

CITY OF BOSTON

DRAFT CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT (CAPER)

PROGRAM YEAR 2021: 7/1/21 to 6/30/22
Issued for Public Comment on 12/01/22



Flat 9 at Whittier in Lower Roxbury, 92 Mixed-Income Rental Units

City of Boston
Michelle Wu, Mayor

Mayor's Office of Housing
Sheila A. Dillon, Director



**CITY OF BOSTON
Program Year 2021 CAPER**

TABLE OF CONTENTS

Page #	Section
1	Introduction
2 - 9	CR-05 Goals and Outcomes
10 - 11	CR-10 Racial and Ethnic Composition
12 - 18	CR-15 Resources and Investments, Leveraging + HOME Match
19 - 23	CR-20 Affordable Housing
24 - 30	CR-25 Homeless and Other Special Needs
31 - 34	CR-30 Public Housing
35 - 43	CR-35 Other Actions
44 - 45	CR-40 Monitoring & Citizen Participation
46	CR-45 CDBG
47 - 48	CR-50 HOME
49 - 50	CR-55 HOPWA
51 - 52	ESG
	Appendix

Introduction

Boston receives four annual formula funding allocations from the Department of Housing and Urban Development (HUD) that vary from year to year due to the amount of funds appropriated by Congress, and changes in the census data used to compute the formula allocations. As a condition of receiving the four funding allocations: 1) Community Development Block Grant (CDBG), 2) HOME Investment Partnership (HOME), 3) Housing Opportunities for Persons With AIDS (HOPWA) and 4) Emergency Solutions Grant (ESG) funds, HUD requires Boston to submit an annual Action Plan (budget) that details how the funds will be used to address priority housing and community development needs for each year of our 5-Year Consolidated Plan. At the end of each plan year, HUD requires a Consolidated Annual Performance and Evaluation (CAPER) report detailing actual accomplishments.

This Program Year (PY21) CAPER report is for year 4, running from 7/1/21 to 6/30/22. HUD provides a required template for producing the report directly within HUD's Integrated Disbursement and Information System (IDIS). Once approved, this PY21 CAPER will be downloaded from the information entered to IDIS and posted on MOH's webpage ([CAPER Reports](#)). The report contains general accomplishments, program specific reporting and an appendix of information detailing activities. Note that the CAPER only reports data on completed projects that received one of the four HUD funding sources. It does not capture projects that the City funded with other resources - these are shown in the Appendix.

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a). This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The accomplishments detailed in Tables 1 reflect the completed projects and activities entered into HUD’s Integrated Disbursement and Information System (IDIS) system during the program year. The completed projects in IDIS are a subset of all the Mayor’s Office of Housing (MOH) activity because the CAPER does not report on projects for which funds have been budgeted and have not yet been set up in IDIS or projects that remain “active” at the end of the program year on June 30. This is often the case for larger scale housing development projects that often span 2-3 program years from commitment of funds to final completion and project closeout.

Table 1 summarizes the actual accomplishments during the PY21 plan year compared with the proposed accomplishments as listed in the Action Plan for PY21. The “proposed accomplishments” represent the number of units of output (housing units, jobs, etc.) expected to result from funding commitments made during the reporting period. These proposed accomplishments include projects or programs assisted with CDBG, HOME, HOPWA, ESG or other funding sources. Many projects are funded with more than one funding source, so it is generally not meaningful to report accomplishments separately for each funding source. For example, in addition to the HUD formula allocations (27% of budget), MOH’s departmental budget of \$188 million for PY21 includes \$41 million in HUD and EPA competitive grant funds; plus \$13.5 million in COVID-19 assistance and \$56.6 million in City funds to allocate to programs and activities. All of the HUD funded programs are either targeted directly to low and moderate-income persons or to geographic areas with a majority of low and moderate-income persons.

Many HUD funded programs met or exceeded the estimated goals. To highlight a few: MOH increased ESG funding for Street Outreach and Homeless Prevention and assisted 71% more persons than projected. The Wu administration committed to expanding opportunities for homeownership for Boston residents yielded results as MOH assisted 141 first-time homebuyers, an increase of 51 homebuyers from the projected 90.

Other HUD funded programs fell short of the PY21 projections. For example, the senior home repair and lead paint abatement programs resumed interior work in private homes after a long pause due to COVID-19 concerns. Other in-person programs (home buying classes and technical assistance workshops) pivoted to virtual meetings but had not yet returned to their pre-COVID service levels. The small business programs in the Mayor's Office of Economic Opportunity and Inclusion addressed the immediate needs of local businesses and paused the larger workshop schedule that is typically offered throughout the program year.

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

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expect Strategic Plan	Actual – Strategic Plan
Abate Brownfields Sites for Redevelopment	Test and remediate brownfield sites	CDBG: \$518,344	Assessments or remediation tasks	Other	50	57
Demolish Blighted Buildings	Demolition	CDBG: \$260,120	Buildings Demolished	Buildings	As needed	
Essential Services to Unsheltered Homeless	Homeless	ESG: \$1,461,960	Street Outreach + Homeless Prevention	Persons Assisted	220	377
Expand Fair Housing Choice	Public Service - fair housing access	CDBG: \$496,716	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2000	2000
Housing Related Services to Homeless	Homeless	CDBG: \$316,956	Housing for Homeless added	Household Housing Unit	1800	1800
Improve Access to Affordable Owner Housing	Affordable Housing	CDBG: \$712,394	Direct Financial Assistance to Homebuyers	Households Assisted	90	141
Improve Neighborhood Storefronts	Non-Housing Community Development	CDBG: \$1,063,309	Facade treatment/business building rehabilitation	Business	80	12
Improve quality existing affordable rental housing	Affordable Housing	CDBG: \$8,335,599	Rental units rehabilitated	Household Housing Unit	62	86

City of Boston, Program Year 2021 CAPER: July 1, 2021 to June 30, 2022

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expect Strategic Plan	Actual – Strategic Plan
Improve quality of neighborhood facilities	Non-Housing Community Development	CDBG: \$679,843	Other	Other	30	17
Improve the quality of owner housing	Affordable Housing	CDBG: \$4,473,908	Homeowner Housing Rehabilitated	Household Housing Unit	940	653
Increase Housing Options for HIV/AIDS	Non-Homeless Special Needs	HOPWA: \$5,144,494	Housing for People with HIV/AIDS added	Household Housing Unit	70	87
Increase self-sufficiency low-income residents	Public Service	CDBG: \$2,677,399	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	4000	3155
Increase supply of affordable housing	Affordable Housing	CDBG: \$1,146,866; HOME \$10,939,204	Rental units constructed	Household Housing Unit	975	830
Increase supply of lead safe housing	Affordable Housing	CDBG: \$270,015	Homeowner Housing Rehabilitated	Household Housing Unit	60	29
Maintain City-owned building and lots	property management	CDBG: \$238,292	Other	Other	As needed	
Prevent Loss of Subsidized Housing Stock	Affordable Housing	CDBG: \$161,282	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	2000	1012
Provide business technical assistance	Non-Housing Community Development	CDBG: \$860,282	Businesses assisted	Businesses Assisted	700	349

City of Boston, Program Year 2021 CAPER: July 1, 2021 to June 30, 2022

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expect Strategic Plan	Actual – Strategic Plan
Provide Housing Stabilization Services	Housing Stability Services	CDBG: \$910,375	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	625	740
Provide technical assistance to owners and renters	Affordable Housing	CDBG: \$755,895	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	4000	2000
Reduce inventory of land + buildings	Sell surplus building and land	CDBG: \$20,000	Other	Other	70	31
Revitalize Business Districts	Non-Housing Community Development	CDBG: \$1,572,719	Jobs created/retained	Jobs	250	424
Support CHDOs	Operating Support	HOME: \$280,662	Other	Other	As Eligible	
Support Development Community Gardens	Public Facilities	CDBG: \$628,823	Other	Other	4	4

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

The primary uses of the CDBG funds are affordable housing development and rehabilitation (69%), public services (18%), economic development (8%) and public facilities (5%).

While there were no significant changes in program objectives this year, the continuation of the COVID-19 pandemic and negative impacts on labor and

construction materials impacted our “planned” program’s accomplishments.

The overall low-mod benefit for the CDBG program for PY21 has not yet been calculated in the HUD system at the time of posting this draft for public comment. However, Boston’s overall low-mod benefit averaged 98% for the last three program years greatly exceeding the overall 70% low-mod benefit requirement. For a snapshot of housing related accomplishments in calendar year 2021, follow this link: <https://www.boston.gov/news/january-2022-latest-updates-mayors-office-housing>

During the program year, 642 low-income (non-elderly) units were permitted. Of those 642 units, 337 are designated for extremely low-income households (including homeless). Another 253 units were permitted for elderly low-income households, and 689 income-restricted units were permitted for middle-income households. With respect to income-restricted units completed during the program year by household income: 42 homeless, 88 extremely-low, 72 very-low, 308 low- to moderate-income, and 89 units serving households at 81% to 100% of median income.

The greatest obstacles faced by the City in addressing underserved housing and community development needs are:

- a) the high prices of homes offered for sale are beyond the reach of most low- and moderate-income residents and even many middle-income residents. This obstacle is addressed with homebuyer assistance and offering below market homes for sale on city-owned land, to name two. As a result, a total of 141 first-time homebuyers received down payment and/or closing cost assistance during the program year. We assisted 57 more buyers than the previous program year with a combination of \$2 million dollars of federal and local funds.
- b) Market rents are not affordable for lower-income residents, especially those with extremely low incomes. We support the creation or rehab of affordable rental units in our NHD division. As a part of this, the City requires a set aside of units for those who have experienced homelessness.
- c) The lack of operating subsidies makes it difficult to finance the development of housing that is affordable to very low and extremely low-income households,

and state and federal resources to address these needs are insufficient to meet the need. \$56 million in local funding sources such as the Inclusionary Development Fund (IDF), HB2030, and City Operating funds were included in the PY21 Action Plan budget to expand upon our federal and state funding.

In April 2022, Mayor Wu committed \$380 million to address housing affordability and stability over three years. The plans call for increasing the stock of affordable properties in Boston and assisting families that want to purchase homes in a very competitive market. Details on those plans are posted here:

<https://www.boston.gov/news/106-million-investments-proposed-homeownership-programs-boston-residents>

Approximately \$4 million in CDBG funds support neighborhood businesses in the **Mayor's Office of Economic Opportunity and Inclusion** under these programs:

The **Economic Development Center** conducted several large-scale workshop series this year, including a collaboration with SOAR (Street Outreach, Advocacy and Response) to provide over 50 hours of business classes to former gang members. We also held our first ever Grow Boston Cohort with 15 business owners growing and scaling their businesses in over 100 hours of classroom instruction. We conducted a two-part workshop series on worker-owned cooperatives, branding for English-language learners, a legal workshop, a certification workshop, and an in-depth training for Boston Main Street directors and board members. These training sessions were recorded and made available on our website so they can continue to serve our constituents long after the live session ended. Of the registered attendees of these workshops, over 80% identified as women, immigrants, or minority owned businesses.

The **ReStore Boston** program helps neighborhood businesses and property owners with storefront improvements, professional design services and signage. The Restore Program completed 18 projects and the Design Services program completed 2 projects falling well short of our projection to assist 80 businesses. Though they have shown much resilience surviving over the last couple of years, many small business owners remain in post-pandemic recovery working to build

back to pre-pandemic numbers. Businesses that would typically be interested in investing in their storefronts through our program decided instead to invest in other areas, or didn't have the financial capacity for such projects. Furthermore, our program lost a staff member which decreased our ability to take on our usual volume of projects. In the coming program year, we plan to assist 40 businesses with our Restore and/or Design Services by adding staff and making programmatic adjustments.

The **Boston Main Streets** program had 18 active Districts during the program year; 14 Main Streets primarily serve low to moderate-income neighborhoods and are funded with CDBG dollars, the remainder are funded with local resources. In total 2,407 businesses received assistance, 91 new businesses opened and 424 local jobs were created. In the upcoming program year 2022, the team at the Mayor's Office of Economic Opportunity and Inclusion will work to make sure all Districts are running and well-supported.

The **Neighborhood Business Access Loan (NBA)** provided \$80,000 to two small food businesses. NBA loans are targeted to businesses that do not typically have access to traditional bank loans to achieve their business and life goals.

CR-10 - Racial and Ethnic composition of families assisted. Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

Race & Ethnicity	CDBG	HOME	HOPWA
Number of Households by Race & Ethnicity			
American Indian or American Native	0	0	1
Asian	11	0	1
Black or African American	119	23	103
White	31	8	71
Other multi-racial	37	7	9
TOTAL	198	38	185
Hispanic	23	17	43
Not Hispanic	175	21	142

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

Narrative

The data of households assisted with housing (CDBG & HOME) is from IDIS report PR23 for housing activities. CDBG funds served 198 households: 60% Black or African American, 19% other multi-racial, 16% White and 6% Asian. 12% of the households' report to be of Hispanic origin. The HOME funded housing units completed in PY21 served 38 households: 23 Black or African American, 8 white and 7 other multi-racial. 45% of the households served reported to be of Hispanic origin.

The total number of persons assisted during program year 2021 using **ESG** funding is entered into another HUD reporting system (Sage). ESG funds served 377 persons with street outreach efforts and 938 households (1382 persons) with homeless prevention.

The total number of persons living with HIV/AIDS receiving housing assistance during program year 2021 is 185 as shown in the table above.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

HUD CPD Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	\$31,237,789	\$17,893,334
HOME	public - federal	\$10,959,142	\$3,959,701
HOPWA	public - federal	\$3,089,167	\$309,648
ESG	public - federal	\$1,506,611	\$994,254

Table 2 - Resources Made Available

Narrative

The table above summarizes the PY21 HUD resources that were available for the program year. At the outset of PY21, we projected \$49.8 million to be available in HUD/CPD funds. This total includes the allocation for the program year, funds remaining from earlier program years and any program income (loan repayments) expected. Based on the IDIS PR06 *Summary of Consolidated Plan Projects* report, we committed a total of \$37.1 million and expended a total of \$23.2 million in HUD/CPD funds in PY21. Any remaining funds from the 4 HUD/CPD sources (CDBG, HOME, HOPWA and ESG) will be drawn as projects progress from start to finish. For example, larger scale housing development projects often span more than one program year and budget cycle. HUD allows grantees more than one year to spend funding, the bulk of funds spent during one, 12-month program year are often from grant monies awarded from 2 or more prior program years. The HOPWA program allows grant funds to be spent over three years and the ESG program rule is to spend the funds in two years.

FEDERAL COVID GRANTS AND AWARDS SUMMARY MOH is working hard to operationalize substantial funding from the Federal government and to ensure that it supports an equitable recovery from the COVID-19 pandemic. Below is a brief summary. More details and reports are posted here:

<https://www.boston.gov/news/american-rescue-plan-projects>

CARES Act funds are targeted to:

\$28.5 million in Emergency Solutions Grants (ESG) funding, to help reduce the spread of COVID in congregate shelters, to de-densify shelters, and to help move unhoused individuals from shelter into housing.

\$20 million in Community Development Block Grant (CDBG) funds for the preservation and production of affordable housing.

\$450,000 in Housing Opportunities for Persons with AIDS (HOPWA) funds, to assist current providers of housing for persons with AIDS with operational costs related to COVID.

The **Consolidated Appropriations Act** provided \$20.9 million that supports the rental relief program, \$8.8 for permanent affordable housing, \$3.7 for mortgage relief and \$1.4 to address street homelessness.

The **American Rescue Plan (ARPA)** helps to address both direct impacts of COVID-19 and the previously existing economic conditions worsened by the pandemic. MOH is utilizing ARPA funds for the following:

- \$60 million to support homeownership;
- \$33 million to invest in public housing improvements to improve air quality and increase efficiency;
- \$30 million to create affordable rental housing;
- \$27 million towards the Acquisition Opportunity Program (AOP), combating displacement of renters;
- \$20 million for energy improvements in deed-restricted affordable housing;
- \$36 million temporary shelter sites and permanent supportive housing;
- \$30.1 million in Rental Relief Funds; and
- \$20.6 million in HOME Investment Partnership funds for supportive housing and rental assistance

Identify the geographic distribution and location of investment

Most of the City's housing and community development programs are available city-wide, except for programs such as Main Streets, which serve designated neighborhood business districts, and the Housing Opportunities for Persons with AIDS (HOPWA) program, which is available throughout a wider three-county service area (Suffolk, Plymouth and Norfolk Counties). Lead Hazard Control Grant funds are available citywide, but are prioritized for areas with high numbers and percentages of children with elevated blood lead levels. All of the HUD funded programs are either targeted directly to low- and moderate-income persons or to geographic areas with a majority of low- and moderate-income persons living.

There were 18 active Boston Main Streets commercial business districts in PY21, 14 of which are CDBG funded with the remaining districts funded with non-federal resources. In PY21, more than 2,407 businesses received assistance, 91 new businesses opened and 424 local jobs were created, all during the continuing pandemic. The average storefront occupancy rate in the Main Street districts remained at 95%.

CDBG Neighborhood Revitalization Strategy Area (NRSA): We have one designation during PY21-- the Boston Housing Authority's Whittier Choice target area is designated as an NRSA through the end of the grant period, 9/30/2023. The City committed a total of \$1.6 million in CDBG funds to BHA's Whittier Choice project. See section CR-30 of this report for more details on Whittier.

Opportunity Zones are Massachusetts designated census tracts offering federal tax incentives for businesses that invest in those areas and create jobs and economic activity. Boston has 13 census tracts designated in April 2018 as "Opportunity Zones"; see map #6 in the Appendix for the locations.

The maps in the appendix show the geographic distribution and locations of the projects assisted under each of our major housing and community development programs during these four years of our 5-year Consolidated Plan. Note that

newly constructed projects and projects that combine multiple parcels may not show on the map if they have not yet been assigned parcel identification by the Assessing Department. These maps are updated throughout the 5-year Consolidated Plan.

Map 1: Homeowner Rehabilitation & Lead Paint Abatement

Map 2: Homebuyer Financial Assistance

Map 3: Affordable Housing Production and Preservation Projects

Map 4: Economic Development Programs

Map 5: Partners with Nonprofits (PNP & Grassroots

Map 6: Opportunities Zones and Whittier Choice Target Area

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

The ESG program requires that grantees match the funding received from HUD and is documented in their application for ESG funds.

Housing Development: During PY21, MOH completed construction on 24 housing projects with 864 total units of housing comprising 772 rentals and 92 ownership units. MOH provided \$39.4 million in funding including \$15.9 million in CDBG and HOME funds, and leveraged \$376 million in additional private, state, and other federal financing.

Homebuyer Assistance leverages substantial amounts of private mortgage financing with its down payment and closing cost assistance program. The City used a combination of CDBG and local funding sources to help 141 homebuyers with an average down payment assistance of \$14,523. The City's assistance in PY21 totaled \$2 million and leveraged \$35.8 million in private (bank) financing. Every \$1 in financial assistance leveraged \$17.50 in private investment.

Public Land: Boston strives to expand affordable housing opportunities and employment opportunities utilizing strategic land acquisition, site assembly and disposition. During PY21, 31 parcels and 2 buildings totaling more than 300,000 square feet were sold for redevelopment. When these twelve projects are complete, a total of 212 housing units will be created (167 rentals and 45 ownership) of which 147 (69%) will be for households earning up to 60% of the area median income.

The Grassroots program is another example where vacant city-owned land supports the development of community gardens, urban farms and community-owned open spaces by neighborhood groups and nonprofits. In February, 2021,

Mayor Wu announced the creation of GrowBoston: Office of Urban Agriculture. The new office is within the Housing Cabinet and works to increase food production throughout Boston; develop and implement innovative food production strategies; provide technical assistance to prospective and existing gardens and farms; develop food production resources for gardeners, farmers, and other residents; and coordinate with other City departments to expand citywide urban agriculture. GrowBoston also contributes to Boston's efforts to mitigate and adapt to climate change while addressing injustices inherent in the current food system.

In PY21, four new gardens completed construction and three additional gardens received funding commitments. Almost \$1 million dollars is leveraged in private funds for the public investment of \$945,000. Additionally, capital improvements were completed at two gardens and funded at two others. Of the projects with funds committed in PY21, two (Whittier Street and Charlestown Sprouts) were funded through a funding RFP (open November 2021 - May 2022) for capital improvements to urban farming, community gardening and other open space projects. Seven other projects around the city of Boston were selected and will be funded in the future. The three other projects funded in PY21 are the result of years-long community engagement processes that reached the funding stage at the same time. Please see the Grow Boston / Grassroots report in the Appendix.

HOME: The table below collects information regarding Boston’s compliance with match requirements. Boston satisfies the HOME match requirement through affordable housing rental vouchers issued by the Commonwealth of Massachusetts

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	\$7,761,026
2. Match contributed during current Federal fiscal year	0
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	\$7,761,026
4. Match liability for current Federal fiscal year	0
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	\$7,761,026

Table 3 – Fiscal Year Summary - HOME Match Report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at beginning of reporting period	Amount received during reporting period	Total amount expended during reporting period	Amount expended for TBRA	Balance on hand at end of reporting period
\$	\$	\$	\$	\$
\$4,236,737	\$1,776,081	\$0	\$0	\$6,012,818

Table 7 - HOME Program Income

CR-20 - Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	63	100
Number of Non-Homeless households to be provided affordable housing units	866	775
Number of Special-Needs households to be provided affordable housing units	84	87
Total	1,013	962

Table 6 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	84	87
Number of households supported through The Production of New Units	725	751
Number of households supported through Rehab of Existing Units	91	86
Number of households supported through Acquisition of Existing Units	113	38
Total	1,013	962

Table 7 – Number of Households Supported

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

The “One-Year Goal” counts in the table above are from the Affordable Housing (AP-55) section of the PY21 Action Plan. The “Actual” counts are from MOH’s Neighborhood Housing Development (NHD) completed construction projects report (in the Appendix). It is important to note that the one-year goals reflect commitments to an estimated number of housing units. The majority of these housing units are produced over multiple program years as planned developments secure funding and proceed to construction and eventually completion. Further, the HUD funding sources used for housing activities (CDBG and HOME) are combined with local resources such as Neighborhood Housing Trust (NHT), Inclusionary Development (IDP), Community Preservation Act (CPA), and Housing Boston 2030 funds to make a project financially possible. Below are details about the type of household supported and the type of assistance provided to each household.

Number of **homeless households** to be supported: A total of 100 units of housing designated for the homeless completed construction in PY21, another 46 units received commitments of funding as shown in the Neighborhood Housing Division production reports in the Appendix. Rental developments with 10 units or more must set-aside at least 10% of units for homeless households.

Number of **non-homeless households** to be provided affordable housing units: A total of 775 units were completed. These units are a combination of projects in the Acquisition Opportunity Program (AOP) and units created through our Neighborhood Housing Development (NHD) division. Another 763 income-restricted units received funding commitments in PY21.

Number of **special-needs households** to be provided affordable housing units: The housing units for special needs households are reported in the HOPWA (Housing Options for Person with AIDS) CAPER, 87 households were provided

housing subsidy assistance and 98 households received short term rental, mortgage or utility assistance.

Number of households supported through **Rental Assistance**: 87 HOPWA units were provided rental assistance in PY21.

Number of households supported through the **Production of New Units**: 713 new units completed construction in PY21.

Number of households supported through **Rehab of Existing Units**: 86 units were rehabbed; all are affordable to households at or below 80% of AMI.

Number of households supported through **Acquisition of Existing Units**: The AOP program completed 7 projects with 38 total units. In addition, MOH provided direct financial assistance to 141 first-time homebuyers to purchase an existing home in Boston.

Discuss how these outcomes will impact future annual action plans.

The primary focus of each of Boston's Annual Action Plans (and associated 5-Year Consolidated Plan) is affordable housing. This is both because affordable housing is one of the most important challenges facing the City and its residents and because the HUD resources covered by the Plan are primarily resources for affordable housing. The housing element of the Plan was built on the City's broader housing strategy *Housing a Changing City: Boston 2030*, which was completed in 2014 and updated in 2018. *HB2030* plan set goals for housing production, including income-restricted housing designed to be affordable to a range of incomes, plans for strategic growth that preserve and enhance existing neighborhoods, and new focus areas on preventing displacement, increasing homeownership, and promoting fair and equitable access to housing.

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

Number of Households Served	CDBG	HOME
Extremely Low-income (0%-30%)	26	30
Low-income (31%-50%)	61	6
Low/Moderate-income (51%-80%)	20	2
Total	107	38

Table 8 – Number of Households Served

Narrative Information

The overall low-mod benefit for the CDBG program for PY21 has not yet been calculated in the HUD system at the time of posting this draft for public comment. However, Boston’s overall low-mod benefit averaged 98% for the last three program years greatly exceeding the overall 70% low-mod benefit requirement.

Housing Permits: During the program year, 642 low-income (non-elderly) units were permitted. Of those 642 units, 337 are designated for extremely low-income households (including homeless). Another 253 units were permitted for elderly low-income households, and 689 units were permitted that are income-restricted for middle-income households. With respect to units completed during the program year by household income: 42 were for the formerly homeless, 88 extremely-low income, 72 very-low income, 308 low to moderate income, and 89 units serving households at 81% to 100% of median income.

The greatest obstacles faced by the City in addressing underserved housing and community development needs are: a) the high prices of homes offered for sale are beyond the reach of most low and moderate income residents and even many middle-income residents. This obstacle is addressed with homebuyer assistance

and offering below market homes for sale on city-owned land, to name two. b) Market rents are not affordable for lower-income residents, especially those with extremely low incomes. We support the creation or rehabilitation of affordable rental units in our NHD division. And, require a set aside of homeless units. C) The lack of operating subsidies makes it difficult to finance the development of housing that is affordable to very low and extremely low-income households, and state and federal resources to address these needs are insufficient to meet the need. \$56 million in local funding sources such as the Inclusionary Development Fund (IDP), HB2030, and City Operating funds were included in the PY21 Action Plan budget to expand upon our federal and state funding.

With local dollars, the city created 15 housing opportunities for youth homeless, for a total of 287 new housing opportunities, 100% of the set goal of 285 units. Rental developments with 10 units or more must set-aside at least 10% of units for homeless households. With respect to persons with disabilities, MOH requires that at least 10% of the units in new construction projects of 4 or more units, have universal design principles to meet the needs of residents with specific needs. Rental developments with 10 units or more must set-aside at least 10% of units for homeless households.

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

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through: Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The COVID-19 public health emergency required CoCs to coordinate a nimble communication structure to ensure lifesaving resources were deployed quickly to those most at risk of an adverse outcome from COVID-19. Boston, like many other communities, received an influx of federal funding through the CARES Act, including ESG-CV. The Mayor's Office of Housing (MOH) serves as the Collaborative Applicant for the CoC, the lead agency responsible for the development of the Consolidated Plan and is the recipient for Boston's ESG allocation. Having these responsibilities centralized within one agency allowed for swift solicitation of input from the CoC and ESG stakeholders on the initial deployment of ESG-CV and as the pandemic has evolved, MOH has continued to consult with stakeholders on new investment in emerging areas of need. Most recently, the community advised that additional ESG-CV investment to support the City's overall street homelessness response strategy was needed to ensure housing pathways, including non-congregate emergency housing and rapid rehousing for unsheltered individuals in the Mass. Ave and Melnea Cass Blvd encampment. MOH recently received an additional award of reallocated ESG-CV funds and is soliciting input and planning on how to best target this new resource. In addition, the Boston CoC coordinated closely with the State's ESG investment efforts, to ensure optimal coordination of funding for Boston's providers.

As part of the scale up of its Front Door Triage system, the City invested additional local funding to increase capacity to provide an immediate housing problem-solving conversation with new guests entering emergency shelters. With the onset of COVID-19, Front Door Triage became a critical component of the CoC's Coordinated Entry System. As crowded congregate shelters had to quickly de-

densify to achieve COVID-safer occupancy levels, Front Door triage was charged with stemming inflow to the City's large emergency adult shelters. Two of the City's large emergency shelters remained open during the initial public health emergency, while others closed their doors to new guests. All guests presenting for emergency shelter were assessed and triaged by Front Door staff to problem solve and identify safe alternatives to entering shelter. If diversion was not possible, guests were provided with a bed. The City substantially increased its local investment in Front Door Triage and continues to fund workers at its two largest emergency shelter provider agencies, Pine Street Inn and Boston Public Health Commission, to grow our triage and diversion efforts.

To provide enhanced coverage to better assess and support the needs of people staying on the street, the City invested an additional \$165,000 into its Street Outreach contract. This investment allows for the team to provide dedicated, bi-lingual coverage in East Boston and additional outreach services in areas of the city that have seen an increasing street population, due to fears of COVID-19 in congregate shelter. The city also worked to ensure adequate day shelter/ drop-in locations, equipped with handwashing stations, sanitizer, food and PPE. In addition, the city embedded a national consulting group with expertise on ending homelessness among people sleeping on the street with our Street Outreach partners. Through this work, partners launched the Street to Home Initiative (S2H), a multi-year effort to house long-term, unsheltered individuals with high substance abuse, behavioral health, medical and disability needs. The Street-to-Home (S2H) outreach approach targeted 265 persons with severe service needs struggling with opioid use or persistent mental illness with a goal of housing 250 individuals over 2 years, and 237 individuals have been housed since July 2021. Mass Cass mitigation efforts using a public health and housing centered approach have reached 185 unsheltered persons through a continuum of low threshold emergency shelter with dedicated pathways to service-rich permanent housing, resulting in 154 low-barrier shelter and interim housing placements.

Families are assessed for Emergency Assistance (EA) using a common assessment tool at coordinated points of entry managed by the state. As part of that assessment families are offered assistance in Rapid Rehousing (RRH) funds that can be used for move-in costs or rental assistance for up to 12 months. The amount and type of assistance is based on a family's needs, which is determined through an assessment. Alternatively, all EA eligible families are entitled to enter State – funded emergency shelter. Additionally, the Boston Housing Authority committed to issuing 1,000 Housing Choice Voucher Program (HCVP) vouchers for families in shelter and unstably housed families with children in Boston Public Schools.

Addressing the emergency shelter and transitional housing needs of homeless persons

In fall of 2021, the Boston CoC embarked on a process to reimagine shelter. Steps of the process involved convening various stakeholders including people with lived experience, surveys, focus groups, and a planning meeting that resulted in a Shelter Transformation Action Plan. The Shelter Transformation Action Plan informs the City's efforts to end unsheltered homelessness, prevent the spread of infectious diseases, and transform the shelter experience. In January 2022, City leaders came together to clear Boston's largest encampment of over 200 residents using a humane, dignified response by standing up cutting edge low threshold shelters to give people a viable option to come inside. As a result, Boston established three new low threshold non-congregate shelters (Roundhouse, Envision, Shattuck Cottages) and one more low-threshold shelter that had semi-private spaces (Willows at Woods) as part of a larger effort to safely and effectively shelter highly vulnerable people sleeping in encampments at the epicenter of Boston's dual opioid and street homelessness crises in an area known as Mass/Cass. In total, there were six new low-threshold shelters with increased capacity of 131 non-congregate shelter beds plus 79 low-threshold beds in smaller congregate spaces for a total of 210 beds across the sites to serve this unsheltered population. These shelters promote radical acceptance of our new

shelter guests- they are staffed with nurses, harm reduction specialists, 24-hour care, sedation areas to monitor for overdose, available naloxone, and shelter policies that allow autonomy. The funding for these sites is a mix of Emergency Solutions Grants CARES Act (ESG-CV) and American Rescue Plan Act (ARPA) funds from both the City of Boston and the state of Massachusetts, as well as leveraged local funding to provide additional behavioral health and housing navigation services. While the low threshold models are extremely new, the City has seen great success: the majority of participants have stayed inside; people no longer sleep in the encampment; and housing navigation teams are deployed to assist everyone to move on to a housing pathway. In addition, Pine Street Inn has continued to operate an auxiliary non-congregate shelter that was created during the height of the COVID-19 pandemic to reduce the spread of the disease among highly vulnerable individuals; the non-congregate shelter at that site (formerly the Charles River Inn) serves up to 85 guests on any given night.

Permanent Housing:

The CoC continues to partner with the Boston Housing Authority (BHA) and the Department of Housing and Community Development (DHCD), the two largest public housing authorities in the City of Boston to administer a homeless admission preference. The BHA is the largest affordable housing provider in the CoC and has a long-standing partnership with the Boston CoC to adopt preferences for homeless populations in its public housing, project-based voucher (PBV) and housing-choice voucher (HCV) portfolios, including targeting the most vulnerable households through coordinated entry prioritization. BHA's Administration Plan gives a homeless priority across its portfolio and also has a long-term homeless preference for the entire PBV portfolio, which was created based on advocacy from the CoC. The BHA has also adopted a policy that households in all rapid rehousing (RRH) programs (regardless of funding source) maintain their homeless status and a Move-On strategy.

The BHA also has Memoranda of Agreement (MOAs) and relationships with numerous homeless, public health, hospital, and social services agencies to assure that families experiencing homelessness can access public housing units and tenant-based vouchers including: A Healthy Start in Housing (Boston Public Health Commission), Health Starts at Home (Boston Medical Center), HomeBase FastTrack (Metro | Housing Boston), Leading the Way Home, and the Family Unification Program (MA Dept. of Children and Families). Senior leadership from the CoC lead agency as well as the Coordinated Entry Operator team meet regularly with BHA senior leadership to review utilization, ensure smooth referrals from CoC agencies to BHA and monitor service match for the Emergency Housing Vouchers (EHV) as well as other partnerships related to Coordinated Entry. BHA is a leader in the CoC Housing and Stabilization Leadership group, the Street 2 Home initiative for people exiting street homelessness, and participates in the case conferencing work group and the veterans work group. While DHCD doesn't have an overall homeless preference for their portfolio, the Boston CoC has advocated for and partnered with DHCD for specific vouchers targeted to people experiencing homelessness, including through the Massachusetts Rental Voucher Program (MRVP) that provide both tenant-based vouchers and project-based vouchers which are used within City of Boston homeless set-aside units. The CoC provided a letter of support to both DHCD and BHA for Stability Vouchers.

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

As part of its Front Door Triage program, the city is assessing clients that present at shelter to determine if the client has any safe alternatives to shelter and, if so, make sure that client is reconnected to that housing option. In addition, the city

advocated with the state to institute stronger discharge protocols related to ensuring people leaving hospitals have support with housing, problem-solving rather than a direct discharge to a homeless shelter. In response, the state released new protocols and guidance in the spring of 2021. The city recognizes the enormous cost that unnecessary evictions of low-income households' place on systems of care, not to mention the trauma it inflicts on households. The City's Office of Housing Stability (OHS) focuses on homelessness prevention. The Boston CoC continues its partnership with non-profit providers and the Boston Housing Court, in working to prevent the eviction of low-income tenants from subsidized units.

Assisting Renters: In March 2022, Mayor Wu formed a Rent Stabilization Advisory Committee to guide development of a rent stabilization policy proposal for Boston. The Advisory Committee will make recommendations to the Mayor and the Mayor's Office of Housing on strategies to stabilize Boston rents and protect tenants from displacement. The Committee is made up of housing advocates, developers, tenants, and other stakeholders.

The Advisory Committee members are currently studying local housing conditions as well as the structure and outcomes of rent stabilization programs in other cities. They are tasked with making recommendations to the Mayor and the Mayor's Office of Housing on strategies to stabilize Boston rents and protect tenants from displacement. Based on the work of this committee, the goal is to shape a proposal for submission in the 2023 state legislative session.

As part of this work, MOH hosted five **Rent Stabilization Public Listening Sessions** as well as focused sessions with tenants, property owners, labor unions and workforce members. Rent Stabilization information is posted here:

<https://www.boston.gov/departments/housing/rent-stabilization>

MOH's Rental Relief Fund (RRF), operated by the Office of Housing Stability division, marked a two-year anniversary in April 2022. The RRF was established due to the financial strain caused by the COVID-19 pandemic. The RRF has

awarded \$36.7 million to almost 5,500 households across the city. Currently, to receive funds, Boston residents must have incomes at or below 50% of the area median income.

In addition to the Rental Relief Fund, MOH's Office of Housing Stability (OHS) established a robust court intervention program, as well as landlord mediation and virtual and walk-in legal clinics. OHS continues to work with all tenants and provides wraparound housing services and support.

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

The Boston CoC continues to make substantial investments in the build out of its Rapid Re-Housing system, including \$750k annually in local funds to sustain this intervention and target this resource to chronically homeless, long-term shelter stayers, families, and unaccompanied youth. The City also continues a highly collaborative and successful partnership with the Boston Housing Authority. The City is also working with its partners at the State level to explore coordination on the prioritization of resources for people experiencing homelessness.

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

Actions taken to address the needs of public housing

Primary responsibility for public housing and resident initiatives rests with the Boston Housing Authority (BHA) and is reported separately in the BHA's annual report to HUD: BHA Annual Plan which includes an attachment called the *5 Year Plan Progress Report* which provides an update on BHA's progress towards its goals. The BHA is the largest public housing authority in New England and the sixth largest in the nation. In total, BHA currently owns and/or oversees approximately 10,000 rental units of public housing in Boston and houses more than 17,000 people under the public housing program. The BHA owns 56 housing developments. Of the 56 developments, 32 are designated as housing for senior and residents with disabilities and 24 are designated for low-income families.

In addition to public housing, the BHA administers approximately 14,979 rental assistance vouchers, otherwise known as Tenant-Based Section 8 vouchers, that allow families to rent in the private market and apply a subsidy to their rent. Vouchers through the Massachusetts Rental Voucher (MRVP) Program assist an additional 867 households. With this assistance, residents are able to pay approximately 30-40 percent of their income toward rent and BHA pays the remainder. BHA helps provide housing to approximately 34,000 people under these programs. In addition, BHA provides subsidies to more than 2400 households under its Section 8 Project-Based Voucher and Moderate Rehabilitation programs.

The Public Housing Waiting List is open and has more than 40,000 applicants at this time. The Leased Housing Waiting List includes about 2,000 applicants at this time; however, it has been closed to all new applicants except the highest priority emergencies since 2008. In December 2020, the City of Boston announced the BHA's efforts to target 1000 Housing Choice Vouchers towards homeless families with children enrolled in Boston Public Schools.

Historically, housing authorities have been limited by the US Department of

Housing and Urban Development (HUD) to one payment standard, known as Fair Market Rent (FMR), for each metropolitan area. However, under new HUD regulations, Small Area Fair Market Rent (SAMFR) can be used by the BHA to adjust its payment standards for each zip code, more precisely matching the actual rental costs. As a result, families will now have the choice to rent in areas that have historically been unaffordable with a voucher. This change affirmatively furthers fair housing goals and takes steps towards deconcentrating voucher families by providing expanded housing choices in Boston and the surrounding areas. A chart of the current payment standards by zip code can be found here: <https://www.huduser.gov/portal/datasets/fmr/smallarea/index.html>

The BHA has a \$2 billion redevelopment pipeline, one of the most ambitious development initiatives in its 75-year history. The BHA has designated developer partners for one-to-one replacement of 4,300 units of distressed public housing, as well as for the creation of more than 5,000 new units of mixed income housing. The City of Boston and BHA are advancing plans to address the capital needs of the Mildred C. Hailey, Bunker Hill, and Mary Ellen McCormack federal family developments through a mix of public investment and public-private redevelopment partnerships. The City and BHA are also investing in repairs across the BHA's federal elderly/disabled portfolio and pursuing updates to these properties.

The Department of Housing and Urban Development's (HUD) Choice Neighborhoods Initiative awarded to the Boston Housing Authority and the residents of the Whittier Street public housing development a \$30 million Choice Neighborhoods implementation grant. The grant followed a three-year community engagement process involving resident meetings, neighborhood workshops, surveys, youth focus groups, and public hearings.

The \$30 million grant leverages an additional \$260 million in private and public funds to transform Whittier Street and the surrounding community by providing educational and economic opportunities for low-income residents and investing

in community amenities and infrastructure that will improve the quality of life for all residents in the lower Roxbury neighborhood.

The partnership is led by the Boston Housing Authority, the City of Boston, the Whittier Street Tenant Task Force, Madison Park Development Corporation, Preservation of Affordable Housing, and Dudley Street Neighborhood Initiative.

As a first phase of redevelopment of the Whittier property, 92 new apartments (known as Flat 9 at Whittier) were completed and occupied in early 2020. Phase 2 replaced a total of 80 units (one-for-one redevelopment plan). The third housing phase will provide 172 mixed income units and include 10,000 square feet of ground floor commercial targeted to local, small businesses. There are two public art installations planned for the Ruggles Street gateway that will be installed in conjunction with the Phase 3 housing project. <http://whittierchoice.org/>

The City provides support to selected programs serving public housing residents through its CDBG-funded human service programs; and provides CDBG, HOME or other funding to BHA redevelopment projects through the Rental Housing Preservation or the Rental Housing Production programs.

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

BHA activities to increase resident involvement include

1. the Resident Advisory Board which is a group of residents elected to represent and reflect the diversity of residents served by BHA and to advise on the development and implementation of the Annual Plan;
2. Local Tenant Organizations which are elected by their peers and represent residents in public housing developments and advocate for the needs of residents on all matters;
3. Section 8 Tenants Incorporated which works on behalf of leased housing participants on areas of education and resident rights and advocates for the needs of leased housing participants; and
4. the Resident Empowerment Coalition which is composed of residents and advocates.

With respect to homeownership, residents participating in the BHA's Section 8 Homeownership Voucher program are encouraged to enroll in MOH's homebuyer education and counseling programs and, upon completion of the program, are eligible to receive down payment and closing cost assistance from MOH if they are purchasing a home in Boston.

A recent initiative is BHA's *First Home* Program, a partnership with the City of Boston Mayor's Office of Housing where the City is providing eligible BHA residents with enhanced down payment assistance of up to \$75,000 for a home purchased within the City of Boston. This program is available to all BHA residents who purchase a home within the City of Boston. <https://www.bostonhousing.org/en/For-Section-8-Leased-Housing/Resident-Information/BHA-First-Home-Program.aspx>

Actions taken to provide assistance to troubled PHAs - Not applicable

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

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

Income- Restricted Housing in Boston

The Massachusetts Comprehensive Permit Law (Chapter 40B) aims for every municipality in the state to income-restrict at least 10 percent of its housing stock for low- and middle-income households. With 56,695 income-restricted housing units, Boston far surpasses this threshold and has one of the highest percentages of income-restricted units in the country, as 19.2 percent of all housing units, and 28 percent of all rental units are income-restricted. While individual neighborhoods are not subject to the state’s Chapter 40B law, which allows developers to seek special permits when a municipality does not have 10 percent of its units in income-restricted buildings, income-restricted units are distributed throughout the city, but some neighborhoods have much higher concentrations than others. Roxbury has the most income-restricted units as a percent of its total housing stock (54 percent), followed by Chinatown (50 percent), the South End (33 percent), and Charlestown (25 percent).

Eight neighborhoods do not meet the 10 percent threshold: Back Bay, Bay Village, Beacon Hill, Hyde Park, the Leather District, the Longwood Medical Area, the North End, and the South Boston Waterfront (Seaport).

Addressing high housing cost burdens has been at the center of every Boston housing plan since the repeal of rent control in the mid-1990s deregulated 22 thousand apartments occupied by low income and elderly tenants. Since 2014, MOH’s use of HUD funded housing programs has been guided by Boston’s comprehensive housing strategy, “Housing a Changing City: Boston 2030”

(HB2030), which was updated in 2018. This plan set goals for housing production, including income-restricted housing designed to be affordable to a range of incomes, plans for strategic growth that preserve and enhance existing neighborhoods, and new focus areas on preventing displacement, increasing homeownership, and promoting fair and equitable access to housing. As of December 2021, we have produced 82% (4,118 units) of the low-income housing target of 5,043 units.

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

The greatest obstacles faced by the City in addressing underserved housing and community development needs are:

- a. the high prices of homes offered for sale are beyond the reach of most low and moderate income residents and even many middle-income residents;
- b. market rents are not affordable for lower-income residents, especially those with extremely low incomes;
- c. lack of operating subsidies make it difficult to finance the development of housing that is affordable to very low and extremely low-income households and
- d. state and federal resources have not grown with the needs.

During the program year, Boston continued to advocate for additional funding for federal programs such as CDBG, HOME, for rental assistance programs such as HOPWA, Shelter Plus Care and Section 8, and for State programs such as the Affordable Housing Trust, the Housing Stabilization Program and the Mass. Rental Voucher Program. MOH aggressively pursued all available resources for housing and community development.

In total, CDBG and HOME funds support 12 housing and homeless programs. In addition, CDBG funds support our economic development, public service and property management programs. Both HOME and CDBG-funded housing

activities provide significant benefits to the lowest income levels. The HOME program reaches a lower-income population because the program is primarily used for development of new housing in conjunction with Low Income Housing Tax Credits and Section 8 subsidies.

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

MOH's Boston Home Center (BHC) administers Boston's nationally recognized Lead Safe Boston (LSB) program. The program utilizes federal, state and homeowner funds to assist the abatement of lead hazards in existing housing. MOH was awarded a \$4.3 million dollar grant with a start date of January 2, 2020 from HUD's Office of Lead Hazard Control and Healthy Homes to abate 200 privately owned units over 42-months. In partnership with HUD, since its inception of the lead hazard programs in 1994, LSB has been directly responsible for the abatement of over 3000 housing units in Boston.

Due to COVID, a grant extension of 6 months was negotiated with HUD in May 2022 to meet production goals impacted by COVID. A total of 51 units were completed during this program year below the program goal of 60 units. The COVID- 19 pandemic continues to impact production with some of the homeowners and tenants remaining hesitant to relocate during some of the COVID surges during the 2021-2022 winter months The pipeline of work was stronger at the end of the program year with 45 units in process from intake to construction.

A significant development in 2018 was the Massachusetts Department of Public Health's Childhood Lead Poisoning Prevention Program (CLPPP) amended its Lead Poisoning Prevention and Control Regulation. Major changes included reducing blood lead levels that constitute poisoning from 25 to 10 ug/dl. Deleading standards were also changed, which reduced the number of intact surfaces considered lead hazards. These regulation changes increased demand for MOH's services to address lead paint while reducing abatement costs

by about 15%. The resources of Lead Safe Boston are available citywide, but assistance is prioritized:

1. First priority is given to addressing lead hazards in properties citywide where a child under age 6 has been found to have an actionable blood lead level under Massachusetts law (EBLL ≥ 10 ug/dL) and the property owner has been ordered by the court to abate the lead hazards.
2. Second priority is given to abating lead hazards in properties with a child under age 6 that is located in target neighborhoods where the numbers and incidence rate of elevated blood lead levels is higher than the citywide average.
3. In addition, MOH works closely with the Boston Housing Authority's Leased Housing Division and Metro Housing Boston to abate units being leased by tenant-based Section 8 certificate holders.

The abatement of lead in existing housing units is an important part of the City's three-pronged plan for addressing an impediment to fair housing faced by low-income families with children.

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

The City provides extensive funding for anti-poverty activities such as job training and education initiatives through the Office of Workforce Development (OWD), a division of the Economic Development Industrial Corporation doing business as the Boston Planning and Development Agency. Approximately \$2.3 million funded 49 organizations serving approximately 3000 people in PY21. These funds were targeted to support programs providing services to Boston residents facing multiple barriers to employment, with a goal of increasing the household income and financial stability of those served.

The funding schedule for CDBG typically runs on a two-year cycle. Based on this two-year schedule, PY19 was an open and competitive funding year, and PY20 was the regular re-funding year (where funds are made available only to currently funded programs). Given the unprecedented nature of the ongoing COVID-19 pandemic, OWD approved converting PY21 from an open and competitive procurement year to a re-funding year.

In addition, OWD set aside a portion of CDBG-PS funds to support Adult Basic Education and English as a Second Language (ESOL) programming through a separate request for proposal (RFP) process. This separate RFP was developed in response to a strategic review of ABE and ESOL services in Boston, which identified a lack of higher-level services to assist students looking to complete a secondary credential and transition to post-secondary education. Seven organizations provide contextualized ESOL and ABE.

In addition, every winter the City runs a volunteer-staffed program to assist low-income families take advantage of the Earned Income Tax Credit (EITC).

Over the last five years, while the number of family households has increased slightly, the number of families below the poverty level has declined. According to the most recent American Community Survey data, Boston had a total of 130,052 family households in 2020, an increase of 510 or 0.4% since the 2015-2019 survey. Of these, 16,647 (12.8%) have incomes below the poverty level, a decrease of 1,618 or 9% since 2019.

	2016-2020	2015-2019	# Change	% Change
# Family HHs	130,052	129,542	510	0.4%
% Below poverty level	12.8%	14.1%	-1.3	-9%
# Below poverty	16,647	18,265	-1,618	-9%

Source: American Community Survey 5-year estimates, Table S1702

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

Some of the nation’s strongest and most experienced community development corporations are based in Boston. The City of Boston provides financial support for this network by using 5% of its HOME funds to provide operating assistance to CDCs and other Community Housing Development Organizations (CHDOs). In prior years, CHDO funds were available on a rolling basis throughout the program year; eligible CDCs would apply for funds when they had an eligible project. Presently, the City of Boston is not providing operating assistance to CDCs and other CHDOs as we await new HUD guidelines on providing CHDO funded assistance.

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

Over the last several years, MOH has developed extensive email lists that includes all homeless and at-risk agencies, mainstream service and housing agencies, community development organizations, civic leaders, etc. We use these email lists regularly to inform agencies of planning efforts, funding opportunities, changes in policy and practice or any other information that the agencies find useful. Often, other agencies including state agencies will solicit our assistance to get the word out on a variety of topics and opportunities.

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

In July 2015 HUD issued a new Rule replacing the Analysis of Impediments to Fair Housing Choice (AI) with a new process called an Assessment of Fair Housing (AFH). The Rule required consultation and community participation in the analysis of fair housing data, an assessment of fair housing issues and contributing factors, and an identification of fair housing priorities and goals. The AFH planning process was designed to help communities analyze challenges to fair housing choice and establish their own goals and priorities to address the fair housing barriers in their community.

From January 2017 to May 2018, the Boston Housing Authority (BHA), the Mayor's Office of Housing (MOH), the City's Office of Fair Housing and Equity (OFHE) and the Boston Planning and Development Agency (BPDA) worked collaboratively on a draft Assessment of Fair Housing with other City agencies and a Community Advisory Committee, made up of advocates from Boston's neighborhoods, civil rights organizations, tenant and housing organizations and legal assistance organizations. The goal of this work was to complete an Assessment of Fair Housing (AFH) that would replace the Analysis of Impediments to Fair Housing as directed by HUD's new AFFH Rule.

However, on May 18, 2018 HUD announced that it was withdrawing its AFH Tool for Local Governments and directed grantees that they were not to submit their AFHs for HUD review until further notice. Despite HUD's decision, MOH and the BHA were committed to completing a locally tailored affirmatively furthering fair housing plan. This plan was released in January 2022, which was accompanied by an Executive Order, signed by Mayor Michelle Wu, to implement the plan. This plan can be found at

https://docs.google.com/document/d/1A59pPt03h1bnTfL_HptUjpiZkIPrlqfV59dXurFUBEg/edit.

In support of both the requirements and spirit of this plan, the City of Boston is making progress on new efforts to Affirmatively Further Fair Housing, including:

- **Implementing the nation's first Affirmatively Furthering Fair Housing Zoning Ordinance:** Under this new ordinance, passed in late 2020, any project with a residential component undergoing Large Project Review and/or Planned Development Area Review under Article 80 of Boston's zoning code must consider impacts on area residents historically discriminated against so that steps can be taken to reduce those impacts, provide new housing opportunities, and address past histories of exclusion. Developers are required to complete the already approved Accessibility Checklist as well as a new AFFH Assessment Tool, guided by a displacement analysis and historical exclusion data, provided by the Boston Planning & Development Agency. The newly created Boston Interagency Fair Housing Development Committee (BIFDC) reviews each project's efforts to Affirmatively Further Fair Housing and their recommendations are incorporated into the development review process. Now approaching its second year of implementation, this committee meets each Friday to review projects and make recommendations. As a result, projects are providing more income-restricted units, with some at affordability levels that are deeper than required under the Inclusionary Development Policy. More information can be found at: <http://www.bostonplans.org/housing/affirmatively-furthering-fair-housing-article-80>.

- **Make More Healthy Housing Available to Families:** Through its Lead Safe Boston program MOH provided funding to homeowners to abate lead hazards in 51 units of housing (another 45 units are in their pipeline) reducing barriers to housing for families with children.
- **Overcome Barriers to Homeownership and Wealth Creation:** In program year 2021, the Boston Home Center provided \$2 million in financial assistance to 93 non-white households to enable them to purchase their first home, reducing the barriers to homeownership for Black, Indigenous and People of Color (BIPOC) households. The **One+ Mortgage** program, launched in program year 2019, “buys down” the mortgage interest rate expanding buyers’ opportunities in Boston’s high priced housing market. The result of this program began to be seen in program year 2021, as 44 home buyers accessed the **One + Mortgage** program.

In 2021, the City launched a unique program in conjunction with the Massachusetts Affordable Housing Alliance (MAHA). The **First-Generation Homebuyer Program** assists income-eligible first-generation homebuyers in purchasing a home in Boston for the first time with a 2:1 matched-savings program. To be eligible for the \$5,000 grant in the City of Boston, first-generation homebuyers must earn below 100 percent of the Area Median Income (AMI) and contribute \$2,500 of their own money. The funds can be used toward down payment assistance and/or closing costs. Funding for this program has been redirected from the Boston Police Department's overtime budget, and has been added to funds MAHA received from the MIDAS Collaborative, Boston Children's Hospital, and the Wells Fargo Foundation. To find out more about the First Generation Homebuyer Program, go to <https://mahahome.org/STASH>.

Creating Programs that Meet the Needs of Protected Classes: The Massachusetts economy shut down due to COVID-19 in mid-March 2020. As a result, thousands of Boston families, many of whom are households of color and/or have limited English proficiency, lost their incomes and are at risk of losing their homes. Not only is this a tragedy for each family, it undermines the financial and physical health of entire communities. It is for this reason that MOH used our understanding of the disparities of income and wealth to craft a rental relief

program (RRF) that responded to the needs, both financial and in terms of language access, for these communities. The RRF marked a two-year anniversary in April 2022 and has awarded more than \$35 million to more than 5,000 households across the city.

State Legislation: During program year 2021, the city advocated for a range of state legislative efforts that would assist protected classes and promote more inclusive communities:

- Legislation that would allow Boston the right to charge a transfer fee on property sales of \$2 million or more, to fund affordable housing;
- Legislation that would create provisions whereby tenants would be able to purchase their building;
- Legislation that would create a permanent right to counsel in evictions program;
- Legislation that would make it easier for Boston to build affordable housing in tandem with the rebuilding of City owned facilities such as libraries and fire stations; and
- Legislation that would require additional fair housing training for real estate agents and implement strong penalties for real estate agents who are cited for discriminatory practices.

CR-40 - Monitoring 91.220 and 91.230

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

Monitoring Procedures and Standards: MOH has a long and successful track record in administering HUD-funded housing and community development programs. The Compliance Unit in MOH has the primary responsibility for ensuring that projects and programs are in compliance with program eligibility and has established review procedures to ensure that all statutory and regulatory requirements are met, and that the information submitted is complete and accurate. In addition, sub-recipients are monitored through a combination of periodic reporting and site visits.

Jobs Monitoring: The Compliance Unit also has the primary responsibility for monitoring adherence to all federal requirements relating to meeting the national objective standards for creating and/or retaining permanent jobs in the CDBG and Section 108 programs. MOH has adopted and is following a Jobs Monitoring Plan.

URA Compliance: Procedures are in place for MOH staff to ensure compliance with Uniform Relocation Act (URA) requirements. The Assistant Director for Housing Development in MOH's Neighborhood Housing Development Division has the primary responsibility for URA compliance.

Rent, Income & Housing Quality Monitoring: The Compliance Unit has undertaken a thorough review of its affordable housing database which will assist in meeting the requirements of the rent and income certification and housing quality standards under the HOME regulations and City policies. Procedures and electronic workflows are in place to ensure on-going compliance. The Boston Housing Authority and MOH are operating under an agreement for conducting Housing Quality Standards (HQS) inspections for units that both agencies monitor.

Boston Residents Jobs Policy: The City has an Equity and Inclusion Unit in Economic Development which reviews all projects to ensure compliance with the City's jobs ordinances and with the requirements of Section 3, Davis-Bacon and other employment related requirements.

Fair Housing: MOH manages the affirmative marketing plans in partnership with the City's Fair Housing Commission to ensure compliance with Fair Housing requirements and with the terms of the Consent Decree.

<https://www.boston.gov/departments/fair-housing-and-equity>

IDIS: The Compliance Unit monitors IDIS on a weekly basis and follows up on any CDBG and HOME projects with IDIS "flags" with the appropriate program divisions and project managers to address any problems.

CR-45 - CDBG 91.520(c)

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

There were no substantial changes during Program Year 2021 with existing programs funded with CDBG as described in our Action Plan. However, with respect to the \$20 million in CARES Act funding through the CDBG program, MOH amended the CDBG-CV budget transferring almost 90% of the funds to the preservation and production of affordable housing program. See page 12 of this CAPER report for the Federal resources to address the disparities of COVID-19 and to support an equitable recovery for all Boston residents.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants? No

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

CR-50 - HOME 91.520(d)

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

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

A total of 505 units were inspected in PY21 for Housing Quality Standards (HQS). A report in the Appendix lists the developments, the total number of HOME-funded units and the number of HQS inspections for each development.

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

MOH, in partnership with the Boston Fair Housing Commission continues to administer the Affirmative Marketing Program fostering equitable access to government-assisted housing and inclusionary developments by providing technical assistance to developers/managers in the preparation of affirmative marketing and tenant/buyer selection plans; and by monitoring the implementation of plans approved by the Commission. During PY21, 41 marketing plans were approved and 55 lotteries were held for affordable units.

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

IDIS Report PR23 "*HOME Summary of Accomplishments*" shows that 38 units were completed in PY21. Of the 38 units, 30 served extremely low income (up to 30% of area median income); 6 units served households between 31% to 50% of area median income and 2 units served households between 51%-60% of area median income. With respect to the race of the households served, 58% are Black/African American, 21% are White and 21% reported as multi-racial.

Describe other actions taken to foster and maintain affordable housing.
91.220(k)

The **Acquisition Opportunity Program (AOP)** protects Boston's rental housing stock from market forces. The AOP give loans to help responsible investor-owners buy occupied, multi-family rental properties. The AOP benefits residents by:

- creating affordable housing for Boston residents who can't afford market-rate rents
- funding developments that have more restricted units, or have units restricted to lower incomes, and
- fighting the forces of gentrification. We work to make sure tenants' apartments don't become unaffordable over time.

The AOP also benefits developers whom we pre-qualify for a set amount of funding. These potential buyers can then become more competitive in the real estate market. During PY21, a total of \$7.6 million in funds were awarded to seven acquisitions projects with a total of 38 restricted rental units. A report in the Appendix lists these projects.

With respect to emergency transfer requests, the property management company is responsible to notify MOH if there is a safety concern in a HOME funded unit. MOH will work with the management company to determine a course of action to protect the safety of the tenant. MOH is not aware of any emergency transfers during the program year.

CR-55 - HOPWA 91.520(e)

Identify the number of individuals assisted and the types of assistance provided

Table for report on the one-year goals for the number of households provided housing through the use of HOPWA activities for: short-term rent, mortgage, and utility assistance payments to prevent homelessness of the individual or family; tenant-based rental assistance; and units provided in housing facilities developed, leased, or operated with HOPWA funds.

Number of Households Served Through:	One-year Goal	Actual
STRUM: Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	45	98
TBR: Tenant-based rental assistance	70	87
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0	0
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0	0

Table 9 – HOPWA Number of Households Served

Narrative

Boston re-procured the HOPWA program in Spring 2022 and initiated new contracts with five (5) non-profit organizations. The array of organizations allows for HOPWA-eligible households to receive services across the Boston EMSA, which includes Suffolk, Norfolk and Plymouth Counties. The areas of investment are Tenant-Based Rental Assistance (TBRA), Short Term Rental Assistance, Mortgage and Utility Assistance (STRMU), Permanent Housing Placement (PHP), Housing Information Services (HIS) and Housing-Related Supportive Services (HRSS). There continues to be a need for permanent affordable housing. To directly address this need, the City increased funding for its HOPWA Tenant Based Rental Assistance program, allowing for the release of additional permanent

housing vouchers for People Living with HIV/AIDS.

The ever-shrinking supply of low-cost housing makes it critical that People Living with HIV/AIDS (PLWHA) maintain current housing situations or rapidly secure new housing when needed. Therefore, funding for financial assistance or supportive services affecting housing stability will continue in the upcoming program year 22. Financial assistance impacting housing stability includes funds for short-term rent, mortgage, and utility assistance, which 50 households were able to access and an additional 48 households were able to secure new units with financial assistance for rental startup costs.

There is an on-going need for STRMU prevention assistance as many participants have unstable employment or have lost employment entirely. The Boston EMSA invoked all flexibility afforded to the HOPWA program under HUD's Mega waiver to allow project sponsors increased options to assist HOPWA-eligible households.

MOH is not aware of any emergency transfers in HOPWA programs for domestic violence. Domestic violence transfer requests are directed to the CoC.

HOPWA-CV Accomplishments/Challenges

The Boston EMSA allocated its full HOPWA-CV award to housing and service providers that manage HOPWA programs in the region. Providers utilized this funding for additional cleaning services and supplies, personal protective equipment, such as masks for staff and clients, and grocery cards and deliveries for clients. HOPWA -CV also allowed for additional program support in STRMU and PHP to assist clients economically impacted by the pandemic with short-term rental, mortgage and utility assistance, as well as start-up costs to assist with obtaining affordable permanent housing. Through its HOPWA investments, the Boston EMSA served 840 HOPWA-eligible households with housing assistance and housing-related supportive services for the program year that concluded on 6/30/2022.

CR-60 - ESG 91.520(g) (ESG Recipients only) HUD requires ESG recipients to submit their financials and program accomplishments in the Sage HMIS reporting platform rather than in IDIS. A summary of the SAGE report will be included in this PY21 CAPER when it is complete. The table below shows the organizations funded in PY21 with ESG. In total, 377 persons were served in the street outreach contract and 1382 persons were served in the homelessness prevention contracts.

MOH is not aware of any emergency transfers in ESG programs for domestic violence. Domestic violence transfer requests are directed to the CoC.

Emergency Solutions Grant Subrecipients: Program Year 2021			
	Provider	Contract Amount	ESG Component
1	Asian American Civic Association	\$55,916	Homelessness Prevention
2	Boston Medical Ctr.	\$128,589	Homelessness Prevention
3	Hearth, Inc	\$60,873	Homelessness Prevention
4	Mass Coalition for the Homeless	\$71,076	Homelessness Prevention
5	Sojourner House, Inc.	\$40,367	Homelessness Prevention
6	Neighborhood of Affordable Housing	\$135,906	Homeless Prevention
7	Nuestra Comunidad	\$47,747	Homeless Prevention
8	Pine Street Inn St.	\$506,550	Street Outreach
9	Little Sisters	\$186,059	Homelessness Prevention
	TOTAL	\$1,233,083	
	Grant Administration	\$148,713	
	GRAND TOTAL	\$1,381,796	

Project Outcomes Data measured under the performance standards developed in consultation with the CoC(s)

All contracts with agencies that are funded with McKinney-Vento resources, including ESG, are required to participate in Boston’s Homeless Management

Information System (HMIS). Programs are required to collect the HUD prescribed Universal Data Elements and Program Specific Data Elements for their clients and provide data for the Annual Homeless Assessment Report and the annual McKinney-Vento funding application to HUD. Program Specific Data Elements are required to be captured at program entry and program exit. HUD also requires McKinney-Vento recipients to collect data regarding a client's homeless status in regards to HUD's definition and the number of chronically homeless served.