight total units notice of intent to apply (pipeline)
- TCB Inc., Provincetown eleven HOME Units, forty-seven total units notice of intent to apply (pipeline)

The BCHC has been actively participating in the development of multi-family affordable rental housing with many projects being completed, in the process of being completed, or beginning construction in the last several years. Additionally, there are numerous other affordable rental housing developments in the pipeline. This activity has proven to be a very effective use of Barnstable County's limited HOME funds.

**CHDO Housing Goal:** Currently, there are no certified CHDOs in Barnstable County. The BCHC continues to seek a local organization that is willing and has the resources to qualify as a CHDO under the HOME regulations. Opportunities for CHDO rental development in the region have proven to be extremely limited. The last CHDO development for Barnstable County was initiated in 2013 and completed in March 2016. As the cost of construction has increased substantially over the years, almost all non-profit affordable rental housing development is now being undertaken by a collaboration of two or more non-profits joining together to acquire the necessary funding and to share in the risk of development. This collaboration disqualifies the development as a CHDO. The BCHC hopes that in the future, HUD suspends the CHDO set-aside requirement to allow use of the funds for non-CHDO affordable rental housing production.

**Downpayment/Closing Cost Program (DPCC) Goal:** Exceedingly high housing prices on the Cape has rendered the HOME DPCC Program unfeasible. The 95 percent moderate home price under the HOME regulations is currently \$372,000 after rehabilitation. However, in meeting the 80% AMI limit as a qualifying household, for a 3-bedroom home in Yarmouth (for example), the purchase price would have to be \$300,000 or less. There is a non-existence of inventory of homes for sale in Barnstable County for under \$300,000 that meets housing quality standards.

In searching Massachusetts Multiple Listing Services for a home in Barnstable County priced at \$300,000 or less: there is one listing for a 3bedroom foreclosed condo in need of major repair, four 2-bedroom condo listings, and zero 1-bedroom listings. Consequently, the DPCC Program is ineffective for Cape Cod and has been discontinued.

**Tenant Based Rental Assistance (TBRA)**: Pursuant to HUD's notice of "Suspensions and Waivers to Facilitate Use of HOME-Assisted Tenant-Based Rental Assistance (TBRA) for Emergency and Short-term Assistance in Response to COVID-19 Pandemic," (the HUD Waiver) as revised and extended, BCHC committed \$100,000 of HOME funds to an emergency short-term TBRA program in October of 2020. This TBRA program concluded September 30, 2021. Eleven households were assisted under the program expending \$54,025 of the HOME funds. Accordingly, \$45,975 of HOME funds was reallocated to affordable rental housing development. As the new HOME-ARP Program allows for TBRA activity, the BCHC will assess a TBRA funding activity under that program during the course of the development of an Allocation Plan for the HOME-ARP program.

#### 4. SUMMARY OF CITIZEN PARTICIPATION PROCESS AND CONSULTATION PROCESS

In accordance with the Citizen Participation Plan of the Consolidated Plan and Annual Action Plan, as amended (see attachment 1.) the following actions were taken to solicit and respond to comments on the 2022 Annual Action Plan:

- April 8, 2022: The notice of public hearing, document availability and comment period is published in the Cape Cod Times.
- April 8, 2022: Notice of public hearing, document availability and comment period emailed to regional town clerks requesting to be posted in their respective towns; notice sent in English, Spanish and Portuguese.
- April 8, 2022: The notice of public hearing, document availability and comment period and a link to the draft Annual Action Plan is published on the Barnstable County Department of Human Services website and emailed to: the HOME Advisory Council, the Assembly of Delegates, the Cape & Islands Legislative Delegation, County Commissioners, HOME housing partners (advocates, various affordable housing developers, etc.), the Regional Network (human services networking group email), the Health and Human Services Advisory Council (HHSAC), town housing authorities including the Mashpee Wampanoag Tribe Housing Division, town mangers/administrators, and town planners.; notices are published and emailed in English, Spanish and Portuguese.
- April 8, 2022: The notice of public hearing, document availability and comment period along with a link to the draft Annual Action Plan is published in the Barnstable County Human Services E-Newsletter which has a subscriber list of over 2,800 individuals, generally in the human services fields across Cape Cod and the Islands, including minority organizations and organizations working with low-income residents; notice is published in English, Spanish and Portuguese.
- April 12, 2022: Comment period begins.
- April 14, 2022: Barnstable County HOME Consortium Advisory Council Meeting is held, public welcomed.
- April 21, 2022: The virtual\* public hearing is held.
- May 6, 2022: The notice of public hearing, document availability and comment period is re-published in the E-Newsletter along with a link to the draft Annual Action Plan
- May 14, 2022: The public comment period is closed.
- After May 15, 2022: The 2022 Annual Action Plan is submitted to HUD.

\* Virtual meetings were held through remote participation pursuant to Chapter 20 of the Acts of 2021, An Act Relative to Extending Certain Covid-19 Measures Adopted During the State of Emergency, signed into law on June 16, 2021, and as extended pursuant to Chapter 22 of the Acts of 2022 signed into law on February 15, 2022.

#### 5. SUMMARY OF PUBLIC COMMENTS

#### No public comments were received.

#### 6. SUMMARY OF COMMENTS OR VIEWS NOT ACCEPTED AND THE REASONS FOR NOT ACCEPTING THEM

No comments or views were not accepted.

#### 7. SUMMARY

The BCHC prioritizes citizen participation, taking steps to ensure each town and its service agencies can participate in the Annual Action Plan process. The most significant aspect of the Barnstable County HOME Program is the establishment of the Advisory Council via an ordinance of the County Legislature in 1992. The Council consists of representatives from each community and two at-large members and the Cape Cod Commission's Affordable Housing Specialist serving as an ex officio member. Council membership is open to individuals representing public and private institutions, and any organizations with an interest in affordable housing. It plays an advisory role in the development of BCHC programs, plans and policies, and acts as the deciding body for funding awards. The Advisory Council has become an essential regional forum for discussing and acting on housing and community matters where all members share their ideas, successes, and obstacles. Meetings are open to the public.

Additionally, Barnstable County staff from the Human Services Department and the Cape Cod Commission regularly engage with regional housing advocates and local legislative bodies on various housing issues.

### PR-05 Lead & Responsible Agencies

#### 1. AGENCY/ENTITY RESPONSIBLE FOR PREPARING/ADMINISTERING THE CONSOLIDATED PLAN/ANNUAL ACTION PLAN

The following are the agencies/entities responsible for preparing the 2022 Annual Action Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
HOME Administrator	Barnstable County	Department of Human Services

TABLE 1 (PR-05) - RESPONSIBLE AGENCIES

#### NARRATIVE

The Barnstable County Commissioners initially designated the Cape Cod Commission, the regional planning agency, to act as BCHC's lead agent responsible for reporting all administrative functions related to the operation of BCHC to HUD. In 2015, Barnstable County designated the Human Services Department to act as the program's lead agent. The Department of Human Services also administers the regional Continuum of Care (CoC) program under the McKinney-Vento Homeless Assistance Act. The consolidation of responsibility for these programs and services has resulted in greater efficiency and coordination in managing affordable housing and human services in the region. Additionally, the newly initiated HOME-ARP Program will also be administered under the Department of Human Services.

The HUD allocation for Program Year (PY) 2022 Annual Action Plan HOME funds is \$480,419.00 plus \$185,523.33 in repurposed program income.

#### CONSOLIDATED PLAN/ANNUAL ACTION PLAN PUBLIC CONTACT INFORMATION

Interested people and/or organizations who wish to contact the Barnstable County HOME Consortium concerning the Annual Action Plan, Consolidated Plan, or any of its related activities are invited to do so through the following:

Website: <a href="https://www.bchumanservices.net/initiatives/home-program/">https://www.bchumanservices.net/initiatives/home-program/</a>

Email: <u>HomeProgram@barnstableCounty.org</u>

Phone: 508-375-6622

## **AP-10 Consultation**

#### 1. INTRODUCTION

BCHC followed the public outreach procedures included in their Citizen Participation Plan (see attachment 1).

The Annual Action Plan process included consultation with agencies concerned with affordable housing and homelessness and gleaning information provided by housing advocate E-Newsletters and local media articles. Special focus was given to the impact on affordable year-round sustainable housing exacerbated by the COVID-19 Pandemic. Additionally, the Cape Cod Commission engaged in conducting a survey of homebuyers who purchased a home on Cape Cod between April 2020 and May 2021 (New Homeowner Survey). The survey provided important insight into what impact COVID-19 had on the affordable housing crisis experienced in the region. For example:

- over one-third (1/3) of those surveyed said the pandemic influenced their decision to purchase a home on Cape;
- thirty-two (32%) percent stated that home would only be used as a second home;
- more than fifty (50%) of the new home purchasers had a household income of over \$150,000; and
- from January 2019 to November 2021, the median sales price for a single-family home increased from \$399,500 to \$660,000.

A presentation of the survey results was provided by the Cape Cod Commission at the BCHC Advisory Council public meeting of February 10, 2022 and a round table discussion followed. (see presentation slides, attachment 2)

A virtual Advisory Council meeting open to the public was held on April 14, 2022 to discuss the PY 2022 HOME allocation and proposed use of those funds. A public meeting was held on April 21, 2022 and the public comment period began on April 12, 2022 thru May 14, 2022.

Section PR-10 of the 2020-2024 Consolidated Plan outlines information gleaned through the consultation process during the development of the of the Five-Year (2020-2024) Consolidated Plan.

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

The HOME Program is administered by the Barnstable County Human Services Department, assisting with coordination efforts between the HOME Program, the Continuum of Care (CoC), and other vital housing, social service, and health agencies. The Barnstable County Health & Human Services Advisory Council (BCHHSAC) operates in conjunction with the Department of Human Services. The Council consists of approximately 28 organizations, including the Barnstable County Human Rights Commission, Cape Cod Child Development, Cape Cod Healthcare Community Benefits, the Cape Cod Hunger Network, and the Cape & Islands District Attorney's Office.

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The Human Services Department creates and distributes a monthly newsletter that includes various human service topics and information about affordable housing, health clinics, upcoming workshops, and numerous local services for residents of Cape Cod including providing COVID-19 information relating to health services and housing assistance. The Department also makes data and recent publications available for each of its initiatives and maintains a calendar of events.

The HOME Advisory Council has an assorted membership base of individuals from Consortium communities representing public and private institutions, and of organizations with interests in regional affordable housing needs. The Advisory Council meetings provide a platform to enhance coordination between public and private housing providers.

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.

The Barnstable County HOME Program and the Cape Cod and Islands Continuum of Care (CoC) are both under the direction of the Human Services Department, allowing the programs to coordinate action and implement resources to address the needs of the at-risk homeless.

The Barnstable County Department of Human Services is the convening agency and the collaborative applicant for the Cape Cod and Islands Continuum of Care (CoC) grant, providing staff assistance to the Regional Network of Homelessness (as with the HOME program). Members of the CoC and HOME programs work closely with community leaders to promote community-wide planning and strategic use of resources to address homelessness.

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

The HOME Program does not work with the CoC to determine the allocation of ESG funds, nor does it evaluate outcomes of ESG-funded or HMIS programs. The CoC and ESG programs work closely together to refer eligible clients for services; they do this via the Coordinated Entry System (CES) for ESG-eligible households. The administering agency for ESG grants is the Housing Assistance Corporation (HAC). As part of the contractual arrangement with the Massachusetts Department of Housing and Community Development (DHCD), HAC submits an annual report tracking utilization and outcomes of the ESG programs it administers. HAC Leadership sits on the Regional Network on Homelessness Policy Board and Executive Committee and provide regular updates on ESG utilization and outcomes to all stakeholders. The Barnstable County Department of Human Services maintains the Homeless Management Information System (HMIS), implementing the Coordinated Entry System (CES), and managing the annual Point in Time (PIT) Count for the CoC. Participation in the Cape and Islands Regional Network on Homelessness/CoC is how the BCHC determines priorities when addressing homelessness prevention and transitioning out of homelessness, including the types of housing and project location.

1.	Agency/Group/Organization	Cape Cod Commission (CCC)
	Agency/Group/Organization Type	Regional Planning Agency
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Accessory Dwelling Units (ADUs) Market Analysis Climate Resiliency Regional Housing Services
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	New Homeowners Survey, Presentation, and Discussion Cape Cod Climate Initiative Action Plan – July 2021 Shared Regional Housing Services
2.	Agency/Group/Organization	Housing Assistance Corporation (HAC)
	Agency/Group/Organization Type	Non-profit
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Accessory Dwelling Units (ADUs) / Zoning Market Analysis Rental Assistance information Regional Permanent Housing Environment and Housing
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Several meetings were held to discuss advocacy for ADUs and Zoning amendments and the dire need for more rental housing and permanent transitional housing. HAC along with APCC provided information on identifying priorities for Conservation and Housing
3.	Agency/Group/Organization	The Community Development Partnership (CDP)
	Agency/Group/Organization Type	Non-Profit
	What section of the Plan was addressed by Consultation?	Housing Advocacy

Agencies, Groups, Organizations and Others Who Participated in the Process and Consultations.

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		Workforce Housing
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Information regarding regional housing coordinator especially pertaining to lower/outer Cape and the specific need for workforce housing. Information regarding implementation of statewide Transfer Fee to support Affordable Housing
4.	Agency/Group/Organization	Barnstable County Department of Human Services
	Agency/Group/Organization Type	Other government – County
	What section of the Plan was addressed by Consultation?	Homeless Needs Homelessness Strategy Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Human Services Department, who administers the Continuum of Care (CoC) grant for the region, was consulted in development and implementation on this AAA. Discussion regarding Coordinated Entry and need for elderly housing
5.	Agency/Group/Organization	Public Housing Authorities and Mashpee Wampanoag Tribe Housing Division
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Public and Assisted Housing (PHA) Public Housing Accessibility and Involvement Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The BCHC sent a survey to all PHA's in the region asking two questions: (1) What actions, if any, is your PHA planning during the next year to address the needs to public housing and (2) What actions, if any, is your PHA doing to encourage public housing residents to become more involved in management and participate in homeownership. Responses are included in Section AP-05 (5.) "Public Comments".
6.	Agency/Group/Organization	BCHC Municipalities
	Agency/Group/Organization Type	Other government – Town
	What section of the Plan was addressed by Consultation?	All sections of the Annual Action Plan
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The draft Annual Action Plan was sent via email group to all town managers/administrators and town planners for comment. Any comments received are stated in Section AP-05 (5.) "Public Comments"
		and have been incorporated herein.

#### TABLE 2 (AP-10) - AGENCIES, GROUPS, ORGANIZATIONS WHO PARTICIPATED

Identify any agency types not consulted and provide rationale for not consulting. N/A

Other Local/Regional/State/Federal Planning Efforts Considered when Preparing the Plan.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan
		overlap with the goals of each plan?
Continuum of Care	Barnstable County Human Services	Homeless Needs

TABLE 3 (AP-10) - OTHER LOCAL / REGIONAL / FEDERAL PLANNING EFFORTS

#### NARRATIVE

BCHC constantly consults with numerous organizations and municipal staff on an ongoing basis throughout the year. Additionally, BCHC engages in topical discussions at monthly HOME Advisory Council meetings. Advisory Council members discuss various initiatives and ideas on solving the affordable housing crisis on Cape Cod. BCHC follows up with outreach to other organizations and state legislation delegates to advocate for funding and assistance. Recently, on April 1, 2022, Barnstable County HOME Program staff participated in a local legislative discussions with Cape delegation to discuss funding for the implementation of a Barnstable County regional shared housing office.

BCHC coordinates efforts and compliance for individual programs, funding sources, regulations, and laws/ordinances when projects are funded through multiple sources (e.g., Department of Housing and Community Development (DHCD), MassHousing, MassHousing Partnership, and MassWorks) and works collaboratively with our state partners in affordable housing. The BCHC shares responsibilities in areas such as environmental review, monitoring issues, and continued financial stability. Additionally, the BCHC has joined the Mass Docs loan documents and engages with DHCD and other funders in the preparation of loan documents for rental development projects.

## **AP-12** Participation

#### **1.** SUMMARY OF CITIZEN PARTICIPATION PROCESS/EFFORTS MADE TO BROADEN CITIZEN PARTICIPATION.

See section AP-05 (4), "Summary of Citizen Participation Process and Consultation Process" for actions taken to broaden Citizen Participation.

Summarize citizen participation process and how it impacted goal-setting.

See section AP-35 "Projects" for how information obtained impacted goal-setting.

The Draft Annual Action Plan was available for review and comment on April 12, 2022, and the Public Comment Period ran through May 14, 2022.

#### **CITIZEN PARTICIPATION OUTREACH**

#### This section to be updated

Sort Order	Mode of Outreach	Target of Outreach	Summary of Response/Attendance	Summary of Comments Received	Summary of Comments Not Accepted and Reasons	URL (If applicable)
1.	BCHC Advisory Council Virtual Meeting of April 14, 2022 to discuss resources, funding allocation, and annual objective and goals.	Non-Targeted/Broad Community BCHC Advisory Council representing the fifteen communities of the region	12 Advisory Council members attended. A PowerPoint presentation was conducted. No members of the public attended.	The Advisory Council members voted unanimously to approve the Annual Action Plan.	N/A	
2.	Publication of Notice of Public Meeting, Document Availability	Non-targeted broad community	Notice of Public Meeting, Document Availability and Comment Period was published in the Cape Cod Times; and posted on the	No comments received.	N/A	

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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 Comment Period (April 8, 2022)	Minorities / Non-English Speaking: Spanish and Brazilian Portuguese Persons with disabilities	Barnstable County websites. Notice published in English, Spanish and Brazilian Portuguese			
3.	Publication of Notice of Public Meeting, Document Availability and Comment Period (April 8, 2022)	Non-targeted broad community Minorities / Non-English Speaking: Spanish and Brazilian Portuguese Persons with disabilities	Notice of Public Meeting, Document Availability and Comment Period was sent to all fifteen Town clerks to be posted and published in their respective towns. Notice published in English, Spanish and Brazilian Portuguese	No comments received.	N/A	
4.	Internet Outreach: Emails, Barnstable County Human Services Department E-Newsletter, and Human Services Department websites (April 8, 2022)	Non-targeted broad community Minorities Non-English Speaking: Spanish and Brazilian Portuguese Persons with disabilities Native American: Wampanoag Tribe Housing and Community Development Organizations/Agencies Housing and Social Service Providers	Notice of Public Meeting, Document Availability and Comment Period along with a link to the Draft PY2022 Annual Action Plan was (a) emailed to the Assembly of Delegates, the Cape & Islands legislative delegation, County Commissioners, HOME Housing Partners – (advocates, various affordable housing developers, etc.), the Regional Network (human services networking group email), the Health and Human Services Advisory Council (HHSAC), town housing authorities including the Mashpee Wampanoag Tribe	No comments received.	N/A	

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)
		Housing and Social Services Advisory Councils Local Officials – State, County and Town Government Private Housing Developers Public Housing Authorities Regional Planning Agency	Housing Division, town mangers/administrators, and town planners; (b) published in the Human Services E- Newsletter which has a subscriber list of over 2,800 people generally in the human services fields, including minority organizations and those working with low-income residents, and (c) posted on the Barnstable County Human Services Department website and the Cape Cod Commission website. Notice published in English, Spanish and Portuguese			
5.	Virtual Public Meeting on Draft PY 2022 Annual Action Plan held on April 21, 2022	Non-Targeted/Broad Community	A virtual TEAMS meeting was held as allowed by MGL; links and info on how to attend the meeting was included on the agenda on posted on the county's websites, and included in the ENewsletter (English, Spanish, & Brazilian Portuguese. A PowerPoint Presentation was conducted. No members of the public attended.	No comments received.	N/A	

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)
6.	Document Availability and Comment Period	Non-targeted broad community	Draft Annual Action Plan was available for review and comment on April 12, 2022, and the Public Comment Period ran through May 14, 2022	No comments received.	N/A	

TABLE 4 (AP-12) – CITIZEN PARTICIPATION OUTREACH

## **Expected Resources**

## **AP-15 Expected Resources**

#### INTRODUCTION

The BCHC expects the following resources to be available for project activity.

#### **EXPECTED RESOURCES**

Program	Source	Uses of Funds		Expected Amo	ount Available Year 1		Expected	Narrative
	of Funds	Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of Con Plan \$	Description of	
HOME	Public - Federal	Acquisition Homebuyer assistance Multifamily rental new construction New construction for ownership	\$480,419.00	\$185,523.33	\$813,373.30 (note: the unspent \$45,975.00 from the 21 TBRA activity was re- allocated to rental development)	\$1,479,315.63	\$1,000,000	Funds expected to be used for: Rental Housing Production (\$1,235,553.73); CHDO (\$195,720.00); and Administration (\$48,041.90)

TABLE 1 (AP-15) – 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.

There are several major programs where leveraged funds play a significant role in program objectives:

**LIHTC or Historic Tax Credits:** Investments in the Low-income Housing Tax Credit (LIHTC) or Historic Tax Credit projects with private funding and/bond financing can assist in the creation of new affordable housing units. The LIHTC applies to the acquisition, rehabilitation, or new construction of rental housing targeted to lower-income households. The majority of BCHC affordable rental developments are LIHTC sponsored projects.

*MassWorks Infrastructure Grants*: MassWorks Infrastructure Grants provide much-needed capital funds to municipalities and other eligible entities for public infrastructure projects that support and accelerate housing production, spur private development, and create jobs throughout the Commonwealth. The MassWorks grant program has provided necessary funds for several current and proposed affordable rental developments in the region. This state grant is a welcomed source of funding for affordable rental developments on the Cape.

**Private Lending Institutions:** Private lending institutions leverage mortgage funding to assist low-income families with the purchase of their first home, especially in conjunction with Housing Choice Vouchers (HCV). The use of HCVs for homeownership is not a practice used in the County but is in many other communities in the country, including ones with high housing costs. Permanent mortgage financing is provided for affordable rental housing developments.

#### HOME Match requirements are satisfied as follows:

DHCD has made MRVPs available as project-based vouchers targeted to homeless individuals and families under the Massachusetts Rental Voucher Program (MRVP). The state also provides MRVP vouchers for project-based and tenant-based opportunities throughout BCHC by working with local PHAs. PHAs and the state can provide up to 20 percent of their Housing Choice Vouchers for specific projects. To satisfy HOME Match requirements, BCHC utilizes any allowable source but relies mostly on the MVRP match.

Community Preservation Act (CPA): Each of the fifteen Consortium communities has established a Community Preservation Fund to preserve open space and historic sites, create affordable housing, and develop outdoor recreational facilities. Imposing a surcharge of up to 3 percent on local property taxes creates this fund. There has been a recent increase in community collaboration for funding affordable housing across the region. Several projects are the result of this collaboration between towns.

#### **Other Resources**

- Local funds from BCHC towns provide other resources for the creation and preservation of affordable housing. Barnstable and Yarmouth are recipients of CDBG funds for this purpose.
- There are also Affordable Housing Trust funds established in 14 Consortium communities and all towns continue to donate land to affordable housing development through the RFP process.
- The BCHC provides grants to low-income owners to install energy efficient lighting and appliances, and also provides subsidies to developers of newly constructed housing that meets Energy Star standards under the Cape Light Compact.
- BCHC continues to request and encourage the investment in on-or offsite improvements from developers when constructing new HOME projects.

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

Almost all towns on the Cape have been actively seeking public land to be used for affordable housing and are planning to continue to do so. Several RFPs are currently in the pipeline.

In May of 2021, the Cape Cod Commission awarded a \$150,000 grant to a joint proposal from the Association to Preserve Cape Cod (APCC) and the Housing Assistance Corporation (HAC) to work together on a two-year project to identify areas where the development of housing and the protection of priority natural resource areas would be most beneficial. The funds for this grant were derived from the Barnstable County License Plate Grant Program.

#### DISCUSSION

The BCHC actively seeks opportunities to match federal HOME funds with local and state funding opportunities to create and preserve affordable housing across the jurisdiction. Additionally, the BCHC will assist towns with locating appropriate developable / re-developable land for the creation of affordable housing.

## Annual Goals and Objectives

## AP-20 Annual Goals and Objectives

The BCHC expects the following resources to be available for project activity.

#### **GOALS SUMMARY INFORMATION**

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1.	Rental Housing Production	2022	2023	Affordable Housing	Barnstable County	Develop and Maintain Adequate Supply of Housing; Preserve and Maintain Existing Affordable Housing Reduce Individual and Family Homelessness	HOME: \$1,235,553.73	Development of 44 affordable rental HOME units in four projects
2.	CHDO Rental Production	2022	2023	Affordable Housing Homelessness	Barnstable County	Develop and Maintain Adequate Supply of Housing Preserve and Maintain Existing Affordable Housing Reduce Individual and Family Homelessness	HOME: \$195,720.00	Development of 5 affordable rental HOME units or other purposes as allowed by HUD (ex. April 2020 waiver and suspension of the CHDO set-aside)

3.	Homebuyer Assistance (DPCC)	2022	2023	Affordable Housing	Barnstable County	Develop and Maintain Adequate Supply of Housing	This activity is currently discontinued; see explanation under Section AP-35 "Projects"	\$0
4.	Tenant Based Rental Assistance (TBRA)	2022	2023	Affordable Housing Homelessness Other – Short-Term Covid-19 related	Barnstable County	Reduce Individual and Family Homelessness	This program was funded in PY2020 and administered through its conclusion date of September 30, 2021	\$O

TABLE 2 (AP-20) – GOALS SUMMARY

#### **GOAL DESCRIPTIONS**

1.	Goal Name	Rental Housing Production
	Goal Description	To create affordable rental housing units.
2.	Goal Name	CHDO Rental Production
	Goal Description	To create affordable rental housing units.
3.	Goal Name	Homebuyer Assistance (DPCC)
	Goal Description	First-time Homebuyer Program. This program activity has been discontinued
4.	Goal Name	Tenant Based Rental Assistance (TBRA) – short-term
	Goal Description	To provide emergency rental assistance to households impacted by COVID-19 based on
		continuing need; this program concluded on September 30, 2021.

## **AP-35 Projects**

#### **INTRODUCTION**

The Barnstable County HOME Program will be dedicating all of its available 2022 project funding allocation to rental housing development. BCHC will continue to seek out opportunities for CHDO development although this has been proven to be unsuccessful in the past. BCHC hopes HUD will reconsider this activity. Ten (10%) percent of funds will be used for Administration of the HOME Program.

Ranking	Project Name	
1.	Rental Housing Development	
2.	CHDO Rental Housing Development	
3.	Down Payment and Closing Cost Assistance	
4.	Administration	
5.	Tenant Based Rental Assistance	

TABLE 3 (AP-35) - PROJECT INFORMATION

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

The allocation priorities are based on information provided by affordable housing partners, public input efforts, and public media data. Rental housing was identified as a priority due to the limited availability of rental housing on Cape Cod which has been exacerbated by the COVID-19 Pandemic. According to the New Homeowner Survey conducted by the Cape Cod Commission, more than fifty (50%) of new Barnstable County homeowners during the Pandemic were not from Cape Cod, thirty-five (35%) percent of all those surveyed said the pandemic influenced their decision, and thirty-two (32%) percent stated they planned to use their new Cape Cod home only as a second home. The median price of a single-family home was \$399,5000 in 2019 but skyrocketed to \$660,000 in 2021 in large part due to the pandemic. This created a whirlwind seller's market and many landlords chose to sell their rental home to cash in on the significantly overvalued real estate market. This sell off of rental units, depleted the rental market of units and caused other unit rents to rise considerably leaving numerous households of all sizes, age demographics, and income levels without adequate affordable housing. Many year-round residents have been forced to relocate off Cape or even out-of-state. A case in point regarding the dire need for affordable rental housing: In late fall of 2021, the Residences at Yarmouth Gardens performed a lottery for their soon to be constructed 40-unit project. They received 657 applications in which 511 met pre-qualification into the lottery.

The obstacles to the development of more affordable rental housing are reduced funding for the HOME program, limited alternative funding sources, skyrocketing construction and development costs (currently in excess of \$500,000 per unit), regulatory constraints, and the

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continuing increase in the cost of property on the Cape exacerbated by the pandemic. Additionally, as Cape Cod is a well-known tourist destination, the attractiveness of the short-term seasonal rental market (Air B&B, VRBO, etc.) is another major obstacle to providing affordable year-round rental options as property owners stand to earn significantly more through short-term rentals than year-round rentals. There are several essential affordable rental projects current in the pipeline; however, immediate funding opportunities are limited.

The above is evidence of the dire need for affordable rental housing on the Cape and the reasoning behind BCHC allocating all allowable HOME funding to the development of multi-family affordable rental housing. The BCHC has been actively participating in the development of multi-family affordable rental housing completed, in the process of being completed, or beginning construction in the last several years. Additionally, there are numerous other affordable rental housing developments in the pipeline. This activity has proven to be a very effective use of Barnstable County's limited HOME funds.

Currently, there are no certified CHDOs in Barnstable County. BCHC continues to seek a local non-profit affordable housing development organization that is willing and has the resources to qualify as a CHDO under the HOME regulations and use the CHDO set-aside funds for an approvable project. Opportunities for CHDO rental development in the region have proven to be non-existent. As the cost of construction has increased substantially over the years and even more so due to the pandemic and supply chain issues, almost all non-profit affordable rental housing development is now being undertaken by a collaboration of two or more non-profits joining together to acquire the necessary funding and share in the risk of development. This collaboration disqualifies the development as a CHDO. The BCHC hopes that in the future, HUD suspends the CHDO set-aside requirement to allow use of the funds for non-CHDO affordable rental housing production. The last CHDO development for Barnstable County was initiated in 2013 and completed in March 2016.

High housing prices on the Cape has rendered the HOME DPCC Program unfeasible. The 95 percent moderate home price under the HOME regulations is currently \$372,000 after rehabilitation. However, in meeting the 80% AMI limit as a qualifying household, for a 3-bedroom home in Yarmouth (for example), the purchase price would have to be \$300,000 or less. There is a non-existence of inventory of homes for sale in Barnstable County for under \$300,000 or less: there is one listing for a 3-bedroom foreclosed condo in need of repair, four 2-bedroom condo listings, and zero 1-bedroom condo listing. Consequently, the DPCC Program is ineffective for Cape Cod and has been discontinued.

## AP-38 Project Summary

#### **PROJECT SUMMARY INFORMATION**

1.	Project Name	Rental Housing Development
	Target Area	Region
	Goals Supported	Rental Housing Production

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	Needs Addressed	<ol> <li>Develop and Maintain Adequate Supply of Rental Housing</li> <li>Provide Access to Affordable Housing for those with Long-Term Support Needs</li> <li>Reduce Individual and Family Homelessness</li> </ol>
	Funding	\$1,235,553.73
	Description	This funding will be dedicated to new construction of affordable rental housing.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	The goal is to create four rental projects for a total of 44 HOME units within PY2022 within four projects. These units will be a variety of bedroom sizes including 1, 2 and 3 bedrooms to assist LMI families making 60 percent AMI or less. These units will also be for elderly and disabled populations.
	Location Description	Barnstable County
	Planned Activities	The Barnstable County HOME program will continue to review and approve applications for rental development project funding by non-profit and for-profit affordable housing developers.
2.	Project Name	CHDO Rental Housing Development
	Target Area	Region
	Goals Supported	CHDO Rental Production
	Needs Addressed	<ol> <li>Develop and Maintain Adequate Supply of Housing</li> <li>Reduce Individual and Family Homelessness</li> <li>Provide Access to Affordable Housing for those with Long-Term Support Needs</li> </ol>
	Funding	\$195,720.00
	Description	This funding will be used to develop affordable rental housing in conjunction with a non-profit CHDO.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	The goal is to create one CHDO rental project of 5 HOME units and 5 total units. These units will be a variety of bedroom sizes including 1, 2 and 3 bedrooms to assist LMI families making 60 percent or less than the AMI. These units will also be for elderly and disabled populations.
	Location Description	Barnstable County
	Planned Activities	The BCHC will continue to foster relationships with regional non-profit affordable housing development organizations in the hopes of locating a viable CHDO development.
3.	Project Name	Down Payment and Closing Cost Assistance
	Target Area	Region
	Goals Supported	Homebuyer Assistance (DPCC)
	Needs Addressed	<ol> <li>Develop and Maintain Adequate Supply of Housing</li> <li>Preserve and Maintain Existing Affordable Housing</li> <li>Reduce Individual and Family Homelessness</li> </ol>
	Funding	Temporarily Suspended

	Description	This funding has a potentially be used to assist first-time homebuyers with down payment and closing cost. However, due to the overvalued real estate market on the Cape, the program has become unfeasible and has been discontinued.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Not applicable.
	Location Description	Barnstable County
	Planned Activities	Not applicable.
4.	Project Name	Administration
	Target Area	Region
	Goals Supported	Rental Housing Production CHDO Rental Production
	Needs Addressed	<ol> <li>Develop and Maintain Adequate Supply of Housing</li> <li>Preserve and Maintain Existing Affordable Housing</li> <li>Reduce Individual and Family Homelessness</li> <li>Provide Access to Affordable Housing for those with Long-Term Support Needs</li> </ol>
	Funding	\$48,041.90
	Description	This funding will be used for administration of the Barnstable County HOME program.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	The funds are to be used for the Administration of HOME program's rental development and CHDO rental housing development activities.
	Location Description	Barnstable County
	Planned Activities	Administration of the Barnstable County HOME program.
5.	Project Name	Tenant Based Rental Assistance (TBRA)
	Target Area	Region
	Goals Supported	Tenant Based Rental Assistance (TBRA)
	Needs Addressed	1. Reduce Individual and Family Homelessness

Funding	This emergency short-term TBRA implemented under HUD Waivers has concluded.
Description	Not applicable.
Target Date	6/30/23
Estimate the number and type of families that will benefit from the proposed activities	Not applicable.
Location Description	Barnstable County
Planned Activities	This program was used for short-term rental assistance program to assist renters who have been impacted by COVID-19. This program has concluded.

## AP-50 Geographic Distribution

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

HOME funds are invested equally throughout Barnstable County.

#### **GEOGRAPHIC DISTRIBUTION**

Target Area	Percentage of Funds
Barnstable County	100

TABLE 5 (AP-50) - GEOGRAPHIC DISTRIBUTION

#### Rationale for the Priorities for Allocating Investments Geographically.

Due to the all-encompassing need for more affordable rental housing, the limited availability of land/property, and the high cost of development, BCHC prioritizes funding distribution within/across all neighborhoods of the region.

#### DISCUSSION

BCHC is led by the County government that represents each of the fifteen individual towns/members: Barnstable, Bourne, Brewster, Chatham, Dennis, Eastham, Falmouth, Harwich, Mashpee, Orleans, Provincetown, Sandwich, Truro, Wellfleet, and Yarmouth. In addition to being in the BCHC, Barnstable and Yarmouth are also Community Development Block Grant (CDBG) Entitlement Communities and grantees. Several other towns actively seek CDBG funding from the state CDBG program for housing purposes.

### **AP-55 Affordable Housing**

#### **INTRODUCTION**

The BCHC's goal for PY2022 is to conditionally commit funding for four affordable rental housing projects consisting of a total of 44 HOME units and one CHDO rental housing project consisting of 5 HOME units.

One-Year Goals for the Number of Households to be Supported	
Homeless	
Non-Homeless	49
Special-Needs	
Total	49

TABLE 5 (AP-55) – ONE YEAR GOALS FOR AFFORDABLE HOUSING BY SUPPORT REQUIREMENT

One Year Goals for the Number of Households Supported Through		
Rental Assistance	0	
The Production of New Units	49	
Rehab of Existing Units	0	
Acquisition of Existing Units	0	
Total	49	

TABLE 7 (AP-55) – ONE YEAR GOALS FOR AFFORDABLE HOUSING BY SUPPORT TYPE

#### Discussion

As detailed in Section AP-05(3.) "Evaluation of Past Performance", since July 1, 2021 through present, for affordable rental project activity, there was one project completed and leased, two projects under-construction, and two projects with pending applications representing the development of 55 HOME units and 187 total units. Additionally, there are three projects in the pipeline who have filed a notice of intent to apply to for the next program year representing another 25 HOME units and 94 total units.

## **AP-60 Public Housing**

#### **INTRODUCTION**

Most housing authorities in Barnstable County do not have federally-funded housing. PHA units on Cape Cod are mainly state-funded and/or receiving subsidies through state programs. PHA units utilize various types of federal housing vouchers including Mobility Vouchers, Single Room Occupancy (SRO), Section 8 Mod Rehab Vouchers, Mainstream voucher program, and vouchers under the Fair Share Program. A survey seeking information on the following two questions were sent to all PHA on the Cape.

#### 1. What Actions, if any, is Planned During the Next Year to Address the Needs to Public Housing.

Four responses were received; in summary: (1) Hoping to partner with a local businesses to convert units into affordable housing rentals and developing family units on a authority owned parcel; (2) expand supply, conduct outreach to identify needed support services, utilize capital grants to address capital needs, research alternative funding, provide, attract, and expand support services; (3) accepting applicants from the CHAMP Homes waiting list; (4) continue to apply for federal and state vouchers to assist residents and prospective tenants to be able to remain on the Cape.

# 2. What Actions, if any, is Planned to Encourage Public Housing Residents to Become More Involved in Management and Participate in Homeownership.

Four responses were received, in summary: (1) educating residents about programs to assist with budgeting, down payment programs, and encouraging them to enter lotteries and take first-time homebuyers classes; (2) outreach and self-sufficiency; (3) encouraging residents to file applications with Habitat for Humanity; (4) requesting the town select board to select a tenant as board member of the authority, encourage tenants to take the first-time homebuyers program, and to apply for Habitat for Humanity.

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

The Massachusetts Department of Housing and Community Development (DHCD) conducted site visits on multiple sites managed by the Falmouth Housing Authority (FHA). In letter dated February 14, 2022, DHCD determined that the current structure of maintenance operations is not sustainable and needs to be addressed. DHCD will continue to provide FHA with guidance, recommendations and technical assistance. A this time, BCHC is in the process of working with DHCD to address the deficiencies at FHA and will continue to monitor the situation. Additionally, BCHC will investigate other funding sources to assist FHA such as town and county ARPA funds.

#### DISCUSSION

Barnstable County continues to work with PHAs in the region to further affordable housing goals and to service those most in need of housing and specialized housing services including LMI populations, the homeless, those at risk of homelessness, and non-homeless special-need populations. As PHA provide housing and services to the qualifying populations under the proposed HOME-ARP program (homeless and atrisk of homelessness, domestic violence victims, veterans, special needs households, etc.), a detailed needs assessment and gap analysis will be conducted during the preparation of the HOME-ARP Allocation Plan.

## **AP-65 Homeless and Other Special Needs Activities**

#### **INTRODUCTION**

The Barnstable County Human Services Department is the HOME program's lead reporting agent to HUD for all administrative functions related to the operation of the BCHC. The Department administers important programs and services for the residents of Cape Cod. These programs are the HOME Investment Partnership Program, the Cape and Islands Regional Network on Homelessness/CoC, Healthy Aging Cape Cod, the Regional Substance Use Council, and SHINE (Serving the Health Insurance Needs of Everyone). Consolidation of responsibility under the Human Services Department for all programs and service-management related to affordable housing and human services has advanced homeless and special needs activities in the region. Additionally, BCHC will be conducting outreach and consultation of Barnstable County service providers as part of the preparation of the HOME-ARP Allocation Plan. Once an Allocation Plan is approved by HUD, the HOME-ARP program will also be administered under the Barnstable County Human Services Department along with the Cape and Islands Continuum of Care program.

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

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

BCHC has an overarching goal of providing a viable CoC that implements a Housing First strategy for permanent supportive housing across the region. There is an increasing need for partnership between shelters, services, and health care providers to address chronic homelessness, which is often the result of other factors contributing to a person(s) inability to stay housed. The most recent PIT Counts published by HUD confirm that 24 percent of chronically homeless people are diagnosed with a mental health condition, and 29 percent are suffering from chronic substance abuse in the region's CoC. There is an understanding among professional service providers in BCHC that on-street outreach connects unsheltered and chronically homeless individuals with emergency shelter, physical and mental health services, and case management for benefits enrollment, housing placement, and other services targeted to individual needs.

Several participating CoC agencies incorporate street outreach programs, including Vinfen, Duffy Health Center, HAC, and the Homeless Prevention Council. Outreach staff interact with unsheltered populations and assess them for services utilizing the Vulnerability Index - Service Prioritization Decision Assistance Tool (VI-SPDAT), for which they have specialized training. VI-SPDAT is a survey administered both to individuals and families to determine risk and prioritization of need. Street outreach providers engage those that have been resistant to accepting an offer of housing or services and follow a low-barrier engagement approach to connect those experiencing homelessness to resources when they are ready for change.

The Cape and Islands Regional Network on Homelessness is a collaborative effort of state, county, and local government, social service providers, health care agencies, housing agencies, faith-based organizations, the business community, individuals working together to prevent and end homelessness and other key stakeholders. Through its broad-based public-private partnership, the Regional Network identifies and implements creative solutions to preventing and ending homelessness on Cape Cod, Martha's Vineyard, and Nantucket. The Regional Network Policy Board meets quarterly and is comprised of representatives from Duffy Health Center (the federal Healthcare for the Homeless provider), local and state governments, mental health and substance abuse agencies, homeless providers, the Council of Churches, veterans' services providers, the house of corrections reintegration team, and homeless or formerly homeless individuals. This Consortium develops strategies to increase access to permanent housing for chronically homeless individuals. It evaluates and recommends changes to discharge policies for individuals exiting behavioral health, criminal justice, and health care systems ensuring collaboration between agencies assisting those who are leaving these systems.

The Regional Network on Homelessness/CoC organizes an ad hoc Emergency Services Committee comprised of numerous local agencies. The Committee works to address the need for emergency shelter options for the unsheltered homeless during extreme weather events when overflow beds at emergency shelter are filled/occupied. Additionally, resources have been developed for those with physical or mental health conditions that prevent them from utilizing the congregate shelter and for unaccompanied homeless youth and young adults (YYA) under age 21. Strategies include leveraging local resources for the short term (i.e., one-night motel vouchers, designated regional shelters, housing provider vacancies) so service providers can engage homeless individuals in accessing resources for stable housing. The Committee continues to plan for sustainable solutions to build the capacity of existing systems to address the need to shelter all of the homeless during weather-related events and other emergent situations such as the COVID-19 pandemic.

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

The emergency shelter and transitional housing programs of the Cape and Islands CoC participate in the Homeless Management Information System (HMIS). HMIS tracks demographic data, client assessments, numbers and configurations of beds, client utilization, services provided, length of time homeless, and current openings/availability. St. Joseph's House, the only individual shelter in the region, operates with a low-barrier threshold and coordinates services to assist adult shelter guests transitioning into housing. HAC operates three family shelters with entry through DHCD. A fourth family shelter is administered by Community Action Committee of the Cape and Islands (CACCI) in Hyannis. With a target population of domestic violence victims, this 52-bed shelter accepts referrals through the Department of Transitional Assistance (DTA).

Each shelter provides services to assist clients in becoming self-sufficient and securing permanent housing. HAC also receives Emergency Solutions Grant (ESG) funding from HUD to operate a four-bed rapid re-housing facility for adult individuals. Homeless Not Hopeless operates four transitional housing projects in Hyannis (two men's houses and two women's houses, for a total of 45 beds), Catholic Social Services operates St. Clare's House in Hyannis, a transitional housing project which provides five beds for formerly incarcerated women, the Cape and Islands Veteran's Outreach Center operates a five-bed house for veterans in Dennis, and CHAMP Homes operates O'Neil House, a 32-bed facility in Hyannis. In the FY2021 HUD Notice of Funding Opportunity (NOFO) Competition, Independence House, the region's only Domestic Violence Service provider, was awarded funds to create a new project combining joint transitional housing and rapid rehousing components for a total of eight beds.

The focus of the CoC continues to be the provision of permanent supportive housing, especially for the chronically homeless. While not expanding the capacity of current shelters, there is an ongoing effort to continue to provide emergency shelters and transitional housing for the homeless and continue to support the efforts of providers within the CoC.

3. 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.

As indicated above, a variety of programs and partnerships among local, regional, state, and federal agencies have facilitated the work of providers in the BCHC communities by assisting homeless people and families in transitioning to independent living and in preventing reoccurrences of homelessness. ESG funds, RAFT, and HomeBASE funding, among other resources have helped in this effort. The Cape and Islands Veterans Outreach Center (CIVOC) has received rapid re-housing funds along with funding for transitional housing and permanent supportive housing to address the needs of homeless/at-risk veterans and their families. CIVOC has also recently opened a 5-bed program for homeless Veterans utilizing subsidies from the Barnstable Housing Authority. Rental subsidies, including Mainstream vouchers, State (MRVP), and Federal vouchers have been allocated with priorities for chronically homeless.

The CoC administers a Coordinated Entry System (CES) to link vulnerable households with available CoC-funded permanent supportive housing. The CES covers the entire geographical area through 13 identified "access points," or service organizations with staff trained to conduct assessments and referrals to available housing and services. While certain access points specialize in particular populations/groups (e.g., individuals without children, unaccompanied youth, families with children, households fleeing domestic violence, people at-risk of homelessness), the CES follows the principle of No Wrong Door. No Wrong Door states that households arriving at any access point, regardless of whether it is an access point dedicated to the population to which the household belongs, can access an appropriate assessment process that provides the CoC with enough information to make prioritization decisions about that household. Several access point agencies

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offer outreach services to unsheltered individuals and are specially trained to access and enroll these populations into CES. The Cape and Islands CoC has established the following priority populations for permanent supportive housing for individuals and families:

- Chronically homeless individuals and families with the most severe service needs;
- Chronically homeless individuals and families with the longest history of homelessness;
- All other chronically homeless individuals and families;
- Homeless individuals and families with a disability with the most severe service needs;
- Homeless individuals and families with a long period of continuous or episodic homelessness; and
- Homeless individuals and families coming from places not meant for human habitation (such as emergency shelters, streets, Safe Havens, etc.).

HAC operates a private homeless-prevention financial assistance program to help people stay housed and avoid entering emergency shelter. Individuals or families can apply for a variety of financial resources that can be paid directly to their landlords or other vendors to stay housed. Through new regional, state and federal funding streams to address the impact of the COVID-19 pandemic, individuals and families now have expanded options to preserve tenancy and avoid mortgage foreclosure.

The Department is the lead agency for the Massachusetts Executive Office of Health and Human Services (EOHHS) Unaccompanied Homeless Youth and Young Adult grant. The six sub-grantees- Champ Homes, Fairwinds Nantucket Counseling, HAC, Homeless Prevention Council, Martha's Vineyard Community Services and Duffy Health Center – provide services and resources for those between the ages of 16 and 24 who are unstably housed. Through community outreach, case managers coordinate support with youth groups, associations, schools, and other organizations to identify YYA in need of assistance and engage them to explore long-term housing solutions. For those under the age of 18, HPC will coordinate case management services in collaboration with a parent/guardian or will refer youth to an appropriate support service for minors. The Council also offers a Resident Services program to ensure residents maintain their housing by helping them understand leases, securing resources to pay rent, and meeting other basic needs.

4. 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.

With the exception of vouchers, most of the funding discussed above addresses both the homeless and those at-risk of becoming homeless. As the HOME Program is under the direction of the Human Services Department, there is coordination which provides for an overall view of

housing need of all groups, including low-income individuals and families. Monthly staff meetings provide the opportunity to discuss the various needs.

HUD introduced the housing grant DedicatedPLUS to provide CoC's with flexibility to serve vulnerable populations and to more effectively and immediately address the needs of people experiencing chronic homelessness, those at-risk of experiencing chronic homelessness, or those who were chronically homeless prior to being housed and who have recently become homeless again. HUD encourages CoC's to continue adopting prioritization standards, such as those outlined above, that are based on the length of time a potential program participant resided on the streets, in an emergency shelter, or in a Safe Haven, along with the severity of their service needs.

The CoC and Unaccompanied Homeless YYA sub-grantees partner with the McKinney-Vento School Liaisons in every school district on the Cape and the Islands, as well as with Cape Cod Community College to identify unaccompanied homeless youth and offer them housing and stabilization services.

The Department is partnering with the Falmouth Housing Authority and the Dept. of Children and Families to provide HUD funded Fostering Youth to Independence (FYI) vouchers for YYA exiting the DCF and Foster Care systems. YYA receiving vouchers who remain on the Cape receive housing stabilization support through HAC as part of the Unaccompanied Homeless YYA grant. YYA leaving children's services often lack independent living skills and the stabilization supports provided by HAC are critical to sustain housing and prevent homelessness. Additionally, the state-funded YYA homeless program has received funding to support a 0.8 FTW Stabilization Case Manager position which will work exclusively with YYA aging out of children's protective services.

Provider organizations in the CoC, such as the Duffy Center and Champ Homes, work closely with the House of Corrections Reintegration Team to assist those leaving incarceration with finding housing and community-based supports.

Housing authorities in Barnstable County continue to seek out Mainstream voucher opportunities for tenants where eligible. These vouchers are dedicated to people with disabilities who are leaving institutions and are paired with community-based services to increase the likelihood of a successful housing placement and housing stability. Falmouth and Sandwich currently offer the program. Households are referred by service providers, who then provide assistance; referrals must be otherwise HCVP eligible.

The Regional Network on Homelessness created the *Cape and Islands Regional Plan to Address Homelessness*, which identifies the action areas of education, advocacy, and facilitation to increase access to safe, accessible, affordable housing, improve the health and stability of target populations, and support economic security. The vision of the Regional Network is that all individuals and families on Cape Cod and the Islands will have safe, affordable housing with the support needed to maintain that housing.

#### DISCUSSION

The Regional Network on Homelessness is a collaborative effort of government, social service providers, housing agencies, faith-based organizations, the business community, and homeless and formerly homeless individuals. BCHC consulted with CoC staff, members, and partners when preparing sections of the Consolidated Plan and the Annual Action Plan that describe the region's homeless strategy and resources available to address homeless needs (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth). The coordination of programs under the Human Services Department provides a detailed overview of housing need in the region. Housing needs and issues are addressed as they are identified and solutions are discussed during monthly staff meetings.

## **AP-75 Barriers to Affordable Housing**

#### **INTRODUCTION**

The barriers to affordable rental housing are reduced funding for the HOME program, limited alternative funding sources, skyrocketing construction and development costs (currently in excess of \$500,000 per unit), regulatory constraints, and the continuing increase in the cost of property on Cape Cod due to the pandemic.

According to the New Homeowner Survey conducted by the Cape Cod Commission, the median price of a single-family home was \$399,5000 in 2019 but skyrocketed to \$660,000 in 2021 largely due to the pandemic. This created a whirlwind seller's market and many landlords chose to sell their rental home to cash in on the significantly overvalued real estate market. This sell off of rental units depleted the rental market and caused other unit rents to rise considerably leaving numerous households of all sizes, age demographics, and income levels without adequate affordable housing. Many year-round residents have been forced to relocate off Cape or even out-of-state. Per the survey, more than fifty (50%) percent of new Barnstable County homeowners during the Pandemic were not from Cape Cod, thirty-five (35%) percent of all those surveyed said the pandemic influenced their decision, and thirty-two (32%) percent stated they planned to use their new Cape Cod home only as a second home.

Additionally, as Cape Cod is a well-known tourist destination, the attractiveness of the short-term seasonal rental market (Air B&B, VRBO, etc.) is another major obstacle to providing affordable year-round options as property owners stand to earn significantly more through short-term rentals than year-round rentals.

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.

Many Consortium member towns have several initiatives in place to encourage affordable housing development These initiatives include purchasing available properties for housing purposes, enacting zoning amendments to allow for a diversity of housing types including multi-family development and accessory dwelling units (ADUs), also by enacting tax policies for affordable housing. For instance, Chatham, Truro, Provincetown and Wellfleet with the addition to Nantucket (Nantucket County) have all filed home rule petitions for housing transfer fees to enact a transfer fee percentage on high-end real estate sales to fund affordable housing initiatives. The President and CEO of the Community

Development Partnership (CDP) on the Outer Cape is advocating for a statewide optional transfer fee of up to 2% on high-end real estate sales and we are encouraging everyone to reach out to the Cape legislative delegation.

Additionally, the region is the recipient of about \$3.5 million of state American Rescue Plan Act (ARPA) funds to deal with the region's affordable housing crisis. Approximately \$500,000 of this funding was dedicated to ADUs and will be used to fund forgivable conditional loans of up to \$10,000 to homeowners who want to construct and ADU on their property. This program will be a collaborative effort with local banks who will allow homeowners to count a portion of their projected rent as part of their income. Some of the ARPA funds have also been set aside to provide a funding source for two affordable rental housing developments; one in Bourne and one in Orleans. Additionally, Barnstable County (\$41 million) and each of the 15 towns have received ARPA allocation and both the county and the towns have listed affordable housing as a priority need. The BCHC will engage with the County and the towns to advocate for the funding of affordable housing projects using ARPA funds.

The BCHC Advisory Council will also continue to work to address affordable housing development issues across the County. Several towns have recently hired a Housing Coordinator and now mostly all of the fifteen Towns on Cape Cod have a Housing Coordinator. These Coordinators assist town staff in removing barriers around affordable housing, including land-use policies, neighborhood and community resistance to

The Cape Cod Commission is actively working with communities to change their zoning to promote housing diversity and to increase stock to meet year-round needs and affordability. Many towns have adopted or are examining zoning amendments to allow for the growth of a more diverse housing supply. Most communities have been successful in adopting ADU bylaws. The Cape Cod Commission is also working with communities to increase housing affordability in the region overall. This includes enforcing a percentage threshold for affordable/workforce housing units in certain developments subject to regional review. The Commission is also working to support towns as they identify town-owned land and other opportunities for housing production.

The BCHC has initiated round table discussions at its HOME Advisory Council meetings wherein each member provides an overview of their town's issues, successes, and failures regarding the development of affordable housing. These round table discussions have included such topics as initiating a regional housing coordinator and opportunities for county and town ARPA funding. These discussions enable the Advisory Council to determine regional solutions to known barriers. BCHC will also remain engaged in local, state, regional, and federal policies and issues that affect year-round affordable housing such as residential tax exemptions, rooms tax, or real estate transfer tax, and short-term rental policies.

#### DISCUSSION

Zoning, building/code, and financial issues are often addressed when communities work with developers on a project in their town. Issues can include incentives and fees associated with construction (building permits, sewer hookups, etc.). As examples, local communities have contributed local funding such as CPA funding, Affordable Housing Trust funding, or donation of town-owned land to assist with overall project costs, waive fees, and even issue municipal bonds to fund infrastructure upgrades. The BCHC and Consortium members work closely with non-profit and for-profit developers and other state and federal funders to encourage and support affordable housing initiatives in an effort to facilitate the process as much as possible.

## **AP-85 Other Actions**

#### **INTRODUCTION**

BCHC will incorporate the following strategies to address the obstacles to affordable housing in the region.

#### Actions Planned to Address Obstacles to Meeting Underserved Needs.

#### **Resource Allocation**

With respect to public subsidies, BCHC will continue to advocate for a larger share of budgetary resources to be devoted to housing production, housing voucher programs, and rental assistance programs at the local, state, and federal level. BCHC will also attempt to streamline and reduce costs of development by participating in the MassDocs program and by collaborating with DHCD on required environmental reviews. In addition, the BCHC will assist towns and regions in applying for and obtaining state, county, and town ARPA funds to be devoted towards affordable housing initiatives and will advocate for other sources of funding such as transfer fees on high-end real estate sales.

#### **Housing Policy**

BCHC will continue to revise and supplement programmatic requirements to align to the greatest extent possible with those of other public funders, especially DHCD for consistency purposes. For ongoing monitoring of rental projects, BCHC will use reports from other public funders to the greatest extent possible for its required compliance reviews.

#### Land Use Policies

BCHC will advocate that towns adopt local affordable housing bylaws, including ADU creation, create multi-family zoning districts, and create a Chapter 40R district and/or adopt inclusionary zoning. BCHC will also assist in locating appropriate properties to be developed or redeveloped for affordable housing and assist with the preparation of Request for Proposals.

#### Limited Wastewater Infrastructure

BCHC will encourage and support wastewater planning and implementation efforts in local communities. BCHC will also advocate that towns adopt land use bylaws that encourage affordable housing and increased density as part of their wastewater planning efforts. The county has stated that federal ARPA funds may be used for wastewater planning on a regional level.

#### **Climate Initiatives and Housing**

Climate change is a key challenge facing the natural, built, and community systems of Cape Cod. Cape Cod is vulnerable to climate-related hazards, such as sea level rise, storm surge and flooding, erosion, and damaging winds. These hazards put vulnerable populations at risk. In 2019, the Cape Cod Commission held community meetings of stakeholders to provide input on planning priorities, concerns, and barriers to implementing climate-related actions. The work of these stakeholders resulted in a Climate Action Plan which can be found at: (https://www.capecodcommission.org/our-work/climate-action-plan/)

In May of 2021, the Cape Cod Commission awarded a \$150,000 grant to a joint proposal from the Association to Preserve Cape Cod (APCC) and the Housing Assistance Corporation (HAC) to work together on a two-year project to identify areas where the development of housing and the protection of priority natural resource areas would be most beneficial. The funds for this grant were derived from the Barnstable County License Plate Grant Program. The BCHC will monitor the findings of this joint effort and incorporate them into the program.

#### Actions Planned to Foster and Maintain Affordable Housing.

The HOME program will continue to prioritize and fund affordable rental development properties where possible throughout the region, as well as to continue to seek out a regional non-profit CHDO to certify a viable CHDO project in the future.

All fifteen Towns on Cape Cod either have, or are hiring, a Housing Coordinator. Coordinators assist staff in removing barriers such as landuse policies, neighborhood and community resistance to development, and funding resources as well as engage the general public in housing questions.

The Cape Cod Commission's Affordable Housing Specialist participates in the HOME Advisory Council meetings and monthly staff meetings to discuss local/regional affordable housing issues. Furthermore, the BCHC hosts discussions at Advisory Council meetings to discuss barriers in the hope that the Advisory Council, in conjunction with the Cape Cod Commission, can provide regional solutions.

#### Actions Planned to Reduce Lead-Based Paint Hazards.

While the cost of lead paint removal can potentially be prohibitively expensive, BCHC will vigorously enforce the revised 2002 lead-based paint regulations for all its program activities and will continue to support efforts to attract lead paint removal resources to the region.

Actions Planned to Reduce the Number of Poverty-Level Families.

HOME program staff encourage setting aside housing vouchers for the homeless/at risk and dedicating HOME Program funds to rental housing for LMI households. BCHC supports the creation of affordable rental housing for those making below 60 percent of the AMI to lessen cost burden and enable these households to have the resources to meet other pressing needs. Now that HUD has initiated a new HOME-ARP Program, county staff will engage in outreach and consultation in preparation of the required Allocation Plan and that outreach will provide data for a needs assessment and gap analysis that will guide the HOME-ARP activity funding to the qualifying populations.

While BCHC's programs and resources have some impact on moving households out of poverty, there are other agencies in BCHC that work with the Human Services Department and who specialize in this issue. PHAs in the County must adhere to legislation outlined in Chapter 235 of the Acts of 2014, An Act Relative to Housing Authorities, which includes Local Housing Authority Mandatory Board Member Training, Performance Management Review (PMR), and participation in the Regional Capital Assistance Team (RCAT) Program. Monitorization such as this will help PHAs improve programming to assist more families in moving out of poverty.

The region's anti-poverty agency, the Community Action Committee of Cape Cod and the Islands, has a number of programs and resources that attempt to move households toward economic self-sufficiency including:

- A childcare services network that provides information, referrals, and access to childcare subsidies;
- Advocacy for low-income immigrants;
- Housing search services;
- Access to health care and public insurance enrollment;
- Homeless prevention and emergency shelter; and
- Educational support services for seniors and their caregivers.

#### Actions Planned to Develop Institutional Structure.

The institutional structure of the delivery system to develop and manage BCHC's HOME funds is broadly-based and integrates key organizations. Funded recipients utilize services and resources from government agencies, private lenders, non-profits, and for-profit organizations to meet goals. Federal, state, and local government agencies provide a major portion of gap funding and support for affordable housing and community development activities across the region. They guide these activities through their policies, program guidelines, and through the direct provision of housing units, rental vouchers, and services (in the case of the local housing authorities). Government agencies typically act as "investors" in housing and community development services provided by nonprofit and for-profit organizations.

State and federal LIHTCs play a role in funding development projects. Due to high construction costs and the limited income derived from such projects, co-funding from several sources is necessary to move forward. The nonprofit and for-profit developers and service providers,

in turn, develop affordable housing projects, offer supportive services, and influence the type of affordable housing projects built and the services offered. Private lenders also play an essential institutional role by providing financing and acting as a conduit for the delivery of mortgage services to investors. The relationship among these stakeholders forms the basis of the housing/community development delivery system and impacts the efforts of the BCHC. Major coordination is carried out by the organizations receiving funds through BCHC, and BCHC provides coordination and support of these efforts to leverage and manage resources.

The HOME Program along with the soon to be initiated HOME-ARP Program and the CoC program are under the authority of the Department of Human Services; the CoC includes each of BCHC communities as well as Nantucket and Martha's Vineyard. The Housing Assistance Corporation (HAC) is the agency responsible for administering the Homeless Management Information System (HMIS) within the CoC. The Cape Cod Commission's Affordable Housing Specialist participates in Advisory Council and monthly staff meetings. Consortium communities contact the HOME Program Manager and/or the Cape Cod Commission to seek guidance and assistance with any affordable housing issues or questions.

The BCHC has administered the federal HOME funds for its fifteen member communities since the adoption of the program in 1992. Member communities choose a representative to serve on the BCHC Advisory Council to speak for their interests. The responsibilities of the Advisory Council include establishing housing policies; approving all actions; determining the allocation of funds; and to remain current on local, state, regional, and federal policies and issues and advocate for policies that will promote the creation and preservation of affordable year-round housing. The Advisory Council members also act as a liaison with their respective towns and local housing partnerships/committees and reports back to them on relevant housing policies. This ensures there is a comprehensive regional approach in place for identifying priorities and delivering services.

#### Actions Planned to Enhance Coordination Between Public and Private Housing and Social Service Agencies.

Actions planned to enhance coordination between public and private housing and social service agencies that supplement those activities:

- Utilizing the HOME Advisory Council as a vehicle for the following purposes: securing federal, state, and other funds; maintaining communication between the towns; and serving as an information resource center for the Cape;
- Encouraging and supporting the activities of regional housing programs;
- Educating the public about what affordable housing is and why it is needed;
- Advocating for and working with DHCD and HUD to resolve inconsistencies in programmatic requirements, funding programs, and within agency policies; and
- Remaining engaged with private housing and social service agencies by attending agency meetings and conferences and coordinating on related housing issues.

#### DISCUSSION

BCHC undertakes activities in coordination with other municipal policies, programs, and expenditures, especially with the CDBG program through the towns of Yarmouth and Barnstable. BCHC staff work in tandem with citizens, municipal departments, and the public and private sectors to reduce poverty, eliminate barriers to affordable housing, address obstacles to meet the underserved need, enhance coordination, and develop the institutional structure. BCHC coordinates federal and state funds for LMI families/individuals and forwards efforts to reduce people in poverty by improving their overall quality of life through affordable housing provision.

## **Program Specific Requirements**

### **AP-90 Program Specific Requirements**

#### **INTRODUCTION**

Below is a description of how BCHC is meeting HUD's Requirements for the Program.

#### HOME Investment Partnership Program (HOME)

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

There are no other forms of investment.

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

The BCHC has discontinued the DPCC homebuyer program activity.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds is as follows: N/A.

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:

Home rehabilitation or debt refinancing assistance are not currently included in program activities.

#### **Homeownership Limits**

BCHC doesn't currently include any homeownership programs. If a homeownership program is reintroduced, HOME funds for homebuyer assistance or rehabilitation of owner-occupied single-family housing will use the HOME affordable homeownership limits provided by HUD.

#### **Possible Beneficiary Limits or Preferences**

BCHC reserves the right to fund rental projects that may limit beneficiaries or set preferences for low-income populations based on certain criteria, such as people with mental and/or physical disabilities or the elderly population in accordance with the Fair Housing Laws.

#### **Rental Housing**

Applications are accepted from non-profit or for-profit entities for the creation or preservation of affordable rental units for very low / lowincome families and individuals. BCHC incentivizes targeting rental units to serve homeless, special needs groups, and/or persons with disabilities. BCHC accepts applications for rental development projects concurrent with the release of funding from DHCD. Due to the limited allocation and staff resources, projects in their second round of the DHCD funding process will be given priority. However, depending upon availability of funds, number of applications, and potential special circumstances, first-round applicants may be accepted. For projects not seeking DHCD funding in conjunction with an application for BCHC funding, applicants may contact the HOME Program Manager regarding the application process at homeprogram@barnstablecounty.org. In the event DHCD has not issued a Notice of Funding and BCHC has available funds, BCHC may issue an RFP soliciting project applications. When staff deems the application complete, an Underwriting Risk Analysis will be prepared in accordance with program guidelines. The BCHC Advisory Council will review the application and underwriting and make the final determination on the funding request. BCHC Rental Housing Development Policies and Guidelines and Applications are https://www.bchumanservices.net/initiatives/home-program/ or by available contacting HOME at Project Manager: homeprogram@barnstablecounty.org / 508-375-6622.

#### **TBRA** Program

The BCHC engaged in an emergency short-term rental TBRA program pursuant to HUD Waivers and guidelines to assist households impacted by the COVID-19 Pandemic. This program was funding in October 2020 and concluded on September 30, 2021 pursuant to HUD guidelines. BCHC does not administer any other TBRA Program activity.