

# **Community Development Block Grant Program**

## **Consolidated Annual Performance and Evaluation Report**



**City of Portsmouth, New Hampshire  
July 1, 2018 – June 30, 2019**

**Prepared by:  
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## **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 Consolidated Annual Performance and Evaluation Report (CAPER) for Program Year 2018 (City FY 2019) describes the programmatic accomplishments and financial expenditures made between July 1, 2018 and June 30, 2019. Accomplishments for the fiscal year are presented in the context of the goals and priorities set forth in the 2015-2109 Five Year Consolidated Plan. This is the fourth in a series of five CAPERs that relate to the 2015-2019 Five Year Consolidated Plan. The Five-Year Consolidated Plan identifies community needs, strategies for addressing these needs, and CDBG program goals. An Annual Plan is developed for each fiscal year to describe the specific projects funded in that year to address the five-year program goals. These documents are developed through a citizen participation process conducted by the Citizens Advisory Committee. This committee, which is comprised of representatives from the community, holds public meetings and hearings to obtain input regarding community needs and potential projects. Community Development staff support the Citizens Advisory Committee in these efforts. The preparation of these documents, including the CAPER, is a requirement of U.S. Housing and Urban Development (HUD) which funds the CDBG program.

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

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

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
City Senior Center	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$ / General Fund: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	200	0	0.00%	0	0	
Citywide Accessibility Improvements	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	850	722	84.94%	300	556	185.33%
Citywide Accessibility Improvements	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Rental units rehabilitated	Household Housing Unit	0	0				
Citywide Accessibility Improvements	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	15	7	46.67%			

Citywide Accessibility Improvements	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Housing for Homeless added	Household Housing Unit	0	0				
Citywide Accessibility Improvements	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Housing for People with HIV/AIDS added	Household Housing Unit	0	0				
Homeless Goal and HIV/AIDS	Homeless	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	250	123	49.20%			
Housing	Affordable Housing Public Housing	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0				
Housing	Affordable Housing Public Housing	CDBG: \$	Rental units rehabilitated	Household Housing Unit	300	273	91.00%	0	0	
Non Profit Planning and Programs	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	100	28	28.00%			

Operation Blessing Emergency Power Installation	Homeless Non- Homeless Special Needs	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1000	1031	103.10%			
Program Administration	Affordable Housing Public Housing Homeless Non- Homeless Special Needs Non-Housing Community Development Program Admin	CDBG: \$	Other	Other	5	4	80.00%	1	1	100.00%
Public Services	Non- Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	3000	2500	83.33%			
Public Services	Non- Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1700	2050	120.59%	398	426	107.04%

Public Services	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0		0	0	
Public Services	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Direct Financial Assistance to Homebuyers	Households Assisted	0	0		0	0	
Public Services	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	40	39	97.50%	8	11	137.50%
Public Services	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	1200	903	75.25%	283	270	95.41%
Public Services	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0		0	0	

Special Needs/Non-Homeless Services	Non-Homeless Special Needs	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1700	1490	87.65%			
Youth Programs	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1000	739	73.90%			

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

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

The activities undertaken during this program year represented the Year 4 priority needs identified in the 2015-2019 Consolidated Plan. Those priority needs included Housing, Public Facilities, Public Services - General Welfare, Public Services - Youth Programs, Public Services - Homeless/HIV-AIDS, Public Services - Health, and Public Services - Non-Homeless/Special Populations. Many of these needs were met by ongoing programs such as the Residential Accessibility Program, Housing Rehabilitation Program, the Public Facility Accessibility and Improvements Program, and the Public Service Agency



Grant Program.

Below, see summary chart of PY 2018 (City FY 19) CDBG expenditures

Plan Year 2018 (City FY 19)	Description	Budget Amount	YTD Expended	Balance Remaining
<b>Program Administration</b>				
	Prgram Administration	\$103,213.00	\$100,003.45	\$3,209.55
<b>Public Facilities/Accessibility Improvements</b>				
	Citywide Accessibility Improvements	\$85,000.00	\$0.00	\$85,000.00
	Multi-Family Housing Rehab Costs	\$107,398.00	\$0.00	\$107,398.00
	Public Facilities Unallocated	\$40,616.00	\$0.00	\$40,616.00
	Public Facilities - Gosling Meadows Playground	\$50,000.00	\$50,000.00	\$0.00
	Public Facilities - Wamesit Place Playground	\$50,000.00	\$50,000.00	\$0.00
	Rock Street Park Rehabilitation	\$143,571.23	\$91,180.59	\$52,410.64
	Senior Center Adaptive Reuse	\$626,428.77	\$164,304.75	\$462,124.02
		\$1,103,014.00	\$355,465.34	\$747,548.66
<b>Public Services Grant Program</b>				
	AIDS Response Seacoast	\$10,000.00	\$10,000.00	\$0.00
	Chase Home for Children	\$5,000.00	\$5,000.00	\$0.00
	Crossroads House	\$17,000.00	\$17,000.00	\$0.00
	Greater Seacoast Community Health	\$9,000.00	\$9,000.00	\$0.00
	HAVEN	\$13,000.00	\$13,000.00	\$0.00
	New Heights Adventures for Teens	\$6,000.00	\$6,000.00	\$0.00
	PHA, Risk & Prevention Youth Program	\$6,000.00	\$6,000.00	\$0.00
	Rockingham CAP	\$7,500.00	\$7,500.00	\$0.00
	Seacoast Community School	\$10,000.00	\$10,000.00	\$0.00
	New Hampshire Legal Assistance	\$2,500.00	\$2,126.99	\$373.01
		\$86,000.00	\$85,626.99	\$373.01
<b>Total</b>		<b>\$1,292,227.00</b>	<b>\$541,095.78</b>	<b>\$751,131.22</b>

**Program Year 2018 CDBG Expenditures**

## 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)

	<b>CDBG</b>
White	1,126
Black or African American	67
Asian	14
American Indian or American Native	5
Native Hawaiian or Other Pacific Islander	2
<b>Total</b>	<b>1,214</b>
Hispanic	97
Not Hispanic	1,117

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

### Narrative

No additional comments.

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

**Identify the resources made available**

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	1,292,227	541,096
General Fund	public - local	85,000	25,539
LIHTC	public - federal	0	0

**Table 3 - Resources Made Available**

**Narrative**

\$25,539 provided from the City for the new Senior Senior design.

**Identify the geographic distribution and location of investments**

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
City-Wide	100	100	Citywide

**Table 4 – Identify the geographic distribution and location of investments**

**Narrative**

CDBG funds were expended to serve primarily low-moderate income individuals or areas.

## 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.**

\$25,539 in local government funding was utilized for the Senior Center Phase I project during this program year. Additional resources were leveraged for projects whenever possible. In HUD Program Year 2018, a total of \$4,945,029 was leveraged by nonprofit agencies as additional investment for several projects including public services and public facility improvement projects.

## 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	0	0
Number of Non-Homeless households to be provided affordable housing units	0	0
Number of Special-Needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>0</b>	<b>0</b>

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	10	11
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	0	0
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>10</b>	<b>11</b>

Table 6 – Number of Households Supported

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

The City met annual goals for assisting households with rental assistance and rehabilitation to provide safe, decent housing.

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

The City will continue to meet or exceed goals to assist eligible households to find and maintain safe, decent affordable 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.**

<b>Number of Households Served</b>	<b>CDBG Actual</b>	<b>HOME Actual</b>
Extremely Low-income	9	0
Low-income	2	0
Moderate-income	0	0
<b>Total</b>	<b>11</b>	<b>0</b>

**Table 7 – Number of Households Served**

### **Narrative Information**

The City continues to collaborate with agency and public housing partners to identify and explore accessibility and affordable housing projects. The City's Blue Ribbon Committee (BRC) on Housing in 2016 worked to evaluate and collect data as part of the 2015 Master Plan existing conditions report. The City Council adopted a formal housing policy in December 2016 to address Portsmouth's housing needs, including that it "will support a housing stock that addresses greater housing supply and variety, including an adequate supply of workforce and moderate-income housing... ." The Community Development Department continues to be actively engaged in issues and discussions related to increasing and improving affordable housing in the City.

Additionally, the City annually provides CDBG funds to nonprofit agencies that deliver services to extremely low-, low- and moderate- income persons citywide. The City continues to address homeless housing and shelter needs through CDBG grant support to the family/individual emergency shelter and the domestic violence shelter.

## **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**

Working with the Home for All (formerly called Greater Seacoast Coalition to End Homelessness) and Cross Roads House, the City, particularly through the Community development and Welfare Departments, is able to reach out and assess the needs of homeless and unsheltered individuals and families in Portsmouth. Additionally, the City coordinates with Portsmouth Housing Authority, also an active participant in Home for All, to reduce and end homelessness in the City.

Cross Roads House is a homeless shelter in the jurisdiction that provides both emergency and transitional shelter to homeless people. In addition to shelter, the Cross Roads House provides a wide range of services to individuals in transition including case management, tutoring, mental health counseling, vocational training, life skills training and assistance in finding permanent housing. The doors of Cross Roads House are open to all individuals in need of shelter, including those who could become homeless after being discharged from publicly funded institutions and systems of care.

In Program Year 2018, \$30,000 in CDBG grant funding was awarded to support the salaries of shelter direct care and case management workers. The City also provided an additional \$62,000 from the Welfare Department to shelter facilities in order to keep extremely low-income individuals and families from becoming homeless. CDBG funding provided for the sheltering of 270 individuals. CD staff are also involved in forums and working groups addressing issues of chronic homelessness and coordination of services for those at or at risk of becoming homeless including the Continuum of Care.

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

The City continues to fund non profit agencies that work to provide emergency shelter and transitional housing needs of homeless persons. In Program Year 2018, the City funded with CDBG the following agencies:

**HAVEN** provided emergency shelter and support services to people in abusive relationships. The population served by this agency is presumed to earn low income. This year, the project benefitted 167 women and children fleeing from domestic violence. Funding was provided through federal, state, private and local sources, including the Portsmouth CDBG program.

**Cross Roads House** provided emergency and transitional shelter to homeless individuals and families. All of the clients were individuals in families who earned very low incomes. Funding was provided by CDBG, the City's general fund, as well as other local, state, federal and private sources. The shelter served 103 clients with bed nights and supportive services.

In Program Year 2018, the City also engaged in close cooperation and participation in the Continuum of Care.

**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**

Community Development staff continued to work closely with the Portsmouth Housing Authority, HUD, the City of Portsmouth Welfare Department, the Balance of State Continuum of Care, the Portsmouth Housing Endowment Fund and The Housing Partnership on affordable housing and homelessness issues; with the Chamber of Commerce and the City's Economic Development Commission on economic development issues; and with the Portsmouth Arts and Cultural Agency Board of Directors and with neighborhood groups on community development issues.

In addition, the City CDBG program funded agencies such as Rockingham Community Action Program and AIDS Response of the Seacoast that work with precariously housed individuals and families and help prevent the hospitalization of those living with HIV/AIDS by providing supportive services.

**AIDS Response of the Seacoast** offered a number of services to 15 individuals living with AIDS, including case management, financial aid and housing assistance for clients unable to work due to illness. Funding was provided by the CDBG program, the City's general fund, Ryan White Care Act, New Hampshire Emergency Shelter Grants in Aid Program and local foundations. Individuals and small families who earned very low or low incomes made up 100% of the Portsmouth beneficiaries.

**Rockingham Community Action** received CDBG funding and support from the City Welfare Department to provide rental deposit assistance, fuel assistance, and related help that helps families stay in their homes. Eleven families were assisted directly with CDBG funds in Program Year 2018.

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

As previously discussed in this section, the City continues to fund and support various nonprofit agencies with CDBG funding and Welfare funds to address homelessness issues. The Welfare Department refers struggling individuals and families receiving assistance from other public or private programs to the Cross Roads House when transitional housing is needed.



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

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

The City continued to support the Portsmouth Housing Authority (PHA) in its efforts to maintain and create new affordable housing opportunities and to administer its public housing and Section 8 voucher programs in Portsmouth. The Housing Authority manages several residential complexes serving the elderly, families with children, and families with disabilities. In addition, the Authority manages a tenant-based Section 8 program and waiting list of at least 210 persons.

The Housing Authority has also worked with local public safety providers to ensure effective screening policies, strict lease enforcement and the maintenance of healthy and safe neighborhoods. The Housing Authority also provides employment and education incentives to tenants, as well as youth risk prevention services. The City of Portsmouth and the PHA have worked closely to address the need for public housing, including on retention, renovation and development of housing units as well as improvements to livability and access to services by residents.

The PHA has made great strides in the past several years in areas including security, accessibility, and partnerships with the community. Challenges to address in the future include the increasing number of non-elderly disabled persons being served, and expanding housing opportunities. Recently the PHA has been required to house greater numbers of non-seniors with physical and/or mental disabilities in traditionally senior housing buildings; this creates a difficult situation to manage but one in which the PHA is confident it can continue to serve both populations through new administrative strategies and community partnerships. With over 210 persons on the PHA's waiting list and sustained lack of affordable housing for the Seacoast's workforce, the PHA is looking for new opportunities to increase housing units through acquisition or new construction, including an expansion of units in the downtown area. While this process can take years, opportunities for potential projects are currently being developed. The PHA has also committed to increase collaboration between other regional or statewide Housing Authorities and non-profit developers. This includes cooperating on issues like policy development, purchasing, back office operations and wait lists in order to decrease costs and improve customer service, with the long-term goal of creating a stronger and more disciplined organization.

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

The City and the Portsmouth Housing Authority (PHA) hold the common interest of ensuring that safe and decent housing is available to individuals and families earning very low, low or moderate incomes. All subrecipient agreements for public service agency grant recipients are required to advertise their services in the PHA housing complexes. In PY 2018, a public service agency grant was awarded to the PHA's **MC3 Program (Making Classroom & Community Connections)**. The CDBG grant funding gives the PHA enough leveraging to open the services of the MC3 Program to all Portsmouth youth.

In addition, the FY 2015-2019 Consolidated Plan referenced needed capital improvements to several public housing properties owned or managed by the Portsmouth Housing Authority. These were

factored into the public facilities needs for the five year consolidated plan. In addition to requiring that Public Service Agency Grant recipient actively market services to PHA residents, the City also coordinates marketing efforts with the PHA administration of the City's First-Time Homebuyer Program, HomeTown.

The PHA is committed to encouraging resident participation in all of its neighborhoods in order to improve social outcomes, reduce crime, foster greater civic engagement, and assure more caring and compassionate communities. Besides working to add more programs and services for tenants, the PHA encourages residents to seek leadership roles and actively engage with the future of the community by joining Resident Advisory Boards.

Improvements at PHA-owned Properties during HUD Program Year 2018 include playground upgrades and improvements at Gosling Meadows and Wamesit Place housing. These improvements benefitted approximately 556 persons living in the housing complexes.

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

No troubled PHAs in the jurisdiction.

## **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)**

Affordable housing continues to be identified as a critical housing need at this time. The 2015 citywide Master Plan addresses the need for the creation and maintenance of new and existing affordable housing opportunities, as well as strategies for accomplishing that objective. In 2015, the City Council appointed Housing Committee, which includes representatives from the Planning and Community Development Departments, is working on a report regarding the creation of additional affordable housing units and zoning changes. These policy considerations are intended to encourage mixed use redevelopment that incorporates workforce housing along transit corridors and central village concept. This work builds upon the 2008 Housing Committee that included establishing a Workforce Housing Trust Fund and zoning changes. The 2008 final report is available on the City's website.

The demand for housing in the region continues to be significant resulting in high rents and very low vacancy rates. The housing cost burden remains difficult, as rents have been rising in Portsmouth, according to the New Hampshire Housing Finance Authority (NHHFA).

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

The City's Annual Action Plan does not allocate resources based on geographic areas or targeted assistance. All programs and projects are intended to benefit residents earning low and moderate incomes accessing services and safe affordable housing, as well as ensuring access for people with disabilities throughout the City.

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

The City actively coordinates on lead reduction efforts with the New Hampshire Housing Finance Authority who is the lead grant recipient of funding from federal lead paint initiatives. The City is involved in supporting these applications and in cooperating in their administration and in referring applicable properties as appropriate.

The City contracts with a Housing Specialist Consultant who is also trained as a risk assessor. Having an in-house risk assessor consultant increases the City's ability to quickly and cost effectively respond to residents' lead-based paint concerns. To facilitate the assessment of lead-based paint hazards, the Housing Specialist works with the State, which analyzes paint samples for the content of lead-based paint.

The Housing Specialist Consultant is also a certified Lead-Based Paint contractor/specialist who is certified to oversee lead safe work practices.

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

The City does not have an explicit policy for the reduction in households below the poverty line. However, the City's Welfare Department provides services directly to families living in poverty. In addition, both the Welfare and Community Development Departments provide grants to public service agencies serving families in poverty. The Community Development Department works closely with the Health Department, Welfare Department and the Portsmouth Housing Authority as well as other agencies that work most closely with families in poverty.

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

No gaps in the institutional structure were identified in the Five-Year Consolidated Plan. In PY 2018, City staff and local officials continued to keep communication open with the non-profit community and the Portsmouth Housing Authority, so that any gaps identified could be addressed. In addition, relationships with the various public service agencies serving clients earning low or moderate incomes allowed staff to keep aware of agency needs. In many cases, these relationships have led to participation by these agencies in grant programs available through the CDBG program.

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

The City of Portsmouth and its residents benefit from a good network of social services and public and privately-assisted housing. For its size, Portsmouth benefits from a wide range of social service providers to assist those in need in Portsmouth. This is due in part to Portsmouth's role as an economic, cultural, and social hub of the region. Many larger non-profits are located in Portsmouth but have service areas beyond the City's borders. In addition, the leading agency in Portsmouth for housing issues, the Portsmouth Housing Authority, is heavily involved in the coordination of non-profit service providers and participates extensively in regional efforts to address substance misuse and homelessness issues. Most all of the City's publicly and privately assisted housing developments are served by regional transportation.

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

The rising home and rental prices in the City, has negatively impacted vulnerable populations and families who spend large portions of their incomes on housing, including persons with disabilities. According to the State-wide AI, non-white racial and ethnic minorities, young single mothers, and persons with disabilities are disproportionately situated within lower income brackets. They are more likely to spend more of their incomes on housing, experience instability in their housing and have more difficulty accessing housing. The State-wide AI notes that "there is one HUD-subsidized housing unit for every five households that may be eligible" and the waiting lists in Portsmouth certainly indicate a demand for affordable housing especially for households earning less than 30% of Median Family Income, which make up over 75% of the households on the Section 8 voucher and public housing

waiting lists. The reality of economic hardship and the City's high-cost housing market together contributed to the identification of this impediment in 2010 and its inclusion in the 2013 update. The City's 2013 Analysis of Impediments (AI) to Fair Housing and further details regarding these activities can be found in the Fair Housing record in the Community Development Department.

The City's actions taken in PY 2018 to address impediments to fair housing choice include:

- Supported the continuation and preservation of affordable housing opportunities for all including those in minority communities, the elderly and the disabled.
- Supported public service agencies **including NH Legal Assistance** that assist households who earn low and/or moderate incomes and often have difficulty in maintaining and accessing housing.
- Supported the Portsmouth Housing Authority in its efforts to maintain and create new affordable housing opportunities and to administer its public housing and Section 8 voucher programs in Portsmouth.

## **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**

All potential community development activities are reviewed by Community Development program staff for eligibility and compliance requirements to determine if the project is eligible for funding. Once a project is funded and underway, Community Development staff monitors project progress either through a desk audit or an on-site visit. Mid-year, project progress is publicized at a Public Hearing (held on February 12, 2019 for PY 2018) and is reviewed by the Community Advisory Committee (CAC) and Community Development staff. Annually, projects are reviewed as a component of the City audit, including through a Single Audit (A-133).

### **External Review**

In addition to cooperation with the City's A-133 Single Audit, the Community Development Department is reviewed externally. Periodically, HUD Community Planning and Development representatives monitor program compliance. Compliance with financial regulations is overseen by the Community Development staff and the City Finance Department. Annually, CD staff demonstrate compliance with CDBG spending thresholds and other programmatic requirements through its submission of its Consolidated Annual Performance Evaluation Report (CAPER).

### **Monitoring Policy**

As the administrator of CDBG entitlement funds granted to Portsmouth, the Community Development (CD) Department has the responsibility to ensure compliance with federal regulations by all of its contractors and subrecipients, including the public housing authority. Monitoring is an important function that is especially required for all programs and projects that require compliance with CDBG regulations. During the previous Consolidated Plan period, local HUD representatives recommended a risk assessment strategy, which would help focus monitoring efforts on projects and programs determined to be at a higher risk of non-compliance with appropriate regulatory authorities. As a result, the CD Department revised its monitoring policy in FY 2005-2006. The risk assessment approach was similarly recommended at a March 2010 HUD training on subrecipient management.

Monitoring of CDBG subrecipients is been determined by the following factors: length or program history, amount of funding, complexity of terms in subrecipient agreement, and familiarity of subrecipient personnel assigned to duties under the CDBG agreement. By prioritizing subrecipients based on these factors CDBG staff will determine if subrecipient monitoring is appropriate for that year.

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

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

The HUD Program Year 2018 Consolidated Annual Performance and Evaluation Report was made available for public review for 15 days beginning on September 13, 2019 and ending on September 28, 2018 (see Attachment 1: Legal Notice). No comments were received.

**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.**

No changes in the jurisdiction's program objectives as outlined in the Five Year Consolidated Plan.

**Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?**

No

**[BEDI grantees] Describe accomplishments and program outcomes during the last year.**

**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.**

No changes in the jurisdiction's program objectives as outlined in the Five Year Consolidated Plan.

**Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?**

No

**[BEDI grantees] Describe accomplishments and program outcomes during the last year.**