

**2014 HOME CONSORTIUM ANNUAL PLAN
MAY 12, 2014**

BARNSTABLE COUNTY HOME CONSORTIUM

ANNUAL PLAN

FEDERAL FISCAL YEAR 2014

(JULY 1, 2014 – JUNE 30, 2015)

COVER SHEET

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BARNSTABLE COUNTY HOME CONSORTIUM

2014 ANNUAL PLAN

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Affordable Housing Acronyms Used in Annual Plan

AMI- Area Median Income

CDBG- Community Development Block Grant

CDP- Community Development Partnership

CHAPA- Citizens' Housing and Planning Agency

CHDO- Community Housing Development Organization

CoC- Continuum of Care

Con Plan- 2010-2014 Barnstable County Consolidated Plan

CPA- Community Preservation Act

DHCD- Massachusetts Department of Housing and Community Development

DPCC- Down Payment Closing Cost program

ESG- Emergency Shelter Grant

FFY- Federal Fiscal Year- October 1- September 30

FMR- Fair Market Rent

HAC- Housing Assistance Corporation

HECH- Harwich Ecumenical Council for Housing

HOME- HOME Investment Partnerships Program

HOPWA- Housing Opportunities for People with AIDS

HPP- Homeownership Preservation Program

HQS- Housing Quality Standards

HUD- United States Department of Housing and Urban Development

LEED- Leadership in Energy and Environmental Design

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Affordable Housing Acronyms Used in Annual Plan

LHA- Local Housing Authority

LIHTC- Low Income Housing Tax Credit program

LIP- Local Initiative Program

LTO- Local Tenant Organization

MBE- Minority Business Enterprise

MHP- Massachusetts Housing Partnership

MRVP- Massachusetts Rental Housing Voucher program

MSA- Metropolitan Statistical Area

PSH- Permanent Supportive Housing

SOMWBA- Massachusetts State Office of Minority and Women Business Assistance

UDR- Massachusetts Universal Deed Restriction

USDA- United States Department of Agriculture

WBE- Women Business Enterprise

2014 HOME CONSORTIUM ANNUAL PLAN
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SECTION 1- EXECUTIVE SUMMARY

A. OVERVIEW

The Barnstable County HOME Consortium was established by County ordinance in 1992 and is comprised of Barnstable County, the lead entity, and the fifteen (15) towns in the County: Barnstable, Bourne, Brewster, Chatham, Dennis, Eastham, Falmouth, Harwich, Mashpee, Orleans, Provincetown, Sandwich, Truro, Wellfleet, and Yarmouth.

The 2010-2014 Consolidated Plan ("Con Plan") that was approved by the U.S. Department of Housing and Urban Development (HUD) on August 13, 2010 and as amended on August 29, 2012 identifies the housing needs of Barnstable County and its 15 towns and provides the framework for how the County intends to address and prioritize those needs over the next five years (2010-2014). The Con Plan and the 2014 Annual Plan only apply to the activities of the HOME Investment Partnerships Program (HOME).

The 2014 Annual Plan is based on the housing priorities/objectives set forth in the Consolidated Plan:

1. Develop and maintain an adequate supply of safe, decent rental housing that is affordable and accessible to residents with a range of income levels and household needs.
2. Preserve and maintain the existing affordable housing stock, particularly the units occupied by extremely and very low income households.
3. Reduce individual and family homelessness by providing a viable continuum of care that implements a housing first strategy for permanent supportive housing.
4. Expand homeownership opportunities for low income households
5. Ensure that County residents with long-term support needs have access to accessible, community housing options

B. EVALUATION OF CURRENT YEAR'S PERFORMANCE

For FFY 2013, through May 12, 2014, the following is the status of the goals and accomplishments in each of the Consortium's three program areas:

Housing Production-

- a. Rental Housing- 2 completed projects: 28 units; Goal- 30 units.
- b. Ownership housing- 0 completed projects; Goal- 3 units.

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Down Payment/Closing Cost Program- 4 households assisted; Goal- 5 households.

As described more fully in Section 2, the Consortium is proposing to continue to allocate funding for these activities- including the set aside for the Homeownership Preservation Program (HPP) in housing production- for FFY 2014. Once final program year data is available, more extensive performance evaluation measurements will be submitted in the FFY 2013 annual performance evaluation report.

C. ALLOCATION OF FUNDS

The Consortium has received a FFY 2014 allocation of \$404,552, a 3.9% increase from FFY 2013; however, this total is still approximately 41% less than the \$681,000 historic average allocation.

In making the following programmatic recommendations for allocating the FFY 2014 HOME funds, the Advisory Council considered the housing market analysis and housing needs described in the Consolidated Plan, the experience and trends it has observed over this program year, the federal and state statutory and policy conflict on ownership deed restrictions, the overall reduction in public subsidies for affordable housing production, and the comments from the February 20th public hearing. The following are the proposed allocations of HOME funds along with the goals for each area:

FFY 2014 HOME ALLOCATIONS

Area/Program	Allocation	Goals- Units or Households assisted
Administration- 10%	\$ 40,455	
CHDO Housing Production Projects- 15%	\$ 60,683	5 units
Housing Production	\$ 228,414	28 units
Down Payment/Closing Cost Program- DPCC	\$ 75,000	5 households
TOTAL	\$ 404,552	38 units/households

Consistent with the objectives and priorities established in the 2010-2014 Consolidated Plan, as amended, HOME funds will be directed to increase the Cape's affordable rental stock for very low and low-income tenants, homeownership opportunities for low-income homebuyers, and promote housing opportunities for the area's special needs populations. Note however that the goal of assisting 38 households a year is a reduction from the original Con Plan annual goal of 65 assisted households- a reduction in assisted households that reflects the over 40% reduction in the Consortium's HOME allocation in FFY 2012- 2014 from that of FFY 2010-2011.

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D. CITIZEN PARTICIPATION

From its inception, the Consortium has placed a high premium on citizen participation. Specific steps were taken early on to ensure that the fifteen towns and the numerous housing/social service agencies that exist on Cape Cod were given the opportunity to participate in this process. In that respect, the most significant step was to create the Advisory Council. Established through the passage of an ordinance by the County Legislature and appointed by the County Commissioners, the Advisory Council plays a central role in the development of Consortium's program, plans and policies.

The Advisory Council, which meets monthly, assisted in the development of this Annual Plan, provides ongoing input regarding program design and implementation, and makes decisions in the award of project funds. The Council meetings are open to the public and welcome their participation. Over the last twenty years, the Advisory Council has become an important forum for discussing and taking action regarding both housing and community matters.

In accordance with the Citizen Participation Plan of the Consolidated Plan, the following actions were taken to solicit and respond to comments on the 2014 Annual Plan:

January 31, 2014- Public Hearing Notice of February 20, 2014 posted on Cape Cod Commission web site in English, Spanish, and Portuguese.

February 5, 2014- Publication of Notice of February 20, 2014 Public Hearing in the Cape Cod Times.

February 5, 2014- E-mail notification of February 20, 2014 Public Hearing to about 150 people from all fifteen towns, local housing authorities, affordable housing developers, local housing committees, and social service and minority organizations working with low income residents. The notice about the hearing that was e-mailed was also provided in Spanish and Portuguese.

February 14, 2014- Notice about the public hearing published in the Barnstable County Human Services Department E-Newsletter. This notice was also included Spanish and Portuguese versions.

February 20, 2014- Public Hearing held at Cape Cod Commission office in Barnstable. The meeting location was handicap accessible, and provisions were made for providing special accommodations for language interpretation or services for the deaf or hard of hearing.

March 13, 2014- Advisory Council meeting voted to approve the draft 2014 Annual Plan. The meeting was held at the Cape Cod Commission office in Barnstable. The meeting location was handicap accessible, and provisions were made for providing special accommodations for language interpretation or services for the deaf or hard of hearing.

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April 9, 2014- Public Comment Notice and draft 2014 Annual Plan posted on Cape Cod Commission web site.

April 9-10, 2014- Copies of the draft 2014 Annual Plan mailed and e-mailed to 15 Town Halls and made available at CCC and Barnstable County offices.

April 10, 2014- Publication of 30 day Public Comment Notice in the Cape Cod Times.

April 10, 2014- E-mail notification of 30 day Public Comment Notice to about 125 people from all fifteen towns, local housing authorities; affordable housing developers, local housing committees, and social service and minority organizations working with low income residents. The notice about the 30 day comment period that was posted on the CCC web site and that was e-mailed included Spanish and Portuguese versions.

A summary of comments received either orally or in writing on the draft Annual Plan are included in Appendix C. In addition, the Consortium's overall Citizen Participation Plan is included in Appendix C.

E. MONITORING AND PERFORMANCE MEASUREMENT

HUD has issued a rule on its Outcome Performance Measurement System. The system incorporated the following three objectives of the Housing and Community Development Act of 1974: 1) create suitable living environments; 2) provide decent housing; and 3) create economic opportunities. Beyond that, the system directed grantees to select from one of the following three outcomes to help define the intent of the activity: 1) availability/accessibility; 2) affordability; and 3) sustainability-promoting livable or viable communities. Therefore, for each proposed activity the grantee has to select one of the nine Outcome Statements. In accordance with HUD's directive, the Consortium started to report its activities using this format as of October 1, 2006. As a result of the Substantial Amendments to the 2010-2014 Con Plan HUD approved on August 29, 2012, the Consortium will use the following annual performance measures for its three programs:

Rental Production: Affordability for the purpose of providing decent housing-30 units

- Number of affordable units produced for each income category: goal is 30 units
- Number of units for households at or below 30% area median income: goal is at least 10% of units
- Number of units for households at or below 50% of area median income: goal is at least 33% of units
- Number of minority households assisted: goal is at least 10% of all households
- Number that are accessible under Section 504: goal is at least 10% of newly constructed units
- Number of units for homeless individuals/families: goal is at least 2 units
- Number of units for special needs households: goal is at least 2 households

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- Number of newly constructed units that meet Energy Star standards: goal is 100% of units
- Number of newly constructed units that are LEED certified: goal is 25% of units

Homeownership Production: Affordability for the purpose of providing decent housing- 3 units

- Number of affordable units produced for each income category: goal is 3 units
- Number of units for households at or below 50% of area median income: goal is at least 10% of units
- Number of minority households assisted: goal is at least 10% of all households
- Number that are accessible under Section 504: goal is at least 10% of newly constructed units
- Number of newly constructed units that meet Energy Star standards: goal is 100% of units
- Number of newly constructed units that are LEED certified: goal is 25% of units

Homebuyer Assistance: Affordability for the purpose of providing decent housing- 5 units

- Number of homebuyers assisted: goal is 5 households
- Number of minority households assisted: goal is at least 10% of all households.

The Consortium will review and revise as necessary its guidelines and scoring system for housing development projects to reflect the priorities and goals in the Consolidated Plan. In accordance with that policy, the Consortium reviewed and updated its scoring system in August 2010, in August 2012, and again in December 2013. The Consortium plans to continue its practice of awarding additional funds beyond the per unit and per project funding maximums to projects that score exceptionally well.

In accordance with the revised set of HOME regulations that became effective on August 23, 2013, the Consortium's Advisory Council adopted the following policies and guidelines that became effective January 1, 2014:

1. Rental Housing Development Project Underwriting, Subsidy Layering, and Risk Analysis Policies and Guidelines:
www.capecodcommission.org/resources/affordablehousing/RentalProjectUnderwritingPoliciesJan2014.pdf.
2. Homebuyer Policies: HOME Down Payment Closing Cost (DPCC) Program Eligibility and Underwriting Policy. Note that this Policy was an update of policies adopted in July 2012 in response to the HOME requirements included in the Appropriations Act of 2012:
www.capecodcommission.org/resources/affordablehousing/DPCC_Eligibility_Policy_Jan2014.pdf.

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SECTION 2.
ALLOCATION OF FUNDS AND ADMINISTRATION

A. OVERVIEW

The Barnstable County HOME Consortium was established by County ordinance in 1992 and is comprised of Barnstable County, the lead entity, and the fifteen (15) towns in the County: Barnstable, Bourne, Brewster, Chatham, Dennis, Eastham, Falmouth, Harwich, Mashpee, Orleans, Provincetown, Sandwich, Truro, Wellfleet, and Yarmouth.

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4. Expand homeownership opportunities for low income households
5. Ensure that County residents with long-term support needs have access to accessible, community housing options

B. USE OF FUNDS

Context/Background: The Federal Fiscal Year (FFY) 2013 HOME allocation of \$389,398 was the second smallest HOME allocation ever. That amount was over \$290,000 less than the historic average allocation (see chart on next page). The Consortium's 2014 allocation is \$404,552, a 3.9% increase from FFY 2013 yet still far below the historic average. Finally it should be noted that the value of \$1 today is about 50% of what it was 20 years ago when the program started. Thus the current allocation in inflation-adjusted dollars leaves the region with significantly fewer actual affordable housing resources than it had in 1994.

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ANNUAL ALLOCATIONS

YEAR	HOME ALLOCATION
1994	\$619,000
1995	\$671,000
1996	\$635,000
1997	\$619,000
1998	\$658,000
1999	\$706,000
2000	\$707,000
2001	\$784,000
2002	\$783,000
2003	\$772,797
2004	\$861,338
2005	\$773,880
2006	\$717,618
2007	\$713,764
2008	\$681,075
2009	\$753,465
2010	\$749,819
2011	\$664,528
2012	\$379,285
2013	\$389,398
TOTAL	\$13,638,267
AVERAGE ANNUAL ALLOCATION	\$681,913

HOME funding is limited to the following four eligible activities for low income households: housing production- both rental and ownership; home buyer assistance, e.g. down payment programs; home owner assistance, e.g. homeowner rehab programs; and tenant-based rental assistance.

In making its decision on programmatic recommendations for allocating the FFY 2014 HOME funds, the Advisory Council considered the housing market analysis and housing needs described in the Consolidated Plan, the experience and trends it has observed over this program year, the federal and state statutory and policy conflict on ownership deed restrictions, and the comments from the February 20th public hearing.

Rental Housing Production:

Developers of larger scale rental projects have seen a dramatic turn-around in the availability of investors and pricing in the low income housing tax credit market

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program from the virtual equity market collapse and investor exit of 4-5 years ago. More investors have entered the market, and prices are near historic highs of at least 90 cents on the dollar. However, investors are still requiring significant additional reserves and very strong balance sheets from applicants and are putting the bulk of their equity much later into the deal, and all of this has required many smaller or mid-sized non-profits to partner with better capitalized entities that can meet the cash reserve and other requirements of the investors.

Developers have continued to locate worthwhile potential projects throughout the region and in the state, and demand continues to far exceed state resources. As a result of both the significant demand and also to better target state housing resources on ready to proceed projects, DHCD announced in summer 2012 that there would now be a pre-application process along with a requirement that projects meet at least one of four sets of priorities in order to receive an invitation to submit a funding request.

There were four tax credit projects from the region that submitted in the August 2013 funding round, and only one of those- Route 134 Community Housing- secured state funding. The three remaining projects will re-apply in the March 2014 funding round- the only funding round for the year. This is the second year in a row in which DHCD has held only one funding round- as opposed to the prior practice of two rounds per year. With a number of projects in the pre-development stage in 2014, this will further lengthen the queue for funding of rental projects from the region. As the Consortium still has some FFY 2012 funds available to commit as well as its FFY 2013 rental housing allocation, this paucity of DHCD funding rounds has meant that the Consortium has had the resources available to support the regional demand; however, it has also put a significant strain on the Consortium's ability to meet its two year commitment requirement.

For the first time in its history in 2010, the Consortium had more rental development project funding requests than it had resources available to allocate. The Consortium decided to adopt a funding round system, as opposed to its long-standing practice of accepting applications on a rolling basis, in order to deal with this circumstance. The Consortium has used the same application deadline as DHCD since September 2010.

In fall of 2011 the Consortium became aware of a number of potential smaller rental housing developments that would not be looking to apply to DHCD. Given the number of rental funding requests in the pipeline at DHCD, these potential locally funded only projects, and the change HUD made to automatically cancel HOME commitments if no funds were expended within 12 months and the resulting impact that had on the Consortium's two year funding commitment requirement, the Consortium in November 2011 adopted a two tier application process that is described on the page 13. The Consortium expects to continue this two tier application process for FFY 2014.

The Consortium's rental program requirements and guidelines are attached in Exhibit B. Some threshold project requirements and per unit and per project funding award limits are noted on the following page:

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- Eligible applicants include for-profit entities in any form of corporate structure, e.g. LLC, LP, etc.; non-profits- CHDOs and others; housing authorities; municipalities in cooperation with any of the above; and municipal affordable housing trusts.
- The Consortium will accept rental development funding requests in either of the following ways: a) Those projects that require DHCD funding sources available only in funding rounds: applications will be accepted with the same deadline as that of DHCD; b) Those projects that will not require DHCD funding round sources: applications will be accepted on a rolling basis. While applicants typically confer with Consortium staff prior to submission of a funding request, both the funding application and the rental housing guidelines are on the HOME Consortium section of the Cape Cod Commission's web site.
- The Consortium will not accept rental housing funding applications for projects containing less than three (3) HOME assisted units unless a waiver is granted in exceptional circumstances and for good reason.
- The applicant must demonstrate site control, either with a signed Purchase & Sale agreement or some other comparable evidence of site control at the time of application and must have an approved zoning permit- with all appeals periods expired- for the number of units in the project.
- The applicant must demonstrate, and the Consortium must make the underwriting determination, that the project is feasible and is very likely to commence within 12 months of the date of the HOME commitment and written agreement.
- The Consortium will not fund projects that include an occupational preference over other income eligible applicants.
- The minimum HOME expenditure is \$1,000 per HOME assisted unit, while the maximum award is \$30,000- \$35,000 per HOME assisted unit with project maximum awards of \$150,000- \$175,000 (see chart below). The Consortium reserves the right to exceed project maximums in exceptional circumstances for good reason.

	Per HOME-assisted Unit Funding Maximum	Maximum Project Funding Limit
Project- Score of Less Than 90 Points	\$30,000	\$150,000
Project- Score of 90 Points or More	\$35,000	\$175,000

Homeownership- Housing Production and Homebuyer Assistance:

Since the height of real estate prices from 2005-2007, the County has experienced similar, albeit not as severe, real estate market conditions as has the rest of the state and

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much of the country. The median single family home price declined about 13.5% from 2005 to 2013 and has returned to the still unaffordable 2003-2004 levels. It requires about \$76,600 in income to afford the \$337,000 median priced single family home in 2013; therefore, the ownership affordability gap has returned after a two year period when the median income family in both 2011 and 2012 could afford (for the first time since 1998) to purchase the median priced home. This re-appearance of the affordability gap, despite 2013's second lowest average annual interest rates in 40+ years, is primarily the result of the decline in median family income and the second year of rising median sales prices. However, prices are still low enough in parts of some Cape communities that some low income buyers are seeing opportunities to purchase in the market; however, if interest rates and sales prices continue to rise in 2014, those opportunities will significantly diminish.

Because of the combination of the downturn in the real estate market, tighter lending standards, and the severe economic recession, new construction, for-profit ownership housing development, including Chapter 40B developments, has remained at a virtual standstill. Since 2008, there have been just eleven (11) such projects that resulted in just forty-nine (49) affordable homes sold to low income, first-time buyer households. The other affordable ownership opportunities are being provided through either Habitat for Humanity projects, Town-sponsored housing buy-down programs, or re-sales of existing affordable units.

The Consortium's current homeownership production program and the down payment program (only four loans made to date this program year) have been brought to a virtual standstill because of the conflict between DHCD's policy requirement and MassHousing's lending requirement that only the 2006 Massachusetts Universal Deed Restriction (UDR) be used for deed restricted homeownership units and the August 2009 HUD ruling that the UDR is in conflict with the HOME statute and regulations.

The HOME statute requires that an affordable home using a resale formula in the deed restriction can only be sold to an income eligible household during the HOME affordability period- typically 10 years for the amount of project per unit assistance the Consortium provides. The UDR, and virtually every prior resale deed restriction used in the state and region, contained a provision that the home could be sold to an over income buyer should an income eligible household not be found during the option to purchase period.

The Consortium worked for over a year with DHCD and HUD to craft a solution that would enable HOME funds to be used for homeownership activities in the region; however, no permanent resolution was achieved. As a result, the Consortium has not been accepting any ownership project funding applications since August 2010. DHCD submitted in late 2011 and again resubmitted in February 2013 what it hopes is a HOME compliant deed restriction to HUD for review; however, DHCD has not received a response, and it is uncertain when HUD will make its determination.

The Consortium does not expect to fund any homeownership development projects in

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FFY 2014; however, should a HOME compliant deed restriction be approved by HUD that is usable by the Consortium for homeownership production activities in FFY 2014, the Consortium will use the same threshold project requirements and per unit and per project funding award limits as for rental projects as described on p. 13.

As part of its efforts in 2010 to reach an agreement with DHCD on a deed restriction that is HOME compliant and acceptable to DHCD so that the four prior HOME commitments to ownership projects could go forward, the Consortium established the Homeownership Preservation Program (HPP). In the HOME Consortium deed restriction, the Consortium, through a designee, will commit to purchase a home up for resale during the HOME affordability period (typically 10 years for the amount of per unit project assistance the Consortium provides) in order to preserve its affordability should an income eligible buyer not be found. Depending upon the project, either Housing Assistance Corporation (HAC) or Habitat will purchase the home for the lesser of the maximum resale price or the appraised value and will continue marketing efforts until an income eligible buyer is found. In order to preserve affordability, the Consortium will provide HOME funds to the designated organization for their holding period in order to cover their carrying costs. The Consortium will execute a Memorandum of Agreement with Habitat and/or HAC to describe each party's respective obligations. Finally, the Consortium will commit to reserve up to \$50,000 of its annual allocation for the next ten years for the HPP should the need ever arise.

February 20, 2014 Public Hearing:

Summary of Discussion: Attendees received an overview from staff of the Consortium's HOME program: allowable uses, allocation history, 2010-2014 Consolidated Plan (Con Plan) priorities and goals, and challenges to conducting activities that support homeownership production and direct homebuyer support. In addition staff reviewed state funding priorities, local rental projects in the pipeline, and current rental and ownership market conditions.

- 1) Rental housing development- Staff noted that because of the demand for and constraint on their resources DHCD held just one rental funding round in both 2013 and 2014. DHCD has already committed its 2014 tax credit allocation, and thus will be committing part or all of its 2015 allocation in the March funding round. The state's Affordable Housing Trust Fund has made commitments to projects through its allocation for 2016. This reality, along with the lack of regional projects that will be ready to proceed until early 2015, will make it challenging to satisfy the Consortium's two year commitment deadline. However, affordable rental housing is the region's top priority, and the Consortium should continue to allocate the majority of its allocation to the creation and preservation of affordable rental housing. Participants also acknowledged the unfortunate circumstance of being unable to support any affordable homeownership development.

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- 2) Technical Assistance - There was a question asked about whether technical assistance to CHDO's would be a reasonable use for HOME funds in order to help to achieve the commitment requirement. Staff responded that up to 5% of our HOME allocation (likely a little under \$20,000) could be used for technical assistance to CHDO's for identified housing development activities. Staff noted that the Consortium did allocate funds to a start-up CHDO- the Housing Land Trust of Cape Cod- 8-10 years ago; however, attendees did not believe that allocating this modest amount of funds among the region's CHDO's would be the most effective use of our funds.

- 3) Rental voucher program- There was some discussion about the use of a rental housing voucher program as an option to expend our funds quicker. There was discussion about the practical challenges of such a program- particularly in finding an experienced administrator. There was extensive discussion about local CPC funded voucher programs that typically have a three year subsidy limit with the goal of participants being able to achieve self-sufficiency. There was doubt expressed that the Cape has the type of economy that would provide enough opportunities for households to move to self-sufficiency in three years and that the creation of a HOME rental voucher program would need to become an ongoing commitment. The consensus of attendees was that a voucher program was not something to be recommended at this time.

Recommendations:

In making the following programmatic recommendations for allocating the FFY 2014 HOME funds, the Advisory Council considered the housing market analysis and housing needs described in the Consolidated Plan, the experience and trends it has observed over this program year, the federal and state statutory and policy conflict on ownership deed restrictions, the overall reduction in public subsidies for affordable housing production, and the comments from the February 20th public hearing.

The Consortium's FFY 2014 allocation is \$404,552, a 3.9% increase from FFY 2013, but still over 40% below historic average allocations.

Given the top priority for rental housing in the Consolidated Plan and given the expected number of rental projects in the rental housing production funding pipeline and given the constraints on homeownership activities caused by the HOME/UDR conflict, the Consortium is proposing for FFY 2014 to:

- 1) Continue the funding priority for the creation or preservation of affordable rental housing units by allocating over 71% of our funding to housing production activities. The Consortium will exclusively fund rental housing production activities in FFY 2014 unless some resolution of the HOME/UDR conflict is achieved. Within the housing production allocation, the Consortium will reserve \$40,000 to be expended if needed on the Homeownership Preservation Program.

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2) Continue the Down Payment Closing Cost (DPCC) program with an allocation of \$75,000. Unless the HOME/UDR conflict is resolved, only purchasers of non deed-restricted homes will be able to qualify. The basic maximum loan amount will continue to be \$10,000 per household; however, the maximum loan amount will be \$20,000 for those households purchasing homes that have modest rehabilitation needs that need to be addressed. The program policy since inception that funds are available on a first-come, first-served basis will continue. The increased allocation assumes 3 "basic" and 2 higher threshold loans in order to achieve the five (5) household goal.

Consistent with the objectives and priorities established in the 2010-2014 Consolidated Plan, as amended, HOME funds will be directed to increase the Cape's affordable rental stock for very low and low-income tenants, homeownership opportunities for low-income homebuyers, and promote housing opportunities for the area's special needs populations. Note however that the goal of assisting 38 households a year is a reduction from the original Con Plan annual goal of 65 assisted households- a reduction in assisted households that reflects the over 40% reduction in the Consortium's HOME allocation in FFY 2012- 2014 from that of FFY 2010-2011.

The following are the proposed allocations of HOME funds along with the goals for each area:

FFY 2014 HOME ALLOCATIONS

Area/Program	Allocation	Goals- Units or Households assisted
Administration- 10% (1)	\$ 40,455	
CHDO Housing Production Projects- 15% (2)	\$ 60,683	5 units
Housing Production (3)	\$ 228,414	28 units
Down Payment/Closing Cost Program- DPCC (4)	\$ 75,000	5 households
TOTAL	\$ 404,552	38 units/households

- (1) The maximum of 10% of the HOME allocation allowed for program administrative costs.
- (2) Required 15% non-profit community housing development organization (CHDO) set aside. Approved Consortium CHDOs include Housing Assistance Corporation, Community Development Partnership, and Harwich Ecumenical Council for Housing. This total includes Consortium legal costs associated with project loan closings and project environmental review legal ads.
- (3) Unless the HOME/UDR conflict is resolved, \$289,097 of the total housing production allocation, including CHDO projects, is reserved for rental projects. This total includes Consortium legal costs associated with project loan closings

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and project environmental review legal ads. \$50,000 of the housing production allocation is reserved if needed for the Homeownership Preservation Program to preserve the affordability during the HOME affordability period of selected ownership units in the Program.

- (4) One pool of funds with the basic maximum award of \$10,000 for first time homebuyers on a first-come, first-served basis with the amount limited to the amount actually needed to complete the transaction. The maximum loan amount can be increased to \$20,000 for those households purchasing homes that have modest rehabilitation needs that need to be addressed. The 0%, deferred payment loan is payable upon sale, transfer, or in some cases refinancing of the property. This total includes associated project related loan costs (\$1,500 per loan) for the administering agency.

As noted earlier, DPCC funds are available on a first-come, first-served basis as low-income, first time homebuyers must have a home under agreement in order to apply for assistance; however, even in those years when demand has exceeded the initial amount allocated to the DPCC program, the Consortium has had the resources available to make supplemental allocations to satisfy the demand and expects to be able to do the same in FFY 2014 should the need arise.

DPCC program information is provided at HAC's homebuyer workshops and through its affirmative marketing efforts, and program information and applications are available on HAC's web site. The HOME Consortium section of the Cape Cod Commission's web site also contains the DPCC Eligibility Policy and the contact information for applications of the staff person at HAC who administers the DPCC program.

* The projected FFY 2014 program income (estimate of \$40,000) will be added to the housing production total submitted to HUD.

C. OTHER RESOURCES

The other federal, state, and local resources that could be available for the activities/priorities described in the Annual Plan are described in Appendix A.

D. LEAD AGENCY

Barnstable County, through the Cape Cod Commission, will continue to serve as the Consortium's lead entity. The Commission will oversee administration of the HOME Program and implementation of the Annual Plan. The Commission will provide staff support to the Consortium's HOME Advisory Council and serve as an ex-officio member. The Consortium intends to utilize the permitted amount of \$40,455 to administer its HOME Program. We note that none of the HOME related work time (15-20 hours per week) or overhead spent by the Commission's affordable housing specialist is charged against the HOME Program.

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E. COMMUNITY HOUSING DEVELOPMENT ORGANIZATION (CHDO) PARTICIPATION

Three organizations have received CHDO designation from the Consortium: Housing Assistance Corporation (HAC), Harwich Ecumenical Council for Housing (HECH), and Lower Cape Cod Community Development Corporation/Community Development Partnership (CDP). All of these organizations were selected, in part, because they have a regional or sub-regional focus and have helped to ensure that CHDO funds are being distributed throughout the Cape. Because of the changes incorporated in the August 2013 HOME rule changes regarding CHDO staff development capacity, HECH does not currently qualify for the CHDO set aside funds.

Since 1994, the Consortium has exceeded the 15% HOME requirement for projects undertaken by its designated CHDO's as 27.0% of its HOME allocations through March 31, 2014 have been awarded to CHDOs. The Consortium will strive to maintain this active CHDO participation during the upcoming year. At a minimum \$60,683 will be available for an eligible project(s).

F. GEOGRAPHIC DISTRIBUTION

As noted in the Consolidated Plan, the Consortium has one census tract- tract 124 in Hyannis- that it has designated as an area of high minority and low income concentration (see map on page 81); therefore, any new construction rental projects that request HOME funds in census tract 124 must satisfy the criteria in CFR 983.57(e)(3) in order to be eligible for funding.

As no community has achieved its 10% affordable housing goal, the need for affordable housing is widespread throughout the region; therefore, the primary funding allocation goal of the Consortium is to provide assistance to all fifteen (15) towns that comprise Cape Cod. A secondary goal is to ensure that the more rural areas of the Cape- the eight towns of the lower Cape- are being adequately served. The Consortium intends to achieve these goals through what it considers client and project based programs/activities. The former (down payment assistance) will be available to individual households residing anywhere in the County. The latter (acquisition/rehabilitation/new construction development projects) will be directed to specific projects throughout the region.

Although the constraints on the down payment program have made it more challenging to achieve our geographic distribution goals, HOME funds have reached into all fifteen towns in the region over the Consortium's history, and in nine (9) of the fifteen (15) towns so far this program year via the client and project based projects we have funded. For example, so far this program year we have construction underway or completed or have commitments to fund development projects in the following towns: Barnstable, Bourne, Dennis, Falmouth, Mashpee, Provincetown, Truro, and Yarmouth. The results also demonstrate that the lower Cape region (the Cape's most rural area) continues to receive assistance from the HOME Program.

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G. MATCH/LEVERAGING

The Consortium will rely on a variety of sources to meet its 25% match requirement. Included in this mix is utilization of the state's Massachusetts Rental Voucher Program (MRVP). As permitted by HUD, the state is allowed to parcel out portions of its MRVP budget to local participating jurisdictions for meeting local match requirements. Use of the MRVP easily permits the Consortium to meet its match requirement. However, other qualified forms of matching resources will be added to our match pool. Over the last five years, towns have invested a significant amount of their Community Preservation Act funding in support of affordable housing projects. Participating jurisdictions are allowed to "bank" match resources into future years in order to guarantee access to the funding stream. As reported in the Consortium's FFY 2012 annual report, there is an excess of \$21.7 million in match funds available for use in this and future program years.

The Consortium will continue to place a strong emphasis on using the HOME funds as a means for leveraging other funds for specific projects. This will be achieved through owner equity, use of other funding sources, town owned land, Cape Cod Commission required affordable housing set-asides, local contributions and other means. As reported in the Consortium's FFY 2012 annual report, the Consortium leveraged over \$60 for every \$1 of HOME funds expended.

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SECTION 3. MONITORING & PERFORMANCE MEASUREMENT

A. MONITORING

Barnstable County, through the Cape Cod Commission, and in collaboration with the Advisory Council, will review and monitor the activities of the Consortium on a monthly basis to assure that all of the statutory and regulatory requirements are being met and that its housing programs are being carried out in accordance with this plan. Commission staff reviews all the HOME funding reports on the HUD web site at a minimum on a monthly basis to ensure that HOME funds are being committed and expended within the required time frames.

The Consortium expects to continue its practice of contracting administration of its down payment program to a local agency. The selected agency is chosen through a competitive procurement process every three years and is required to execute a comprehensive sub-recipient agreement that comprises a scope of services, implementation timetables, requirements for program performance and the submission of quarterly reports. The Consortium went through the procurement process for an administering agency in summer 2013, and once again HAC was chosen as the sub-recipient.

The Advisory Council will meet monthly to review program operations, policies, goals, etc. Additionally, the Commission's affordable housing specialist will provide the Barnstable County Commissioners and/or Assembly of Delegates with annual reports.

The Consortium has instituted a schedule for annual on site monitoring of the down payment/closing cost program as well as housing development projects that are completed and occupied during the program year and will continue that practice during this program year. In addition, all completed HOME assisted rental projects are monitored annually (usually in the late summer/early fall) for certification of tenant incomes and rents, compliance with affirmative marketing, tenant selection, lease terms and financial health. Finally, the Consortium contracts for an inspector to conduct the required (every one-three years depending upon the HOME unit total) Housing Quality Standards (HQS) inspections on completed HOME-assisted rental housing projects.

The revised HOME Rule of August 23, 2013 requires that jurisdictions develop and follow written policies, procedures, and systems, including a system for assessing risks of activities and projects, and a system for monitoring that ensures HOME requirements are met. The Consortium expects to have adopted such policies, etc. by the required July 24, 2014 deadline and to implement those policies, etc. for the FFY 2014 program year.

B. PERFORMANCE MEASUREMENT

HUD has issued a rule on its Outcome Performance Measurement System. The system incorporated the following three objectives of the Housing and Community

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Development Act of 1974: 1) create suitable living environments; 2) provide decent housing; and 3) create economic opportunities. The system also directed grantees to select from one of the following three outcomes to help define the intent of the activity: 1) availability/accessibility; 2) affordability; and 3) sustainability- promoting livable or viable communities. Therefore, for each proposed activity the grantee selects one of the nine Outcome Statements. In accordance with HUD's directive, the Consortium started to report its activities using this format as of October 1, 2006. As a result of the proposed Substantial Amendments to the 2010-2014 Con Plan, the Consortium will use the following annual performance measures for its three programs:

Rental Production: Affordability for the purpose of providing decent housing- 30 units

- Number of affordable units produced for each income category: goal is 30 units
- Number of units for households at or below 30% area median income: goal is at least 10% of units
- Number of units for households at or below 50% of area median income: goal is at least 33% of units
- Number of minority households assisted: goal is at least 10% of all households
- Number that are accessible under Section 504: goal is at least 10% of newly constructed units
- Number of units for homeless individuals/families: goal is at least 2 units
- Number of units for special needs households: goal is at least 2 households
- Number of newly constructed units that meet Energy Star standards: goal is 100% of units
- Number of newly constructed units that are LEED certified: goal is 25% of units

Homeownership Production: Affordability for the purpose of providing decent housing- 3 units

- Number of affordable units produced for each income category: goal is 3 units
- Number of units for households at or below 50% of area median income: goal is at least 10% of units
- Number of minority households assisted: goal is at least 10% of all households
- Number that are accessible under Section 504: goal is at least 10% of newly constructed units
- Number of newly constructed units that meet Energy Star standards: goal is 100% of units
- Number of newly constructed units that are LEED certified: goal is 25% of units

Homebuyer Assistance: Affordability for the purpose of providing decent housing- 5 units

- Number of homebuyers assisted: goal is 5 households
- Number of minority households assisted: goal is at least 10% of all households.

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The Consortium will review and revise as necessary its guidelines and scoring system for housing development projects to reflect the priorities and goals in the Consolidated Plan. In accordance with that policy, the Consortium reviewed and updated its scoring system in August 2010, August 2012, and again in December 2013. The Consortium plans to continue its practice of awarding additional funds beyond the per unit and per project funding maximums to projects that score exceptionally well.

In accordance with the revised set of HOME regulations that became effective on August 23, 2013, the Consortium's Advisory Council adopted the following policies and guidelines that became effective January 1, 2014:

1. Rental Housing Development Project Underwriting, Subsidy Layering, and Risk Analysis Policies and Guidelines:
www.capecodcommission.org/resources/affordablehousing/RentalProjectUnderwritingPoliciesJan2014.pdf.
2. Homebuyer Policies: HOME Down Payment Closing Cost (DPCC) Program Eligibility and Underwriting Policy. Note that this Policy was an update of policies adopted in July 2012 in response to the HOME requirements included in the Appropriations Act of 2012:
www.capecodcommission.org/resources/affordablehousing/DPCC_Eligibility_Policy_Jan2014.pdf.

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SECTION 4. OBJECTIVES AND STRATEGIES

The following objectives and strategies from the 2010- 2014 Consolidated Plan are incorporated into the 2014 Annual Plan:

The Consortium has established five priorities for the upcoming period. These priorities are designed to address what we consider the most pressing affordable housing needs facing the County. In addition, there are strategies outlined to achieve each objective. It is our opinion that if we are successful in achieving these objectives, it will result in a significant improvement in the quality of life for some of the area's low income households.

PRIORITIES/OBJECTIVES AND STRATEGIES

Priority/Objective #1: Develop and maintain an adequate supply of safe, decent rental housing that is affordable and accessible to residents with a range of income levels and household needs

Strategies:

- * Increase the supply of rental housing across a range of incomes by allocating the largest share of HOME resources over the next five years to this objective.

- * While there is a clear need to expand rental housing production for all of the various low income households, the cost of producing newly built units exceeds that of rehabilitated or redeveloped units, and the Consortium will continue to give a higher funding priority to projects that propose to rehabilitate or redevelop existing structures. Clearly, however, newly constructed units will need to be built in order to achieve the goals in the Plan.

- * In order to respond to the significant increase in individuals with some type of disability, provide a higher funding priority for those new construction rental developments that provide units that are accessible and/or that have universal design and/or that are visit-able.

- * In order to provide a healthier living environment for tenants and to reduce energy costs, the Consortium will provide a higher funding priority for those new construction rental projects that are LEED certified.

Priority/Objective #2: Preserve and maintain the existing affordable housing stock, particularly the units occupied by extremely and very low income households.

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Strategies:

* Preserve the physical and financial viability of existing affordable housing (both privately and publicly assisted). While HOME funds cannot be used during the HOME affordability period to preserve development projects which had a prior HOME investment, the Consortium can certainly provide resources to affordable rental developments that had no HOME investment and that are in danger of losing their affordability. In addition, the Consortium will closely monitor the three developments identified as at potential risk of losing their affordability over the next five years.

* Support efforts of local housing authorities and others to increase the operating support for their state-funded units in order to address long term deferred maintenance because of underfunding in order to preserve this stock of approximately 1,000 affordable units in the region.

Homelessness

Priority/Objective #3: Reduce individual and family homelessness by providing a viable continuum of care that implements a housing first strategy for permanent supportive housing.

Barnstable County is the convening entity and provides staff support for the region's Continuum of Care (CoC): The Regional Network To Address Homelessness ("Network"). The region has had a CoC since 1997 and has accessed McKinney-Vento funds since that time. The region's CoC strategy to address homelessness rests on three goals: increase access to safe, stable, accessible and affordable housing; improve the health and stability of individuals and families that are experiencing homelessness or that are at risk of homelessness; and improve the economic security of these individuals and families.

In January 2012 the Network updated the 2005 Ten Year Plan to make it consistent both with local priorities and also with the 2010 Federal Strategic Plan to Prevent and End Homelessness. (see www.bchumanservices.net/library/2012/02/FINAL-Regional-Plan-2.29-12-with-edits-to-tables-and-cover2.pdf).

In the 2013 CoC McKinney-Vento application, the Network identified the following unmet need in the region:

- Transitional housing- 24 beds for households without children
- Permanent Supportive Housing- 148 beds, 137 of which for households without children

The region has one shelter for individuals- the NOAH Shelter in Hyannis operated by HAC- that has a capacity of 60 beds and that serves an average of 500 people a year. There are a variety of family shelters in the region that have a capacity of about 70 units/beds. While the focus of the CoC over the last decade has been to provide permanent supportive housing (PSH), especially for the chronically homeless, there are

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approximately 80 transitional housing beds available for homeless individuals. The average length of stay in emergency shelter is four months and eleven months in transitional housing.

The region has at least five street outreach workers who engage the unsheltered homeless to link them with emergency shelter, physical and mental health services, and case management for benefits enrollment, housing placement, and other services. There is an Emergency Response Network that involves the outreach workers, Duffy Health Center, the police, Cape Cod Hospital, service providers, treatment providers, the Council of Churches, and businesses that meets to coordinate responses to those living on the street or in other places not meant for human habitation.

The Network has a Client Coordination Council that meets monthly and that is comprised of staff from the Community Action Committee, homeless service providers, housing authorities, health care providers, and faith-based organizations to identify service gaps, eliminate barriers to accessing housing, develops and implements training in evidence-based best practices, and improves and coordinates the intake and assessment process for the homeless individuals and families they are working with.

The Network also has a Community Consortium that meets quarterly and that is comprised of representatives from Duffy Health Center, local and state governments, mental health and substance abuse agencies, homeless providers, the Council of Churches, veterans' services providers, and homeless or formerly homeless individuals that develops strategies to increase access to permanent housing for chronically homeless individuals, and evaluates and recommends changes to discharge policies for individuals exiting behavioral health, criminal justice, and health care systems.

Since the adoption of the Ten Year Plan To End Homelessness in 2005, the focus of the Network has been on adding permanent supportive housing beds/units using a housing first model with a priority on serving chronically homeless individuals. While the amount of McKinney funding available to the CoC to create new beds has sharply diminished since 2009 to about \$45,000 per year, the region has seen the number of PSH beds increase from 157 in 2005 to 265 in 2013. Collaboration between the housing and service providers for these PSH beds has resulted in a very high level of housing stability for residents: 88% of residents in FFY 2012 remained housed for over six months.

The region has been a leader in the state in developing homelessness prevention programs and resources. Non-profits such as HAC, the Homeless Prevention Council, and the Council of Churches, among many others, have successfully raised hundreds of thousands of dollars for homelessness prevention. The region has received a variety of public grants to keep individuals and families housed and out of the shelter system: HAC has received ESG, RAFT, and HomeBase grants from DHCD and the Cape and Islands Veterans Outreach Center has just received VA funding for rapid re-housing of veterans. HAC and Community Action Committee have received funding for foreclosure prevention counseling.

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Through the collaborative and creative work of members of the Regional Network, the Cape has made significant progress in reducing individual and family homelessness as **the region has seen its annual point in time homeless counts decrease from 1,071 in 2005 (613 individuals and 458 persons in families) to 375 in 2014 (211 individuals and 164 persons in families).**

The Consortium strongly supports all of these efforts and the strategy adopted by the Regional Network. Staff and members of the HOME Advisory Council have taken an active part in the development of the Cape's Continuum of Care strategy, and the Affordable Housing Specialist serves on both the Regional Network's Policy Board and McKinney Vento grant committee. The Consortium certified that the programs included in this reporting period's McKinney SuperNOFA application were consistent with the goals and priorities of our Consolidated Plan. The Regional Network's December 2012 application was successful in securing \$1,676,806 in funding for renewals of various ongoing homelessness efforts and programs- including 146 of the permanent supportive housing beds for homeless individuals.

While the HOME Consortium's primary role would be to provide funding support for any new permanent supportive housing requests, the Consortium will continue to play an active role in the Regional Network's efforts to end homelessness in the region.

Strategies to reduce homelessness:

- * Prevent homelessness by continuing to secure private and public resources for prevention and continue close coordination among the network of prevention organizations.
- * Continue to provide housing first by getting chronically homeless people into permanent supportive housing as quickly as possible and eliminate the time consuming step by step process of "housing readiness" that was the hallmark of the prior continuum of care model.
- * Develop a range of housing options and services for homeless families and individuals. This includes promoting a "housing first" model to get chronically homeless people into permanent supportive housing with needed supportive services as quickly as possible.
- * While not expanding the capacity of current shelters, continue to provide emergency shelters and transitional housing for the homeless and continue to support the efforts of the Council of Churches to continue its Overnights of Hospitality program and local efforts such as Operation In From the Streets.
- * Improve access/coordination across mainstream services and benefit sources.
- * In addition, the strategies that preserve and expand the supply of affordable housing, and programs that enable low income residents to pay for housing (e.g., rental assistance) also support the objective of reducing homelessness.

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- * Preserve existing affordable housing (both publicly assisted and private).
- * Maintain a system of public housing and rental assistance.
- * Increase the supply of affordable rental housing.

Priority/Objective #4: Expand homeownership opportunities for low income households

Strategies To Expand Homeownership:

- * Provide down payment assistance and affordable mortgage programs: The Consortium will continue to allocate HOME resources to provide down payment/closing cost assistance to first time, low income households.
- * The County will also continue to advocate for adequate resources be allocated for the state's Soft Second Loan Program.
- * Provide homebuyer counseling and education: Homebuyer counseling and education are valuable marketing and outreach tools that can bridge the information gap and expand the pool of potential homebuyers, preparing them for a successful application and ownership experience. The HOME Consortium will continue to require that recipients of down payment assistance attend a first time homebuyer workshop.
- * Increase the supply of housing affordable to a range of incomes: Any effort that increases the supply of housing by creating new units, especially to very low income households as well as to moderate income households, extends the opportunity for homeownership.

Strategies to Maintain Homeownership:

- * Assist existing low income homeowners to make home repairs and/or modifications by supporting the efforts of non-profits and Towns to attract state and federal rehabilitation resources to upgrade existing housing stock owned or rented by low income household to ensure that health and safety issues are addressed, and that the homes remain functional and habitable.

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Specialized Housing Needs

Objective #5: Ensure that County residents with long-term support needs have access to accessible, community housing options

Strategies:

- * Encourage community-based, supportive living options for those with disabilities.
- * Provide a range of housing options and services for persons with specialized housing needs.
- * In addition, the strategies that preserve and expand the supply of affordable rental housing, and the programs that enable low income residents to pay for housing (e.g., rental assistance) also support this objective.

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SECTION 5. OTHER STRATEGIES: AFFORDABLE HOUSING BARRIERS; LEAD PAINT; ANTI-POVERTY

A. STRATEGIES FOR REDUCING BARRIERS TO AFFORDABLE HOUSING

The Consortium identified a number of barriers to affordable housing production that involved resource allocation, housing policy, land use policy, lack of infrastructure and staff capacity, and public perception and attitudes. The Consortium proposes the following strategies to address these barriers over the 2010- 2014 Con Plan period:

Resource allocation: With respect to public subsidies, the Consortium will continue to advocate for a larger share of budgetary resources be devoted to both housing production- including HOME- and housing voucher programs at the state and federal level. In addition, the Consortium will continue to support funding for the federal Affordable Housing Trust Fund.

Housing policy: The Consortium will have programmatic requirements to the greatest extent possible that are consistent with those of other public funders- especially with DHCD. For ongoing monitoring of rental projects, the Consortium will use reports from other public funders to the greatest extent possible for its required compliance reviews. Finally, the Consortium will continue to engage DHCD to develop an ownership deed restriction that 1) survives foreclosure; 2) satisfies HOME regulations; and 3) enables units to be counted on the Subsidized Housing Inventory so that HOME funds can again be directed to homeownership activities.

Land use policies: The Consortium will publicize and will advocate that towns 1) adopt local affordable housing bylaws such as those in Dennis and Barnstable; and 2) create a Chapter 40R district and/or adopt inclusionary zoning. The Consortium will continue to advocate for the continuation and improvement in Chapter 40B- the state's comprehensive permit law that allows applicants in communities that have not achieved 10% affordable housing to receive waivers from local regulations if the project has at least 20-25% affordable units. Chapter 40B has been a critical tool for affordable housing in the County as a September 2012 Cape Cod Commission study found that historically 44% of the County's affordable units had been created through the Chapter 40B zoning process- including 84% of all newly created affordable units since 2001. Chapter 40B allows the densities needed for affordable housing development which would otherwise have been impossible under the existing zoning. A ballot initiative to repeal Chapter 40B was rejected by the state's voters in November 2010.

Limited wastewater infrastructure: The Consortium will encourage and support wastewater planning and implementation efforts in local communities. The Consortium will also advocate that towns adopt land use bylaws that encourage affordable housing as part of their wastewater planning efforts.

Town staff capacity: The Consortium will continue to promote and support the use of

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the Planned Production regulations under Chapter 40B as a means for towns to both have an affordable housing plan and also to have more control over the types of Chapter 40B development that occurs. To implement these plans, the Consortium will advocate that Towns look to local resources- particularly Community Preservation Act funds- to provide staff capacity to carry out the activities in the housing plans.

Neighborhood and community resistance: The Consortium will continue to educate the public through publications, workshops, and its web site of the need for and impact of affordable housing in the region.

B. LEAD BASED PAINT STRATEGIES

Because housing in Barnstable County is relatively new (median year built is estimated to be 1974) compared with other areas of the state, lead paint poisoning is not a widespread problem. Screenings of children under age six by the Massachusetts Childhood Lead Poisoning Prevention Program as of June 2012 indicated a rate of .2 per thousand (1 case out of 4,651 screened) for the Cape and Islands region compared to a rate of .5 statewide. While the cost of lead paint removal can potentially be prohibitively expensive, the Consortium will vigorously enforce the revised 2002 lead based paint regulations for all of its program activities and will continue to support efforts of local organizations to attract lead paint removal resources to the region.

C. ANTI-POVERTY STRATEGY

Through implementation of this plan, the Consortium hopes to make an impact on the reduction of the number of households with incomes at or below the area's poverty level. To the extent that the Consortium can support the creation of affordable rental housing- especially for extremely low income households- that will lessen the housing cost burdens on these households and will enable those households to have resources to meet other pressing needs. The creation of ownership housing for very low income households will enable those families to build assets. Finally, the Consortium will support all efforts in the region to protect low income households in deed restricted ownership units from losing their assets through foreclosure.

While the Consortium's programs and resources can have some, albeit a very limited, impact on moving households out of poverty, there are other agencies in the region that have more impact and resources to address this issue. Through a DHCD initiative, all of the region's Section 8 voucher holders are part of a Moving To Work program that is designed to provide flexibility to administering agencies and to encourage voucher holders to increase their economic self-sufficiency. 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: a child care network that provides information, referrals and access to child care subsidies; advocacy for low income immigrants; assistance for low income households to find free or affordable health care; housing search services; and staff support to Cape United Elders- a grassroots senior activist organization.

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SECTION 6. PUBLIC HOUSING

Public housing on Cape Cod is an aging stock that is 20- 50 years old and is in fair to good condition with most authorities reporting many more critical modernization needs for their state-funded units than for their federally-funded ones. A March 2005 CHAPA study found that the state needed to spend on average an additional \$139 per unit per month to meet actual housing authority operating costs, or an additional \$78 million over the \$32 million allocated in the FY 2005 budget. While prior to the recession the state did significantly increase operating support to authorities, the FY 2010- FY 2012 budgets were each \$62.5 million, the FY 2013 budget was \$64.5 million, and the FY 14 budget was \$64.4 million- a little less than 60% of what was reported to be needed in 2005. The lack of adequate state funding for public housing is putting at risk a housing stock that accounts for over 20% of all the affordable housing in the region.

The dearth of state and federal resources for new construction over the last two decades has resulted in only two units being added to the public housing stock from 2010- 2012, and those units were created by the Barnstable Housing Authority through the Neighborhood Stabilization Program. However, the Barnstable Housing Authority completed construction on its 12 unit Stage Coach Road development in December 2013, and Housing Assistance Corporation started construction in June 2013 on its 10 unit Great Cove Community development in Mashpee that will be on land leased from the Mashpee Housing Authority. In addition, several housing authorities (Brewster, Chatham, Falmouth, Harwich, Mashpee, and Truro) facilitated the development of 180 affordable rental housing units by other entities. In addition, the Brewster, Sandwich, and Wellfleet authorities all have development projects in various stages of the pre-development or permitting process. The Falmouth Housing Authority (FHA) was able to federalize the 59 unit Rose Morin Apartments. While this did not result in any new units, it will provide a better level of operating support.

There are no troubled housing authorities in the region; however, the public housing stock is inadequate in terms of number of units as housing authorities Cape-wide have over 1,900 households on wait lists for family housing and over 2,600 households on waiting lists for elderly/disabled housing.

PUBLIC HOUSING STRATEGIES

Public housing financial needs: As described earlier, there are no state or federally designated troubled housing authorities in the region. Federal and state public housing on Cape Cod is an aging stock that is 20- 50 years old and is in fair to good condition with most authorities reporting many more critical modernization needs for their state-funded units than for their federally-funded ones. A March 2005 CHAPA study found that the state needed to spend on average an additional \$139 per unit per month to meet actual housing authority operating costs, or an additional \$78 million over the \$32 million allocated in the FY 2005 budget. While prior to the recession the state did significantly increase operating support to authorities, the FY 2010- FY 2012 budgets were each \$62.5 million, the FY 2013 budget was \$64.5 million, and the FY 14 budget

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was \$64.4 million- a little less than 60% of what was reported to be needed in 2005. The lack of adequate state funding for public housing is putting at risk a housing stock that accounts for over 20% of all the affordable housing in the region. As noted in the strategies for priority/objective #2, the Consortium will vigorously advocate for additional state resources be made available to local housing authorities to maintain and upgrade the over 1,000 affordable units in their ownership.

Tenant involvement in management: Local housing authorities (LHA's) are governed by a five member Board of Commissioners- four of whom are elected locally and one of whom is a Governor's appointee. Tenants are eligible to run for seats, and one housing authority- Provincetown- has a tenant serving on the Board. Provincetown and Dennis have active tenant associations, while Barnstable, Bourne, and Falmouth have active resident advisory boards for their federally-funded apartments. DHCD provides technical support for tenants interested in forming local tenant organizations (LTO's). State regulations require that LTO's be consulted when the LHA's annual operating budget is prepared, when LHA jobs become available or when modernization funds become available. LHA's are required to fund the LTO's and to notify them of all LHA Board meetings. The Consortium will continue to encourage housing authorities to include the maximum tenant involvement in the LHA's decision-making processes.

Homeownership: The high cost of homes in the region has made it difficult, if not impossible, for housing authorities interested in promoting homeownership to effectively implement a program. The Barnstable Housing Authority (BHA) has a self-sufficiency program for its state-funded family units and has used Town CDBG and other resources to enable five of their tenant families to become homeowners over the last three years. BHA has found that its participants in the CDBG funded program had difficulty securing financing even with the \$25,000 in down payment assistance.

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SECTION 7. ANNUAL PLAN INSTITUTIONAL STRUCTURE AND COORDINATION

Cape Cod has a long history of being in the forefront when it comes to addressing its affordable housing needs. Throughout the community there exists a network of highly experienced, capable individuals and agencies committed to addressing this issue. Guiding these efforts is a spirit of cooperation and collaboration that has come to characterize the Cape's housing community. This approach, which places the needs of low income households first, has played a central role in the successes and accomplishments achieved by this community.

The creation of the Consortium is one of the best examples of this cooperative spirit in action. This effort, which began over twenty years ago, has required the participation and support of county and town officials, housing agencies, housing advocates and private citizens.

The creation of the Consortium along with the history of the Cape's housing community has provided fertile ground for intergovernmental cooperation. The Consortium, through the Cape Cod Commission and the Advisory Council, will provide overall coordination of the strategies, actions, and resources to effectively meet the goals and objectives of this Plan. The Commission will continue to provide technical assistance to local agencies involved in affordable housing activities, seek additional housing grants, and monitor the development and certification of the local comprehensive plans.

The Advisory Council, which is comprised of individuals representing local housing authorities, regional nonprofit housing organizations, town housing committees, town municipal housing trusts, town officials, and others, will monitor the development and implementation of the HOME Program and the five year strategy. The Council will serve as an information resource for the Cape, as well as a regional center where critical housing issues are discussed and new and innovative strategies are developed.

The existing structure has proven to be particularly effective in carrying out the Consortium's housing strategy and addressing matters impacting the area's affordable housing needs. The Consortium has identified four areas that it believes requires ongoing attention and action. Briefly stated, these are: the relationship between affordable housing and the area's economy, addressing the area's housing needs on a regional basis, conflicting state and federal policy and programmatic requirements, and the effects of community and neighborhood resistance to affordable housing development.

To address the issues cited above, the Consortium will undertake the following actions:

1. Utilize the HOME Advisory Council as a vehicle for the following purposes: secure federal, state and other funds, maintain communication between the towns, and serve as an information resource center for the Cape.

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2. Encourage and support the activities of regional housing programs.
3. Educate the public about what is affordable housing and why it is needed.
4. Advocate and work with DHCD and HUD to resolve inconsistencies in programmatic requirements, funding programs, and in agency policies. The Consortium will focus on the creation of a HOME compliant deed restriction as its first priority in this area.
5. Educate and work with lenders on the needs of first time homebuyers and the issues associated with affordable housing restrictions.
6. Advocate that all towns create housing action plans in accordance with DHCD's Housing Production standards and provide capacity to implement those plans.
7. Encourage use of local labor for HOME assisted projects.

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SECTION 8. HOME SUBMISSION REQUIREMENTS

A. RESALE/RECAPTURE PROVISIONS

Rental Housing Development

All HOME-funded rental housing units must contain long-term affordability restrictions. The restriction will include both a HOME period of affordability followed by a County period of affordability. The length of the County period of affordability will be dependent upon the amount of development project assistance received. Rental projects receiving assistance under the rental housing development program are subject to the following affordability restrictions:

Amount of HOME Project Funding	HOME period of affordability- years	County period of affordability- years	Total period of affordability- years
Less than \$50,000	20	20	40
\$50,000- \$99,999	20	30	50
\$100,000- \$149,999	20	50	70
\$150,000 or more	20	79 or longest period allowed by law to achieve perpetuity	99 or longest period allowed by law for perpetuity

This structure will enable the Consortium to determine the level of project monitoring required after 20 years depending upon project performance and staff resources and will also enable the Consortium to have the ability to invest additional HOME resources in the project, if needed, requested, and approved, after 20 years. The dual affordability structure will result in all projects having at least a 40 year affordability period for those projects receiving less than \$50,000 in assistance with projects receiving awards of \$150,000 or more being perpetually affordable.

During the HOME affordability period, HOME-assisted rental units will be subject to an initial one year lease with lease renewals also for a one year period. The project will need to comply in every respect with all applicable HOME regulations governing income eligibility, income occupancy percentages, rents, lease terms, tenant selection, property standards, and financial reporting.

During the County affordability period, compliance with HOME income eligibility, rents, and income occupancy percentages will continue to be required. The extent of additional information and the amount of monitoring required during the County affordability period will be determined by an assessment of the project's performance during the HOME affordability period.

Each applicant/borrower shall be required to sign a Promissory Note, Mortgage, Loan Agreement and Affordable Housing Restriction.

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The HOME funds shall be provided in the form of a forty (40) year, zero interest, no monthly payment, deferred payment loan. During the final year of a loan, the borrower may request an extension of up to forty (40) years in order to preserve the affordability of the housing. During the term of the Affordable Housing Restriction, the affordability requirements will remain in effect regardless of a transfer occurring during its term or whether the loan is repaid. The only exception to the 0% interest rate policy will be for tax credit projects that are underwritten by the equity investor to have an interest-bearing loan at a certain rate and that interest rate is determined by the Consortium to be the minimum required for financial feasibility.

Homeownership Development

For the reasons described on page 14, the Consortium does not expect to fund any homeownership development projects in FFY 2014; however, should a HOME compliant deed restriction be approved by HUD that is usable by the Consortium for homeownership production activities in FFY 2014, the following are the requirements that would accompany that HOME assistance.

Each applicant/borrower shall be required to sign a Promissory Note, Mortgage, and Loan Agreement with the Affordable Housing Restriction (AHR) as an exhibit to the Loan Agreement. The HOME funds shall be provided in the form of a short term (five years or less), zero interest, no monthly payment, forgivable loan. Upon the applicant's completion of the project and submission of evidence that the required number of HOME-assisted units were sold to income-eligible households and that affordable housing restrictions were recorded, the Consortium will discharge the mortgage.

All HOME-assisted homeownership unit(s) shall be restricted to ensure long-term affordability through the use of an Affordable Housing Restriction recorded after the deed of the homebuyer. Similar to the structure used for rental projects, there will be a HOME affordability period of the minimum length required based upon the total amount of HOME funds invested in the unit followed by a County affordability period. The overall, total affordability term will be perpetuity or the longest term allowable by law. In compliance with the HOME statute and regulations, the AHR will require that the owner sell their home/unit to an income-eligible household during the minimum required HOME affordability period, i.e. typically 10 years for the amount of per unit assistance the Consortium provides. During the County affordability period, the owner will be allowed to sell to an over income household only if an income eligible household is not found during the various option to purchase time frames in the AHR.

The Consortium will employ an AHR that uses a resale formula indexed to area median income that will ensure a fair return (including approved capital improvements discounted over their useful life) while preserving affordability to a reasonable range of low income households. The Consortium's resale formula is the original multiplier (price of home, including whatever down payment the buyer made, divided by the area HUD median income at time of purchase) times the area HUD median income at the

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time of resale plus the value of any approved capital investments discounted over their useful life plus any required resale fee (not to exceed 2.5% of resale price).

Therefore, Original Multiplier=
$$\frac{\text{Original sales price}}{\text{HUD area median income}}$$

The Maximum Resale Price Formula= (Original multiplier x Current HUD area median income at time of resale) + Approved capital improvements discounted over their useful life + Any required resale fee up to a maximum of 2.5% of resale price.

The owner receives a fair return as their proceeds from the sale will be the following: original investment or down payment + any approved capital improvements discounted over their useful life + equity gained from mortgage principal payments + equity from the % increase in the median income— other closing costs associated with the sale.

To achieve the HOME resale requirement of preserving affordability to a reasonable range of low income buyers, the Consortium basically uses the same affordable sales pricing methodology as DHCD and sets the initial affordable sales price at what a household at 70% of area median income can afford who pays no more than 30% of their income for housing costs. As the resale formula is primarily indexed to the % increase in area median income, the Consortium expects that the resale of the home/unit should continue to be affordable to households from 70-80% of area median income. Note that for some Habitat for Humanity or Town-sponsored developments, the initial sales price is set at an even lower income threshold, e.g. Habitat's income eligibility limit is up to 65% of median income, and the resale formula therefore has the effect of maintaining that wider affordability range at the time of resale.

Homebuyer Assistance

As noted on pages 14 and 17, unless the HOME/UDR conflict is resolved with a deed rider that is usable for Barnstable County, homebuyer assistance in FFY 2014 will only be available to purchasers of non deed-restricted homes.

A) Non deed restricted home purchases: The Consortium will utilize recapture provisions for non-deed restricted purchases in its Down Payment/Closing Cost program, i.e. the owner will be able to sell the home at market price to any willing buyer. The HOME funds shall be provided in the form of a zero-interest, no monthly payment, deferred loan. Each applicant/borrower shall be required to sign a Written Agreement, Promissory Note, and Mortgage. The Consortium will require applicants receiving down payment/closing cost homeownership assistance to repay all of the HOME assistance at the time the unit is resold, transferred, or in some cases refinanced. Repayment of the full amount due in the case of a resale will not be required if there are not sufficient net proceeds. Net proceeds are the sales price minus closing costs and loan repayment(s) (other than HOME funds). If full repayment of the HOME funds is not possible, then the amount of the HOME repayment will be proportional to the HOME investment and the owner's initial down payment, i.e.

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$\frac{\text{HOME DPCC loan}}{(\text{HOME loan} + \text{owner down payment})} \times \text{net proceeds} = \text{HOME repayment amount}$

As noted on pages 14 and 17, unless the HOME/UDR conflict is resolved, homebuyer assistance in FFY 2014 will only be available to purchasers of non deed-restricted homes. Should a HOME compliant deed restriction become available that is usable for the Consortium and acceptable to Towns and applicants, the following resale provisions will be used.

B) Deed restricted home purchases: The Consortium will utilize resale provisions for deed restricted purchases in its Down Payment/Closing Cost program, i.e. the owner will have to sell the home at up to the maximum resale price to an income eligible buyer. The HOME funds shall be provided in the form of a zero-interest, no monthly payment, deferred loan. Each applicant/borrower shall be required to sign a Written Agreement, Promissory Note, and Mortgage. The Consortium will require applicants receiving down payment/closing cost homeownership assistance to repay all of the HOME assistance at the time the unit is resold, transferred, or in some cases refinanced. Repayment of the full amount due in the case of a resale will not be required if there are not sufficient net proceeds. Net proceeds are the sales price minus closing costs and loan repayment(s) (other than HOME funds). If full repayment of the HOME funds is not possible, then the amount of the HOME repayment will be proportional to the HOME investment and the owner's initial down payment, i.e.

$\frac{\text{HOME DPCC loan}}{(\text{HOME loan} + \text{owner down payment})} \times \text{net proceeds} = \text{HOME repayment amount}$

B. AFFIRMATIVE MARKETING

The Barnstable County HOME Consortium has established a statement of policy and procedures to meet the requirements for establishing and overseeing a minority and women business outreach program and affirmative marketing under 24 CFR 92.350 and 92.351 respectively; consistent with HUD responsibilities under Executive Orders 11625 and 12432 (concerning Minority Business Enterprise (MBE)) and 12138 (concerning Women Business Enterprise (WBE)). The Consortium will make all efforts to encourage the use of minority business and women business enterprises in connection with HOME funded activities. These will be in conformance with 24 CFR 85.36 (e).

Minimum Acceptable Outreach Standards

Section 281 of the HOME Investment Partnerships Act and 24 CFR 92.350 require each participating jurisdiction to prescribe procedures acceptable to HUD to establish and oversee a minority outreach program. The program shall include minority and woman-owned businesses in all contracting activities entered into by the Barnstable County Consortium to facilitate the provision of affordable housing authorized under this act or any other Federal housing law applicable to such jurisdiction. Therefore, minimum

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HUD standards require that the Barnstable County HOME Consortium outreach effort to minority and woman-owned businesses be:

1. A good faith, comprehensive and continuing endeavor;
2. Supported by a statement of public policy and commitment published in the print media of widest local circulation;
3. Supported by an office and/or a key, ranking staff person with oversight responsibilities and access to the chief elected official, and
4. Designed to use all available and appropriate public and private sector local resources.

Minority Outreach Program

Under the minimum HUD standards cited above, the following guidelines are provided for use in implementing outreach programs to ensure the inclusion, to the maximum extent possible, of entities owned by minorities and women. The Barnstable County HOME Consortium will:

1. Utilize the State Office of Minority and Women Business Assistance Directory (SOMWBA) to ensure the inclusion of MBEs and WBEs in activities of the HOME Program;
2. Use local media, electronic and print, to market and promote contract and business opportunities for MBEs and WBEs;
3. Develop solicitation and procurement procedures that facilitate opportunities for MBEs and WBEs to participate as vendors and suppliers of goods and services;
4. Maintain records with statistical data on the use and participation of MBEs and WBEs as contractors/subcontractors in HOME assisted program contracted activities.

Affirmative Marketing Procedures and Requirements

The Barnstable County HOME Consortium in accordance with 24 CFR 92.351 (b) has adopted the following procedures to ensure fair and affirmative marketing of HOME assisted housing containing five (5) or more housing units and its homebuyer assistance program. The Consortium and its contracted agency(ies) will:

1. Require the agency that administers its Down Payment/Closing Cost program to submit affirmative outreach plans for program participants and to submit quarterly reports on minority participation in the program.
2. Include additional points for applicants utilizing MBE's and/or WBE's as part of their development team in the development project scoring system.

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3. Require any development project receiving the maximum award (\$150,000) to make a good faith effort to commit 10% of its development budget to utilization of MBE's and/or WBE's.
4. Require any development project to submit an affirmative marketing plan and tenant/owner selection plan for Consortium approval. The Consortium intends to use the requirements of DHCD's Local Initiative Program for this purpose.
5. Not provide funding for any development project that includes occupational preferences for either eligibility or selection.
6. Inform the public, owners and potential tenants about the existence of fair housing laws and the Consortium's policies.
7. Notify towns, public and non-profit agencies and organizations that serve and/or represent minorities and women of the availability of HOME assisted housing.
8. Utilize local media, electronic and print, to market and promote, on widest scale possible, the availability of HOME funds.
9. To appear before local boards, tenant groups, non-profits, social service agencies and others to inform and market the Consortium's HOME program to women and minorities.

C. FAIR HOUSING AND ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING (AIFH)

The Consortium completed its updated Fair Housing Plan and Analysis of Impediments in January 2010, and the Plan is available for review in the Affordable Housing section of the Cape Cod Commission web site- www.capecodcommission.org. The Plan noted that the Consortium had done a very good job both of distributing its resources throughout the region (all towns have received funding for some type of HOME eligible activity) and also of achieving a much higher minority participation rate in its programs (15%) than exists in the region (8.4%). However, the Plan noted that the Consortium did not have a formalized approach to fair housing activities; housing discrimination exists in the region on the basis of disability, family status, and language; mortgage lending data revealed higher denial rates for minority applicants than for white applicants; and there was generally low public awareness of fair housing in the region.

The Consortium has designated staff- the Affordable Housing Specialist- as the Fair Housing officer and created a Fair Housing Subcommittee of interested stakeholders to oversee the implementation of the recommendations in the Plan. The subcommittee met and agreed that the following areas should be addressed during the Con Plan period:

- Identify/seek resources, e.g. HUD's Fair Housing Initiatives Program (FHIP), for

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- outreach and information on fair housing
- Partner with regional and state fair housing organizations to publicize fair housing issues
- Support adoption by housing providers/managers of HUD's "Supplemental and Optional Contact Information for HUD-Assisted Housing Applicants"
- Sensitivity training for housing providers on issues faced by individuals with disabilities
- Address linguistic and hearing barriers faced by applicants for affordable housing

The subcommittee agreed that securing sufficient resources for a broad information and outreach effort was the top priority. The Consortium, in conjunction with the County's Human Services Department, applied for a FHIP outreach and education grant for the second time in August 2011 but was not awarded funding even though we scored 97 out of 100 possible points. The subcommittee will pursue future FHIP funding and will pursue action on the target areas to the extent possible with the resources available.

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SECTION 9. CITIZEN PARTICIPATION

From its inception, the Consortium has placed a high premium on citizen participation. Specific steps were taken early on to ensure that the fifteen towns and the numerous housing/social service agencies that exist on Cape Cod were given the opportunity to participate in this process. In that respect, the most significant step was to create the Advisory Council. Established through the passage of an ordinance by the County Legislature and appointed by the County Commissioners, the Advisory Council continues to play a central role in the development of Consortium's program, plans and policies.

The Advisory Council, which meets monthly, assisted in the development of this Annual Plan, provides ongoing input regarding program design and implementation, and makes decisions in the award of project funds. The Council meetings are open to the public and welcome their participation. Over the last twenty years, the Advisory Council has become an important forum for discussing and taking action regarding both housing and community matters.

In accordance with the Citizen Participation Plan of the Consolidated Plan, the following actions were taken to solicit and respond to comments on the 2014 Annual Plan:

January 31, 2014- Public Hearing Notice of February 20, 2014 posted on Cape Cod Commission web site in English, Spanish, and Portuguese.

February 5, 2014- Publication of Notice of February 20, 2014 Public Hearing in the Cape Cod Times.

February 5, 2014- E-mail notification of February 20, 2014 Public Hearing to about 150 people from all fifteen towns, local housing authorities, affordable housing developers, local housing committees, and social service and minority organizations working with low income residents. The notice about the hearing that was e-mailed was also provided in Spanish and Portuguese.

February 14, 2014- Notice about the public hearing published in the Barnstable County Human Services Department E-Newsletter. This notice was also included Spanish and Portuguese versions.

February 20, 2014- Public Hearing held at Cape Cod Commission office in Barnstable. The meeting location was handicap accessible, and provisions were made for providing special accommodations for language interpretation or services for the deaf or hard of hearing.

March 13, 2014- Advisory Council meeting voted to approve the draft 2014 Annual Plan. The meeting was held at the Cape Cod Commission office in Barnstable. The meeting location was handicap accessible, and provisions were made for providing special accommodations for language interpretation or services for the deaf or hard of hearing.

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April 9, 2014- Public Comment Notice and draft 2014 Annual Plan posted on Cape Cod Commission web site.

April 9-10, 2014- Copies of the draft 2014 Annual Plan mailed and e-mailed to 15 Town Halls and made available at CCC and Barnstable County offices.

April 10, 2014- Publication of 30 day Public Comment Notice in the Cape Cod Times.

April 10, 2014- E-mail notification of 30 day Public Comment Notice to about 125 people from all fifteen towns, local housing authorities, affordable housing developers, local housing committees, and social service and minority organizations working with low income residents. The notice about the 30 day comment period that was posted on the CCC web site and that was e-mailed included Spanish and Portuguese versions.

A summary of comments received either orally or in writing on the draft Annual Plan are included in Appendix C. In addition, the Consortium's overall Citizen Participation Plan is included in Appendix C.

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APPENDIX A**

**Directory of Federal, State, and Local Resources Available to
Support Barnstable County's
FFY 2014 Annual Plan**

Federal and State Resources

The information included on the following pages outlines the broad array of federal and state resources available to potentially support affordable housing efforts in the region. The Tables on pages 46-53 are taken from DHCD's Draft FY 2014 HUD Action Plan.

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FY 2014 HUD Action Plan

Table 5: Summary of Projected FY 2014 Housing and Community Development Resources and Activities				
Funding Source & Program	Use	Target Population	Expected Level of Funding FY 2014	Expected Level of Activity FY 2014
<i>Federal Consolidated Plan Covered Resources</i>				
CDBG (Total Allocation)	Housing Rehab, CD Activities, Economic Dev.	Min 51% low income	\$29,397,541	
CDBG: Community Development Fund	Housing Rehab	Min 51% low income	\$7,114,246	
CDBG: Community Development Fund	CD Activities	Min 51% low income	\$10,671,369	
CDBG: Mini-Entitlement	Housing Rehab	Min 51% low income	\$1,795,500	
CDBG: Mini-Entitlement	CD Activities	Min 51% low income	\$6,754,500	
CDBG: Economic Development Fund	Community Economic Development and Revitalization	Min 51% low income	\$1,600,000	
CDBG: Bridge Financing & Section 108 Loan Guarantee Program			Not a cash allocation	
CDBG: Massachusetts Downtown Initiative	Tech Assistance, Information and Workshops	Municipalities	\$80,000	30 municipalities
ESG	Shelter Operations, Services	100% low income, Homeless Ind. & Fam.	\$1,783,100	274 beds for individuals, 37 beds for families & 15 units for families fleeing DV
HOME (Total Allocation)	Production & Homebuyer Assistance	100% low income with 60% and 50% bands	\$6,602,985	108 units
HOME: Multi-Family Rental	Rental Production	100% below 60% & 50% AMI	\$5,942,686	108 units
HOME: Homebuyer Assistance - rehab/new construction for FTHB	Rehab/New Const - Ownership	100% at/below 80%AMI	-0-	-0- units
HOME: Homebuyer Assistance - DP and closing costs (HOME ADDI)	Homebuyer Assistance	100% at/below 80% AMI	-0-	-0- households
HOPWA: Technical Assistance	TA to HIV/AIDS Housing Programs	N/A	\$188,819	Capacity building and TA throughout Massachusetts

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FY 2014 HUD Action Plan

Table 5: Summary of Projected FY 2014 Housing and Community Development Resources and Activities				
Funding Source & Program	Use	Target Population	Expected Level of Funding FY 2014	Expected Level of Activity FY 2014
<i>Other Federal Resources</i>				
DOE: WAP (Administered by DHCD)	Weatherization Repairs & Improvements	Low income households	Approximately \$5.14 million	650 households
HHS: CSBG (Administered by DHCD)	Anti-poverty & self-sufficiency programs	Low income individuals & households at or below 125% of FPL	\$17,344,113	285,000 households
HHS: HEARTWAP (Administered by DHCD)	Emergency Heating Repairs and Replacements	Low income households at or below 60% of SMI	\$12,000,000	12,000 households
HHS: LIHEAP (Administered by DHCD)	Fuel Assistance	Low income households at or below 60% of SMI	\$184,126,585	216,000 households
HUD: NSP2 (ARRA) Administered by Mass. Housing Investment Corp.)	Rental and Ownership Preservation	Low Income households at or below 50% AMI and Low Moderate Middle Income households up to 120% AMI	\$21,822,940	312 units (over the life of the NSP2 grant)
HUD: NSP3	Rental and ownership acquisition, rehabilitation and new construction	Low Income households at or below 50% AMI and Low Moderate Middle Income households up to 120% AMI	\$6,190,994	100+ units
IRS: LIHTC (annual calendar year per capita authority)	New Rental Production and Preservation	40% @ 60% AMI OR 20% @ 50% AMI & 10% @ 30% AMI	\$15,286,131	825 total units
McKinney Act Program (only state administered balance of state continuum of care funds included.	Excluding ESG	Homeless	\$9,400,000	3,380
McKinney Act Program: Shelter Plus Care	Rental Assistance (Excluding ESG)	Homeless & Disabled	\$3,400,000 (incl. in above)	
Section 202	Elderly Rental Production	Low Income Elderly	Not available	Not available
Section 8 Rental Assistance (S8 RA) Administered by DHCD – Housing Choice Vouchers (HCV)	Rental Assistance (See Note)	ELI/Low Income Households	\$231,270,727	20,154
S8 RA MS 5	Rental Assistance	Families with a Person with Disabilities	\$713,000	75

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FY 2014 HUD Action Plan

Table 5: Summary of Projected FY 2014 Housing and Community Development Resources and Activities				
Funding Source & Program	Use	Target Population	Expected Level of Funding FY 2014	Expected Level of Activity FY 2014
S8 RA Special Voucher Programs	Rental Assistance	Various Special Needs (Listed Below)		
S8 New Construction/Substantial Rehab (NC/SR)	Rental Assistance	Family/Elderly	\$25,451,000	2,905
S8 RA Special Voucher Program: FUP	Rental Assistance	DSS involved families in reunification	(Included in HCV)	785
S8 RA Veterans Housing Voucher Program (VHVP)	Rental Assistance	Disabled Veterans	(Included in HCV)	92
S8 RA Special Voucher Program: TBRA/AIDS	Rental Assistance	Disabled Persons with HIV/Aids	(Included in HCV)	217
S8 RA Special Voucher Program: HOP	Rental Assistance	Homeless Persons with Disabilities	(Included in HCV)	345
S8 RA Special Voucher Program: DSG	Rental Assistance	Disabled, non-Elderly Individuals	(Included in HCV)	600
S8 RA Special Voucher Program: MS	Rental Assistance	Disabled Households	(Included in HCV)	200
S8 RA Special Voucher Program: PBRA/AIDS	Rental Assistance	Persons living with HIV/AIDS	(Included in HCV)	18
S8 RA Special Voucher Program: VASH	Rental Assistance	Homeless veterans -- substance abuse or mental illness	\$736,000	440
Section 8 Mod Rehab	Rental Assistance	ELI/Low Income Households	\$10,000,000	1,1,139
Section 811	Special Needs Rental Production	Persons with Disabilities	Not yet available	Not yet available
USDA Rural Development: Sec 502 Single Family Housing	Direct Loans for Homeownership	ELI/Low Income Rural Households	\$53,000,000	\$53,000,000
USDA Rural Development: Sec 502 Single Family Housing	Guaranteed Loans	Low Income Rural Households	\$10,000,000	\$10,000,000
USDA Rural Development: Sec 504 Single Family Housing	Repair Loans	ELI Elderly Rural Households	\$122,000,000	\$122,000,000
USDA Rural Development: Sec 504 Single Family Housing	Repair Grants	Non-Profits for Admin of Rehab Programs	\$134,000,000	\$134,000,000

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FY 2014 HUD Action Plan

Table 5: Summary of Projected FY 2014 Housing and Community Development Resources and Activities				
Funding Source & Program	Use	Target Population	Expected Level of Funding FY 2014	Expected Level of Activity FY 2014
USDA Rural Development: Sec 515 Multi- Family Housing	Rental Housing	Existing Multi Family Housing	\$18,000,000 available nationally; competitive process	\$1,000,000 maximum/state for new Sec. 515 properties
USDA Rural Development: Sec 538 Multi- Family Housing	Rental Housing	Multi Family Guaranteed Loans in Rural Areas	\$129,000,000 available nationally; competitive process	No limit/state. Goal is one loan of \$2.4 million for 20-24 units
USDA Rural Development: Community Facilities Program	Essential Community Facilities	Community with a population of less than 20,000	Approximately \$4,000,000	Approximately \$4,000,000
USDA Rural Development: Water & Waste Disposal Program	Public water and sewer systems	Community with a population of less than 10,000	Approximately \$10,000,000	Approximately \$10,000,000
USDA Rural Development: Distance Learning Telemedicine Program	Telecommunications technologies	Community with a population of less than 10,000	\$50,000 - \$500,000	\$50,000 - \$500,000
USDA Rural Development Business and Cooperative programs	Improve Economic Climate	Communities with a population of less than 50,000	\$7,000,000 guaranteed loans and \$200,000 grant	\$7,000,000
State & Other Resources				
CEDAC: Pre-development	Tech Assistance to Create & Preserve Affordable Housing	Non-profit developed housing throughout the Commonwealth		
CEDAC: Acquisition Loan Program		Non-profit developed multi-family housing throughout the Commonwealth		
DHCD: Affordable Housing Trust Fund	Production and Preservation of Rental & Ownership	Up to 110% AMI	\$34,800,000	2,763 total units 2,357 affordable
DHCD: AHVP	Rental Assistance	Low income, disabled, and under the age of sixty (60)	\$3,450,000	400 households
DHCD: Capital Improvement Preservation Fund	Preservation of Expiring Use Rental Developments	Households at/below 50% and 80% AMI	\$5,000,000	200 units
DHCD: Commercial Area Transit Node Housing Program	Production & Rehabilitation of Rental & Ownership	Individuals & Families at/below 80% AMI	\$2,000,000	45 units
DHCD: Community Based Housing	Production & Acquisition of Rental Housing	Individuals with Disabilities and Elders	\$5,000,000	36 units

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FY 2014 HUD Action Plan

Table 5: Summary of Projected FY 2014 Housing and Community Development Resources and Activities				
Funding Source & Program	Use	Target Population	Expected Level of Funding FY 2014	Expected Level of Activity FY 2014
DHCD: Chapter 707 - Department of Mental Health Rental Subsidy Program	Rental Assistance and Supportive Services	DMH Clients	\$6,250,000	1,250
DHCD: Facilities Consolidation Fund	Production & Acquisition of Special Needs Housing	DMH/DDS clients	\$7,500,000	140 units
DHCD: Housing Innovations Fund	Production & Acquisition of Special Needs Housing	Very low income persons	\$8,000,000	400 units
DHCD: Housing Stabilization Fund	Rental & Ownership Production & Preservation	Low/mod households	\$13,000,000	352 units
DHCD: Local Initiative Program	New Production, Ownership & Rental	Low/mod households	Technical assistance provided	476 units
DHCD: Local Housing Authority Transitional Housing Program	Transitional Housing and Services	Homeless families in DTA shelters	\$1,511,894	101
DHCD: Local Housing Authority Housing First Program	Public Housing, case management and services	Homeless families in DTA shelters	\$312,080	45
DHCD: LIHTC (annual authority per calendar year)	New Rental Production and Preservation	40% @ 60% AMI OR 20% @ 50% AMI & 10% @ 30% AMI	\$20,000,000	657 total units (see IRS:LIHTC, also)
DHCD: Mixed Pop Service Coordination Program	Service Coordination	Young Disabled and Elderly Residents of C.667 Housing	\$350,401, plus PH admin	20 LHAs 29 Communities Approx. 4,500 units 500 cases/mo.
DHCD: MRVP	Rental Assistance	Low/mod households	\$57,500,000	Approximately 6,800 households
DHCD: Public Housing Administration	Public Housing Operations	Very low income households	\$64,400,000	Approximately 48,000 units
DHCD: Public Housing - Modernization	Public Housing Improvements & Upgrades	Very low income households	\$90,000,000	550 projects
DHCD: Housing Consumer and Education Centers	Information, Education, Referral	Housing consumers and providers	\$2,641,992	58,954
DHCD: Residential Assistance for Families in Transition	Homelessness Prevention	Families at risk of homelessness/50% AMI	\$10,000,000	3,000
DHCD: Tenancy Preservation Program (total to TPP, incl. funds from MassHousing and other sources)	Homelessness Prevention	Persons with disabilities facing eviction	\$715,501	547 full cases 2,180 consultations
DMH: Housing (administered by DHCD)	Special Needs Housing	DMH clients	Included in Public Housing Administration	621 units

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FY 2014 HUD Action Plan

Table 5: Summary of Projected FY 2014 Housing and Community Development Resources and Activities				
Funding Source & Program	Use	Target Population	Expected Level of Funding FY 2014	Expected Level of Activity FY 2014
DDS: Supervised and Supportive Living Services (administered by DHCD)	Special Needs Housing	DDS Clients	Included in Public Housing Administration	Approx. 1,050 units
DOB: Regional Foreclosure Education Centers	Foreclosure Prevention	Homeowners in danger of foreclosure, prospective homebuyers	Estimate: \$800,000 for actual grant distribution (funded through mortgage licensing fees)	3,000 clients
DHCD: Emergency Assistance Family Shelter	Family Shelters	Homeless Families	\$164,077,808	4,694 families per night
DHCD: Individual Homeless Shelter	Individual Shelters	Homeless Individuals	\$40,450,335	3,155 adults per night
DVS: Shelters	Homeless Veterans Housing	Homeless Veterans	Total DVS funding (homeless veterans programs): \$5,105,000	Emergency Shelter capacity for approx. 400 adults each night
DVS: Transitional Housing	Homeless Veterans Housing	Homeless Veterans	Total DVS funding (homeless veterans programs): \$5,105,000	400 Transitional units for single veterans
DVS: Permanent Housing	Homeless Veterans Housing	Homeless Veterans	Not yet available	Under review
Elder Affairs: Assisted Living	Assisted Living	Elders & Disabled Persons	N/A	13,000 certified Assisted Living units
Elder Affairs: Supportive Senior Housing	Rental Senior & Disabled Housing	Elders & Disabled in Chap. 667 Public Housing	\$4,013,303	32 sites/4200 units
Elder Affairs: Congregate Housing	Rental Senior & Disabled Housing	Elders & Disabled in Ch. 667 Public Housing	\$1,503,617	51 sites/1800 units
Housing & Economic Development: MassWorks	Public infrastructure supporting housing, community and economic development	Public owned or managed projects	\$61,000,000 (over 2-3 fiscal years)	41 communities
ICHH: Regional Networks	Homelessness Prevention	Homeless and At Risk of Homelessness Individuals and Families	\$1,00,000	Funding for 10 Regional Networks
FHLB Boston: Affordable Housing Program	Gap Financing (Usually): Rental & Ownership	Low/mod households	10% of the Bank's net earnings from the prior year. Forward looking data are not available.	Forward looking data are not available.
FHLB Boston: New England Fund	Rental & Ownership Production	25% for Low/Mod Households	Program available, subject to market forces and	Program available, subject to market forces and demand.

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FY 2014 HUD Action Plan

Table 5: Summary of Projected FY 2014 Housing and Community Development Resources and Activities				
Funding Source & Program	Use	Target Population	Expected Level of Funding FY 2014	Expected Level of Activity FY 2014
			demand. Forward looking data are not available.	Forward looking data are not available.
FHLB Boston: Community Development Advances	Rental & Ownership Production; Economic Development; Mixed-Use	Residential and Economic Development: Up to 115% of Area Median Income depending on the activity	Program remains available; subject to market forces and demand. Forward looking data are not available.	Program remains available; subject to market forces and demand. Forward looking data are not available.
MassDevelopment: Brownfields Redevelopment Fund - Site Assessment	Site assessment		\$924,000	1,162 units
MassDevelopment: Brownfields Redevelopment Fund - Remediation	Remediation		\$2,652,000	250 units
MassDevelopment: Tax-exempt Affordable Rental Housing Production	Rental Housing Production	20% @ 50% AMI or 40% @ 60% AMI	\$86,000,000	671 units
MassDevelopment: Tax-exempt Affordable Rental Housing Preservation	Rental Housing Preservation	20% @ 50% AMI or 40% @ 60% AMI	\$135,000,000	1,255 units
MassHousing: Rental Lending -- New Production	Rental Housing Production	Low/Mod/Market households	\$46,746,300	510 units in 7 developments
MassHousing: Rental Lending -- Preservation	Rental Housing Preservation	Low/Mod/Market households	\$315,219,245	3,051 units in 23 developments
MassHousing: Priority Development Fund	Rental Housing Development	Gap filler financing for MassHousing-financed developments	\$9,217,204	414 units in 4 developments (These developments also receive production and preservation funds, and are included in the totals for those programs.)
MassHousing: Home Ownership Mortgage Products	Homeownership	Moderate income	\$450,000,000	2,100 loans
MassHousing: Home Improvement Mortgage Products	Home repairs, including lead paint abatement	100% AMI and below	\$1,477,000	73 loans
MassHousing: Center for Community Recovery Innovations (CCRI)	Rental Housing Production/Preservation	Creation and preservation of Sober Housing	\$700,000	100 units
MassHousing: Mortgage Insurance for Non-MassHousing Financed Home Mortgages	Homeownership	Eligible buyers with less than 20% down payment	\$20,000,000	100 loans insured

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FY 2014 HUD Action Plan

Table 5: Summary of Projected FY 2014 Housing and Community Development Resources and Activities				
Funding Source & Program	Use	Target Population	Expected Level of Funding FY 2014	Expected Level of Activity FY 2014
MassHousing: Portfolio Management	Rental Housing Preservation	71% low-income; 12% moderate-income; 17% market		101,826 rental units and 137 homeownership units in 940 developments
MHP: Permanent Financing	Rental Housing Production & Preservation	Low/mod households	\$110,000,000	1,400 housing units (new and preserved), with 785 affordable to households at 60% AMI or less
MHP: Technical Assistance	Technical Assistance	Housing Authorities and Municipalities	\$150,000	15 total: communities and housing authorities
MHP: Chapter 40B Technical Assistance	Technical Assistance	Municipalities	\$130,000	13 contracts
MHP: Soft Second Loan	Homeownership	Low/mod FTHB	\$4,800,000	1,000 loans
MHP: Neighborhood Rental Initiative	To increase supply of affordable housing for low-income residents in high-opportunity communities	Either 40% of units eligible at 60% of area median income or 20% at 50% AMI.	\$4,875,000 in subordinate debt committed plus PRFP first mortgage debt estimated at \$5,000,000	Six projects totaling 78 units will either complete construction, close construction financing, or be committed for financing in FY12.
MHP: HomeFundors, Permanent Financing	To increase # of ELI units in MHP Rental Production	100% low income, 20% ELI	\$2,050,000 in HomeFundors dollars committed	Est. 166 units of which about 36 for households earning <30% AMI
MHP: Neighborhood Stabilization Loan Fund	To provide financing for acquisition and rehab of foreclosed properties in distressed neighborhoods	Mixed income, both market and affordable	\$7.8 million committed or expected by end of FFY; \$8.5 million credit line for MHIC's NSLF.	See NSP2
MRC: Home Modification Loan Program	Home Modifications	Individuals/Families with Disabilities	\$4,000,000	180 loans
Home Fundors: Predevelopment & Acquisition Loans (CEDAC)	Rental Production	100% low income, 25% ELI		

Note - Includes 7 special set asides for special populations, but does not include units administered by the state's local housing authorities. In total, more than 71,000 MA households receive Section 8 Housing Choice Rental Vouchers. In addition, the rents of tenants in more than 60,000 units of subsidized housing are supported by Section 8 project based rental subsidies.

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Local Resources

Community Preservation Act (CPA)

Allows communities, at local option, to establish a Community Preservation Fund to preserve open space, historic resources and community housing, by imposing a surcharge of up to 3% on local property taxes. The state provides matching funds from its own Community Preservation Trust Fund, generated from an increase in certain Registry of Deeds' fees. All fifteen Cape communities passed ballot questions by May 2005 to adopt the CPA. Thirteen communities exchanged CPA for the Land Bank, while two- Chatham and Provincetown, have both CPA and the Land Bank. Two communities- Bourne at 70% and Brewster at 50%- have required that a significant portion of their CPA allocation be spent on open space and thus reduced the potential amount available for affordable housing in those communities. Many CPA committees have funding criteria that encourage projects that address more than one of the CPA issue areas, and the Consortium encourages those types of projects whenever feasible.

Through June 30, 2013 Cape communities have received over \$183.4 million in CPA funds and have committed over \$32.7 million of that total (17.9%) for community housing activities.

Community Development Block Grant (CDBG)

During the mid 1990's, the towns of Barnstable and Yarmouth were designated as entitlement communities to receive CDBG funds. Both communities have used parts of their CDBG allocations for affordable housing purposes. Barnstable will receive \$289,628 and Yarmouth \$137,042 in FFY 2014.

Cape Cod Commission

The Commission requires that 10% of all residential developments of 30 units or 30 acres or more be set aside for affordable housing. 126 affordable units have been created as a result of the Commission's regulatory programs. In addition, the 2009 Regional Policy Plan includes cash mitigation for affordable housing impacts from commercial projects that come under Commission review; therefore, some funds for affordable housing creation should be available in those towns in which Commission-reviewed projects are located.

Housing Trust Funds

A number of Cape communities have established housing trust funds for locally generated revenue to be expended on affordable housing efforts, and Barnstable, Bourne, Chatham, Dennis, Eastham, Mashpee, and Yarmouth have taken advantage of changes in state legislation to create municipal housing trusts that have powers to act independently of Town Meeting.

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Town Donated Land

Currently all fifteen towns in the County have designated a total of approximately 200 acres of undeveloped town-owned land for affordable housing.

Cape Light Compact

This County consortium provides grants to low income owners to install energy efficient lighting and appliances and also provides subsidies to developers of newly constructed housing that meet Energy Star standards.

Barnstable County Surplus Housing Funds

Since 1998 the County has made five separate allocations totaling over \$1.2 million for a variety of affordable housing initiatives (\$700,000 for rental housing development; \$300,000 for homeownership initiatives, including support for a regional monitoring system of the resale of affordable units; and over \$200,000 for a variety of homelessness initiatives). While budget surpluses in the next few years are unlikely, the County will continue to be looked to for support of certain targeted housing initiatives.

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APPENDIX B**

**RENTAL HOUSING DEVELOPMENT PROGRAM
REQUIREMENTS**

Eligible Applicants	Non-profit organizations, for profit entities, housing authorities, and municipalities in cooperation with any of the above.
Eligible Activities	<p>HOME funds are available for 1) the creation of new affordable rental units- whether new construction, rehabilitation or redevelopment; and 2) transactions that involve the acquisition and/or rehabilitation of existing affordable units whose affordability restrictions are about to expire in the near term (in general within the next 36 months).</p> <p>With the exception of preservation projects noted in 2) above, HOME rental development funds are not available for the rehabilitation of existing affordable rental units.</p> <p>The Consortium will not accept rental housing funding applications for projects containing less than three (3) HOME assisted units, unless determined otherwise for good cause.</p>
Site Control	The applicant must demonstrate site control, either via a deed, signed Purchase & Sale or Designated Developer agreement, or some other comparable evidence of site control at the time of application.
Permitting	The applicant's development must be fully permitted (with the exception of building permits) with all appeals periods ended in order to apply for HOME funds.

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Location	<p>To the greatest extent feasible, the Consortium looks to fund developments that 1) are located close to (within a mile) employment opportunities, public and other services, health care, public transportation, schools, and recreational areas; 2) have no environmental impacts or none that cannot be mitigated; and 3) are consistent with DHCD's sustainable development principles.</p> <p>The applicant must also demonstrate that their project promotes greater choice of housing opportunities and avoids undue concentration of assisted persons in areas containing a high proportion of low-income and/or minority households.</p>
Eligible Costs	<p>In general with the exceptions of the timing of the expenses noted below and with the list of ineligible costs noted in the following section, most development related expenses: acquisition, hard and soft costs, and developer overhead and fee are eligible costs. The maximum allowable overhead and fee is 15% of the total of hard and soft costs.</p> <p>Consortium policy is to reimburse only for those expenses incurred after the date of the HUD Regional Office's approvals of the environmental review and Request for Release of Funds.</p>
Ineligible Costs	<p>Initial operating and other capitalized reserves;</p> <p>Non-residential portions of the development;</p> <p>Working capital;</p> <p>Providing assistance to a project previously assisted with HOME funds during the established period of affordability unless the project is subsequently determined to be a "troubled" project;</p> <p>Providing assistance to federal public housing;</p> <p>Project-based rental assistance.</p>

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Maximum Award/ Loan Amount	<p>The minimum HOME expenditure is \$1,000 per HOME assisted unit, while the maximum award is \$30,000 per HOME assisted unit for projects scoring less than 90 points or \$35,000 per HOME assisted unit for projects scoring 90 points or more.</p> <p>No single funding award, unless determined otherwise for good cause by the Consortium, will exceed \$150,000 for projects scoring less than 90 points and \$175,000 for projects scoring 90 points or more (see chart below).</p>
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	Per HOME-assisted Unit Funding Maximum	Maximum Project Funding Limit
Project- Score of Less Than 90 Points	\$30,000	\$150,000
Project- Score of 90 Points or More	\$35,000	\$175,000

Project Cost Limits	<p>Consistent with DHCD's policy, the Consortium does not have a maximum per unit Total Development Cost (TDC) limit; however, the Consortium is obligated to use its limited HOME resources in the most efficient manner possible. The Consortium will review the project's per unit TDC compared with that of other recent, similar HOME funded projects to make an assessment of the reasonableness of the project's overall costs.</p>
Term of Loan	<p>Generally, awards are provided as a Deferred Payment Loan (DPL) with a term of forty (40) years. During the final year of the loan, the borrower may request an extension of up to forty (40) years in order to preserve the affordability of the housing.</p> <p>During the term of the Affordable Housing Restriction, the affordability requirements will remain in effect regardless of a transfer occurring during its term or whether the loan is repaid. The full amount of the DPL will be repaid if the property is sold, transferred or otherwise encumbered during the term of the mortgage or if the terms and conditions of the loan are violated.</p>

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Interest Rate	<p>Generally HOME loans are 0% interest rate with no monthly payments required.</p> <p>For projects receiving federal or state Low Income Housing Tax Credits, if a 0% interest rate is absolutely infeasible for tax credit underwriting purposes, the interest rate on the Note and Mortgage can therefore be the Applicable Federal Rate at the time of closing.</p>
Security	<p>The DPL will be secured through a Promissory Note and Mortgage on the property to be executed between the County and the Borrowing entity. HOME funds are usually subordinate to other loans although the subordinate position will depend upon the financial structure of the deal.</p>
Recourse	<p>The loan will be non-recourse.</p>
Holdback	<p>HOME funds are provided through the regular requisition process with 10% of the loan held back until both substantial completion of the project and submission of a HOME completion report.</p>
Replacement Reserve	<p>The Consortium's replacement reserve requirement will be consistent with that of DHCD (currently \$350 per unit per year) on DHCD projects; however, the Consortium may impose a higher replacement reserve requirement on non-DHCD funded projects.</p>
Permanent Loan	<p>In general, the permanent loan shall have a fixed rate for at least twenty (20) years.</p>
Debt Service Coverage (DSC)	<p>The minimum acceptable DSC (annual net operating income divided by annual mortgage(s) expense) shall be 1.15 and the absolute maximum allowable DSC shall be 1.25. In exceptional circumstances and with the concurrence of the permanent lender, the Consortium may accept a DSC as low as 1.10.</p>
Affordability- Incomes	<p>All HOME assisted units shall be occupied by households whose income at their initial lease up is no more than 60% of the HUD published area median income.</p>

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<p>Affordability- Rents and Allowable Fees</p>	<p>Up to 80% of the HOME-assisted units in a rental housing project of five units or more must have rents that are no more than the “high” HOME rent.</p> <p>A minimum of 20% of the HOME-assisted units in a rental project of five units or more must have rents that are no more than the “low” HOME rent for households whose incomes are at or below 50% of area median income.</p> <p>In general and to allow for a marketing window, the Consortium will approve rents that are set about 10% below the maximum allowable HOME rents.</p> <p>Applicants may use either the Section 8 or local housing authority utility allowance schedule or the Consortium schedule, if available.</p> <p>For households that have a mobile Section 8, MRVP, or local rental voucher, the maximum HOME rent is the “high” HOME rent or the Section 8 fair market rent (FMR), whichever is less.</p> <p>In those instances where the project receives State or Federal project-based rental subsidies, the HOME rent is the rent allowable under the Federal or State project-based rental subsidy program.</p> <p>Application/wait list fees and other fees other than those that the Consortium has deemed reasonable and customary for the particular location or market area are prohibited.</p>
<p>HOME Assisted Units</p>	<p>In general, the income, rent, and bedroom unit mix of the HOME assisted units shall be proportional to that of the overall project.</p> <p>The Consortium will generally designate the HOME assisted units within a project as “floating” units; i.e. not tied to any particular units in the project as long as the income, rent, and bedroom mix requirements are satisfied.</p>
<p>Affordable Housing Restriction (AHR)</p>	<p>All HOME funded projects require an AHR executed by the borrower and recorded at loan closing to ensure the long term affordability of the HOME units for the period noted in the chart below.</p>

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Amount of HOME Project Funding	HOME period of affordability- years	County period of affordability- years	Total period of affordability- years
Less than \$50,000	20	20	40
\$50,000- \$99,999	20	30	50
\$100,000- \$149,999	20	50	70
\$150,000 or more	20	79 or longest period allowed by law to achieve perpetuity	99 or longest period allowed by law for perpetuity

Conflict of Interest	No HOME assisted affordable housing unit can be leased to any individual or any member of an individual's immediate family, including those by blood, marriage or adoption, who is an officer, employee, agent, elected or appointed official, or consultant of the owner, developer, or sponsor of a project assisted with HOME funds.
Environmental Review	An ASTM Phase One environmental site assessment must be submitted with the application for each property within the project. All HOME projects must satisfy HUD's environmental review requirements, including possible review and approval from the HUD Regional Office. Additional documentation will be required from the applicant in order for Consortium staff to complete the review. Construction and site work cannot begin, and HOME funds cannot be released prior to approval from HUD.
Design Guidelines	<p>The Consortium's Design guidelines are generally consistent with those of DHCD's Qualified Allocation Plan and DHCD HOME program guidelines that encourage energy efficient building envelopes and major building systems, healthy interior air quality, universal design, and "green" design elements.</p> <p>In addition to the DHCD design guidelines, the Consortium will require that the Applicant provide additional individual tenant storage space for each unit beyond what is provided inside the units.</p>
Lead- Based Paint Requirements	All projects involving the rehabilitation of properties constructed prior to 1978 are subject to HUD's lead-based paint requirements.

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<p>Accessibility for Persons with Disabilities</p>	<p>For new construction of five (5) or more rental units or substantial rehabilitation projects of fifteen (15) dwelling units or more, Section 504 requires a minimum of five (5) percent of the dwelling units in the project (but no less than one unit) must be accessible to and usable by persons with mobility impairments.</p> <p>An additional two (2) percent of the dwelling units (but at a minimum no less than one unit) must be accessible to individuals with sensory impairments (i.e. hearing or vision impairments).</p> <p>For moderate rehabilitation of 15 or more units, Section 504 also requires to the maximum extent feasible that the units be accessible to and usable by individuals with disabilities.</p> <p>For new construction projects, adoption of visit-ability standards is strongly encouraged. A unit is visit-able when a person with mobility impairments can enter the unit and navigate throughout the first floor and have access to an accessible bathroom.</p>
<p>Section 3 and MBE/WBE Requirements</p>	<p>All HOME projects must have outreach and reporting plans to achieve the Section 3 and MBE/WBE goals approved prior to closing.</p>
<p>Affirmative Marketing/Tenant Selection</p>	<p>As a condition of any funding, the Consortium will require the submission of an Affirmative Fair Housing Marketing Plan (AFHMP) that fully complies with the form and content of DHCD's Chapter 40B AFHMP Guidelines. The Consortium does not allow occupational preferences in tenant selection; however, consistent with DHCD policy, the Consortium will allow a local preference for selection of up to 70% of the initial tenants only if requested by the applicant and if supported by sufficient documentation.</p>

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<p>Monitoring/Fee</p>	<p>The Consortium will annually monitor the recertification of tenants' income, rent, and utility allowances.</p> <p>Every 1-3 years, depending upon project size, the Consortium will conduct property inspections along with site monitoring visits to review for compliance in the areas of tenants' income and rents, lease terms, and resident selection policies.</p> <p>Finally, the Consortium will require annual project income/expense reports and/or audits in order to assess the project's financial health.</p> <p>The annual monitoring fee currently is \$35 per HOME unit plus the actual cost of the property inspections. Such fee must be carried as an expense in the project's operating budget.</p>
<p>Good Standing</p>	<p>Applicants for HOME funds, including all members of their development teams, must be in good standing with the Consortium with respect to other Consortium-funded projects.</p>

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APPENDIX C

**Citizen Participation Plan; Summary of Citizen Comments;
Copies of Public Notices**

1. CITIZEN PARTICIPATION PLAN (CPP)

Introduction:

The Barnstable County HOME Consortium's Citizen Participation Plan (CPP) was prepared as required for the Consolidated Plan in accordance with CFR Part 91, Section 105. The purpose of the CPP is to outline the procedures for citizen's participation in the development and implementation of the Consortium's Five-Year Consolidated Plans, Annual Plans, Consolidated Annual Performance Reports (CAPER), and substantial amendments to five-year or annual plans.

The development of the Consolidated Plan takes place under the supervision of the Cape Cod Commission and the Barnstable County HOME Consortium Advisory Council. The Commission is Barnstable County's land use and planning agency and is responsible for the overall administration of the HOME Program. The Advisory Council is comprised of a representative from each of the fifteen towns, two at-large members and the Commission's affordable housing specialist as its ex-officio member. The Council has had representation from a broad range of housing and community interests, including local housing authorities, non-profit housing agencies, local housing partnerships, the elderly, tenants, banks, real estate, town government, the religious sector, human services and private citizens.

The Advisory Council was consulted on a regular basis and played an integral role in the development of the Consortium's CP. The broad range of housing/community interests and experience of the Advisory Council helped to ensure that the Consolidated Plan reflected what the community saw as its most critical needs and priorities.

A key element of the Consolidated Planning process is citizen participation. The CPP is designed to encourage the participation of low income households, particularly those living in slum and/or blighted areas and in areas where HOME funds are proposed to be used. The CPP encourages the participation of all citizens, including minorities and non-English speaking persons, as well as persons with mobility, visual and/or hearing impediments. The CPP also encourages the participation of public and assisted housing residents in the development and implementation of the Consolidated Plan.

The community involvement process has three main objectives:

1. To help determine the housing, needs of our region.
2. To assess how well the County is meeting these needs.
3. To help determine priorities.

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Citizen Participation in the Development of the Consolidated Plan:

The following narrative describes how citizens of the Barnstable County can become involved in the development of the Five-Year Consolidated Plan, Annual Plans (also known as Action Plans), Consolidated Annual Performance Evaluation Reports (CAPER), Citizen Participation Plan, and Substantial Amendments. The Five-Year Consolidated Plan identifies priority housing needs within Barnstable County. It also identifies the funding (public and private) and the activities required to address priority needs over a five-year period. The Action Plan identifies the housing and community development funding and activities that the Consortium anticipates being available during each of the program years covered by the Five-Year Consolidated Plan. The Annual Plan also serves as the application for HOME program funds allocated by formula to the region. The Consolidated Annual Performance Review (CAPER) provides the public with the means to gauge the progress of each activity listed in an Annual Action Plan. This document is prepared at the end of each program year covered by a Five-Year Consolidated Plan.

1. **Consultation Meetings:** During the development of the Five-Year Consolidated Plan, the Consortium consults with local service providers (public and private) to obtain their opinion on the housing and needs of “special needs” households in the County. These households include: 1) elderly/frail elderly; 2) persons with HIV/AIDS; 3) substance abusers; 4) persons with developmental disabilities; 5) persons with mental disabilities; 6) persons with physical disabilities; and 7) the homeless. The consultations may include scheduled meetings, focus groups, phone/e-mail interviews, invitations to public meetings, and surveys as deemed appropriate.

2. **Public Hearings/Meetings:** The Consortium will schedule at least two public hearings per year as part of the regular monthly Advisory Council meetings to obtain citizen’s views on housing needs, the development of proposed activities, and to review the program performance at different stages of the program year. The Consortium will provide timely notification of these meetings and public hearings of not less than one week. The County will notify the general public of the time and date of all public hearings by placing a legal advertisement in the Cape Cod Times. Additional notices may be posted on the Commission web site- www.capecodcommission.org, County buildings, and in local government offices, libraries, and senior centers as deemed appropriate. All public hearings will be held in handicap accessible locations. The County will make every effort to provide translation services for those needing it upon request. Requests should be made in advance and through the Cape Cod Commission- phone 508.362.3828.

Encouragement of Citizen Participation:

Encouragement will include legal ads in the Cape Cod Times. Additional notices may be posted on the Commission web site- www.capecodcommission.org, County buildings,

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and in local government offices, libraries, and senior centers as deemed appropriate. All public hearings will be held in handicap accessible locations. The County will make every effort to provide translation services for those needing it upon request. Requests should be made in advance and through the Cape Cod Commission- phone 508-362-3828. Citizens are encouraged to submit their views and proposals on all aspects of the housing plan at the public hearings. However, to ensure that citizens are given the opportunity to assess and comment on all aspects of the HOME program on a continuous basis, citizens may, at any time, submit written comments or complaints to the Cape Cod Commission, PO Box 226- 3225 Main Street, Barnstable, MA 02630, ATTN: Affordable Housing Specialist.

Citizen Comment on the Consolidated Plan and Annual Plans:

According to 24 CFR 91.105, all citizens, public agencies, and other interested parties have thirty (30) days to submit comments on the Consolidated Plan and Annual Plans. The Consortium will place a legal advertisement in the Cape Cod Times announcing the availability to examine the Consolidated Plan and the Annual Plans and all related documents at the Cape Cod Commission, 3225 Main Street, Barnstable, MA, 02630; at the Barnstable County Commissioners Office, Superior Court House, Main Street, Barnstable, MA. 02630; and all fifteen town halls in the county. The public hearing and availability of Consolidated Planning and Annual Plan documents will also be advertised for viewing on the Commission website at www.capecodcommission.org, and at selected housing organizations, and other municipal buildings and libraries as deemed appropriate. The official thirty day comment period will be begin when announced in the paper, but comments are encouraged at the hearings, and participants may contact the Cape Cod Commission office during regular office hours Monday through Friday 8:30am to 4:30pm.

Barnstable County is including the following minimum requirements per 24 CFR 91.105 in the development of the Consolidated Plan:

The Citizen Participation Plan requires that prior to adopting the Consolidated Plan, the County will make available to citizens, public agencies, and other interested parties the amount of assistance the jurisdiction expects to receive (including grant funds and program income) and the range of activities that may be undertaken, including the amount that will benefit low income persons. Barnstable County includes the expected grant fund amount and program income in the draft Consolidated Plan document for all public hearings and open comment periods related to the Consolidated Planning process. The expected amount is then included in any advertisement announcing the availability and final comment period of the draft Consolidated Plan, Citizen Participation Plan, and Annual Plans.

The plan will also identify Barnstable County's plans to minimize displacement and what type of assistance will be made available to those persons displaced. It is rare for the Consortium to undertake projects that include displacement or relocation. The County works closely with applicants in an effort to minimize permanent residential

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displacement. It would be the County's general practice not to approve any proposed HOME activities involving relocation of tenants, businesses, or owners unless circumstances warrant it. If a project is approved that results in displacement, the Consortium, in compliance with Uniform Relocation Act under the Federal Regulations, will work with a qualified relocation advisory agency to give relocation assistance to the occupants to be replaced.

Amendments- Criteria for Amendment to Consolidated Plan:

Due to changes in regional needs during program years, amendments and/or revisions to the Consolidated Plan and/or Action Plan may be necessary. Some changes may be substantial enough that they significantly alter the priorities of the Action Plan and ultimately the Five-Year Consolidated Plan. Amendments and/or revisions that are considered substantial will include:

Substantial Amendments:

- * Reduction in funding of 25% or more of the HOME program;
- * Addition of a new funding category from the prior year's Annual Plan with an allocation of \$100,000 or more;
- * Deletion of a funding category from the prior year's Annual Plan that had an allocation of \$100,000 or more;
- * Redefinition of the number and type of HOME program beneficiaries.

The HOME Consortium will follow the following procedures for any substantial amendments:

A legal advertisement will be placed in the Cape Cod Times announcing any substantial amendments to the Consolidated Plan, action plan, or citizen participation plan.

The public will have thirty (30) days to submit written and/or oral comments on the amendment from the date the public is notified via legal advertisement; all comments will be considered and a summary will be filed in the Affordable Housing department of the Cape Cod Commission and made part of the plan.

Approval must be granted by the Advisory Council for any substantial amendments.

A written admission to the Department of Housing and Urban Development (HUD) for approval will be required prior to the implementation.

Performance Reports:

The HOME Consortium will place a legal advertisement in the Cape Cod Times announcing the availability of the Consolidated Annual Performance Evaluation Report (CAPER) for review at the office of the Cape Cod Commission, 3225 Main Street, Barnstable, MA 02630. The Consortium will allow comments to the Cape Cod

2014 HOME CONSORTIUM ANNUAL PLAN MAY 12, 2014

Commission on the performance report for a period of not less than fifteen (15) days prior to submitting to HUD for approval.

Availability to the Public and Access to Records:

To facilitate citizen access to HOME program information, the Cape Cod Commission's Affordable Housing department will keep all documents related to the HOME program on file at 3225 Main Street, Barnstable, MA 02630, which can be accessed upon request Monday through Friday from 8:30am to 4:30pm. The County will make every effort to provide translation services for those needing it upon request. Requests should be made in advance and through the Cape Cod Commission. Any questions or comments relating to the HOME program or plans can be mailed to the above address or by calling 508.362.3828.

Information from the project files shall be made available for examination and duplication, on request, during regular business hours. The HOME Consortium will make every reasonable effort to assure that HOME program information is available to all citizens, especially those of low income and those residing in blighted neighborhoods and/or HOME project areas. The location of the public files and public hearings are handicap accessible.

Materials to be made available shall include, but are not necessarily limited to the following: the Citizen Participation Plan; the Consolidated Plan; the Annual Action Plan; the Consolidated Annual Performance Evaluation Report (CAPER); records of public hearings; mailings and promotional materials; prior HOME applications; letters of approval; grant agreements; the construction specifications; labor standards and materials; proposed and approved HOME program applications for the current year; written comments or complaints received concerning the HOME housing programs; written responses from the HOME Consortium; and copies of the applicable Federal and State rules, regulations, policies, requirements and procedures governing the HOME program.

In no case shall Barnstable County disclose any information concerning the financial status of any program participant(s) that may be required to document program eligibility or benefit. Furthermore, Barnstable County shall not disclose any information which may, in the opinion of legal counsel, be deemed of a confidential nature.

Technical Assistance:

The Consortium's affordable housing staff offers technical assistance, upon request, to all low, very low and poverty income individuals and/or organizations serving low income neighborhoods or persons. The assistance is for the purpose of developing proposals to request funding under its HOME program and activities. Consortium staff will also provide technical assistance to grant recipients to ensure compliance with federal rules and regulations. Please contact the Cape Cod Commission, 3225 Main Street, Barnstable, MA 02630, or call 508.362.3828.

2014 HOME CONSORTIUM ANNUAL PLAN MAY 12, 2014

Complaints:

The public hearings scheduled, as described in this Citizen Participation Plan, are designed to facilitate public participation in all phases of the HOME program planning process. Citizens are encouraged to submit their views and proposals on all aspects of the regional HOME housing plan at the public hearings. However, to ensure that citizens are given the opportunity to assess and comment on all aspects of the HOME program on a continuous basis, citizens may at any time submit written comments or complaints to the Cape Cod Commission, PO Box 226- 3225 Main Street, Barnstable, MA 02630, ATTN: Affordable Housing Specialist.

The Consortium will respond to all comments and complaints regarding any phase of the Consortium's Consolidated Plan, or any activities implemented under the plan, in writing within fifteen (15) working days of receipt of them, where feasible. Responses will be substantive, where appropriate. When complaints remain unsatisfied, the staff will bring the complaint to the Advisory Council for review and resolution.

Adoption of the Citizen Participation Plan:

The Citizen Participation Plan will be adopted as a section of the Consolidated Plan, thereby going through the same process of local review and public comment, ending with a thirty (30) day public comment period. Amendments and changes to the Citizen Participation Plan will be addressed in the annual update of the Consolidated Plan.

Use of Citizen Participation Plan:

The Barnstable County HOME Consortium will follow the citizen participation plan as outlined in this document.

Any comments or questions about this plan can be directed to:

**Affordable Housing Specialist
Cape Cod Commission
3225 Main Street
Barnstable, MA 02630**

Phone: (508) 362-3828; Fax: (508) 362-3136

Office Hours: Monday through Friday 8:30am to 4:30pm

2014 HOME CONSORTIUM ANNUAL PLAN

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2. SUMMARY OF PUBLIC COMMENTS AND RESPONSES

Public Hearing:

February 20, 2014 Public Hearing Comments and Notes

Summary of Discussion: Attendees received an overview from staff of the Consortium's HOME program: allowable uses, allocation history, 2010-2014 Consolidated Plan (Con Plan) priorities and goals, and challenges to conducting activities that support homeownership production and direct homebuyer support. In addition staff reviewed state funding priorities, local rental projects in the pipeline, and current rental and ownership market conditions.

- 1) Rental housing development- Staff noted that because of the demand for and constraint on their resources DHCD held just one rental funding round in both 2013 and 2014. DHCD has already committed its 2014 tax credit allocation, and thus will be committing part or all of its 2015 allocation in the March funding round. The state's Affordable Housing Trust Fund has made commitments to projects through its allocation for 2016. This reality, along with the lack of regional projects that will be ready to proceed until early 2015, will make it challenging to satisfy the Consortium's two year commitment deadline. However, affordable rental housing is the region's top priority, and the Consortium should continue to allocate the majority of its allocation to the creation and preservation of affordable rental housing. Participants also acknowledged the unfortunate circumstance of being unable to support any affordable homeownership development.
- 2) Technical Assistance - There was a question asked about whether technical assistance to CHDO's would be a reasonable use for HOME funds in order to help to achieve the commitment requirement. Staff responded that up to 5% of our HOME allocation (likely a little under \$20,000) could be used for technical assistance to CHDO's for identified housing development activities. Staff noted that the Consortium did allocate funds to a start-up CHDO- the Housing Land Trust of Cape Cod- 8-10 years ago; however, attendees did not believe that allocating this modest amount of funds among the region's CHDO's would be the most effective use of our funds.
- 3) Rental voucher program- There was some discussion about the use of a rental housing voucher program as an option to expend our funds quicker. There was discussion about the practical challenges of such a program- particularly in finding an experienced administrator. There was extensive discussion about local CPC funded voucher programs that typically have a three year subsidy limit with the goal of participants being able to achieve self-sufficiency. There was doubt expressed that the Cape has the type of economy that would provide enough opportunities for households to move to self-sufficiency in three years and that

2014 HOME CONSORTIUM ANNUAL PLAN MAY 12, 2014

the creation of a HOME rental voucher program would need to become an ongoing commitment. The consensus of attendees was that a voucher program was not something to be recommended at this time.

Public Comment Period:

The Yarmouth Community Housing Committee supported the Consortium's emphasis on the production of affordable rental housing in its funding allocations.

Another commenter stressed the importance, especially for those small-scale affordable rental housing developments, of continuing the operation of the Regional Ready Renter program so that those units can count towards the town's Subsidized Housing Inventory.

Response: The Cape Cod Commission has administered the Regional Ready Renter Program for its first three years. The Commission is currently in discussions with other organizations to assess their interest in administering the Program; however, the Commission concurs that the Program is an important one to continue in the region.

2014 HOME CONSORTIUM ANNUAL PLAN MAY 12, 2014

3. COPIES OF PUBLIC NOTICES

WEDNESDAY, FEBRUARY 5, 2014

CAPECODONLINE.COM

(508) 775-6201

CAPE COD TIMES/C-7

Legal Notices

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Legal Notices

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NOTICE OF PUBLIC HEARING
Barnstable County HOME Consortium
Federal Fiscal Year (FFY) 2014 Allocations
In accordance with the requirements of the U.S. Department of Housing and Urban Development (HUD) that provides funding to the County for the HOME Investment Partnerships Program (HOME) and with the provisions of the Consortium's Citizen Participation Plan, the Consortium, prior to publishing the FFY 2014 (July 1, 2014-June 30, 2015) Action Plan will hold the following public hearing:
Thursday, February 20, 2014- 5:00- 8:30 PM
Cape Cod Commission- Conference Room 3225
Main Street Barnstable, MA 02630
The location is handicap accessible and if you are deaf or hard of hearing or a person with a disability who requires an accommodation, please contact Michelle Springer at 508.362.3828 or TTY 508.362.5885 by February 13, 2014.
Estimated FFY 2014 HOME Allocation: \$390,000 (based upon level funding from FFY 2013)
The purpose of the hearing is to obtain the comments and views of citizens, public agencies, community organizations, and other interested parties on Barnstable County housing needs, the scope of HOME program activities, and recommended allocation levels for HOME program activities. Information obtained from the hearing will be considered in the preparation of the Draft FFY 2014 Action Plan. Anyone unable to attend the hearing may submit written comments or questions on or before February 20, 2014 to the Cape Cod Commission, PO Box 226, Barnstable, MA 02630 Attention: Paul Ruchinskas or to pruchinskas@capecodcommission.org.
Any questions should be directed to Paul Ruchinskas at 508.362.3828.
2/05/14

CAPE COD TIMES - 04/10/14

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PUBLIC NOTICE
BARNSTABLE COUNTY HOME CONSORTIUM
2014 ANNUAL PLAN
PUBLIC COMMENT PERIOD
Pursuant to the requirements of the Citizens Participation Plan of the HOME Investment Partnerships Program, the Consortium will provide a thirty day comment period on the 2014 Annual Plan. The proposed allocations in the 2014 Annual Plan of the \$404,552 in HOME funds and \$40,000 in expected program income are as follows:
Housing Production- \$268,414
Community Housing Development Organization Housing Production- \$60,683
Down Payment/Closing Cost Program- \$75,000
Program Administration- \$40,455
This comment period will begin April 11, 2014 and end May 12, 2014 at 4:00 p.m. The Annual Plan is available for review at the following locations:
Barnstable County- Commissioners Office Superior Court House
3195 Main Street
Barnstable, MA 02630
Cape Cod Commission
3225 Main Street
Barnstable, MA 02630
Town Halls in each town in Barnstable County Cape Cod Commission web site- www.capecodcommission.org
The Annual Plan will contain a summary of public comments received. All comments should be submitted to: Paul Ruchinskas, Cape Cod Commission, 3225 Main Street- PO Box 226, Barnstable, MA 02630 or pruchinskas@capecodcommission.org
4/10/14

**2014 HOME CONSORTIUM ANNUAL PLAN
MAY 12, 2014**

APPENDIX D. ANNUAL PLAN ALLOCATION FORMS

**U.S. Department of Housing & Urban Development
CPD Consolidated Plan
Listing of Proposed Projects**

<u>Project ID</u>	<u>Project Title/Priority Objective/Description</u>	<u>HUD Matrix Code Title/Citation/Accomplishments</u>	<u>Funding Source</u>	<u>Funding Amount</u>
0001	Housing Production	01 Acquisition of Real Property	CDBG ESG	
	Housing	570.201(a) 28 Housing Units	HOME HOPWA	\$268,414
	To create affordable rental and ownership units through acquisition and/or rehabilitation of existing stock.		Total	\$268,414
	Help the Homeless?	Yes	Start date: 07/01/14	
	Help with HIV or AIDS?	Yes	Completion Date: 06/30/15	
	Eligibility:			
	Subrecipient:	Local Government		
	Location (s):	Various Addresses		

**2014 HOME CONSORTIUM ANNUAL PLAN
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**U.S. Department of Housing & Urban Development
CPD Consolidated Plan
Listing of Proposed Projects**

<u>Project ID</u>	<u>Project Title/Priority Objective/Description</u>	<u>HUD Matrix Code Title/Citation/Accomplishments</u>	<u>Funding Source</u>	<u>Funding Amount</u>
0002	Downpayment Closing Cost Assistance Housing	05R Homebuyer Downpayment Assistance 570.201 (e) 5 Households	CDBG ESG HOME HOPWA TOTAL	 \$75,000 \$75,000

Help the Homeless?
Help with HIV or AIDS?

No
No

Start date: 07/01/14
Completion Date: 06/30/15

Eligibility:
Subrecipient:
Location (s):

Local Government
Various Addresses

2014 HOME CONSORTIUM ANNUAL PLAN MAY 12, 2014

U.S. Department of Housing & Urban Development CPD Consolidated Plan Listing of Proposed Projects

<u>Project ID</u>	<u>Project Title/Priority Objective/Description</u>	<u>HUD Matrix Code Title/Citation/Accomplishments</u>	<u>Funding Source</u>	<u>Funding Amount</u>
0004	CHDO	12 Construction of Housing	CDBG	
	Housing	570.201(a)	ESG	
		5 Housing Units	HOME	\$60,683
	15% CHDO set aside		HOPWA	
			Total	\$60,683

Help the Homeless?
Help with HIV or AIDS?

Yes
Yes

Start date: 07/01/14
Completion Date:06/30/15

Eligibility:
Subrecipient:
Location (s):

Local Government
Various Addresses

2014 HOME CONSORTIUM ANNUAL PLAN MAY 12, 2014

U.S. Department of Housing & Urban Development CPD Consolidated Plan Listing of Proposed Projects

<u>Project ID</u>	<u>Project Title/Priority Objective/Description</u>	<u>HUD Matrix Code Title/Citation/Accomplishments</u>	<u>Funding Source</u>	<u>Funding Amount</u>
0005	Administration	21A General Program Administration	CDBG ESG	
	Planning \$ Administration	570.206	HOME HOPWA	\$40,455
	10% Admin set aside	0 Households (General)	Total	\$40,455
	Help the Homeless?	No	Start date: 07/01/14	
	Help with HIV or AIDS?	No	Completion Date:06/30/15	
	Eligibility:			
	Subrecipient:	Local Government		
	Location (s):	Various Addresses		

**2014 HOME CONSORTIUM ANNUAL PLAN
MAY 12, 2014**

**APPENDIX E. CONSOLIDATED PLAN HOUSING NEEDS AND
LOW INCOME/MINORITY CONCENTRATIONS**

**HUD Table 2A
Priority Housing Needs/Investment Plan Table**

PRIORITY HOUSING NEEDS (households)		Priority		Unmet Need
Renter Total- 6,892	Small Related	0-30%	H	919
		31-50%	H	719
		51-80%	H	717
	Large Related	0-30%	H	144
		31-50%	H	81
		51-80%	H	160
	Elderly	0-30%	H	800
		31-50%	H	595
		51-80%	H	431
	All Other	0-30%	H	930
		31-50%	H	745
		51-80%	H	651
Owner Total- 11,312	Small Related	0-30%	M	479
		31-50%	M	630
		51-80%	M	1,729
	Large Related	0-30%	M	62
		31-50%	M	199
		51-80%	M	507
	Elderly	0-30%	M	2,312
		31-50%	M	1,922
		51-80%	M	1,558
	All Other	0-30%	M	530
		31-50%	M	525
		51-80%	M	859
Non-Homeless Specialized Housing Needs	Elderly	0-80%	H	620
	Frail Elderly	0-80%	H	910
	Severe Mental Illness	0-80%	H	175
	Physical Disability	0-80%	H	75
	Developmental Disability	0-80%	H	40
	Alcohol/Drug Abuse	0-80%	H	50
	HIV/AIDS	0-80%	H	10
	Domestic Violence Victim	0-80%	H	600

**2014 HOME CONSORTIUM ANNUAL PLAN
MAY 12, 2014**

HUD Table 1A-Homeless and Special Needs Populations

Continuum of Care: Housing Gap Analysis Chart

	Current Inventory	Under Development	Unmet Need/ Gap
--	-------------------	-------------------	--------------------

Individuals

Example	Emergency Shelter	100	40	26
Beds	Emergency Shelter	91	0	0
	Transitional Housing	85	0	20
	Permanent Supportive Housing	227	5	112
	Total	403	5	132

Persons in Families With Children

Beds	Emergency Shelter	181	0	0
	Transitional Housing	36	0	9
	Permanent Supportive Housing	6	0	54
	Total	223	0	63

Continuum of Care: Homeless Population and Subpopulations Chart

Part 1: Homeless Population	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Number of Families with Children (Family Households):	66	12	22	100
1. Number of Persons in Families with Children	179	36	60	275
2. Number of Single Individuals and Persons in Households without children	108	84	144	336
(Add Lines Numbered 1 & 2 Total Persons)	287	120	204	611
Part 2: Homeless Subpopulations	Sheltered		Unsheltered	Total
a. Chronically Homeless	68		77	145
b. Seriously Mentally Ill	147			
c. Chronic Substance Abuse	175			
d. Veterans	68			
e. Persons with HIV/AIDS	17			
f. Victims of Domestic Violence	108			
g. Unaccompanied Youth (Under 18)	0			

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HUD TABLE 5.1

<u>Grantee Name:</u> Program Year:	Expected Annual Number of Units To Be Completed	Actual Annual Number of Units Completed	Resources used during the period			
			CDBG	HOME	ESG	HOPWA
<u>BENEFICIARY GOALS</u> (Sec. 215 Only)						
Homeless households	1		<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>
Non-homeless households	36		<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>
Special needs households	1		<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>
Total Sec. 215 Beneficiaries*	38		<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>
<u>RENTAL GOALS</u> (Sec. 215 Only)						
Acquisition of existing units	0		<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Production of new units	20		<input type="checkbox"/>	X		<input type="checkbox"/>
Rehabilitation of existing units	10		<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>
Rental Assistance	0		<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Total Sec. 215 Affordable Rental	30		<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>
<u>HOME OWNER GOALS</u> (Sec. 215 Only)						
Acquisition of existing units	0		<input type="checkbox"/>			
Production of new units	3		<input type="checkbox"/>	X		
Rehabilitation of existing units	0		<input type="checkbox"/>	<input type="checkbox"/>		
Homebuyer Assistance	5		<input type="checkbox"/>	X		<input type="checkbox"/>
Total Sec. 215 Affordable Owner	8		<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>
<u>COMBINED RENTAL AND OWNER GOALS</u> (Sec. 215 Only)						
Acquisition of existing units	0		<input type="checkbox"/>			<input type="checkbox"/>
Production of new units	23		<input type="checkbox"/>	X		<input type="checkbox"/>
Rehabilitation of existing units	10		<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>
Rental Assistance	0		<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Homebuyer Assistance	5		<input type="checkbox"/>	X		<input type="checkbox"/>
Combined Total Sec. 215 Goals*	38		<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>

**2014 HOME CONSORTIUM ANNUAL PLAN
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OVERALL HOUSING GOALS (Sec. 215 + Other Affordable Housing)	Expected Annual Number of Units To Be Completed	Actual Annual Number of Units Completed	CDBG	HOME	ESG	HOPWA
Annual Rental Housing Goal	30		<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>
Annual Owner Housing Goal	8		<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>
Total Overall Housing Goal	38		<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>

Areas with Concentration of Racial/Ethnic Minorities and/or Low Income Families

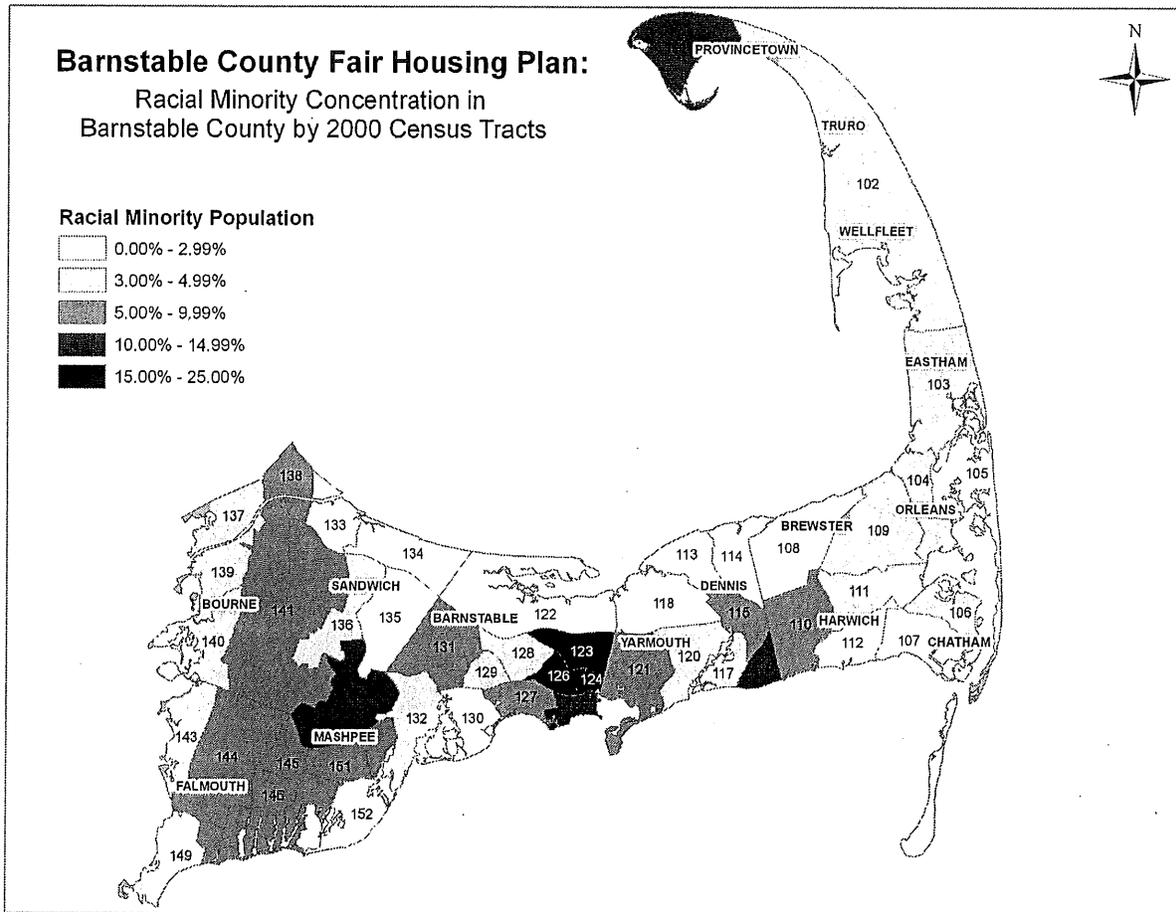
As noted in the 2009 Barnstable County HOME Consortium Fair Housing Plan, Barnstable County is generally characterized by the fact that both racial and ethnic minorities and also low-income households are scattered throughout the region.

The HOME Consortium defines an area of racial/ethnic concentration as a census tract with a population of at least 2,000 that has more than three (3) times the percentage of minorities as exists in the region. As the minority population in the region in the 2000 Census was 6.6%, any census tract that has a minority percentage of 20% or more will be defined as one of racial/ethnic concentration. One Hyannis census tract -124- meets that criterion. See attached map (note that census tract 123's total population was 585 and 126's minority population was 19.15%).

The HOME Consortium defines an area of low income concentration as a census tract with a population of at least 2,000 people that has a median family income that is less than 50% of the regional median income. According to the 2000 Census, one Hyannis census tract -124- meets that criterion.

Therefore, any new construction rental projects that request HOME funds in census tract 124 must satisfy the criteria in CFR 983.57(e)(3) in order to be eligible for funding.

2014 HOME CONSORTIUM ANNUAL PLAN MAY 12, 2014



Source: 2009 Barnstable County HOME Consortium Fair Housing Plan

**2014 HOME CONSORTIUM ANNUAL PLAN
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APPENDIX F. CERTIFICATIONS

Attached are the Application for Federal Assistance (SF-424) and the required certification forms.

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- Preapplication
- Application
- Changed/Corrected Application

*** 2. Type of Application:**

- New
- Continuation
- Revision

*** If Revision, select appropriate letter(s):**

*** Other (Specify):**

*** 3. Date Received:**

4. Applicant Identifier:

DC-25-0217

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:**

Barnstable County

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

04-6001419

*** c. Organizational DUNS:**

0766124070000

d. Address:

*** Street1:**

3195 Main Street

Street2:

P.O. Box 427

*** City:**

Barnstable

County/Parish:

Barnstable

*** State:**

MA: Massachusetts

Province:

*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

02630-0427

e. Organizational Unit:

Department Name:

Cape Cod Commission

Division Name:

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

Prefix:

Mr.

*** First Name:**

Paul

Middle Name:

*** Last Name:**

Ruchinskas

Suffix:

Title:

Affordable Housing Specialist

Organizational Affiliation:

Cape Cod Commission

*** Telephone Number:**

508-362-3828

Fax Number:

508-362-3136

*** Email:**

pruchinskas@capecodcommission.org

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME Investment Partnerships Program

*** 12. Funding Opportunity Number:**

* Title:

13. Competition Identification Number:

Title:

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

Barnstable County

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Annual HOME allocation to create and preserve affordable housing for the region's low income households.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

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

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="404,552.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text" value="40,000.00"/>
* g. TOTAL	<input type="text" value="444,552.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

- Yes No

If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title: 

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative: * Date Signed:

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

BARNSTABLE COUNTY COMMISSIONERS



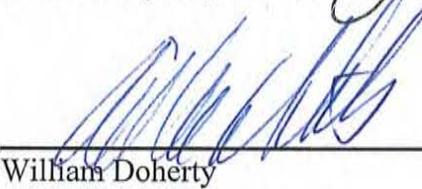
Mary Pat Flynn, Chair

5/14/14

Date



Sheila R. Lyons, Vice-Chair



William Doherty

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

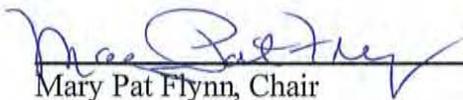
Tenant Based Rental Assistance -- If the participating jurisdiction intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the participating jurisdiction's consolidated plan for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

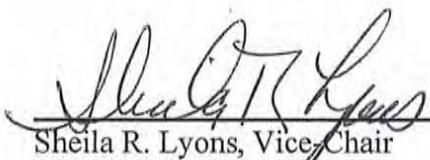
Eligible Activities and Costs -- it is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in § 92.214.

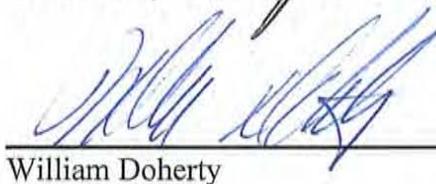
Appropriate Financial Assistance -- before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

BARNSTABLE COUNTY COMMISSIONERS


Mary Pat Flynn, Chair

5/14/14
Date


Sheila R. Lyons, Vice-Chair


William Doherty

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING:

A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.