



**DRAFT**

## **BARNSTABLE COUNTY HOME PROGRAM**

### **CONSOLIDATE ANNUAL PERFORMANCE EVALUATION REPORT (CAPER)**

**FOR PROGRAM YEAR 2021  
July 1, 2021 – June 30, 2022**

#### ***For Review and Comment***

***Public Comment Period: September 2, 2022 through September 19, 2022***

Written Comments may be submitted to: Barnstable County Department of Human Services, Attn: HOME Program, P. O. Box 427, Barnstable, MA 02630 or by email to: [homeprogram@barnstablecounty.org](mailto:homeprogram@barnstablecounty.org)

***Virtual Public Meeting to be held: September 13, 2022 @ 3:00 p.m.; see Notice of Public Meeting for information on how to join the public meeting attached at the end of this document.***

**BARNSTABLE COUNTY HOME PROGRAM**  
**CONSOLIDATED ANNUAL PERFORMANCE EVALUATION REPORT (CAPER)**  
**PROGRAM YEAR 2021 (July 1, 2021 – June 30, 2022)**

---

*U.S. Department of Housing and Urban Development (HUD) for the HOME Investment Partnership Program*

**CR-05 - Goals and Outcomes**

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

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

**AFFORDABLE RENTAL HOUSING PRODUCTION**

The Barnstable County HOME Consortium (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 starting construction. Additionally, there are several other affordable rental housing developments in the pipeline. This activity has proven to be an effective use of Barnstable County's limited HOME funds. It is noted that for the purposes of this Consolidated Annual Performance Evaluation Report ("CAPER") only those projects that have been **completed** with a meaning of obtaining certificates of occupancy and being substantially leased up within a program year are counted for that program year. As rental development activities may take up to two to three years from initial funding date to completion date, it is important to note the current and pending development projects in order to provide a complete picture of Barnstable County HOME activities.

In Program Year 2021 (PY21), 11 HOME units were **completed** with the development and completion of Terrapin Ridge in Sandwich. However, two affordable rental developments consisting of a total of 22 HOME units are substantially constructed, one project consisting of 11 HOME units has just been conditionally committed funds, and one project consisting of 11 HOME units is under application review for HOME funds. Additionally, there are numerous other projects in the pipeline. Unfortunately, with the limited amount of allocation, the BCHC will not have enough funds to commit to all these projects in the future.

**Completed:**

Terrapin Ridge, Sandwich: a 30 unit (11 HOME units) affordable rental housing project completed construction and leasing in June 2022. This project was awarded \$250,000 in BCHC funds.

**Under Construction (to be completed in Program Year 2022):**

Yarmouth Gardens, Yarmouth: is a 40 unit (11 HOME units) affordable rental housing project. \$250,000, plus an additional \$100,000 in construction gap funding, of BCHC funds has been conditionally committed to the project.

Brewster Woods, Brewster: is a 30 unit (11 HOME units) affordable rental housing project. \$250,000 of BCHC funds has been conditionally committed to the project.

**Conditionally Committed:**

LeClair Village, Mashpee: is a 39 unit (11 HOME units) affordable rental housing project that was recently awarded a conditional commitment of \$300,000 in BCHC funds.

**Application Submitted:**

Scranton on Main, Falmouth: is a 38 unit (11 HOME units) age-restricted affordable rental housing project that submitted an application for a conditional commitment of \$300,000 in BCHC funds. The application is currently being reviewed.

**Notice of Intent:**

Cloverleaf, Truro: is a 39 unit (11 HOME units) affordable rental housing project that has submitted a pre-application and a notice of intent to submit an application in the next funding round for a conditional commitment of \$300,000 in BCHC funds.

***The Rental Housing Production expected goal of the 2020 – 2024 Strategic Plan<sup>1</sup> is 88 HOME affordable rental units; approximately 17.5 units per program year. For PY21, the goal was the development of 33 and BCHC accomplished the completion of 11 HOME rental units. However, it should be noted that an additional 22 HOME rental units are currently leasing up and close to completion. Additionally, BCHC***

---

<sup>1</sup> As a part of the 2020-2024 Consolidated Plan

***conditionally committed funds for the development of another 11 units and is anticipating the conditional commit funds to another project of units.***

***For the Strategic Plan goal of 17.5 units per program year, for the first two years, BCHC has completed 26 units in three projects and will be completing another 22 units early in the 2022 program year.***

### **CHDO'S**

The BCHC set a five-year Strategic Plan goal of 11 CHDO HOME rental units. The BCHC has been unable to meet this goal due to a lack of possible CHDO entities seeking project funding. The BCHC has been actively attempting to recruit a CHDO to collaborate with however, BCHC has thus far been unable to locate a viable CHDO that could meet all of HUD's requirements for the allocation of funds. In April 2021, in response to the COVID-19 Pandemic, HUD issued a Notice of "Availability of Waivers and Suspensions of HOME Program Requirements in Response to COVID-19 Pandemic" (HUD General Notice) which suspended the required 15% CHDO set-aside for PYs 2017, 2018, 2019, and 2021; totaling \$262,678. As the BCHC has been unable to recruit a CHDO in many years, the restricted CHDO funds for these program years were reallocated. The release of these restricted set-aside CHDO funds pursuant to the HUD General Notice provided vital funds to be conditionally committing for the development of critically-needed affordable rental units.

***Based on the above, the BCHC does not believe that the CHDO Rental Housing Production project activity is a practical use of BCHC's limited HOME funds. The HUD General Notice that suspended the customary 15% CHDO set-aside allowing those funds to be used for other project activities was applauded and the BCHC would welcome the continued suspension of the restricted 15% CHDO set-aside in the future so Participating Jurisdictions who have difficulty locating viable CHDO's in their region may use the allocated funds for other much-needed affordable housing projects.***

### **Short-Term Tenant Based Rental Assistance (TBRA)**

The BCHC initiated a short-term TBRA program in August 2020 under 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" (HUD TBRA Notice). This short-term TBRA program activity ended on September 30, 2021 pursuant to the HUD TBRA Notice. The BCHC conditionally committed \$100,000 of HOME funds to the program and set a goal of assisting 20 rental households during this time period (August 2020 through September 2021). For PY20, the TBRA program assisted 11 rental households. For PY21, the TBRA did not assist any additional rental household.

BCHC had a goal of assisting another 9 households in PY21 from July 1, 2020 until the termination date of the temporary program of September 30, 2021. However, as other federal, state and local funding sources were available for short-term rental assistance, this HOME short-term TBRA program was not used and remaining funds were re-allocated to affordable rental project development.

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

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee’s program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected Strategic Plan	Actual Strategic Plan	Percent Complete	Expected Program Year	Actual – Program Year	Percent Complete
<b>CHDO Housing Production</b>	Affordable Housing Homeless	HOME: \$375,000	Rental units constructed	Household Housing Units	11	0	0.00%	5	0	0.00%
<b>Rental Housing Production</b>	Affordable Housing	HOME: \$1,775,000	Rental units constructed	Household Housing Units	77	26	33.77%	33	11	33.33%
<b>Short-Term Tenant Based Rental Assistance</b>	Affordable Housing Homeless Non-Homeless Special Needs	HOME: \$100,000	Short-Term Tenant-based rental assistance	Households Assisted	20	11	55.00%	9	0	0.00%

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

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

The BCHC believes affordable housing rental development is a priority for Cape Cod and will continue to provide funding for development of affordable rental housing units for families earning less than 50% to 60% AMI. As described above and in the 2021-2024 Consolidated Plan and PY21 Annual Action Plan, this is an effective and beneficial use of the BCHC’s limited HOME funds. The BCHC hopes that in the future, HUD again suspends the 15% CHDO set-aside requirement to allow use of the funds for non-CHDO affordable rental housing production. Barnstable County does not administer CDBG funds.

**CR-10 - Racial and Ethnic composition of families assisted**

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

	HOME
White	8
Black or African American	1
Multi-Racial	2
Asian	0
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	0
<b>Total</b>	<b>11</b>
Hispanic	4
Not Hispanic	7

**Table 2 – Table of assistance to racial and ethnic populations by source of funds**

## CR-15 - Resources and Investments 91.520(a)

### Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
HOME	public - federal	\$960,335	\$785,489

Table 3 - Resources Made Available

### Narrative

Funds in the total amount of \$785,489.01 were expended in PY21 as follows:

Affordable Rental Housing Development:	\$740,000
Administration of HOME Program:	\$45,489
<b>Total:</b>	<b>\$785,489</b>

### Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Barnstable County	100		Region

Table 4 – Identify the geographic distribution and location of investments

### Narrative

Affordable Rental Housing Development funds were requisitions by three projects during PY21: Terrapin Ridge, Sandwich (\$250,000); Yarmouth Gardens, Yarmouth (\$265,000); and Brewster Woods, Brewster (\$225,000).

### Leveraging

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

HUD has allowed HOME Consortia in Massachusetts to use the Massachusetts Rental Voucher Program (MRVP) expenditures in the consortia communities as a source to count toward the 25% match requirement. The BCHC has over \$25 million in excess match credit through the MRVP administered by the Housing Assistance Corporation that has been accumulated over the history of the Barnstable County HOME Program. Additionally, the HOME Program's federal funds leverage state and local fund as follows: Mostly all of BCHC's affordable rental housing developments receive various state (*DHCD affordable housing funding, low-income tax credits, MassWorks grants, etc.*) and local (*CPA and AHT funds, and land donation*) funding to subsidize the development of the affordable rental housing project. It is a collaborative funding effort of federal, state, and local funds.

**NOTE:** Pursuant to the HUD Notice entitled, "Additional Revision, and Extension of December 2020 and April 2020 Memorandum- Availability of Waivers and Suspensions of the HOME Program Requirements in Response to COVID -19 Pandemic" dated September 27, 2021 the matching contribution requirement for funds expended between October 1, 2019 through September 30, 2022 has been reduced to zero. Thus, no matching funds were required for the Barnstable County HOME Program PY21.

<b>Fiscal Year Summary – HOME Match</b>	
1. Excess match from prior Federal fiscal year	25,188,191
2. Match contributed during current Federal fiscal year	0.00
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	25,188,191
4. Match liability for current Federal fiscal year	0.00
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	25,188,191

**Table 5 – Fiscal Year Summary - HOME Match Report**

<b>Match Contribution for the Federal Fiscal Year</b>								
<b>Project No. or Other ID</b>	<b>Date of Contribution</b>	<b>Cash (non-Federal sources)</b>	<b>Foregone Taxes, Fees, Charges</b>	<b>Appraised Land/Real Property</b>	<b>Required Infrastructure</b>	<b>Site Preparation, Construction Materials, Donated labor</b>	<b>Bond Financing</b>	<b>Total Match</b>
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

**Table 6 – Match Contribution for the Federal Fiscal Year**



**Program Income Report**

<b>Program Income – Enter the program amounts for the reporting period</b>				
<b>Balance on hand at beginning of reporting period</b>	<b>Amount received during reporting period</b>	<b>Total amount expended during reporting period</b>	<b>Amount expended for TBRA</b>	<b>Balance on hand at end of reporting period</b>
<b>\$390,744.58</b>	<b>\$185,523.33</b>	<b>\$234,922.58</b>	<b>\$0</b>	<b>\$341,345.32</b>

**Table 7 – Program Income**

**HOME MBE/WBE report**

<b>Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period</b>						
	<b>Total</b>	<b>Minority Business Enterprises</b>				<b>White Non-Hispanic</b>
		<b>Alaskan Native or American Indian</b>	<b>Asian or Pacific Islander</b>	<b>Black Non-Hispanic</b>	<b>Hispanic</b>	
<b>Contracts</b>						
Dollar Amount	7,411,987	0	0	0	0	7,411,987
Number	1	0	0	0	0	1
<b>Sub-Contracts</b>						
Number	30	0	0	0	0	30
Dollar Amount	7,411,987	0	0	0	0	7,411,987
	<b>Total</b>	<b>Women Business Enterprises</b>	<b>Male</b>			
<b>Contracts</b>						
Dollar Amount	7,411,987	0.00	7,411,987			
Number	1		1			
<b>Sub-Contracts</b>						
Number	30	3	17			
Dollar Amount	7,411,987	237,571	7,174,416			

**Table 8 - Minority Business and Women Business Enterprises**

**Minority Owners of Rental Property** – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted

	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	1	0	0	0	0	1
Dollar Amount	250,000	0	0	0	0	250,000

**Table 9 – Minority Owners of Rental Property**

**Relocation and Real Property Acquisition** – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition

Parcels Acquired		0	0			
Businesses Displaced		0	0			
Nonprofit Organizations Displaced		0	0			
Households Temporarily Relocated, not Displaced		0	0			
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

**Table 10 – Relocation and Real Property Acquisition**

## CR-20 - Affordable Housing 91.520(b)

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

	<b>One-Year Goal</b>	<b>Actual</b>
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	47	11
Number of Special-Needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>47</b>	<b>11</b>

**Table 11 – Number of Households**

	<b>One-Year Goal</b>	<b>Actual</b>
Number of households supported through Rental Assistance	9	0
Number of households supported through The Production of New Units	38	11
Number of households supported through Rehab of Existing Units	0	0
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>47</b>	<b>11</b>

**Table 12 – Number of Households Supported**

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

The BCHC set a one-year goal of the production of 38 new HOME rental units; five of which was to be created by a CHDO development. For PY21, the BCHC completed 11 new HOME rental units; none of which were CHDO developments. The production of 11 new HOME rental units was from one project that were completed in PY21; Terrapin Ridge, Sandwich. It is noted that although we missed our goal of creating 33 non-CHDO affordable rental HOME units, an additional 22 HOME rental units are currently under constructed and reaching completion and another 22 HOME rental units have applied for funding. The BCHC views the overall goal of developing affordable rental units throughout the region a success.

Unfortunately, we were not able to meet our goal of the creation of three CHDO rental units as there are currently no CHDO development opportunities in Barnstable County as discussed above in Section CR-05 – Goals and Outcomes.

Under the short-term TBRA program, the BCHC had a goal of assisting 20 households experiencing financial hardship due to the COVID-19 Pandemic. BCHC assisted 11 households in PY20. BCHC had a goal of assisting another 9 households in PY21 from July 1, 2020 until the termination date of the temporary program of September 30, 2021. However, as other federal, state and local funding sources were available for short-term rental assistance, this HOME short-term TBRA program was not used and remaining funds were re-allocated to affordable rental project development.

**Discuss how these outcomes will impact future annual action plans.**

During the last several years, the production of affordable rental housing on the Cape has increased as the need has increased and the development of affordable rental units has been a successful activity for the BCHC. Thus the production of rental units will continue to be a top priority for the Cape Cod region. The BCHC has not been able to locate a CHDO applicant that meets all the HUD regulations to qualify as a CHDO, however, as the CHDO funds are restricted to that specific activity, BCHC will continue to attempt to foster CHDO opportunities.

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

<b>Number of Households Served</b>	<b>CDBG Actual</b>	<b>HOME Actual</b>
Extremely Low-income	0	10
Low-income	0	0
Moderate-income	0	1
<b>Total</b>	<b>0</b>	<b>11</b>

**Table 13 – Number of Households Served**

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

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

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

Several participating CoC partner agencies operate street outreach programs, including Vinfen, Duffy Health Center, Housing Assistance Corporation, and Homeless Prevention Council. Outreach staff are specially trained to interact with unsheltered populations and to assess them for services utilizing standardized assessment tools. Street outreach providers are expected to engage those persons that have been resistant to accepting an offer of housing or services and to follow a low barrier engagement approach.

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

Four local emergency assistance shelters (one for individuals and three for families) and seven transitional housing programs (including a project dedicated to veterans) participate in the CoC’s HMIS. The emergency shelter for individuals (St. Joseph’s House) operates with a low barrier threshold and coordinates with health care and social service providers to assist shelter guests in transitioning out of shelter into housing. One family emergency shelter is dedicated to individuals and families who are currently homeless due to fleeing domestic violence and coordinates with the MA Department of Transitional Assistance to provide financial stabilization and resources to prepare for moving into safe housing. Client level demographic data, client assessments, numbers and configurations of beds, client utilization, and current openings / availability are tracked through HMIS.

The Regional Network on Homelessness/CoC has organized an ad hoc Emergency Services Committee attended by numerous local service agencies to address the need for emergency shelter overflow beds during extreme weather events. Strategies have been developed to

leverage local resources for the short term (i.e., one-night motel vouchers, designated regional shelters). The availability of additional Emergency Solutions Grants (ESG) funds through the CARES Act enabled both year-round and seasonal individual Emergency Shelters in Barnstable County to provide 16,509 bed nights to more than 300 unduplicated individuals during the period from November 1, 2021 through April 30, 2022. The Committee continues to build capacity of existing shelter systems during weather related and other emergency declarations.

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

With the increase of multi-family affordable housing rental development in recent years on the Cape, the BCHC has been able to leverage their funds with other federal, state, and local funding sources to provide rental opportunities for our extremely low-income and low-income families. Most of the multi-family affordable rental housing developments consists of a high number of their rental units being set aside for extremely low-income and low-income families and include project-based Section 8 vouchers, Section 811 vouchers, and CBH units. To address the needs of homeless women exiting correction facilities, Catholic Social Services of Fall River operates St. Clare's House, a Transitional Housing program in Barnstable. As the convenor of the Regional Network on Homelessness and the Collaborative Applicant/Lead Agency for the MA-503 Continuum of Care, BCDHS maintains extensive partnerships with community agencies and local state offices including but not limited to; the Massachusetts Depts. of Mental Health (DMH), Children and Families (DCF), Youth Services (DYS), Rehabilitation (Mass Rehab) and MassHire; the Reintegration Team from the Barnstable County House of Corrections; the Probation Dept. for the Barnstable District Court; the Healthcare for the Homeless provider Duffy Health Center; the Cape Cod Chapter of the National Alliance on Mental Illness and; a number of psychiatric treatment facilities including the only inpatient unit on the Cape managed by Cape Cod Healthcare. The CoC has signed on to a Memorandum of Understanding with Falmouth Housing Authority and DCF to provide Transitional Housing subsidies to young persons exiting the DCF system.

The BCDHS is also the lead agency for the Massachusetts Executive Office of Health and Human Services (EOHHS) Unaccompanied Homeless Youth and Young Adult (YYA) grant. The six sub-grantees for these funds- Champ Homes, Housing Assistance Corporation, Homeless Prevention Council, Martha's Vineyard Community Services, Duffy Health Center and Fairwinds Nantucket Counseling- provide flexible and

person-centered services to anyone 24 years of age or younger experiencing housing instability across the entire region. As part of the grant EOHHS has included “Flex Funds” that can be used to meet the immediate needs of YYA including food, transportation, cell phones, clothing, re-housing expenses, back rent, and utilities. These funds assist Case Managers to engage with YYA who have minimal trust in caregivers because of past trauma and foster belief in long term connections. Additional resources funded through the grant include an Emergency Response which provides motel rooms during inclement weather or an emergency declaration if a YYA has no other options for a safe place to stay.

**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**

In 2017 HUD introduced the housing grant project category of DedicatedPLUS to provide CoCs with more flexibility to serve vulnerable populations and to more effectively and more immediately address the needs of persons experiencing chronic homelessness, at risk of experiencing chronic homelessness, or who were chronically homeless prior to being housed and who have recently become homeless again. HUD encourages CoCs to continue adopting prioritization standards 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 partners with the McKinney-Vento School Liaisons in every school district on the Cape and Islands and with the Cape Cod Community College in order to identify unaccompanied homeless youth and to offer them housing and stabilization services. Provider organizations in the CoC (e.g. Duffy Health Center, a health care for the homeless agency) also work closely with the House of Corrections on a re-entry task force to assist those leaving the House of Correction find housing and community based supports.

During FY20, the Unaccompanied Homeless YYA grant provided services and resources to 130 YYA and successfully housed 37 individuals who maintained their housing a minimum of 3 months. The EOHHS eligibility criteria for “At-Risk” YYA includes those who are couch surfing, those who are in danger of losing housing because of caregiver abuse or substance use, previous experience of homelessness by the YYA or their family and several other areas that allow for resources to be dedicated to prevention, diversion or other problem solving techniques.

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

### **Actions taken to address the needs of public housing**

This question was asked of all the local housing authorities during the preparation of the PY21 Annual Action Plan and received the following three responses, in summary: (1) PHA has been applying for and receiving additional rental vouchers to assist families in paying their rent; (2) PHA is doing due diligence on several housing-authority owned properties in hopes of moving towards development in the next year, have applied and received more VASH vouchers, and have issued and re-issued vouchers as quickly as possible extending search deadlines; and (3) PHA intends to expand its offering of information to residents regarding job training and retention services.

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

This question was asked of all the local housing authorities during the preparation of the PY21 Annual Action Plan and received the following three responses, in summary: (1) PHA refers tenants to take First Time Homeownership classes and if any affordable home ownership opportunities arise, PHA passes the information along to tenants; (2) PHA encourages First Time Home Buyer's classes and refers tenants to town home buyer program; and (3) PHA plans to increase communication with prospective landlords about program participations and housing quality standards and will work with housing search agencies to reduce barriers to securing permanent housing in diverse neighborhoods.

### **Actions taken to provide assistance to troubled PHAs**

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. At 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.

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

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

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), and 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 and other stakeholders are advocating for a statewide optional transfer fee of up to 2% on high-end real estate sales. These member towns along with the Consortium itself are engaging in discussions around the negative effects of short-term rental properties in the region and are exploring regulation options to minimize the negative effect. BCHC through its Consortium Advisory Council members 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 taxes.

Additionally, Barnstable County is the recipient of approximately \$41 million of ARPA funds and has listed housing as one of two priority needs along with wastewater. The County is opening an application portal to provide ARPA funding for affordable housing projects and initiatives.

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

Currently, the most significant obstacle on Cape Cod is the high cost of residential units due to a higher percentage of second home ownership and short-term rental properties which drives up the home prices. This has been substantially exacerbated by the COVID pandemic increasing the median single-family home price from approximately \$400,000 to \$660,000. Year-round housing has become a scarce commodity. To address some of these obstacles to meet the needs of our low to moderate-income year-round residents, local communities are working to change their zoning, particularly in village center areas, to accommodate greater density; and to provide for the creation of year-round accessory dwelling units. Additionally, many communities are creating and dedicating revenue streams through the

Community Preservation Act, expanding the occupancy tax to include a short-term rental tax, and creating other property tax revenue sources and using these funds to purchase real property for the development of affordable year-round housing.

In addition, county staff is currently engage in outreach and consultation in preparation of the required Allocation Plan for the new HUD HOME-ARP Program; 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 in need.

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

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

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

In addition to dedicating BCHC funds to rental housing for extremely low-income households and encouraging the set aside of housing vouchers for homeless or at risk homeless individuals/households, the BCHC supports all efforts in the region, and works with individual towns, to protect low income households in deed-restricted ownership units from losing their affordable restricted units through foreclosure. In addition, county staff is currently engage in outreach and consultation in preparation of the required Allocation Plan for the new HUD HOME-ARP Program; 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 in need.

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

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.

Additionally, BCHC staff, in conjunction with the Cape Cod Commission, is actively pursuing the creation of a Regional Housing Coordinator for the region with the technical assistance from the Massachusetts Housing Partnership (MHP). BCHC will be applying for Barnstable County ARPA funds to support the initial creation of this regional Coordinator position.

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

The BCHC maintains communication between the fifteen towns and serves as an information resource center for the Cape. BCHC staff will continue to meet with town staff, regional affordable housing advocates, and social service agencies over the course of the year to discuss the changing needs of the region and on the barriers to meeting those needs. Additionally, BCHC will coordinate with the CoC and local housing authorities in implementing the pending HOME American Rescue Plan program (HOME-ARP) through its life cycle and provide informational support and advocacy for housing projects and initiatives applying for Barnstable County ARPA funds.

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

The BCHC requires all affordable housing rental developers and project managers to have an approved Affirmative Fair Housing Marketing Plan (AFHMP) and Tenant Selection Plan (TSP) which includes a list of criteria that will be used in the selection of tenants complying with Fair Housing regulations. Compliance with adherence to this Plan is monitored by the BCHC Monitoring agent.

**CR-40 - Monitoring 91.220 and 91.230**

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

BCHC has a Rental Housing Development Monitoring Policy and retains the services of, and works closely with, FinePoint Associates in rental housing monitoring. Additionally, the BCHC requires as a condition of funding that all HOME projects must have Section 3 and MBE/WBE outreach and reporting plans in place before the financial closing. The HOME Program also requires as a condition of funding that the developer submit an AFHMP & TSP as stated above. BCHC, through its monitoring agent FinePoint Associates, provides free virtual training seminars on a bi-annual basis for all of its program managers so they can stay current on all regulations and requirement and as a refresher course for monitoring procedures.

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

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

Per the BCHC Citizen Participation Plan: HOME Program staff will notice the availability of the Consolidated Annual Performance Evaluation Report (CAPER) by placing a legal advertisement in the Cape Cod Times or in other local newspapers of general circulation (if available); **and/or** by posting a notice on the Barnstable County Human Services or HOME Investment Partnership Program website, other Barnstable County websites, and at Barnstable County buildings. Additional notices may be posted on Barnstable County social media sites; included in Barnstable County ENewsletters; and sent via email to specific group listserv; and may be posted with other local government offices, town halls, libraries, and senior centers, as deemed appropriate. The CAPER Notice is emailed to all fifteen Town Clerks for posting. The public will have not less than fifteen (15) days (*unless said 15-day requirement is reduced for emergency temporary reasons by HUD*) to submit written and/or oral comments on the CAPER.

## **CR-50 - HOME 91.520(d)**

### **Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations**

**Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.**

BCHC has a Rental Housing Development Monitoring Policy and retains the services of, and works closely with, FinePoint Associates in rental housing monitoring. Monitoring Reviews were completed for the projects ***listed in the attached Monitoring Review for Program Year 2021 (July 1, 2021 through June 30, 2022); Monitoring conducted by FinePoint Associates.*** There were no projects that should have been inspected but were not inspected. There were no emergency VAWA transfers for the Program Year.

### **Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)**

Notices of Public Hearings and Document Availability of the Barnstable County's HOME Consortium's Annual Action Plans, CAPERS, and Consolidated Plans are provided in English, Spanish, and Brazilian Portuguese and posted on the Barnstable County's website and in the

Barnstable County Human Services Department E-Newsletter that has a subscriber list of over 2,800 individuals who are generally in the Human Services fields across Cape Cod and the Islands including minority organizations and organization working with low-income residents and is provided to all local housing authorities, non-profit advocates and local housing partners. The Notices are also provided to all fifteen towns (Town Clerks, Administrators/Managers, Planners, and Affordable Housing Committees) for posting and distributing in their local community.

Additionally, as part of the scheduled monitoring of rental development projects, the monitoring agent reviews the property management's implementation of policies and procedures to affirmatively further fair housing and for compliance with an approved Affirmative Fair Housing Marketing Plan and Tenant Selection Plan.

**Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics**

The BCHC expended \$234,922.58 of program income for three affordable housing development projects:

- Terrapin Ridge, Sandwich (completed) – 30 total units / 11 HOME units. All units are under 60% AMI
- Yarmouth Gardens, Yarmouth (substantially constructed) – 40 total units / 11 HOME units. All units are under 60% AMI
- Brewster Woods, Brewster (under construction) – 30 total units / 11 HOME units. All units are under 60% AMI

**Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)**

The BCHC staff notifies individual towns, local housing authorities, and local affordable housing advocates when potential loss of affordable housing units due to foreclosure, bankruptcy, or other financial distress is brought to the County's attention in an effort to bring together the necessary stakeholders to attempt to save the affordability of the units. Additionally, the BCHC in coordination with the Cape Cod Commission is currently investigating the possible implementation of a Regional Housing Coordinator for the region. This regional Coordinator will work with the towns to implement shared funding sources such as regional CPA funding and grant applications.