



CITY OF ATTLEBORO, MASSACHUSETTS

COMMUNITY DEVELOPMENT BLOCK GRANT

Program Year 2014-2018

5 Year Consolidated Plan

Executive Summary

ES-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

Mission: To improve the quality of life for all residents of the City of Attleboro and increase the economic self-sufficiency of low and moderate income-residents through the creation of affordable housing and job opportunities while effectively administrating and efficiently allocating CDBG resources and fostering community participation.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

While the City will continue to serve all its residents, priority and CDBG funds will be given to its low and moderate income census tracts, blocks, and neighborhoods. The City has defined a Neighborhood as: A geographic sub-area within a city that may be defined by tradition, period development, or sub-division patterns. Neighborhood boundaries may include major streets or other physical features. Neighborhoods may be: established and stable, established and redeveloping, developing, or new. Neighborhoods that use to be self-contained, where folks lived, worked, and played in the Neighborhood have become less defined.

3. Evaluation of past performance

During the past five-years the City has consistently improved its performance. Most recently the City underwent a fiscal audit and successfully resolved all of the issues identified with the exception of two economic development initiatives. The City is currently in negotiations to resolve these issues.

4. Summary of citizen participation process and consultation process

A legal notice notifying the public of a needs meeting and to solicit proposals was place on the City's web site, emailed to various departments, and agencies, and placed in the Sun Chronicle, a local newspaper on January 8, 2014. The public needs meeting was held on January 28, 2014 requesting comments from the public on issues related to the development of affordable housing, economic development, infrastructure improvements and social service needs. The public was encouraged to offer input on how the City through the use of block grant funds could address these issues in the upcoming 2014-2018 Consolidated Plan and Program year 2014 Action Plan. Also, during the public needs meeting,

various non profit and city agencies expressed interest in applying for CDBG funds. Applications were made available that evening. The application submission deadline date was February 28, 2014.

As part of the citizen participation process, staff appeared before the public city council meeting on March 4, 2014 informing the council of the preparation of the 201-2018 Consolidated Plan and the preparation of Program year 2014 Annual Action Plan. The public was invited to express the needs of the community. Draft copies of 5 Year Consolidated Plan and Action Plan were made available through the Office of Community Development, the City's web site, the City's public library and at the Senior Center from April 11, 2014 through May 12, 2014. During the weeks preceding the public meetings, community development staff met with various City departments and non-profit agencies to obtain further comment on the needs to the community and how black grant funds can be used over the next five years to address though the use of block grant funds.

5. Summary of public comments

During the needs meeting held on January 28, 2018 various agencies and city departments expressed the importance of the City's continued support of public service non profit groups. It was also expressed that an issue of concern is that lack of affordable housing especially to individuals within the 50% of median income, transitional housing for the homeless and senior housing for the city's fast growing senior population.

6. Summary of comments or views not accepted and the reasons for not accepting them

No comments apposing the submission of the 2014-2018 5 Year Consolidated Plan and Program Year 2014 Annual Action Plan were received from the public.

7. Summary

Though the City of Attleboro has made great strides in addressing the needs of its low income population through the development of affordable housing, continued support of micro business, and continued funding of non profit social service agencies, the needs of the target population (those below 80% of median income) remain great. The following areas of concern have been identified as priorities;

- Preserve the current housing stock being occupied by low and moderate income households by not only bringing the properties up to meet minimum housing quality standards, but to also address issues of lead contamination, and include energy efficient repairs and appliances when necessary;
- Increase the availability of affordable housing by imposing affordable housing restrictions to multi- family owner investor properties;
- Encourage the use of HOME down-payment funds to increase home ownership.
- Promote self-sufficiency for families and individuals through the creation of jobs and the provision of public services;

- Encourage continued development of the downtown by offering incentives to business owners through the City's Sign and Façade Program.

Considering the relatively small amount of CDBG funds available to the City of Attleboro, it was determined that its resources should be focused in three categories: Neighborhood Revitalization including the creation of Affordable Housing, increasing access to Public Facilities, and Façade Improvements, Economic Development for the purpose of job creation and the provision of goods and services to low and moderate income residents, and Public Services to support individual and family needs.

Given the limits of the CDBG program the City views its overall investment as follows:

- 35% Housing
- 30% Economic Development/Public Facilities Improvement
- 20% Administration
- 15% Public Services

During the next five years the City will attempt to meet the following goals:

- Rehabilitate 10-15 units;
- Create 30-40 affordable rental units through an affordable housing restriction placed on rehabilitated multi-family units;
- Create 15-20 jobs for low and moderate income individuals;
- Provide funding for public services at the maximum 15% of the City's CDBG allocation each year;
- Implement 5-10 public facilities projects to improve access to services for the City's residents.
- 5-10 Sign or Façade Improvements to the downtown

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

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

Agency Role	Name	Department/Agency
CDBG Administrator		Office of Community Development

Table 1 – Responsible Agencies

Narrative

The Department of Planning and Development, through its Office of Community Development took the lead in the development of the 5-Year Consolidated Plan. In order to ensure that the Plan was a comprehensive document, staff consulted with the Attleboro Housing Authority, agencies that provide housing and related services such as the United Way, various City departments and personnel, including the City's Social Worker, staff of the Police Department, Veteran's Department, Council on Aging, Department of Public Works, organizations that provide other needs, such as job skills training, economic development, and child development.

Consolidated Plan Public Contact Information

Attleboro Office of Community Development

Attn: Dorothy Brissette, Community Development Director

77 Park Street

Attleboro, MA 02703

PR-10 Consultation - 91.100, 91.200(b), 91.215(I)

1. Introduction

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I)).

The Community Development Office maintains a long-standing relationship with many agencies and organizations within the City that have knowledge of the housing needs, of the City's population and clients they serve. They also have knowledge of the City's economic development needs. Additionally, they have demonstrated particular concern for the human service needs of the City's low-income population.

In addition to its own efforts to gather information for the City of Attleboro's five year plan, the Office of Community Development is fortunate to be able to access information compiled by the consultant who developed the Greater Attleboro Taunton Home Consortium (GATHC) Five-Year Plan. Throughout this document the reader will find data and recommendations based upon the results of these efforts. Information acquired through these processes was translated into HUD's CPMP tables and integrated into this plan's narrative sections.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

The CoC identified individuals and families (both sheltered and unsheltered), who were chronically homeless on February 4, 2009, using a one night census of both sheltered and unsheltered homeless people, along with documentation from administrative records.

The Continuum of Care process identified 138 individuals (115 sheltered and 23 unsheltered), who were chronically homeless at a single point in time based on the one-night census of both sheltered and unsheltered homeless conducted in 2009, with further documentation from administrative records. In addition, it was reported from other sources that at least 16 additional persons from the GATHC area, were placed in motels outside of the CoC area and thus were not included in the count. In addition the Brockton/Plymouth City & County CoC 'point in time' count, reported no persons from the GATHC cities they serve were homeless.

The Continuum uses the following definitions for emergency and transitional housing:

Emergency Shelter: “A supervised public or private facility designed to provide temporary living accommodations to persons (individuals and families) who lack a fixed, regular and adequate nighttime residence, for which they pay no rent or fees”. Given HUD’s definition, families placed by the state in motels are being counted as in emergency shelter. However, the Continuum deems this a completely inappropriate response to family homelessness and these families are a top priority for relocation to more appropriate settings

Transitional Housing: “A longer-term residence (up to 24 months) for individuals or families coming from emergency shelters, or having no fixed, regular nighttime residence”. These programs are designed to offer appropriate case management and supportive services to prepare residents for transition to permanent housing and independence in the community. Residents may pay program fees.

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

The City of Attleboro is not in receipt of ESG funds.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

1	Agency/Group/Organization	ATTLEBORO REDEVELOPMENT AUTHORITY
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless Services-Education Services-Employment Services - Victims Other government - State Other government - Local Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Anti-poverty Strategy

<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>The Community Development staff met with the Executive Director of the Attleboro Housing Authority (AHA) to discuss and share information with regard to the housing and service needs. The AHA prepared its PHA Plan Update and previously provided the Community Development Office with information regarding such plan. The Office of Community Development and the Attleboro Housing Authority are on the Boards of some of public service organizations, i.e., Attleboro Area Coalition for the Homeless, Attleboro Community Council, and the Greater Attleboro/Taunton Coalitions on Homelessness. As part of the consultation/citizen participation process, an ad was placed in the local paper notifying the public and various social service providers, non-profit organizations, CDBG subrecipients, City Departments, City mayor, City Councilmen, Director of Planning and Development and other parties and individuals interested in housing the homeless, and meeting community development needs of a public hearing held of January 29, 2014. Interested parties were encourages to provide comments on such matter. The Office of Community Development also met separately with various Social Service Agencies, such as the United Way and Herbon Food Pantry as an attempt of obtain additional comments and observations of housing and homelessness needs within the Community. Throughout the Plan, you will find strategies and actions based upon information provided by the agencies The Office of Community Development used to determine the City’s priority needs over the next five (5) years.</p>
---	---

Table 2 – Agencies, groups, organizations who participated

Identify any Agency Types not consulted and provide rationale for not consulting

N/A

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	GATCH	This plan works in conjunction with the City's plan to address homelessness.

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l))

The Office of Community Development also met separately with various City Departments such as the Department of Public Works, Police Department, Attleboro Council on Aging, Veterans Office, the Social Service Case Manager of the Board of Health, and Building Department. Information collected will be used in the development of the Consolidated Plan.

Narrative (optional):

PR-15 Citizen Participation

1. Summary of citizen participation process/Efforts made to broaden citizen participation
Summarize citizen participation process and how it impacted goal-setting

Please see attachment- PR-15 Citizens Participation Summary Page 1-3 of attachment

Citizen Participation Outreach

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The Needs assessment was done by compiling information obtained from surveys, meetings, with datasets furnished in IDIS and also obtained from the 2010 Census, ESRI/HUD Maps and recent ACS datasets. Priority needs were determined from data analysis, from agency consultations and from other citizen and organizational input. All priorities were screened against regulatory requirements and limitations.

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

The overwhelming housing issue which has a real world connection to family instability and homelessness is the excessive cost of housing. As noted above and in the sections to follow, if it was possible to reduce housing cost, especially for extremely low income households (who have less elasticity in their household budgets), we could impact instability and homelessness, especially for rental households.

Demographics	Base Year: 2000	Most Recent Year: 2010	% Change
Population	42,068	43,355	3%
Households	16,021	16,330	2%
Median Income	\$50,807.00	\$64,634.00	27%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2006-2010 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households *	1,355	1,340	2,630	1,570	9,435
Small Family Households *	325	260	1,260	690	5,700
Large Family Households *	0	70	180	80	980
Household contains at least one person 62-74 years of age	339	460	400	305	1,110
Household contains at least one person age 75 or older	395	330	335	205	405
Households with one or more children 6 years old or younger *	175	160	470	235	1,210
* the highest income category for these family types is >80% HAMFI					

Table 6 - Total Households Table

Data Source: 2006-2010 CHAS

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	50	45	15	0	110	0	4	0	0	4
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	0	0	10	0	10	0	0	0	0	0
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	10	15	50	0	75	0	0	25	0	25
Housing cost burden greater than 50% of income (and none of the above problems)	505	200	10	0	715	260	255	655	130	1,300
Housing cost burden greater than 30% of income (and none of the above problems)	135	155	370	4	664	65	295	250	515	1,125

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Zero/negative Income (and none of the above problems)	20	0	0	0	20	20	0	0	0	20

Table 7 – Housing Problems Table

Data 2006-2010 CHAS
Source:

Table NA1-A: Explanation

Source: HUD Chas Tables, Census 2010

As can be seen in Table NA10-A, programs for rehabilitation would benefit many households in Attleboro especially if the rehab included features which would lower operating costs. Also programs which support the acquisition and/or construction of new housing would also benefit many households. Given the limitations of funding, there is more than ample demand for assistance for households who are Extremely Low Income.

Table NA10-B: Explanation

Source: HUD CHAS Tables, Census 2010

Table NA10-B illustrates the need for assistance for owner occupied households. As can be seen, the need for rehabilitation of housing is appropriate but not as urgent as for rental housing. The need for acquisition and/or new construction to lower housing costs might be appropriate but CDBG rules limit the use of funds for these purposes.

Table NA10-C: Explanation

Source: HUD CHAS Tables

As can be seen in Tables NA10-A and NA10-B, the problems for households who are eligible for CDBG funds are greater for renters rather than owners, especially for those earning less than 31% of the median income of the area. Table NA10-C illustrates these serious problems overall affect over 12% of the City’s households.

Table NA10-A: Renter Households

	Renter				Total
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	
Substandard Housing - Lacking complete plumbing or kitchen facilities	50	45	15	0	110
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	0	0	10	0	10
Housing cost burden greater than 50% of income (and none of the above problems)	505	200	10	0	715
Total Numbers	555	245	35	0	835
% HHs with Major Problems	66.47%	29.34%	4.19%	0.00%	
% of Attleboro HHs	3.40%	1.50%	0.21%	0.00%	5.11%

Table NA10-B: Owner Households

	Owner				Total
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	
Substandard Housing - Lacking complete plumbing or kitchen facilities	0	4	0	0	4
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	0	0	0	0	0
Housing cost burden greater than 50% of income (and none of the above problems)	260	255	655	130	1300
Total Numbers	260	259	655	130	1304
% HHs with Major Problems	19.94%	19.86%	50.23%	9.97%	
% of Attleboro HHs	1.59%	1.59%	4.01%	0.80%	7.99%

Source: HUD CHAS Tables, Census 2010

Table NA10-C: All CDBG Eligible Households (0%-80% of Median Income)

Housing Problem Category	Total HHs with Serious Problems	% of Attleboro HHs
Substandard Housing - Lacking complete plumbing or kitchen facilities	114	0.70%
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	10	0.06%
Housing cost burden greater than 50% of income (and none of the above problems)	1,885	11.54%
Totals	2,009	12.30%

Source: HUD CHAS Tables

As can be seen in Tables NA10-A and NA10-B, the problems for households who are eligible for CDBG funds are greater for renters rather than owners, especially for those earning less than 31% of the median income of the area. Table NA10-C illustrates these serious problems overall affect over 12% of the City's households.

Table NA10-D: Types of Households with Extreme Housing Cost Burdens (>50% of Income)

Cost Burden > 50% (renter)	0-30% AMI	30-50% AMI	50-80% AMI	All Households
Small Related	205	80	0	285
Large Related	0	20	0	20
Elderly	275	80	10	365
Other	85	50	0	135
Total Households by Income	565	230	10	805

Cost Burden > 50% (owner)	0-30% AMI	30-50% AMI	50-80% AMI	All Households
Small Related	45	90	545	680
Large Related	0	45	15	60
Elderly	180	90	30	300
Other	35	25	60	120
Total Households by Income	260	250	650	1160

Cost Burden > 50%	0-30% AMI	30-50% AMI	50-80% AMI	All Households
Small Related	250	170	545	965
Large Related	-	65	15	80
Elderly	455	170	40	665
Other	120	75	60	255
Total Households by Income	825	480	660	1,965

Source: Source: HUD CHAS Tables, Census 2010

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	565	260	90	0	915	260	260	680	130	1,330
Having none of four housing problems	415	265	1,085	470	2,235	75	555	775	975	2,380
Household has negative income, but none of the other housing problems	20	0	0	0	20	20	0	0	0	20

Table 8 – Housing Problems 2

Data 2006-2010 CHAS
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	230	115	135	480	45	130	670	845
Large Related	0	20	10	30	0	45	65	110
Elderly	350	115	20	485	235	335	115	685
Other	115	165	225	505	45	35	70	150
Total need by income	695	415	390	1,500	325	545	920	1,790

Table 9 – Cost Burden > 30%

Data 2006-2010 CHAS
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	205	80	0	285	45	90	545	680
Large Related	0	20	0	20	0	45	15	60

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Elderly	275	80	10	365	180	90	30	300
Other	85	50	0	135	35	25	60	120
Total need by income	565	230	10	805	260	250	650	1,160

Table 10 – Cost Burden > 50%

Data 2006-2010 CHAS
Source:

Table NA10-D Type of Households with Extreme Housing Costs Burdens (>50%of Income)

Table NA10-D Type of Households with Extreme Housing Cost Burdens (>50% of Income)-Owners

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	10	4	30	0	44	0	0	25	0	25
Multiple, unrelated family households	0	10	30	0	40	0	0	0	0	0
Other, non-family households	0	0	0	0	0	0	0	0	0	0
Total need by income	10	14	60	0	84	0	0	25	0	25

Table 11 – Crowding Information – 1/2

Data 2006-2010 CHAS
Source:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

Table 12 – Crowding Information – 2/2

Data Source
Comments:

Describe the number and type of single person households in need of housing assistance.

The Attleboro Housing Authority has approximately 2,659 persons on their waiting list. Based on this waiting list and data collected from the US census, the type of housing needs of single individuals in primarily rental units. This number is great among families with an absentee parent and the fast growing senior population in our community.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

There are approximately 61 families and victims of domestic violence who have applied and are in need of housing. In the prior year, approximately 200 victims of domestic violence were served through the New Hope Program based in Attleboro. Housing is available to clients for approximately 18 months. There are five scattered sites in the region, so the need for housing is great. With the new guidelines imposed on the multi-family rehab program, the city will notify all housing type agencies including new hope of the availability of affordable units.

What are the most common housing problems?

The following table summarizes the information for the most serious issues facing households in Attleboro. Namely, the housing is seriously substandard or severely overcrowded or seriously costly as a percentage of the household income. A survey conducted by the Greater Attleboro Taunton HOME Consortium [GATHC] is consistent with the data below. The survey ranked assistance with rent and affordability as the highest needs.

Are any populations/household types more affected than others by these problems?

As noted above, even if we confine the discussion to the most serious problems, there is a significant cost of housing problem. Unfortunately, this is not easily addressed by the CDBG program as the resources required to lower housing costs are significantly high in the Attleboro market.

Table NA10-D above shows that extremely low income small household renters and elderly owners are the two groups most affected by the cost of housing.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the

needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Based on discussions with providers of services to families, the elderly and to the homeless, the households who are at risk of becoming homeless are those whose homes have been foreclosed on or are in the process of foreclosure; homes where separation or divorce has occurred; and homes in which the primary earner of income has had a cut in compensation or is unemployed. There are also a number of youth who have left dysfunctional homes. The end result of these problems listed above is that there are significant numbers of “unattached youth” who are not counted as homeless as they are “couch surfing” in the homes of friends and sometimes relatives. This information has been developed as a result of school social worker investigations and people who come into service agencies for help.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

The agencies are not able to provide hard numbers at this time, but several different agencies confirmed the analysis. There are moves to begin a documentation of the problem, but it requires significant cooperation of the School Departments, the Police Departments and other agencies. It also involves confidentiality issues.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

As noted above, Table NA10-D illustrates that small renter households and elderly owners have significant problems in terms of costs. There is insufficient data to determine what physical characteristics are associated with these problems. Agencies which serve the elderly have noted that elderly owners who seek help are caught between rising housing expenses and fixed incomes.

While the data is spotty and has significant error rates, it is noteworthy, that 69% of the households in Attleboro are family households while 31% are non-family households. In addition, 26% of the family households are single person headed with 1,020 male heads and 1,956 female heads. Of these single headed households, 54% have children under the age of 18. This likely to create more difficult parenting and possibly increase the likeliness of youth leaving the house and becoming homeless.

Discussion

The overwhelming housing issue which has a real world connection to family instability and homelessness is the excessive cost of housing. As noted above and in the sections to follow, if it was possible to reduce housing cost, especially for extremely low income households (who have less elasticity in their household budgets) we could impact instability and homelessness, especially for rental households.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

HUD breaks down housing problems into two categories. One is the physical condition of the housing and the other is the cost of housing.

In turn the physical conditions are split into four types:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

HUD also has several policies which look at whether there is a disproportionate need as it relates to race or ethnicity. These vary depending upon what the proposed action might be. For example, Site and Neighborhood Standards are used to determine the appropriateness of an investment in new housing in an area.

For the analysis in this section we are using a variance of 10% to define a “disproportionate” share of a housing problem.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,200	235	25
White	1,090	190	25
Black / African American	15	0	0
Asian	60	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	0	45	0

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2006-2010 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

Table NA15-A Modified Disproportion Chart – Extremely Low Income (0%-30%)

Housing Problems	Has one or more of four housing problems	% of HHs with Severe Housing Problems in the Income Group	% of Extremely Low Income Cohort	Race and Ethnicity %s in the City
Jurisdiction as a whole	1,200			
White	1,090	90.83%	80.44%	86.98%
Black / African American	15	1.25%	1.11%	4.16%
Asian	60	5.00%	4.43%	5.21%
American Indian, Alaska Native	0	0.00%	0.00%	0.10%
Pacific Islander	0	0.00%	0.00%	0.03%
Hispanic	0	0.00%	0.00%	6.41%
Total Households in ELI Cohort	2,365			

Data Source: HUD CHAS Data, ACS 2012 5 Year Estimates

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	940	475	0
White	840	430	0
Black / African American	25	0	0
Asian	10	30	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	70	0	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2006-2010 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Table NA15-B Modified Disproportion Chart – Low Income (50%-80%)

Housing Problems	Has one or more of four housing problems	% of HHs with Severe Housing Problems in the Income Group	% of Extremely Low Income Cohort	Race and Ethnicity %s in the City
Jurisdiction as a whole	1,510			
White	1,245	82.45%	47.34%	86.98%
Black / African American	45	2.98%	1.71%	4.16%
Asian	120	7.95%	4.56%	5.21%
American Indian, Alaska Native	0	0.00%	0.00%	0.10%
Pacific Islander	0	0.00%	0.00%	0.03%
Hispanic	85	5.63%	3.23%	6.41%
Total Households in LI Cohort	3,005			

Data Source: HUD CHAS Data, ACS 2012 5 Year Estimates

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,510	1,140	0
White	1,245	1,050	0
Black / African American	45	0	0
Asian	120	30	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	85	50	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2006-2010 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

Table NA15-B Modified Disproportion Chart – Very Low Income (30%-50%)

Housing Problems	Has one or more of four housing problems	% of HHs with Severe Housing Problems in the Income Group	% of Extremely Low Income Cohort	Race and Ethnicity %s in the City
Jurisdiction as a whole	940			
White	840	89.36%	62.69%	86.98%
Black / African American	25	2.66%	1.87%	4.16%
Asian	10	1.06%	0.75%	5.21%
American Indian, Alaska Native	0	0.00%	0.00%	0.10%
Pacific Islander	0	0.00%	0.00%	0.03%
Hispanic	70	7.45%	5.22%	6.41%
Total Households in VLI Cohort	1,885			

Data Source: HUD CHAS Data, ACS 2012 5 Year Estimates

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	680	1,020	0
White	550	975	0
Black / African American	10	0	0
Asian	40	30	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	75	14	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2006-2010 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

Discussion

In reviewing the tables above and in the previous Section NA-15, it can be seen that there is no racial or ethnic group with a disproportionate share of the severe housing problems in the City as a whole.

It was noted above in Section NA-10, that there are some other groups which have greater need such as the elderly, but neither HUD nor the Census break the needs down into racial/ethnic classifications.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

HUD breaks down housing problems into two categories. One is the physical condition of the housing and the other is the cost of housing.

In turn the physical conditions are split into four types:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden greater than 50%

HUD also has several policies which look at whether there is a disproportionate need as it relates to race or ethnicity. These vary depending upon what the proposed action might be. For example, Site and Neighborhood Standards are used to determine the appropriateness of an investment in new housing in an area.

For the analysis in this section we are using a variance of 10% to define a disproportionate share of a housing problem.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	935	500	25
White	895	385	25
Black / African American	15	0	0
Asian	25	35	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	0	45	0

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2006-2010 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Table NA20-A Modified Disproportion Chart –Extremely Low Income (0%-30%)

Housing Problems	Has one or more of four housing problems	% of HHs with Severe Housing Problems in the Income Group	% of Extremely Low Income Cohort	Race and Ethnicity %s in the City
Jurisdiction as a whole	935			
White	895	47.86%	66.05%	86.98%
Black / African American	15	0.80%	1.11%	4.16%
Asian	25	1.34%	1.85%	5.21%
American Indian, Alaska Native	0	0.00%	0.00%	0.10%
Pacific Islander	0	0.00%	0.00%	0.03%
Hispanic	0	0.00%	0.00%	0.00%
Total Households in ELI Cohort	1,870			

Data Source: 2005-2009 CHAS and 2010 Census

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	620	795	0
White	530	740	0
Black / African American	15	10	0
Asian	10	30	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	70	0	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data Source: 2006-2010 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Table NA20-B Modified Disproportion Chart –Very Low Income (30%-50%)

Housing Problems	Has one or more of four housing problems	% of HHs with Severe Housing Problems in the Income Group	% of Extremely Low Income Cohort	Race and Ethnicity %s in the City
Jurisdiction as a whole	620			
White	530	42.57%	39.55%	86.98%
Black / African American	15	1.20%	1.12%	4.16%
Asian	10	0.80%	0.75%	5.21%
American Indian, Alaska Native	0	0.00%	0.00%	0.10%
Pacific Islander	0	0.00%	0.00%	0.03%
Hispanic	70	5.62%	5.22%	6.41%
Total Households in VLI Cohort	1,245			

Data Source: 2005-2009 CHAS and 2010 Census

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	810	1,840	0
White	655	1,635	0
Black / African American	0	45	0
Asian	100	50	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	45	95	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data Source: 2006-2010 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Table NA20-C Modified Disproportion Chart –Low Income (50%-80%)

Housing Problems	Has one or more of four housing problems	% of HHs with Severe Housing Problems in the Income Group	% of Extremely Low Income Cohort	Race and Ethnicity %s in the City
Jurisdiction as a whole	810			
White	655	40.68%	24.90%	86.98%
Black / African American	0	0.00%	0.00%	4.16%
Asian	100	6.21%	3.80%	5.21%
American Indian, Alaska Native	0	0.00%	0.00%	0.10%
Pacific Islander	0	0.00%	0.00%	0.03%
Hispanic	45	2.80%	1.71%	6.41%
Total Households in LI Cohort	1,610			

Data Source: 2005-2009 CHAS and 2010 Census

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	110	1,590	0
White	95	1,430	0
Black / African American	10	0	0
Asian	0	70	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	4	85	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data Source: 2006-2010 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

Discussion

In reviewing the tables above and in the previous Section NA-15, it can be seen that there is no racial or ethnic group with a disproportionate share of the severe housing problems in the City as a whole. However in the LI cohorts there is a larger proportion for Asian and Hispanic households than in the income LI cohorts.

It was noted above in Section NA-10, that there are some other groups which have greater need such as the elderly, but neither HUD nor the Census break the needs down into racial/ethnic classifications.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	10,455	3,370	2,435	25
White	9,460	2,935	2,135	25
Black / African American	190	60	40	0
Asian	325	110	110	0
American Indian, Alaska Native	0	0	0	0
Pacific Islander	0	0	0	0
Hispanic	370	195	120	0

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2006-2010 CHAS

Table NA25 – A Housing Cost by Race/Ethnicity

	Column A1	Column A2	Column B1	Column B2	Column C1	Column C2	Column D	Column E
Housing Cost Burden	<=30%	% of HHs with No Housing Cost Burden	30-50%	% of HHs with Moderate Housing Cost Burden	>50%	% of HHs with Severe Housing Cost Burden	% of all HHs with Severe Housing Cost Burden	Race and Ethnicity %s in the City
Jurisdiction as a whole	10,455		3,370		2,435		14.98%	
White	9,460	90.48%	2,935	87.09%	2,135	87.68%	9.99%	86.98%
Black / African American	190	1.82%	60	1.78%	40	1.64%	0.19%	4.16%
Pacific Islander	0	0.00%	0	0.00%	0	0.00%	0.00%	0.03%
Asian	325	3.11%	110	3.26%	110	4.52%	0.51%	5.21%
American Indian, Alaska Native	0	0.00%	0	0.00%	0	0.00%	0.00%	0.10%
Hispanic	235	2.25%	195	5.79%	120	4.93%	0.56%	6.41%

Data Source: 2005-2009 ACS Data

Discussion:

The second Table above (NA25-A), shows the percentage shares of each of the racial/ethnic groups of the households with cost burdens.

Columns A2, B2 and C2 compares the percentage of households compared with all households with that housing cost burden. When compared with the racial/ethnic distribution throughout the City (Column E), there is n disproportion for any racial or ethnic group.

However, as noted in prior sections and in NA-10 there are cost burden problems for elderly owners and small household renters, but these are not broken down into racial/ethnic groups.

The City of Attleboro will need to look at any projects being funded with CDBG in terms of how they will impact moderately cost burdened Hispanics as their proportion of this group (5.79%) is approaching their percentage in the City as a whole (6.41%).

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

Based on the analysis above and in Tables NA10-A and NA10-B in Section NA-10, we have developed the following table:

Table NA30-A Severe Housing Problems by Income Group

Source: Chas 2006-2019, US census 2010

This table indicates that 41% of the households with severe problems are Extremely Low Income. For this group the vast majority of the problems are with the cost of housing. If we examine the analyses in NA-10, NA-15, NA-20 and NA-25, we can conclude that there is no glaring disproportionate share of problems in the various income categories based on race and/or ethnicity.

We want to note that income elasticity is less the lower one's income. Hence paying 50% or more for housing when your income is less than 30% of median (Extremely Low Income) is particularly burdensome as the basic resources needed for food, health and education are severely impacted.

If they have needs not identified above, what are those needs?

The specific needs identified in the HOME Consortium survey, indicate that the highest needs are for the populations identified in Section MA-35. The top five needs cited in order of importance in the survey were the mentally ill, those with substance addictions, seniors, those suffering from domestic violence and neglected and abused children.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

Data extracted from data source US Census 2010, HUD/CPD Maps indicates that Tract 6134 has an Asian percentage above 10% and 6138 has a Hispanic origin percentages above 10%. In addition only Tracts 6111 and 6313 have a minority percentage below 10%. These are all substantially above the Attleboro proportions as a whole. The two Census Tracts with the highest percentages of minorities do not have a disproportionate share of the severe housing problems.

It should also be noted that two thirds of the households with severe cost burdens are owners, while two thirds of the households with substandard physical conditions are renters.

Based on the analyses above we can conclude that while there are severe housing problems which need to be addressed, these are not necessarily related to racial/ethnic concentrations.

NA-35 Public Housing – 91.205(b)

Introduction

The Community Development staff met with the Executive Director of the Attleboro Housing Authority (AHA) to discuss and share information with regard to the housing and service needs. The AHA prepared its PHA Plan Update and previously provided the Community Development Office with information regarding such plan. The Office of Community Development and the Attleboro Housing Authority are on the Boards of some of public service organizations, i.e., Attleboro Area Coalition for the Homeless, Attleboro Community Council, and the Greater Attleboro/Taunton Coalitions on Homelessness.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	0	114	0	114	0	0	0

Table 22 - Public Housing by Program Type

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Data Source: PIC (PIH Information Center)

NA-35-A Public Housing Total In Use

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	0	114	0	114	0	0	0
Survey Attleboro Housing Authority**			436	91		137			

Table 1 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data PIC (PIH Information Center) PHA Survey 2013

Source:

Note**: The Attleboro PHA has only State public housing and also has 46 state vouchers [MRVP]

Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	0	15,787	0	15,787	0	0
Average length of stay	0	0	0	5	0	5	0	0
Average Household size	0	0	0	2	0	2	0	0
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	0	7	0	7	0	0
# of Disabled Families	0	0	0	51	0	51	0	0
# of Families requesting accessibility features	0	0	0	114	0	114	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	0	88	0	88	0	0	0
Black/African American	0	0	0	22	0	22	0	0	0
Asian	0	0	0	4	0	4	0	0	0
American Indian/Alaska Native	0	0	0	0	0	0	0	0	0
Pacific Islander	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	0	88	0	88	0	0	0
Survey Attleboro Housing Authority**			390			31			
Black/African American	0	0	0	22	0	22	0	0	0
Survey Attleboro Housing Authority**			5			2			
Asian	0	0	0	4	0	4	0	0	0
Survey Attleboro Housing Authority**			5			1			
American Indian/Alaska Native	0	0	0	0	0	0	0	0	0
Survey Attleboro Housing Authority**			4						
Pacific Islander	0	0	0	0	0	0	0	0	0
Survey Attleboro Housing Authority**									
Other	0	0	0	0	0	0	0	0	0
Survey Attleboro Housing Authority**	0	0	0	0	0	12	0	0	0

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 1 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center) PHA Survey 2013

Note**: The Attleboro PHA has only State public housing and also has 46 state vouchers [MRVP]

Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	0	22	0	22	0	0	0
Not Hispanic	0	0	0	92	0	92	0	0	0

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

Table NA35-B Waiting List Disability Information

While there may be other information about requests for accessible accommodations or specialized disabled needs, the information supplied by the Attleboro Housing Authority indicates that there are a significant number of physically disabled people on the waiting lists for housing. Some of these may be in need of something less than wheelchair accessibility.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

Table NA35-C Waiting Lists for Public Housing and Vouchers

Note*: The waiting list is not restricted to residents of Attleboro. Moreover, people can be on both public housing and voucher waiting lists. Consequently, the numbers in each category of income in Table NA35-D can be less than the number on the waiting lists. Roughly 483 families on the waiting list are currently Attleboro Residents making up approximately 18% of the total list.

Table NA35-C above indicates an overwhelming need for housing for extremely low income families with children.

How do these needs compare to the housing needs of the population at large

Table NA35-D Household Types at or Below 80%

The need is in line with the needs of the population at large in the City. The overwhelming need is for housing which serves extremely low income households. In terms of the demand from families and the elderly compared with the needs as analyzed in Table NA35-D above, we find that of the eligible population (i.e., households at or below 80% of median) 24% are elderly and 82% are families.

Discussion

As a method of addressing affordable housing needs within the City, the City has adopted an affordable housing restriction policy that will be imposed on any multi-family resident rehabilitation project using block grant funds. The City will also make an effort to utilize HOME funds through the Great Attleboro Taunton HOME Consortium (GATHC) to create new adorable housing rental units not only for individuals, but also families, seniors and veteran residents of our community. Through its Gateway City status, the City will assist housing developers obtain funding through the Housing Develop Incentive Program. This program, through the Department of Housing and Community Development (DHCD) offers financial assistance for the development of market rate housing in designated housing zones.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

Please see attachment Page 7 labeled NA-40 Homeless Needs Assessment-91.205(c)

Source and Notes

Source: Attleboro/Taunton/Bristol County Continuum of Care, Point-In-Time Summary (PIT) 1/30/2013 and through consultation.

Notes: The Attleboro/Taunton/Bristol CoC includes about 80% of the population of the Consortium area. Homelessness data is not available by municipality and it cannot be determined with reasonable accuracy, therefore, only A/T/B CoC data is presented in the table above. *[The estimated yearly count is included in the AHAR report but it shows an annual total about ½ that of the PIT count – the data does not include all of the region’s shelters.]*

Response to Table

There is not a rural homeless population in the GATHC region. (Note: HUD defines rural as a community with <2500 residents regarding rural homeless population.)

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

The CoC estimates that it serves approximately 300 homeless households with emergency housing, traditional housing or supportive services. The poor economy, the foreclosure crisis and a reduction of federal and state funding for essential programs (especially substance abuse detoxification services, affordable housing and core human service programs) has exacerbated homelessness for some time. The chronically homeless are especially hard hit. Chronically homeless are individuals (or families with at least one member) with a disabling condition that has either been continuously homeless for a year or has had at least four episodes of homelessness in the past three years. Disabling conditions are usually an untreated mental illness and/or substance abuse. In 2013, the PIT number of chronically homeless was 10 and there were no recorded homeless families. Often, admission to housing and service programs for homeless people has been based on what people deemed a potential for long term stable tenancy. This has left many of the chronically homeless separated from the programs designed to help them.

Homeless families with children accounted for 73% of all homeless individuals identified in the 2013 PIT count. While the number of homeless individuals has dropped slightly in the past five years, the number of homeless families has more than doubled. Most of these families were located in either emergency or transitional shelters.

Two homeless veterans were counted for the PIT survey. One was sheltered, while the other was not. Both were male veterans. Unaccompanied youth is a category of homelessness that has been undercounted for many years. This category is defined as a youth not living with a parent or guardian, and include youth who are residing with a care giver who does not have legal guardianship and youth who are living alone. The youth also lack a fixed, regular and adequate nighttime residence. Often, the individuals who fall in this category do not realize they are considered homeless. Identifying unaccompanied homeless youth is a crucial first step in ensuring these youth receive the support they need. The CoCs have been working diligently with schools and other agencies to help identify these youth.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	0	0
Black or African American	0	0
Asian	0	0
American Indian or Alaska Native	0	0
Pacific Islander	0	0
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	0	0
Not Hispanic	0	0

Data Source
Comments:

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

There were a total of 58 homeless households counted in the 2013 annual PIT survey. It showed a disproportional number of people in families that were homeless compared to individual persons that were homeless during the annual count. Almost three quarters of homeless people were in families with children and another 5% were minors and their children. Most of these households were sheltered either in emergency or transitional facilities. Three households were not sheltered during the annual count. The average household size of the families including adults was 3.6 and the average household size for families without adults was 1.8. Some shelters provide assistance for families with minor children but problems arise when children are not minors and family members are required to be housed in separate facilities.

The PIT data shows two homeless veterans were counted and no homeless veterans with families counted. Consultation with homeless advocates and discussions with the public revealed that there is assistance available for most veterans that were discharged honorably, but there are some difficulties with those whose discharge was less than honorable.

PIT data collection does not include households currently sheltered in hotels by the Commonwealth of Massachusetts and that data is unavailable. Estimating the number of families in need of housing assistance for families with children is also hampered as some families are “doubling up” with friends and families. These displaced families are not included in the PIT counts.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

Data on race and ethnic groups was included in the 2011 Annual Homeless Assessment Report (AHAR) for the Attleboro/Taunton area. It shows that 49% of persons in families in emergency shelters were white, non-Hispanic/non-Latinos. White, Hispanic/Latinos accounted for 24%, black or African Americans accounted for 22% and Asians accounted for the remaining 5% of the population of families in emergency shelters. The race of persons in families in permanent supportive housing was 71% white, non-Hispanic/non-Latino and 29% white, Hispanic/Latino

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

The ratio of sheltered homeless to unsheltered homeless in the region is seven to one. The PIT count shows that one third of the unsheltered homeless are considered chronically homeless individuals. HUD considered an individual or family to be chronically homeless if that individual or family:

- is homeless and lives or resides in a place not meant for human habitation, a safe haven, or is in an emergency shelter;
- has been homeless and living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter continuously for at least one year or on at least four separate occasions within the last three years; and
- has an adult head of household (or a minor head of household in no adult is present in the household) with a diagnosable substance use disorder, serious mental illness, developmental disability, post traumatic stress disorder, cognitive impairments resulting in brain injury, or a chronic physical illness or disability, including the occurrence of 2 or more of those conditions.

Individuals who are mentally ill or have chronic substance abuse problems are twice as likely to be unsheltered than they are sheltered. The data also shows that the homeless who are victims of domestic violence are two times as likely to be unsheltered as they are sheltered.

Discussion:

There are some common characteristics of low-income and extremely low-income individuals and families with children who are either homeless now or threatened with homelessness. The causes for homelessness almost always include one or more of the following factors: unemployment/job loss, mental illness, substance abuse, not enough money, family problems, domestic abuse, disability, eviction, and legal problems. These characteristics, while not unique to the Consortium's communities, are prevalent in the homeless (and near homeless) population throughout the region.

The Consortium recognizes that preventing homelessness, especially chronic homelessness, is the first step to solving a homeless problem. Supportive services are especially critical to assist people with mental illness, substance abuse problems, HIV/AIDs, victims of domestic violence, and former prisoners. Individuals (and families) with these issues are often among the chronically homeless and services are needed to help make a transition to permanent affordable housing. The Consortium also believes that a variety of housing types is an important factor in providing affordable, safe and decent housing that can

meet the needs of individuals and families with children who are either homeless now or threatened with homelessness. Finally, education and employment are a critical component to assisting those homeless who are able to work.

Members of the Consortium, the Greater Attleboro Taunton Coalition on Homelessness (GATCH), service partners and others are continuing their coordinated efforts to combat homelessness in the region. "The Ten to End", a 10 year plan to end chronic homelessness in the Greater Attleboro and Taunton area, was prepared in 2011 as a regional effort to address and eliminate homelessness. The Plan identifies actions that must be taken to solve the homeless and chronic homeless problems in the Consortium region. The Consolidated Plan includes priority needs, goals and objectives that are consistent with the "Ten to End" Plan.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

Throughout the City, there are households in various subpopulations who are not homeless but have specific housing needs and may also require special attention due to their current or prospective service requirements. These subpopulations include: elderly, frail elderly, persons with severe mental illness, developmentally disabled, physically disabled, substance abusers and persons with HIV/AIDS.

The City is aware of the needs of special populations and is committed to supporting initiatives which target these populations. One of the most effective strategies is the use of Project Based Section 8 [PBA], which is made available through the Attleboro Housing Authority and through the state's HCV allocation. If CDBG funds can assist any developments proposed, the City will seriously consider them.

One way the City has been successful in assisting the special needs population has been through rehab programs. The City has a history of assisting agencies that house and assist special needs clients. When doing rehab, either for agencies or homeowners, the needs of individual household members, including handicapped, disabled, or other special needs persons are taken into consideration and addressed.

Describe the characteristics of special needs populations in your community:

There is a lack of accessible and meaningful information with which to provide the data. We are using some recent data as well as extrapolations from older and national, state and regional analyses updated where possible. These estimates are reasonable but not definitive.

Elderly

The elderly designation varies in terms of how agencies classify people and households. HUD uses age 62, while the Census generally classifies the elderly as persons who are 65 or older. However, much of the census data is for persons 60 years or older. In addition, households may have one or more members who are different ages. Also sources are not consistent and may give different and apparently conflicting data.

Please see attachment page 9 labeled Table NA45-A Elderly Demographics- Attleboro for additional information on Elderly Demographic, Page 10 labeled Table NA45-B Elderly Population Demographics by Income and NA 45-C Elderly Population Share of the Population by Age and Income

What are the housing and supportive service needs of these populations and how are these needs determined?

Please see tables and description of attachment Page-14 Labeled NA 45

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

The City does not have that data available.

Discussion:

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction’s need for Public Facilities:

Public Facilities- The City is very concerned about ensuring that all public facilities are accessible to the residents of Attleboro, especially low and moderate income residents and resident with disabilities. Therefore the City will appropriate annual CDBG funds to the removal of architectural barriers and will continue to look for opportunities to rehabilitate public facilities to ensure that they meet ADA requirements. The City will look to undertake 5 ADA projects for the next five years.

How were these needs determined?

The need was determined is an effort to provide accessibility to individuals with disabilities in all public facilities.

Describe the jurisdiction’s need for Public Improvements:

Public Improvements – The City is continuing its efforts to beautify its downtown which is in the middle of a 51% low-moderate income census tract. As such the block grant funds will be set aside to address improvements to façade and signs within the targeted downtown to support the Streetscape effort currently underway. Funding will be offered in the form of a grant up to two-thirds of the cost of the project not to exceed ten thousand dollars per improvement. . Should other public improvements become necessary as a result of economic development initiatives the City will consider those as well.

Economic Development – The primary goal of economic development is the creation and retention of jobs. To this end the City will work with developers to acquire and rehabilitate buildings to create job opportunities for low/moderate income residents of the City. Though, the City will show priority to economic development projects in the downtown area in an attempt to create a vibrant downtown that is filled with retail, entertainment, and art, block grant funds will be used in an effort to create job opportunities through out the City . It is the City’s hope that this type of activity will increase foot traffic through the downtown, create jobs, and allow local businesses to flourish.

How were these needs determined?

Need was determined as a way to vitalizing some public facilities in some of the most low income census tracts through out the City.

Describe the jurisdiction’s need for Public Services:

Public Services – The City is committed to funding public services up to the maximum 15% cap during the next five years to ensure that low and moderate income individuals and families are receiving the maximum amount of support available. The city is interested in funding services that promote and support economic self-sufficiency.

How were these needs determined?

Need was determined through various public meetings, and one on one meetings with various local agencies and City's entities.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

Please See attachment page 13-page 18 labeled MA-05 Overview

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

This section analyses the type of housing in the City and especially the nature of the supply and need and thus the gaps in the supply.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	9,507	55%
1-unit, attached structure	908	5%
2-4 units	3,522	20%
5-19 units	1,708	10%
20 or more units	875	5%
Mobile Home, boat, RV, van, etc	885	5%
Total	17,405	100%

Table 26 – Residential Properties by Unit Number

Data Source: 2006-2010 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	0	0%	231	5%
1 bedroom	241	2%	1,171	24%
2 bedrooms	2,512	22%	2,287	47%
3 or more bedrooms	8,661	76%	1,227	25%
Total	11,414	100%	4,916	101%

Table 27 – Unit Size by Tenure

Data Source: 2006-2010 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

The data available from The Attleboro Housing Authority is more detailed and more readily available than from other subsidized housing providers. Table MA10 - A below shows that the vast majority (at least 75%) of housing provided through the AHA's governmentally subsidized housing programs serve Extremely Low Income households.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

Please attachment Page 19 labeled Table MA10 – A Expiration of Subsidy Inventory

As Table MA10-B shows, there are at least 1,104 households with subsidies in the City. In addition, it is estimated that there are approximately another 1,066 units which are occupied by households and for whom the cost is affordable, using the same 30% of income rule. Therefore, there is not only a need to protect governmentally subsidized housing, of which more than 290 units are at risk of losing their subsidies in the next 5 years, but also to protect private landlords who are providing subsidized affordable housing.

It should also be noted here that the lack of non-subsidized affordable housing creates a situation where the percentage of household income to support household expenses becomes a larger burden for the household and leads those affected to seek assisted/affordable housing units thereby fueling the need

Does the availability of housing units meet the needs of the population?

In addition to the developments subsidized with specific governmental actions/financing and therefore a variety of restrictions both in terms of the longevity of the restrictions and the criteria for admittance (mostly income restrictions), there are many units which based on the US Census, were affordable to their occupants at the time (2010). This is calculated using the 30% of gross income formula.

The following table shows this distribution and also adjusts the numbers for the known subsidized households in the City. It should be noted that the State also manages HUD HCV vouchers and that many of these are being used in Attleboro. The actual numbers are not known at this time.

Describe the need for specific types of housing:

In terms of the need for specific types of housing, the CHAS data (Table NA10-D) shows that small households who are extremely low income (less than 30% of median income) and elderly owners who are extremely low income, are the two largest groups in need of housing. The driving characteristic of these two groups is the housing cost burden which can be in part relieved by modernization of the housing with energy saving investments and in part by the development of new subsidized housing.

Discussion

Apart from the overwhelming need for lower housing costs discussed above and in other sections, there are also special sub-groups of the population which need to be served. These include dishonorably discharge veterans, those who have lost public housing assistance (with and without cause), unaccompanied youth and those discharged from jail or confinement).

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

Much of public debate about housing focuses on the supply of housing while some focuses on the cost of housing. Housing affordability is a complex topic. However one of the simpler measures is to see if household income and the cost of housing run in parallel tracks. The data and analysis below focuses on this relationship.

Cost of Housing

	Base Year: 2000	Most Recent Year: 2010	% Change
Median Home Value	147,200	0	(100%)
Median Contract Rent	531	0	(100%)

Table 28 – Cost of Housing

Data Source: 2000 Census (Base Year), 2006-2010 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	1,016	20.7%
\$500-999	2,783	56.6%
\$1,000-1,499	848	17.3%
\$1,500-1,999	212	4.3%
\$2,000 or more	57	1.2%
Total	4,916	100.0%

Table 29 - Rent Paid

Data Source: 2006-2010 ACS

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	465	No Data
50% HAMFI	1,025	235
80% HAMFI	2,740	670
100% HAMFI	No Data	1,655
Total	4,230	2,560

Table 30 – Housing Affordability

Data Source: 2006-2010 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	826	872	1,134	1,412	1,515
High HOME Rent	826	911	1,134	1,412	1,515
Low HOME Rent	650	832	922	1,047	1,350

Table 31 – Monthly Rent

Data Source Comments: Additional information includes Typical Contract rent in the AHA MRVP voucher Program and is as follows; efficiency (no bedroom)-190, 1 bedroom-367, 2 Bedroom-360, 3 Bedroom-533, 4 Bedroom-N/A

Is there sufficient housing for households at all income levels?

Please see attachment on page 20 labeled Table MA15-A Estimated Supply of and need for Affordable Housing.

As can be seen from Table MA15-A above, there is a need for at least 1,764 affordable units assuming that there is no loss from the subsidized inventory and no loss of the privately affordable units. There are 290 units with subsidy restrictions which will expire by 2018 so that will require careful actions by the City to preserve that housing.

How is affordability of housing likely to change considering changes to home values and/or rents?

In general the demand for housing is stable as there has been a small (4.2%) increase in population in Attleboro over the last decade. The gaps in housing supply are for the VLI and LI groups. As noted above, there is a limited supply of subsidized and private market housing affordable to this group. At the same time there are declining funds for low income housing which is evidenced by the 2,344 households on the waiting lists of the Attleboro Housing Authority. Renters may find rents remaining higher and candidates for home ownership still find affordability difficult unless they can take advantage of the HCV homeownership option. It should be noted that median income has risen 23% over the period 2000-2010, while median rents have risen 49% and housing values 104% - more than double the rate. This is a growing discrepancy in terms of supply and demand ratios which will certainly impact both rental and ownership affordability.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

FMR limits and HOME rent limits are much higher than the reasonable rents calculated by the housing authority and the rents generally found in the market (so called 'street' rents). If rents are not subsidized there is little benefit to low/mod renters under HOME limits. In most cases tenants are at or below 60% AMI and high

HOME rents apply

unless income is below 30% AMI where low HOME rents apply. In any event, this ConPlan deals with CDBG funds not HOME funds. Therefore a preservation strategy through rehab and other techniques is the most appropriate use of CDBG funds

Discussion

As noted above, there are an estimated 1,066 privately owned and managed housing units which are serving people with incomes of less than or equal to 80% of median income and which are providing housing at a cost of 30% or less of household income. These are worth preserving as the cost of replacing them with new housing is substantial. Programs which target rehab of these units such as CDBG or provide direct subsidy of the units (such as Project Based Section 8) are more cost effective. Attleboro is also a member of the Greater Attleboro Taunton HOME Consortium and can access these extremely limited funds (cut in half by recent HUD budgets) for rehab and/or new construction.

In addition as noted above, there are at least 290 units of housing with contractual obligations to provide affordability, in which the contract term will expire in the next 5 years. Preservation of these units will in general be less costly than replacing them with new units.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

The sources of information about the condition of housing are primarily the census and the code inspections of the City. We have chosen to use the data supplied by HUD from the Census as the criteria for defining ‘condition’ may differ.

Definitions

The City considers any property that does not meet minimum Housing Quality Standards as a unit in substandard condition suitable for rehab.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	4,116	36%	1,632	33%
With two selected Conditions	65	1%	100	2%
With three selected Conditions	0	0%	32	1%
With four selected Conditions	0	0%	0	0%
No selected Conditions	7,233	63%	3,152	64%
Total	11,414	100%	4,916	100%

Table 32 - Condition of Units

Data Source: 2006-2010 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	1,052	9%	279	6%
1980-1999	3,122	27%	789	16%
1950-1979	4,030	35%	1,808	37%
Before 1950	3,210	28%	2,040	42%
Total	11,414	99%	4,916	101%

Table 33 – Year Unit Built

Data Source: 2006-2010 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	7,240	63%	3,848	78%
Housing Units build before 1980 with children present	205	2%	5,155	105%

Table 34 – Risk of Lead-Based Paint

Data Source: 2006-2010 ACS (Total Units) 2006-2010 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 35 - Vacant Units

Data Source: 2005-2009 CHAS

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	1,295
Abandoned Vacant Units	0	0	0
REO Properties	0	0	50
Abandoned REO Properties	0	0	0

Table 1 - Vacant Units

Alternate Data Source Name:

Please see below

Data Source Comments:

Need for Owner and Rental Rehabilitation

Table MA20-A attached as a text indicates that there are several housing units in Attleboro which are in need of substantial rehab. As can be seen about half are vacant. Whether in fact the occupied units can be rehabbed or whether in fact the vacant units can be acquired and restored is not known. What is known is that the City of Attleboro has assisted housing units through the housing rehab program. The City normally gets far more requests for assistance than can be addressed with available funding. It also have to turn people away who have applied for assistance due to their being over income or have no equity in the property to support the debt incurred through rehab. Other properties have been turned down due to capacity issues with homeowners or the extremely poor condition of the units and associated costs of addressing the needed repairs.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

The total number of houses built prior to 1979 when lead based paint was banned was 12,219. Since that time many houses have been rehabbed, many houses have voluntarily or under lead poisoning regulations have been de-lead. In addition, many of these houses are occupied by families without children or families with children over the age of 6 (which in Massachusetts is the cut-off point for LBP rules). The exact number of houses which need deleading or which are in violation of LBP rules is not known at this time.

We do know that 31% of the housing is occupied by non-family households. We also know that 32% are occupied by family households with at least one child under 18 years old. In addition, it is likely that income eligible families are more likely to occupy houses built prior to 1980 as in general the housing prices are lower for the older housing stock. So it might be reasonable to assume that perhaps no more than 40% of the housing stock built prior to 1980 (4,900) is occupied by families with children where there may be a LBP hazard.

As noted in the jpg files, the age of housing no longer is a good proxy for the presence of LBP. Over the last 30 years there has been a significant set of enforcement and rehab programs resulting in the mitigation and/or removal of lead based paint. An indicator of this is the number of cases of LBP poisoning in Attleboro. Over the last 10 years the rate has dropped to zero. The dramatic reduction in lead poisoning is also an indication of the effectiveness of deleading programs.

Over the last 10 years (2003-2013) the City has utilized four funding sources to assist with lead abatement activities. The MHFA "Get the Lead Out" program provides funds to homeowners for the abatement of a property which has tested positive for lead. State deleading grants also contributed funding to assist (co-fund) or fully fund deleading activities. The presence of lead paint in older housing has been and will probably continue to be an area of concern for the City and its residents.

Discussion

There is some potential for creating more affordable housing through acquisition and rehab and there is definitely potential for preserving and/or upgrading existing affordable housing. The CDBG program has been used and can continue to be used for these purposes.

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

As noted in earlier sections, the public housing stock in the City consists of State funded and regulated units. Also there are both Federal vouchers (HCV) and State vouchers (MRVP). The numbers and discussion below include both Federal and State housing.

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available				95			0	0	0
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 36 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

Table MA25 – A Supply of Housing in Attleboro

Project Name	# of Elderly Units	# of Family Units	# of Disabled Only Units
Oakhurst	107	0	6
Rivercourt	54	0	5
Maple Terrace	72	0	0
Brookside	75	0	0
Ellis Street	0	2	0
Garden Street	0	2	0
Holman Street	0	2	0
Martin Street	0	15	0
Hillcrest Oaks	0	96	4
MRVP Project	0	48	0
MRVP Mobile	0	4	0

Data Source: Attleboro Housing Authority 2014

Table MA 25 Supply of Housing in Attleboro

Describe the supply of public housing developments:

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

Given the efforts of the AHA staff to attract continuing modernization funding to Authority sites, we have been able to build in longer term viability into almost 50% of the Authority portfolio of public housing assets. We have completely rebuilt an existing 10 acre site containing 98 units in 15 buildings at our Hillcrest Oaks site. In addition, we are completing construction on all exterior components of the fourteen buildings (113 units) at our Oakhurst Apartments site. Along with what now amounts to approximately \$20 million investment in housing along South Avenue we have built 11 new fully accessible handicap units where none existed before. There is still a sizable need for continued investment in another 206 units of elderly housing and about \$2 to \$3 million in needed modernization funding. The Authority also owns three homes occupied by programs conducted by the Department of Mental Health and the Department of Mental Retardation, which will require another \$500,000 in funding to accomplish needed repairs and enhancements. The Authority has been awarded an allocation from the Department of Housing and Community Development through their Formula Funding Program that will allow the Authority to spend about \$400,000 per year on planned projects.

Public Housing Condition

Public Housing Development	Average Inspection Score
Oakhurst	Pass
Rivercourt	Pass
Maple Terrace	Pass
Brookside	Pass
Ellis Street	Pass
Garden Street	Pass
Holman Street	Pass
Martin Street	Pass
Hillcrest Oaks	Pass
MRVP Project	Pass
MRVP Mobile	Pass

Table 37 - Public Housing Condition

Describe the supply of public housing developments:

If the general supply of public housing were to be gauged by the breadth of the AHA waiting lists we are sadly short of quality affordable housing for those below the 60% median income level. The AHA waitlists generally hover in the range of 1,500 to 2,000 families at any given time. The rate of new applications for housing filed with the Authority average 15 applications per week. Currently, existing public housing units for elderly and handicap families comprise 80% of the Authority housing stock. There is a significant need building for additional family units in the two bedroom range. As regard those families who are currently housed there is a need to provide some form of intermittent self-sufficiency support in order to allow those families to continue viable tenancies.

Table MA25 – A Supply of Housing in Attleboro

Project Name	# of Elderly Units	# of Family Units	# of Disabled Only Units
Oakhurst	107	0	6
Rivercourt	54	0	5
Maple Terrace	72	0	0
Brookside	75	0	0
Ellis Street	0	2	0
Garden Street	0	2	0
Holman Street	0	2	0
Martin Street	0	15	0
Hillcrest Oaks	0	96	4
MRVP Project	0	48	0
MRVP Mobile	0	4	0

Data Source: Attleboro Housing Authority 2014

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

Please see attachment page 22 labeled Table MA25-B Physical Needs

The Authority currently has a five year capital plan in place to address ongoing needs for restoration and revitalization. We shall be expending more than \$3 million over the next three years for a multiple number of projects. Projects shall include interior repairs to bathrooms and kitchens, plumbing and electrical repairs, sewer and drainage work, roofs, window replacement, site repaving, interior and exterior doors and trim, exterior lighting, elevator repairs and enhancements, parking area asphalt overlays, and much more.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

The Authority staff strives to improve the living environment on two fronts at all times. We continually encourage and correspond with local tenant organizations and look to create means to effectively disseminate information between the general tenant population and the staff at the Authority. Administrative staff work to implement policies that will not only consider the rigidity of regulatory needs but also balance those needs with their considered effect on our tenant population. Our Administrative staff tries to incorporate user-friendly techniques with the need to exercise sound judgment and firm, knowledgeable management expertise.

In maintaining the public housing units, maintenance staff is schooled in the need for continual and effective communication in all facets of their work. In addition, our maintenance staff documents all aspects of maintenance activity in order to review and analyze our work product. Much of the reporting and analysis we perform is geared toward not only quantifying our approach to housing maintenance but leading us to other ways of providing quality, comprehensive and cost-efficient housing services. By being more comprehensive and critical in our approach to providing housing maintenance services we augment asset viability and assist in perpetuating affordable family tenancies.

Discussion:

In September of 2008 with funding provided through the Department of Housing and Community Development, the Attleboro Housing Authority began a modernization project to address the rehabilitation of two hundred and twelve (212) affordable housing units. As a result of said modernization plan, eleven (11) units were renovated to meet Section 504 accessibility requirements. There are four hundred and thirty-eight (438) state funded public housing units in Attleboro. Of said units, eighty percent (80%) are occupied by elderly residents. In 2012 The Housing Authority received six hundred thousand dollars (\$600,000) for the rehabilitation of eighteen (18) units, will complete renovation to common areas including the replacement of existing roof and stair replacement at the River Court.

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	203	0	54	32	0
Households with Only Adults	30	0	22	54	0
Chronically Homeless Households	0	0	0	0	0
Veterans	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0

Table 38 - Facilities and Housing Targeted to Homeless Households

Data Source Comments: Source: Attleboro/Taunton/Bristol County Continuum of Care, Point in Time 01/30/2013 and the Conway House NOTE: Data includes 36 beds at the Conway House in Middleboro (this is located within the consortium area and outside of the Attleboro/Taunton/Bristol CoC area). The Conway House located in the Brockton/Plymouth CoC

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons.

Supportive Service	Agency	Services
Life Skills	Pro Home	financial literacy education
	The Family Resource Center w/ American Credit Counseling	offers seminars and credit counseling
Alcohol and Drug Abuse Treatment	High Point Treatment Centers	inpatient treatment program
	Community Counseling of Bristol County	outpatient, detoxification and short-term residential services
	AA,NA, ALANON	peer lead support groups
	Veterans Administration	veterans health services
	Mass Health	detoxification and treatment programs
General Health and Emergency Health	Mass Health	Provides medical insurance for use at most doctors, clinics and hospitals
	Local hospitals	Provides emergency medical care
Mental Health Treatment	Community Counseling of Bristol County	case management and treatment for the mentally ill
	Community Counseling of Bristol County	veterans mental health services
	Mass Health	mental health services
	Department of Developmental Services	mental health services
	Veterans Administration	veterans mental health services
Employment and Training	Bristol Workforce Investment Board	Attleboro Career Center
	Bristol Workforce Investment Board	Taunton Career Center
	MA Dept of Mental Health	assists in finding funding for education or training
	Community Counseling of Bristol County	Education and employment programs
Child Care	MA Dept. of Transition Assistance	Welfare to Work provides child care subsidies
	US Dept. of Education	child care for working parents in an employment training program
	Taunton Family Center	child care assistance
Transportation	United Way of Greater Attleboro/Taunton	Community Care-Vans and Med Wheels

	United Way of Greater Attleboro/Taunton	Transportation for children to attend Triumph, Inc.
	Community Counseling of Bristol County	HIV client services
	MA Dept. of Mental Health	contingency funds for transportation
Dental Health	DotAve Community Services, Inc.	dental care
Clothing	Church in the Park Program	provides clothing and supplies once a year
	St. Vincent DePaul	provides clothing and disability equipment
	Citizens for Citizens	Provides clothing at the food pantry
Other	United Way of Greater Attleboro/Taunton	MASS 2-1-1 referral service and Emergency Food Service
	South Coastal Counties, Inc.	legal services
	Veterans Services	Assistance with Veterans Administration programs and services
	New Hope, Inc.	legal services

Food Pantries and Soup Kitchens

Attleboro Area Council of Churches	Attleboro
Coyle & Cassidy H.S. Food Pantry	Taunton
Cupboard of Kindness Food Pantry	Norton
Dighton Community Food Bank	Dighton
Doorways, Inc.	Seekonk
Hebron Food Pantry	Attleboro
Lenore's Food Pantry	North Attleboro
Open Shelves Food Pantry	Berkley
Our Daily Bread	Mansfield and Taunton
Raynham Food Basket	Raynham
Rehoboth Food Pantry	Rehoboth
Society of St. Vincent de Paul	Taunton
United Methodist Church Food Bank	Plainville

Supportive services and are critical to address the special needs of homeless persons and families. The following is a list of supportive services that are designed to meet the needs of homeless individuals and families living in shelters.

Supportive Service	Agency	Services
Case Management	Samaritan House	Case Management Services
	Family Resource Center	Case Management Services
Life Skills	Family Resource Center	Skills Training including parenting and budgeting
Alcohol and Drug Abuse Treatment	Community Counseling of Bristol County	Alcohol and drug treatment for the chronically homeless
Mental Health Treatment	Community Counseling of Bristol County	Mental health service for homeless
Education	MA Dept. of Mental Health	Community Career Links Program fund for higher education
	US Dept. of Veterans Services	Help homeless veterans qualify for funding higher education
	The Family Resource Center	child enrichment activities for children at the shelter
Employment and Training	Samaritan House	job skills training and employment assistance
Child Care	The Taunton Family Center	child care assistance
	Horizons for Homeless Children	child care assistance

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

please see attached jpeg file above named Mainstream Service 1 and Main Street Service 2

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

There are several types of housing facilities available for homeless and at-risk individuals and families in the Consortium region. They include emergency shelter, transitional housing, and permanent housing.

- Emergency Shelters are meant to be short-term residential facilities that respond to a household emergency of homelessness. Guests may not have rooms but are often assigned a bed in a large open area. Emergency shelters provide about 60% of the beds for the homeless in the region.
- Transitional Housing is temporary. Individuals staying in transitional housing are homeless and referred by emergency shelters, detoxification programs and outreach and assessment programs working with emergency shelter providers. Transitional housing is intended to facilitate the movement of individuals and families experiencing homelessness to permanent housing within 24 months. About 19% of beds in the region are included in this category.
- Permanent supportive housing is community-based housing without a designated length of stay. It incorporates supportive services into the design to enable the homeless to maintain long term tenancy. Residents of this type of housing often include the chronically homeless who cannot stabilize in permanent housing without the supportive services. These types of beds comprise 21% of region's homeless housing.

There are seven organizations that provide assessment, support services and shelter to the area's homeless population. Together they provide 395 beds for the region. Two additional programs provide housing assistance to Veterans and to homeless families. The VA Supportive Housing and Treatment (VASH) program provides services and housing vouchers to homeless veterans. This program is run through the Veterans Administration Healthcare System. The MA Executive Office of Housing and Community Development runs the Emergency Assistance program where homeless families are housed in hotels throughout Massachusetts when family shelters are at capacity.

Supportive Services are critical. PLEASE SEE ATTACHED JPEG FILE ABOVE LABELED SUPPORTIVE SERVICES

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

Throughout the City, there are households in various subpopulations who are not homeless but have specific housing needs and may also require special attention due to their current or prospective service needs. These subpopulations include: elderly, frail elderly, persons with severe mental illness, developmentally disabled, physically disabled, substance abusers, and persons with HIV/AIDS.

The City is aware of the needs of special populations and is committed to supporting initiatives which target these populations. One of the most effective strategies is to assist in providing affordable housing through the use of Project Based Section 8 which is made available through the AHA and through the State DHCD, which provides its own state public housing subsidies and units. If funds can assist any developments proposed, the City will consider them seriously.

The approach to addressing the needs posed by these populations has changed over the past twenty years. In response, a variety of public and private sector resources are available to address some of the current approaches to housing and service needs for these groups. These resources are limited and insufficient to meet all the needs identified. In addition, members of these subpopulations frequently require assistance from multiple sources in order to succeed in daily life.

In addition to the availability of public housing and other federally assisted housing programs for the elderly (especially Section 202) and for the disabled (especially Section 811 and Project Based Section 8), Massachusetts is one of the few states which provides state aided public housing for the elderly, for the frail elderly and for the non-elderly disabled through DHCD. Other state agencies serving the elderly within the Consortium include the Executive Office of Elder Affairs and the Executive Office of Health and Human Services. Massachusetts also has a variety of community-based programs serving the elderly. There is a local Council on Aging (COA) within the City which provides elders and families with direct care services. There is Bristol Elder Services, which is designated by the state as the Area Agency on Aging and the access point for aging services. Programs which meet the needs of elderly residents include subsidized housing; protective services (intervention in cases where there is evidence that an elder has been neglected, abused or financially exploited by someone in a domestic setting); home care; congregate housing; nutrition; guardianship; legal services; transportation; assistance with health care administration; and coordination services for the elderly who are also disabled.

In addition to affordability, a key issue for the physically disabled has been the physical inaccessibility of housing units. Rehab funds available from the CDBG program have been used to create accessibility. The AHA has units and programs which are available and are utilized for adapting housing to meet the needs of the physically disabled as well as meeting ADA and Section 504 requirements.

The numbers of adults with mental illness or developmental disabilities who are treated in state funded institutions has continued its dramatic decline. Correspondingly, the number receiving community-

based services has significantly increased. DMH and DMR are the primary service systems for providing services and housing (through the use of state and private housing providers) to these populations.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

Please see attached jpeg file labeled elderly data 1-3

The elderly population of Attleboro is as follows.

Table MA35-A Elderly Population of Taunton

	Persons Age 65+	Persons Age 80+
All Income Groups	5,609	1,766
	Persons Age 62-74*	Persons Age 75+**
<=80% Median	1,199	1,060

Source: ACS2011 and Census 2010

Note: * HUD traditionally has defined elderly as 62 or more years old

** HUD traditionally has defined frail elderly as 75 or more years old

A more logical definition would be older persons who are afflicted with physical or mental disabilities that may interfere with the ability to independently perform activities of daily living.

Based on this definition, we have listed elderly disabled non-institutionalized population for Attleboro in Table MA35-B below. As can be seen we can certainly estimate the frail elderly population as those with a self-care difficulty or with an independent living difficulty. The census numbers are not mutually exclusive so at a minimum there would be 834 frail elderly but it could be more depending upon how many of the 425 with a self-care difficulty are not in the independent living difficulty category.

Table MA35-B Non-Institutionalized Disability Population Analysis

	Estimated Numbers	% Of Total Disability Population	% Of Elderly Disabled	% of All Elderly 65+	Estimated # of All Elderly 65+ and <=80%HAMFI
Population 65 years and over with a disability	1,769	30.8%	N/A	31.4%	710
With a hearing difficulty	760	13.2%	43.0%	13.5%	305
With a vision difficulty	270	4.7%	15.3%	4.8%	108
With a cognitive difficulty	450	7.8%	25.4%	8.0%	181
With an ambulatory difficulty	1,132	19.7%	64.0%	20.1%	454

Elderly Data 1

	Estimated Numbers	% Of Total Disability Population	% Of Elderly Disabled	% of All Elderly 65+	Estimated # of All Elderly 65+ and <=80%HAMFI
With a self-care difficulty	475	8.3%	26.9%	8.4%	191
With an independent living difficulty	624	10.9%	35.3%	11.1%	250

Source: ACS2011 and Census 2010

The table MA35-C following, shows the number of institutionalized persons in Attleboro.

Table MA35-C Institutionalized Population

People in group quarters in Attleboro in 2010:	
People in nursing facilities/skilled-nursing facilities	429
People in group homes intended for adults	76
People in other non-institutional facilities	37
People in emergency and transitional shelters (with sleeping facilities) for	
People in residential treatment centers for adults	
People in group homes for juveniles (non-correctional)	22

Source: City-Data 2014

Generally we can conclude that the elderly population with specialized needs not in assisted living, nursing home and other institutions and facilities but either in special housing with supportive services and adaptive features or in independent living situations totals about 1,769 households. We know of that there are somewhere around 541 units of public and subsidized housing designed and occupied by the elderly although the vast number of these are not designed specifically for the disabled elderly population and that many if not most do not have supportive services attached. So we might conclude that there could be somewhere between 1,200 elderly households which might need specialized housing and/or specialized services.

The disabled population of Attleboro is detailed in Table MA35-D below. Each of these classes would require different approaches in terms of housing and supportive services. These numbers include all income groups. We estimate that a significant percentage of these are in households whose income is less than or equal to 80% of median, thus making them income eligible for HOME and CDBG programs.

Table MA35-D Disability Population Analysis

Elderly Data 2

Attleboro Disability Populations	Number
Total civilian non-institutionalized population	5,741
SEX - Male	2,361
SEX - Female	3,380
RACE AND HISPANIC OR LATINO ORIGIN - One Race - White alone	5,349
Population 5 to 17 years	435
With a cognitive difficulty	268
With an ambulatory difficulty	14
With a self-care difficulty	91
Population 18 to 64 years	3,537
With a hearing difficulty	588
With a vision difficulty	524
With a cognitive difficulty	1,263
With an ambulatory difficulty	1,746
With a self-care difficulty	806
With an independent living difficulty	1,557
Population 65 years and over	1,769
With a hearing difficulty	760
With a vision difficulty	270
With a cognitive difficulty	450
With an ambulatory difficulty	1,132
With a self-care difficulty	475
With an independent living difficulty	624

Source: ACS2011 and Census 2010

Elderly Data 3

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

Currently there are no programs available in Attleboro to meet this need

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

Through the rehabilitation and development of adorable housing

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

Throughout the Consortium, there are households who are not homeless but have specific housing needs and may also require special attention due to their current or prospective service needs. These include: elderly, frail elderly, persons with severe mental illness, developmentally disabled, physically disabled, substance abusers, and persons with HIV/AIDS.

The City of Attleboro is aware of the needs of these individuals and is committed to supporting initiatives that help them. The City will ensure that the maximum 15% is dedicated to funding Public Services that will support people with special needs. Additionally, the City will look for opportunities to fund projects that provide supportive housing for special needs individuals.

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

In general, public policies affecting the cost and production of affordable housing are modified by specific zoning by-laws. Production is enhanced in Massachusetts through the following:

- Inclusionary zoning (a percentage of housing developed in the marketplace being set aside for affordable use and usually placed within mixed income developments);
- Accessory apartments (particularly effective in enabling low income elderly owners to continue living in the community);
- Overlay districts permit increased density and state funding support and enable affordable units within mixed income developments;
- Chapter 40B is a state law which permits it to override local zoning if local government does not have the zoning tools to permit affordable housing production. There is a voluntary process known as LIP [Local Initiative Plan] which a local government can use and thus not invoke state override of zoning.

The attached jpeg file labeled Status of Major Initiatives Affecting Affordable Housing summarizes the current state of such initiatives in the Attleboro area.

Status of Major Initiatives Affecting Affordable Housing

Community	Inclusionary Zoning	Accessory Apartment	Overlay Districts such as 40R	Chapter 40B LIP	Other Affordable Housing Incentive Zoning
Attleboro	Yes	No	Yes	Yes	Yes

Status of Major Initiatives Affecting Affordable Housing

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	0	0	0	0	0
Arts, Entertainment, Accommodations	0	0	0	0	0
Construction	0	0	0	0	0
Education and Health Care Services	0	0	0	0	0
Finance, Insurance, and Real Estate	0	0	0	0	0
Information	0	0	0	0	0
Manufacturing	0	0	0	0	0
Other Services	0	0	0	0	0
Professional, Scientific, Management Services	0	0	0	0	0
Public Administration	0	0	0	0	0
Retail Trade	0	0	0	0	0
Transportation and Warehousing	0	0	0	0	0
Wholesale Trade	0	0	0	0	0
Total	0	0	--	--	--

Table 39 - Business Activity

Data Source: 2006-2010 ACS (Workers), 2010 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	25,451
Civilian Employed Population 16 years and over	23,386
Unemployment Rate	8.11
Unemployment Rate for Ages 16-24	24.41
Unemployment Rate for Ages 25-65	5.64

Table 40 - Labor Force

Data Source: 2006-2010 ACS

Occupations by Sector	Number of People
Management, business and financial	5,133
Farming, fisheries and forestry occupations	1,158
Service	2,106
Sales and office	4,381
Construction, extraction, maintenance and repair	1,882
Production, transportation and material moving	1,652

Table 41 – Occupations by Sector

Data Source: 2006-2010 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	13,547	61%
30-59 Minutes	6,465	29%
60 or More Minutes	2,320	10%
Total	22,332	100%

Table 42 - Travel Time

Data Source: 2006-2010 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	1,683	103	731
High school graduate (includes equivalency)	5,185	625	1,198
Some college or Associate's degree	5,879	289	1,024

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Bachelor's degree or higher	6,499	360	690

Table 43 - Educational Attainment by Employment Status

Data Source: 2006-2010 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	65	66	152	580	758
9th to 12th grade, no diploma	455	403	373	943	794
High school graduate, GED, or alternative	1,798	1,686	1,621	3,701	1,908
Some college, no degree	1,006	1,282	1,311	2,008	754
Associate's degree	158	431	1,058	1,132	238
Bachelor's degree	324	1,574	1,739	2,371	491
Graduate or professional degree	8	434	668	877	223

Table 44 - Educational Attainment by Age

Data Source: 2006-2010 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	23,375
High school graduate (includes equivalency)	33,397
Some college or Associate's degree	41,858
Bachelor's degree	52,853
Graduate or professional degree	63,481

Table 45 – Median Earnings in the Past 12 Months

Data Source: 2006-2010 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

The majority of Attleboro residences are employed through areas of management, finances, business, construction and services.

Describe the workforce and infrastructure needs of the business community:

The City's views the fundamental goal as increasing economic self-sufficiency by creating wealth for low and moderate-income residents through the creation of jobs and increased access to homeownership. Given the relatively small amount of CDBG funds available to the City of Attleboro, the City has determined that its resources should be focused in three categories: Neighborhood Revitalization including the creation of Affordable Housing, increasing access to Public Facilities, and Façade Improvements, Economic Development for the purpose of job creation and the provision of goods and services to low and moderate income residents, and Public Services to support individual and family needs. Within the City's fiscal parameters, resources will be prioritized to meet the needs within the geographical areas identified above.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

The two major private economic development projects/investments that will have a very significant impact on the (local) economy and impact job and business growth opportunities include the \$12MM Renaissance Station project in downtown Attleboro as well as the \$44M New England Sports Village project at the Industrial Park. The major public economic development project/investment that will have a significant impact on the (local) economy and impact job and business growth opportunities is the Downtown urban revitalization projects that are underway – construction of the ITC, construction of Riverfront Drive and Park, the new development pads what will created, as well as all of the new infrastructure being developed in the downtown to support dense urban growth, business development, and pedestrian/commuter transportation.

In 2013, the City of Attleboro was designated as a Gateway City. This status makes the City eligible to a wide range of additional state resources previously not available to the city – resources that will augment the City's current efforts to spur economic growth and to provide a suitable living environment for our residents. Various state resources and incentives include, but are not limited to, the development of fair market rent housing through the Housing Development Incentive Program, fostering job creation and stimulating business growth, the support of commercial residential transportation and infrastructure development through the Growth District Initiative, recreational opportunities through the City Park Program, and the promotion of financial literacy, education, and training for residents, businesses, educational institutions, community organizations through the Financial Literacy Trust Fund

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

Jobs will be generated for individuals of all economic and education levels. Some employment opportunities include, but certainly are not limited to customer service, management, sales,

landscaping, maintenance and small business opportunities enabling economic opportunity and growth for all residents if the City.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

The City houses an employment training center that provides employment opportunities and training to individuals who are currently unemployed. When new jobs are created through the City's economic development initiative, recipients of our funds. For many years the City has support through the use of Block Grant funds the English as a Second Language Program. This program provides essential literacy skills including resume and job interviewing preparation desperately needed by newcomers.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

Yes

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

The development of the Industrial Business Park, the implementation of our Downtown Revitalization Urban Renewal Plan. Phase 1 is the implementation of the Intermodal Transit Center (ITC) and all of the related infrastructure improvements that go along with the ITC such as, but not limited to, the construction of Riverfront Drive, the development pad that is Renaissance Station, and commercial development along Route 1 and 1A.

Discussion

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

For the purposes of this plan, while the City looks at concentration of housing problems in general, it does not rely on these when approving proposed projects for the use of CDBG. It may use them from time to time in choosing between otherwise "equal" proposals. As the City focuses its funds on rehab, it does refer to the Table MA50-A below which identifies the severe housing problems for the City. [Note that this table was also in Section NA35].

PLEASE SEE JPEG FILE LABELED MA-50 A

We would define concentration of problems as being neighborhoods (census tracts) in which the percentage of a serious problem was at least 10 percentage points greater than in the City as a whole. Under this definition, there is no neighborhood in which there is a concentration of problems. However the table above can be used to focus efforts in rehab.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

HUD has established the following definitions for new construction, substantial rehab and project based Section 8.

HUD's position is that a site in an area (usually defined as a census tract) which has more than 30% of the population in poverty does not qualify as an eligible site and/or one that is in an area which has more than the median minority concentration for the community (defined as the market area which means there are no hard and fast boundaries or definitions) plus 20%. [24 CFR Part 941.202]

For the purposes of this plan, the City looks at concentration of ethnicity and race, poverty and existing subsidized housing.

The City strives for proportional distribution of funds across the neighborhoods but it has conducted an analysis of poverty and racial/ethnic concentration for all neighborhoods to assist it in making funding decisions.

Significant concentrations of poverty and of low and moderate income subsidized households provide pertinent information when decisions are made of where resources might be concentrated. Racial/ethnic concentration is more complicated in that HUD regulations (Site and Neighborhood Standards) affect the planning and approval of new or significantly rehabbed housing which utilizes Federal resources.

PLEASE SEE ATTACHED JPEG FILE LABELED MA50-B

Table MA50-B indicates that census tracts 6314 and 6316 have a significant concentration of minorities and poverty

What are the characteristics of the market in these areas/neighborhoods?

There is not enough current or recent information to describe the market in these neighborhoods with any precision. We can note the following. PLEASE SEE ATTACHED JPEG FILE LABELED MA50-C AND D

Table MA50-D shows that the two tracts with high minority and poverty concentrations also have low homeownership rates.

Are there any community assets in these areas/neighborhoods?

The assets within the low income census tracts of our community include a Recreation Center that provides a stable and safe environment of teens, various parks including the City zoo located with a mile of said tracts, *the regional transit line* located in the heart of the downtown, Sturdy Hospital, various social services agencies that provide support to our underserved population, a job training center, and Bristol Community College

Are there other strategic opportunities in any of these areas?

The Block Grant program will attempt to increase the number of affordable housing units by imposing an affordable housing restriction on multi-family properties that participate in the rehab program. Jobs will also be generated through the Economic Development Program, Social Service agencies located within the downtown will provide services such as basic literacy, outreach for the elderly, credit counseling, and subsidized day care vouchers for low income families.

Table MA50 – A Severe Housing Problems

	Total HU Including Vacancies	Total Occupied HU	Lack Complete Plumbing & Kitchen	Severely Over- crowded	Severe (>50%) Cost Burden	Total Serious Occupied Housing Problems	% of Occupied Housing Units
Attleboro	18,022	16,884	154	14	1,990	2,158	12.78%
6311	3,428	3,210	-	-	295	295	9.19%
6312	2,750	2,617	-	-	430	430	16.43%
6313	2,149	2,023	40	-	215	255	12.61%
6314	1,372	1,210	34	10	160	204	16.86%
6315	1,229	1,136	-	4	195	199	17.52%
6316	1,608	1,441	-	-	235	235	16.31%
6317	2,456	2,342	80	-	130	210	8.97%
6318	3,030	2,905	-	-	330	330	11.36%

Source: CPD Maps. US Census 2010

Table MA50-A

Table MA50-B Concentrations of Race/Ethnicity and Poverty by Census Tract

	% Minority 2000 Census	% Minority CPD Maps 2014	Median Income	Household Income			Poverty Rate
				80% of Median [LI]	50% of Median [VLI]	30% of Median [ELI]	
Attleboro							
6311	4.17%	8.91	\$65,028	\$52,022	\$32,514	\$19,508	6.39
6312	5.10%	12.21	\$77,641	\$62,113	\$38,821	\$23,292	3.51
6313	5.59%	9.47	\$69,488	\$55,590	\$34,744	\$20,846	7.55
6314	15.19%	26.00	\$42,881	\$34,305	\$21,441	\$12,864	17.36
6315	4.18%	18.28	\$61,941	\$49,553	\$30,971	\$18,582	5.37
6316	19.44%	28.38	\$48,167	\$38,534	\$24,084	\$14,450	14.70
6317	4.72%	15.28	\$74,625	\$59,700	\$37,313	\$22,388	3.02
6318	5.89%	17.05	\$76,157	\$60,926	\$38,079	\$22,847	8.13

Data Source: US Census 2000, 2010

Table MA50-B

Table MA50-C Occupied and Vacant Housing by Census Tract

Census Tract	Total housing units	Occupied housing units	Vacant housing units	Vacant as a % of All Housing Units
6311	3,428	3,210	218	6.4%
6312	2,750	2,617	133	4.8%
6313	2,149	2,023	126	5.9%
6314	1,372	1,210	162	11.8%
6315	1,229	1,136	93	7.6%
6316	1,608	1,441	167	10.4%
6317	2,456	2,342	114	4.6%
6318	3,030	2,905	125	4.1%

Data Source: US Census 2010

As can be seen, the same tracts with high minority and poverty populations also have a high vacancy rate.

Table MA50-D Owner and Renter Occupied Housing by Census Tract

	Owner Occupied	%	Renter Occupied	%
6311	2506	14.8%	704	4.2%
6312	2046	12.1%	571	3.4%
6313	1338	7.9%	685	4.1%
6314	247	1.5%	963	5.7%
6315	625	3.7%	511	3.0%
6316	637	3.8%	804	4.8%
6317	1870	11.1%	472	2.8%
6318	1939	11.5%	966	5.7%

Data Source: US Census 2010

Table MA50-C and D

Strategic Plan

SP-05 Overview

Strategic Plan Overview

Please see the attached jpeg files labeled Strategic Plan 1, 2, 3

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The Community Development Block Grant [CDBG] program was initiated by the Housing and Community Development Act (HCDA) of 1974. The statutory objectives of this program stated by Congress are to develop viable urban communities by creating and supporting:

DECENT HOUSING

- assisting homeless persons obtain affordable housing;
- assisting persons at risk of becoming homeless;
- retention of affordable housing stock;
- increasing the availability of affordable permanent housing in standard condition to low-income and moderate-income families, particularly to members of disadvantaged minorities without discrimination on the basis of race, color, religion, sex, national origin, familial status, or disability;
- increasing the supply of supportive housing which includes structural features and services to enable persons with special needs (including persons with HIV/AIDS) to live in dignity and independence; and
- providing affordable housing that is accessible to job opportunities.

A SUITABLE LIVING ENVIRONMENT

- improving the safety and livability of neighborhoods;
- increasing access to quality public and private facilities and services;
- reducing the isolation of income groups within areas through spatial de-concentration of housing opportunities for lower income persons and the revitalization of deteriorating neighborhoods;
- restoring and preserving properties of special historic, architectural, or aesthetic value; and
- energy conservation.

EXPANDED ECONOMIC OPPORTUNITIES

- job creation and retention;
- establishment, stabilization and expansion of small businesses (including micro-businesses);
- provision of public services concerned with employment;
- provision of jobs to low-income persons living in areas affected by those
- programs and activities, or jobs resulting from carrying out activities under programs covered by the plan;

Strategic Plan 1

- availability of mortgage financing for low-income persons at reasonable rates using non-discriminatory lending practices;
- access to capital and credit for development activities that promote the long-term economic and social viability of the community; and
- empowerment and self-sufficiency for low-income persons to reduce generational poverty in federally assisted housing and public housing.

The U.S. Department of Housing and Urban Development (HUD) administers the funds appropriated by Congress and transmits them to the City of Attleboro for this wide range of community development activities as outlined in the Five Year Consolidated Plan and Annual Action Plan. Regulations governing the CDBG program require that each activity undertaken with CDBG funds meet one of the following three broad national objectives:

- Benefit people with low and moderate incomes
- Aid in the prevention or elimination of slums and blight
- Meet an urgent need (such as earthquake, flood, or hurricane relief)

Agencies and organizations in or serving populations within Attleboro are invited to propose projects which are then reviewed by staff and final recommendations are made to the Mayor who selects projects to fund. After reviewing past performance, analyzing the needs of the City and considering the major planning and development priorities of the City, the City has established key priorities for the use of CDBG funds for the five year period 2014-2018.

The major overarching goal is to

To improve the quality of life for all residents of the City of Attleboro and increase the economic self-sufficiency of low and moderate income-residents through the creation of affordable housing and job opportunities while effectively administrating and efficiently allocating CDBG resources and fostering community participation.

Specifically the priorities are:

Economic Development/Neighborhood Revitalization: Funds will be invested in activities benefiting that will create job opportunities for low and moderate persons within the downtown neighborhoods and City wide. Funding will also encourage continued infrastructure improvements of the downtown by offering incentives to business owners through the City's Sign and Façade Program

Homeownership Opportunity: Develop affordable housing for moderate income residents through homeownership opportunities using HOME Investment funds.

Housing Rehabilitation: Funds will be invested in housing rehabilitation for low and moderate-income persons within the City. As a method of rehabilitation, the city will work towards increasing the availability of affordable housing by imposing affordable housing restrictions to multi-family owner investor properties. CDBG funds will also be used to;

Strategic Plan 2

Public Services: Funds will be invested directly and indirectly through agencies to provide critical services which will strengthen the independence and life success of various sectors of the low and moderate income population;

Planning and Administration: Funds will be utilized for planning and administration of the program.

In prior years there have been several initiatives undertaken by the state, City, private developers, businesses owners and the City of Attleboro. These include the following:

- The development of affordable housing through various sources of funding and programs such as the Neighborhood Stabilization Program, HOME funds.
- Rehabilitation of Affordable housing through the City's Community Development Block Grant Program
- The cleaning of contaminated sites through the Brownfields Grants
- The development of an 80 unit housing complex on the corner of South and Wall Street
-

While developing the five year strategies, the City conducted surveys, held meetings to discuss issues and needs, researched data, debriefed experts in areas of concern and held public hearings to secure input and comments on the Five Year Consolidated Plan and Annual Action Plan.

The Office of Community Development evaluates and recommends projects and activities for Mayoral approval from proposals submitted for each action plan year, based on the following:

- Meeting a HUD national objective;
- Project eligibility;
- Income and/or area eligibility of beneficiaries;
- Number of affordable units;
- Consolidated plan priorities;
- Reasonable timeframe for project/activity;
- Reasonable amount of funding requested;
- Leveraged funds;
- Organizational capacity;
- Effectiveness of activities based on project outputs and outcomes

Strategic Plan 3

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

1	Area Name:	Downtown
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Other
	Other Revital Description:	Commercial and Residential
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	The majority of the census tract listed above includes multi-family homes, and micro business. Area specifically targeted in the down town
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Data collected through census determined that some of the census tracts in concentrated areas are some of the lowest tracts in the city
	Identify the needs in this target area.	There is great need for affordable housing, social services and economic opportunities
2	Area Name:	City Wide
	Area Type:	funds targeted to all low income residents of the City
	Other Target Area Description:	funds targeted to all low income residents of the City
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	
	What are the opportunities for improvement in this target area?	Because some of the census tracts are the lowest income tracts of the community
Are there barriers to improvement in this target area?		

Other Revital Description:	
Identify the neighborhood boundaries for this target area.	
Include specific housing and commercial characteristics of this target area.	
How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
Identify the needs in this target area.	
What are the opportunities for improvement in this target area?	
Are there barriers to improvement in this target area?	

Table 46 - Geographic Priority Areas

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

As can be seen from the attached text labeled Table SP10-A, in the 2014 data tables based on the 2010 census and ACS 2011, there are two tracts (highlighted) in which there were a significant percentage of people at or below the poverty line and also with a percentage of households at 80% of median or lower which exceeds 51%. There were also the census tracts in which the minority population in 2014 would exceed 20%. However, within each census tract there may be census blocks which had different concentrations. This census block information is not available from the US Census of 2010.

While the City will continue to serve all its residents, priority will be given to its low and moderate income census tracts, blocks, and neighborhoods. The City has defined a Neighborhood as: A geographic sub-area within a city that may be defined by tradition, period development, or sub-division patterns. Neighborhood boundaries may include major streets or other physical features. Neighborhoods may be: established and stable, established and redeveloping, developing, or new. Neighborhoods that use to be self-contained, where folks lived, worked, and played in the Neighborhood, all have become less defined.

Boundary Lines: East Side

Characteristics: Multi family dwellings - have developed over the years from Family owner occupied to absent landlords, revolving back to owner occupied, however more short term.

Major Assets: Briggs Pool and Playground, Recreation Center, Peter Thacher, Sturdy Hospital Auditorium & Fields at Peter Thacher School,

Needs: More programs & longer hours at recreation center – Briggs pool repair, more resources allocated to the East Side, sidewalks need repairing, and litter is a problem.

Boundary Lines: Downtown

Characteristics:

Needs: Vision for the future; Encourage Redevelopment; employment, housing, and food, place where people can live, work and play, Streetscape program needs to continue. Additional Parking: Signage on existing parking areas

Major Assets: City Hall, Police Station, Fire Station, Sturdy Hospital YMCA Art/Industrial/Women at Work Museums, DAR House, Blackinton Inn, and Balfour River walk, Jewelry Outlet, Churches.

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

1	Priority Need Name	Priority Needs
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill veterans Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	
	Associated Goals	Public Services Public Facilities Improvement Economic Development Housing Rehabilitation

Description	The priority needs for the 2014-2018 Five Year Consolidate Plan were established through the pre-populated IDIS information and public participation and consultation process and are as follows: Please see more detailed tables in the administrative attachment pages 19-21 labeled SP 25 Priority Needs
Basis for Relative Priority	<p>The needs of the target population of those below 80% of median are wide spread and no one strategy stands out as being the best way to address many needs with the limited resources available. As the needs were analyzed, the following priorities emerged:</p> <p><u>Economic Development/Neighborhood Revitalization</u>: Funds will be invested in activities benefiting that will create job opportunities for low and moderate persons within the downtown neighborhoods and City wide. Funding will also encourage continued infrastructure improvements of the downtown by offering incentives to business owners through the City’s Sign and Façade Program</p> <p><u>Homeownership Opportunity</u>: Develop affordable housing for moderate income residents through homeownership opportunities using HOME Investment funds.</p> <p><u>Housing Rehabilitation</u>: Funds will be invested in housing rehabilitation for low and moderate-income persons within the City. As a method of rehabilitation, the city will work towards increasing the availability of affordable housing by imposing affordable housing restrictions to multi- family owner investor properties. CDBG funds will also be used to;</p> <p><u>Public Services</u>: Funds will be invested directly and indirectly through agencies to provide critical services which will strengthen the independence and life success of various sectors of the low and moderate income population;</p> <p><u>Planning and Administration</u>: Funds will be utilized for planning and administration of the program.</p> <p>The priorities are categorized by the Office of Community Development with of a list of criteria that staff utilizes when reviewing applications for funding. Consistency with the Consolidated Plan is another consideration in the application review process for the Annual Action Plans.</p> <p>Finally, the Mayor reviews all proposed programs and projects, considers those recommended for funding, and then makes the final decision.</p>

Table 47 – Priority Needs Summary

Narrative (Optional)

Please see attached

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	Due to the short term nature of TBRA and the rules which permit more focus on their use, the most likely conditions would be the emergence of a program which would enable people to achieve economic self-sufficiency if their housing costs were lowered for a two year period.
TBRA for Non-Homeless Special Needs	As noted above, the most effective use of TBRA would be persons who can become self-sufficient within a two year period.
New Unit Production	The emergence of increased demand requiring nominal subsidies or an increased amount of subsidy.
Rehabilitation	The increased costs of new or existing homes and higher rents will require more focus on the preservation of existing affordable housing. In addition, the expiration of contract subsidies for housing will increase the demand for affordable housing unless these subsidies can be extended or replaced.
Acquisition, including preservation	In general, acquisition with rehab is too expensive as a way of creating affordable housing, unless there is a new supply of subsidies

Table 48 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	374,653	26,000	194,000	594,653	1,873,265	To provide decent and affordable housing create and economic opportunities through job creation and social service support that will increase economic self- sufficiency
Section 8	public - state	Housing	218,900	0	0	218,900	1,094,500	State Voucher Program
Other	public - federal	Housing	50,000	0	0	50,000	250,000	To provide decent and affordable housing
Other	public - state	Admin and Planning	397,792	0	0	397,792	1,988,960	State Public Housing Operating Funds
Other	public - state	Other	4,386,000	0	0	4,386,000	0	State funded modernization Capital funds

Table 49 - Anticipated Resources

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

All of the above programs all work with CDBG funds and CDBG programs. No matching is required in the use of CDBG funds.

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

Public land and use is not identified at this time.

Discussion

N/A

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
CITY OF ATTLEBORO - COUNCIL ON AGING	Government	public services	Other
CITY OF ATTLEBORO RECREATION DEPARTMENT	Departments and agencies	public services	
City of Attleboro	Government	Planning	
City fo Attleboro	Government	Homelessness public services	
The Literacy Center	Non-profit organizations	public services	
Hebron Food Pantry, Inc.	Non-profit organizations	public services	
Markman Children's Programs	Non-profit organizations	public services	
American Credit Counseling Service	Non-profit organizations	public services	
COMMUNITY COUNSELING OF BRISTOL COUNTY	Continuum of care	Homelessness	Region
MA - DHCD	Departments and agencies	Ownership Public Housing Rental	State
Mass - DOT	Public institution		State
MassDevelopment	Private Industry		State

Table 50 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

STRENGTHS:

Most subrecipients are knowledgeable and cooperative in achieving common goals and objectives, as well as complying with regulations.

WEAKNESSESS:

Sometimes it is difficult to acquire additional funding sources to meet project needs. New subrecipients must be nurtured at inception of programs and during program year to achieve projected goals and outcomes.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X		
Mortgage Assistance	X		
Rental Assistance	X		
Utilities Assistance	X		
Street Outreach Services			
Law Enforcement			
Mobile Clinics			
Other Street Outreach Services	X	X	
Supportive Services			
Alcohol & Drug Abuse	X		
Child Care	X		
Education	X		
Employment and Employment Training	X	X	X
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X		
Mental Health Counseling	X		
Transportation	X	X	X
Other			
Food, clothing, shelter	X		

Table 51 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

The CoCs, local governments and other organizations in the region create and provided affordable, safe housing with supportive services for individuals and families (including veterans and their families, and unaccompanied youth) who had once been homeless. Supportive services help participants achieve housing stability, self-sufficiency, and employment and/or income maximization. Case managers

provide assistance with financial management, tenancy issues, access to employment programs, food, medical and mental healthcare and other programs.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

Most of the region's government and community organizations are working together to fight to end homelessness. They know that solving the problem of chronic homelessness needs to be a priority and a coordinated approach is required to be effective.

The weakness of the system is that there is not enough manpower, money, jobs and housing to provide all of those in need.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

Please see attachment pages 22 & 23 labeled SP-40 Institution Delivery Structure

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Services	2014	2018	Non-Housing Community Development Public Service		Priority Needs	CDBG: \$280,990	Public service activities for Low/Moderate Income Housing Benefit: 30000 Households Assisted
2	Public Facilities Improvement	2014	2018	Public Facilities Improvements		Priority Needs	CDBG: \$200,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 43000 Persons Assisted
3	Economic Development	2014	2018	Economic Development		Priority Needs	CDBG: \$500,000	Jobs created/retained: 20 Jobs Businesses assisted: 10 Businesses Assisted
4	Housing Rehabilitation	2014	2018	Affordable Housing		Priority Needs	CDBG: \$500,000	Rental units rehabilitated: 40 Household Housing Unit Homeowner Housing Rehabilitated: 10 Household Housing Unit
5	Administration	2014	2018	Non-Housing Community Development Administration			CDBG: \$375,000	

Table 52 – Goals Summary

Goal Descriptions

1	Goal Name	Public Services
	Goal Description	To provide such needed social services to the low/moderate income residents of the City.
2	Goal Name	Public Facilities Improvement
	Goal Description	CDBG funds will be used to assist approximately 10 facilities or provide neighborhood sidewalk improvements to improve accessibility for persons with physical handicaps. Also funding will provided to move a facility which houses serves for low/mod residents from a substandard to a standard facility.
3	Goal Name	Economic Development
	Goal Description	To provide financial assistance with the micro-business with priority focused on the downtown neighborhoods in an effort to create 15-20 new jobs for low/moderate income residents
4	Goal Name	Housing Rehabilitation
	Goal Description	Funding provide to address dilapidated single and multi-family homes. Approximately 10-15 single family units and 30-40 multi family units are planned over the next 5 years. In an effort to create more affordable housing units in the City of Attleboro, the Community Development Department will impose an affordable housing restriction and focus a majority of funding to the rehabilitation of multi-family properties. terms of the agreements are as follows; Single family & Multi-family owner occupied 100% of the total cost of rehabilitation project offered in the form of 75% grant assistance with a recapture provision of 5 years and 25%- 0% amortized loan paid over 15 years. Multi-family owner investor-50% total cost of rehab, 2% interest amortized loan paid over 15 yrs with an Affordable Housing Restriction over 15yrs. In the case of a multi-family-owner investor, if the owner agrees to rent to individuals or family of 50% of median income or sell, the terms are as follows-75% total cost of the rehab at 2% interest amortized loan over 15 years with a 15 year affordable housing restriction. Emergency funding will be available to veterans, seniors and mobile homes in the form of grant assistance we a recapture provision of 5 years

5	Goal Name	Administration
	Goal Description	To successfully administer the Community Development Block Grant funds. Funding will cover the salary and fringe of the Community Development Director, and necessary office supplies and consultant fees as needed.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

The GATHC is in receipt of \$393,766 in HOME funds. Based on prior experience the City of Attleboro receives approximately ten percent of the funds and anticipates continuing on received such based on funding availability.

Under CDBG Program we anticipate on receiving \$374,653 in Program Year 2014. The program anticipates on generating approximately \$26,000 in PY'14 and had approximately \$194,000 available in unprogrammed funds

Goal Explanation

These goals have been set based on the needs of the Community. It's suggested that with the availability of jobs and affordable housing, an individual of low/moderate income can move from a substandard to standard social and economic status.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

Though the Attleboro Housing Authority is not under a voluntary Section 504 Compliance Agreement, through a \$25 million dollar modernization project undertaken in 2008, the AHA was able to complete modernization to approximately 200 units including the addition of eleven new Section 504 compliant units.

Activities to Increase Resident Involvements

Resident participation is encouraged primarily through conversation at monthly Board meetings, dissemination of notices and flyers, quarterly safety briefings, handbook publications and LTO correspondence and discussion. Public meetings are held monthly, with special meetings scheduled for modernization projects and other special interest issues.

Our Board of Commissioners is made up of five members. One member is a Governor's appointee with the other four appointed by the Mayor. Out of the Mayoral appointees, one member must represent labor interests and one must be a tenant of the Authority.

Is the public housing agency designated as troubled under 24 CFR part 902?

No

Plan to remove the 'troubled' designation

N/A

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

In general, public policies affecting the cost and production of affordable housing are modified by specific zoning by-laws. Production is enhanced in Massachusetts through the following:

- Inclusionary zoning (a percentage of housing developed in the marketplace being set aside for affordable use and usually placed within mixed income developments);
- Accessory apartments (particularly effective in enabling low income elderly owners to continue living in the community);
- Overlay districts permit increased density and state funding support and enable affordable units within mixed income developments;
- Chapter 40B is a state law which permits it to override local zoning if local government does not have the zoning tools to permit affordable housing production. There is a voluntary process known as LIP [Local Initiative Plan] which a local government can use and thus not invoke state override of zoning.

The attached jpeg file labeled Status of Major Initiatives Affecting Affordable Housing summarizes the current state of such initiatives in the Attleboro area.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

This section provides guidance when deciding the scope and focus of the Analyses of Impediments to Fair Housing Choice. The areas covered include:

1. Suggested questions the Attleboro Office of Community Development (AOCD) can ask to determine current policies, procedures, and activities. What impediments, if any, to fair housing choice exist in the area under the AOCD's control?
2. Whether an impediment has already been analyzed or is in need of initial or further analysis.
3. Which impediments are more severe and their order of priority for analysis.
4. What affirmatively furthering fair housing actions have been taken by the jurisdiction and which ones should be continued, strengthened, initiated, or ended?
5. Actions by the AOCD: whenever the AOCD decides that a particular action would be appropriate, but is one for which an entity other than the AOCD itself has or should have responsibility, the AOCD should determine what steps it can take to support such action, including who, in the AOCD's governmental structure, should provide such support.
6. The nature, extent, and disposition of housing discrimination complaints, violations, or suits against private housing providers within the jurisdiction; other evidence of private housing discrimination occurring within the jurisdiction; information on any contract conditions related

to fair housing considerations placed by HUD on the jurisdiction; or information on any failure by the AOCD in complying with its affirmatively furthering fair housing certification should be available from HUD, the Department of Justice, and local fair housing enforcement agencies, and private fair housing groups operating within the jurisdiction.

7. Evidence of segregated housing conditions and the housing desegregation plans or efforts of HUD or other Federal agencies should be available from census maps, the records of public housing authorities, HUD, and local housing agencies.
 8. The delivery system for programs providing social services to families with children and persons with disabilities.
 9. Information regarding financing assistance for dwellings may be available from Fair Housing Initiatives Program (FHIP) recipients engaged in special projects and activities to address property insurance and mortgage lending discrimination such as:
 10. Other laws, policies, and practices affecting the location, cost, and availability of housing and related information should be available from the local housing authorities/finance agencies and human rights agencies.
 11. Where there is a determination of unlawful segregation or other housing discrimination by a court or a HUD Administrative Law Judge, or a finding of noncompliance with Title VI or the Fair Housing Act by HUD regarding assisted housing within a jurisdiction, an analysis of the actions that could be taken by the jurisdiction to help remedy the discriminatory condition, including actions involving the expenditure of funds made available under CDBG or other programs to rehabilitate housing units or redress neighborhood deficiencies; the provision of economic development programs for occupants of assisted housing; and development and implementation of a fair housing information program for municipal officials and employees having duties related to fair housing, zoning, planning, assisted housing, and community/economic development.
-
1. Discriminatory lending patterns, practices, and disclosures Discriminatory appraisal and insurance underwriting practices Disinvestment and insurance redlining practices.

SP-60 Homelessness Strategy – 91.215(d)

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

1. One goal of the CoC, was to create a ten-year plan to end all homelessness, with particular emphasis on ending chronic homelessness. The City of Attleboro through the Office of Community Development was a member in the leadership for the 10 year plan task force. The task force has over 30 community participants and serves as a coordinating body for issues of homelessness and housing. Its strategies are based on need determined through data analysis and related information provided by organizations servicing these populations. The CoC emphasizes the following goals and related strategies:
2. Data Collection: Improve the accuracy of counting the chronically homeless and their demographic characteristics so that the resulting plan for addressing needs so that planning and programming accurately addresses the most critical needs.
3. Coordination: Maximize the cooperation and participation among the communities involved in the Continuum of Care Process. To accomplish this goal, GATCH will work with the Consortium to review the needs for creating housing for homeless (with a priority on chronic homelessness).
4. Housing: Increase the supply of permanent supportive housing option for the chronically homeless through efforts to secure available local, state and federal funding.
5. Prevention: Prevent homelessness among low-income disabled individuals at high risk for chronic homelessness, through relocation and tenancy preservation. Prevent chronic homeless for disabled individuals through improved coordination of discharge planning.
6. Services: Improve the system of treatment and services for homeless individuals with multiple disorders.

Addressing the emergency and transitional housing needs of homeless persons

The strategies identified are central to the focus of addressing chronic homelessness. Chronically homeless individuals are likely to also suffer from the effects of substance abuse and/or mental illness. A national homeless study conducted by the National Coalition for the Homeless indicated that 25 percent of the homeless suffer from mental illness and that 60 percent of homeless individuals are drug dependent.

An integral part of the prospective planning process is outreach to the local governments of the cities that are part of the Continuum of Care. The Commonwealth of Massachusetts has been funding regional

networks of homeless providers. Recently one which includes most of the communities in the Consortium was approved and funded. This will have as one of its primary tasks, addressing the problems of chronic homelessness. Regional information, cooperation and new innovative strategies are expected to be particularly effective in impacting this problem. Improved data collection procedures will ensure that this population is correctly counted so that planning can be optimized. Appropriate discharge planning by mental health facilities, medical hospitals, substance abuse treatment centers and prisons are all critical in assisting chronically homeless. As part of the Continuum of Care process, GATHC will meet regularly with representatives of these groups to review data, discharge protocols and policies.

Additionally, as a member of the Massachusetts Housing and Shelter Alliance (MHSA), the CoC will participate in advocacy at the state level to insure that monitoring and discharge protocols are given ongoing priority. In conjunction with this outreach, every effort will be made to connect the chronically homeless with benefits and resources with the goal of achieving economic self-sufficiency. A cornerstone in the eradication of chronic homelessness is the provision of permanent supportive housing. In meeting this need, it will be necessary that available units be targeted to this population and that other housing resources are made available.

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 Commonwealth of Massachusetts has been funding regional networks of homeless providers. As one of its primary tasks, this network will address the problems of chronic homelessness. Regional information and cooperation and new innovative strategies are expected to be particularly effective in impacting this problem. The major barrier in its first year will be to develop effective strategies and create a regional database of information and tracking of homeless people.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

The Office of Community Development assists in the leadership for the 10 year plan task force. The task force has over 30 community participants and serves as a coordinating body for issues of homelessness and housing. Many of the planning responsibilities and activities addressed under the CoC are administered through GATHC. Numerous other non-profit organizations and municipal departments also provide services.

Other organizations which provide services in the CoC which serve the homeless, include:

Community Partnerships, Inc., which assists people with disabilities to locate decent, accessible housing that they can afford. It refers clients to available housing assistance (to rent or own) and works closely with local and state agencies in this regard. A majority of its clients live in their own apartment or utilize housing subsidies.

Independence Associates, Inc., serves the disability population with a four-course service program which provides outreach, peer counseling, community and individual advocacy and independent living skills training. It also provides personal care attendant services with funds from Mass Health. According to a representative of the program, the supportive services needs of people with physical disabilities in Taunton are currently being adequately addressed by existing services.

Attleboro Councils on Aging, provide numerous programs and services for citizens, such as health, recreation and social programming; in-home case management and support services; telephone reassurance; assistance with application completion for basic needs; and many other eligible services including home care, and non-invasive nursing services.

Association of Retarded Citizens (ARC), is a grass roots non-profit association, serving individuals with developmental disabilities and their families. They are a local affiliate of a statewide and national advocacy organization formed in 1959 by a small group of parents concerned about the quality of life for their family members with disabilities. The Arc services are flexible and varied to meet each individual's and family needs.

Associates for Human Services, Inc. (AHS), is a not-for-profit organization which is dedicated to providing choice, opportunity and support to the individuals it serves, their families and those it employs in order to enhance the quality of life in the community. AHS was founded in 1974 to meet a wide range of human services needs in the area. AHS is a private, not-for-profit agency providing support services for children, adults, and seniors experiencing developmental delays and/or disabilities, economic disadvantage, or who have educational risk factors. Today, they have five programs which serve children, adults and seniors living in the area. AHS works with individuals at all levels of ability to support their efforts to achieve equality, dignity and independence. It is committed to helping people reach their maximum potential and self-sufficiency. AHS currently provides five programmatic services:

- Early Head Start
- Early Intervention
- Parent-Child Home Program
- Residential
- Wise Adult Day Health

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

State law and regulations require LBP removal and/or treatment prior to that sale of housing to families with children under the age of 6 when there is knowledge of lead. All non-emergency CDBG funding for housing rehabilitation also requires LBP removal and/or treatment. The City will also work closely with the state sponsored “get the lead out” program designed to assist individuals whose income exceeds 80% of area median income and with households where a child shows elevated lead levels.

How are the actions listed above related to the extent of lead poisoning and hazards?

As noted in Section MA20 above, there have been no cases of Lead Based Paint poisoning in the last few years. Also noted in that section, there are probably remaining hazards in some of the housing and as sales of housing which will be occupied by children under the age of 6 must be LBP treated or free and as any rehab conducted by the City requires LBP treatment and/or removal, we anticipate a continuing success story for our City.

How are the actions listed above integrated into housing policies and procedures?

The Community Development Department of the City has incorporated lead abatement activities into its rehab specs and also acts as the local rehab agency for a state funded program to specifically address lead paint hazards. The local housing authority requires lead certificates for pre 1978 housing units that their tenants/certificate holders who have children under the age of six, might occupy. The City’s Housing Rehabilitation Program will continue to require lead paint testing and abatement in all non emergency housing rehabilitation projects.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

Most activities undertaken by the Community Development Department with CDBG and other federal and state funds for low income families include efforts to reduce persons in poverty and improve the quality of life for Attleboro residents, either directly or indirectly. Staff also works in partnership with citizens, other City departments, and the public and private sectors to accomplish the goal of reducing poverty.

Currently funded CDBG programs that can directly influence the household income level include; The Economic Development Program in which CDBG funds are provided to encourage business development with priorities shown to the downtown (which some of the highest low income census tracks abut) in an effort to create new jobs opportunities for low income residents. The City also funds the Literacy Center's English Program. The program is designed to assist non- English or minimal English speaking residents of our community learn to speak, read, and write English in return opening higher paying job opportunities.

Currently funded CDBG programs that indirectly influence the impact of household living by reducing other costs include affordable housing development, housing rehab, energy efficiency, public facility improvements, infrastructure improvements, neighborhood revitalization, counseling programs and health care assistance.

For the upcoming year, the City will be funding the following activities:

- 35% Housing
- 30% Economic Development/Public Facilities Improvement
- 20% Administration
- 15% Public Services

Additional projects will assist in providing decent affordable housing and a suitable living environment for area residents and much needed jobs in the impacted areas.

Section 3 requirements will assist in securing jobs to local residents on locally funded projects if new employees are added to the workforce.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

The City of Attleboro supports any efforts which provide housing improvements and preserve or promote affordability and thus enable low-mod households to set aside more resources for education and training.

In so far as most low income households being provided housing assistance end up with a reduced level of housing costs, they are more able to allocate their scarce resources to other needs such as nutrition, education and other activities which can help lead them out of poverty.

The poverty rate for the City of Attleboro is as follows:

Table SP70-A Poverty in Attleboro

Data Source: CPD Maps 2014

As noted in Table SP10 above, Tracts 6314 and 6316 have high poverty rates (17.5% and 14.7% respectively).

SP-80 Monitoring – 91.230

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

Please see attachment page 24-25 labeled SP-80 Monitoring-91.230

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	374,653	26,000	194,000	594,653	1,873,265	To provide decent and affordable housing create and economic opportunities through job creation and social service support that will increase economic self- sufficiency
Section 8	public - state	Housing	218,900	0	0	218,900	1,094,500	State Voucher Program
Other	public - federal	Housing	50,000	0	0	50,000	250,000	To provide decent and affordable housing
Other	public - state	Admin and Planning	397,792	0	0	397,792	1,988,960	State Public Housing Operating Funds

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other	public - state	Other	4,386,000	0	0	4,386,000	0	State funded modernization Capital funds

Table 53 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

All of the above programs all work with CDBG funds and CDBG programs. No matching is required in the use of CDBG funds.

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

Public land and use is not identified at this time.

Discussion

N/A

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Services	2014	2018	Non-Housing Community Development Public Service	Downtown City Wide	Priority Needs	CDBG: \$60,395	Public service activities other than Low/Moderate Income Housing Benefit: 600 Persons Assisted
2	Administration	2014	2018	Non-Housing Community Development Administration	City Wide	Priority Needs	CDBG: \$74,930	Other: 1 Other
3	Public Facilities Improvement	2014	2018	Public Facilities Improvements	City Wide	Priority Needs	CDBG: \$75,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 4900 Persons Assisted
4	Economic Development	2014	2018	Economic Development	Downtown	Priority Needs	CDBG: \$150,000	Facade treatment/business building rehabilitation: 5 Business Jobs created/retained: 4 Jobs
5	Housing Rehabilitation	2014	2018	Affordable Housing	Downtown City Wide	Priority Needs	CDBG: \$234,326	Rental units rehabilitated: 6 Household Housing Unit Homeowner Housing Rehabilitated: 4 Household Housing Unit

Table 54 – Goals Summary

Goal Descriptions

1	Goal Name	Public Services
	Goal Description	
2	Goal Name	Administration
	Goal Description	
3	Goal Name	Public Facilities Improvement
	Goal Description	
4	Goal Name	Economic Development
	Goal Description	
5	Goal Name	Housing Rehabilitation
	Goal Description	

Projects

AP-35 Projects – 91.220(d)

Introduction

Within the City’s fiscal parameters, resources will be prioritized to meet the needs within the geographical areas identified above. Given the relationship among these categories, the City’s investment in each is equally important; and, given the limits of the CDBG program the City views its overall investment as follows:

- 35% Housing
- 30% Economic Development
- 20% Administration
- 15% Public Services
-

Given the City’s total FY’14 allocation of \$374,653, \$26,000 in anticipated program income and \$194,000 in reprogrammable funds the breakdown in terms of actual dollars is as follows:

- \$234,426.70 for Housing/Project Delivery
- \$100,000 for Economic Development
- \$75,000 for Public Facility Improvements
- \$50,000 for Sign and Façade Improvements
- \$74,930.60 for Administration
- \$60,395.70 for Public Service

Projects

#	Project Name
4	Economic Development
5	Facade and Sign Improvement
7	Housing Rehabilitation- Single Family
8	Public Services
9	Administration
10	Housing Rehabilitation Project Delivery Cost
11	Public Facility Improvements
12	Housing Rehabilitation- Multi-Family

Table 55 – Project Information

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

AP-38 Project Summary

Project Summary Information

1	Project Name	Economic Development
	Target Area	Downtown
	Goals Supported	Economic Development
	Needs Addressed	Priority Needs
	Funding	:
	Description	To provide financial assistant to 2 new micro business city wide, but primarily focused in the Downtown. Funds will be offered in the form of grant and loan.
	Target Date	6/30/2015
	Estimate the number and type of families that will benefit from the proposed activities	2 business will be assisted with the creation of 3 to 4 jobs
	Location Description	Though assistance is available city wide, priority will be placed to new business located in the downtown
	Planned Activities	2 micro businesses will be assisted with approximately \$50,000 in the form of a grant and 0% amortized loan in an effort to generate 3 to 4 jobs for low to moderate income residents.
	2	Project Name
Target Area		Downtown
Goals Supported		Economic Development
Needs Addressed		Priority Needs
Funding		:

	Description	As part of the redevelopment plan, the City will offer grant assistance to businesses located in the downtown and in some of the City's lowest income census tracks. Funding up to \$10,000 or 2/3 of the cost will assist 5 businesses with improvement of the exterior and sign.
	Target Date	6/30/2015
	Estimate the number and type of families that will benefit from the proposed activities	Since funds are targeted to some of the lowest income census tracks in the City, butting neighborhoods will most benefit from the beautification and redevelopment of the downtown
	Location Description	funds are targeted to improve dilapidated exteriors of business located within the downtown
	Planned Activities	2/3 of the total cost of the project not to exceed \$10,000 will be offered in the form of grant to 5 business located in the downtown
3	Project Name	Housing Rehabilitation- Single Family
	Target Area	Downtown City Wide
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Priority Needs
	Funding	:
	Description	Funding provided to address dilapidate single family and mobile units to meet minimum housing quality standards. Emergency grant assistance will be offered to owners who are disabled, elderly or a veteran.
	Target Date	6/30/2015
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that approximately 4-5 units will be assisted through the use of block grant funds.
	Location Description	Funding will be provided City Wide
	Planned Activities	

4	Project Name	Public Services
	Target Area	City Wide
	Goals Supported	Public Services
	Needs Addressed	Priority Needs
	Funding	:
	Description	funding provided to address the social service needs of some of the City's lowest income residents.
	Target Date	6/30/2015
	Estimate the number and type of families that will benefit from the proposed activities	approximately 600 individuals and families will be provided with services
	Location Description	
	Planned Activities	planned activities are as follows; Literacy Center- provide basic literacy skills to approximately 36 residents Markman Day Care- provide child day care voucher subsidy to 6 low income families Attleboro Council on Aging- provide outreach services to over 300 elderly residents American Credit Counseling Services- Credit counseling to 30 low income Attleboro Residents Hebron Food Pantry- provides protein to approximately 100 frail and elderly Attleboro Residents. On Common Ground- Provide 1:1 mentoring services to 5 low income Attleboro Residents.
5	Project Name	Administration
	Target Area	City Wide
	Goals Supported	Administration
	Needs Addressed	Priority Needs

	Funding	:
	Description	The funds expended under this activity are those necessary for the administration and implementation of the Community Development Block Grant Program, including salaries of the Community Development Director and Community Development Coordinator, operational costs and related office expenses.
	Target Date	6/30/2015
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
6	Project Name	Housing Rehabilitation Project Delivery Cost
	Target Area	City Wide
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Priority Needs
	Funding	:
	Description	The funds expended under this activity are those necessary for the project and delivery costs associated with the implementation of the Housing Rehabilitation Program, including the Single, Emergency and Multi-Unit Rehabilitation Programs.
	Target Date	6/30/2015
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 4-6 units will be managed by the Housing Rehab Specialist and the City's Community Development Director.
	Location Description	
	Planned Activities	

7	Project Name	Public Facility Improvements
	Target Area	Downtown City Wide
	Goals Supported	Public Facilities Improvement
	Needs Addressed	Priority Needs
	Funding	:
	Description	Public Facilities improvements including, Handicap Accessibility, the Removal of Architectural Barriers and the rehabilitation of a dilapidated public building located primarily in a low income census track or who's primary use is to assist low income residents. The City will accept proposals and projects through the program year.
	Target Date	6/30/2015
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
8	Project Name	Housing Rehabilitation- Multi-Family
	Target Area	City Wide
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Priority Needs
	Funding	:
	Description	Funding will be used to rehabilitate existing dilapidated multi-family housing units in an effort to create more affordable housing units especially housing for individuals and families whose income is less than 50% of median income. 5-6 units are expected in the up coming program year

	Target Date	6/30/2015
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that approximately 5 to 6 units will be assisted.
	Location Description	
	Planned Activities	

AP-50 Geographic Distribution – 91.220(f)

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

While the City will continue to serve all its residents, priority will be given to its low and moderate income census tracts, blocks, and neighborhoods. The City has defined a Neighborhood as: A geographic sub-area within a city that may be defined by tradition, period development, or sub-division patterns. Neighborhood boundaries may include major streets or other physical features. Neighborhoods may be: established and stable, established and redeveloping, developing, or new. Neighborhoods that use to be self-contained, where folks lived, worked, and played in the Neighborhood have become less defined.

Boundary Lines: East Side

Characteristics: Multi family dwellings - have developed over the years from Family owner occupied to absent landlords, revolving back to owner occupied, however more short term.

Major Assets: Briggs Pool and Playground, Recreation Center, Peter Thacher, Sturdy Hospital Auditorium & Fields at Peter Thacher School,

Needs: More programs & longer hours at recreation center & Briggs pool repair, more resources allocated to the East Side, sidewalks need repairing, and litter is a problem.

Boundary Lines: Downtown

Characteristics:

Needs: Vision for the future; Encourage Redevelopment; employment, housing, and food, place where people can live, work and play, Streetscape program needs to continue. Additional Parking: Signage on existing parking areas

Major Assets: City Hall, the Police Station, Fire Station, Sturdy Hospital, YMCA Art/Industrial/Women at Work Museums, DAR House, Blackinton Inn, and Balfour River walk, Jewelry Outlet, Churches.

Geographic Distribution

Target Area	Percentage of Funds

Table 56 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Though funds are allocated and will assist low to moderate income residents as a whole, low income residents are concentrated in the downtown neighborhoods and two primary census tracts within the boundaries described above. Investing in the rehabilitation of housing, creating of affordable housing, providing services and providing economic opportunities with primary focus on businesses in the downtown will enrich the lives of said residents.

Discussion

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City of Attleboro is currently in the process of developing an inclusionary zoning ordinance. When complete it could be combined with other programs, to reach into households who are at less than 80% median.

Chapter 40B M.G.L. requires local governments to have at least 10% of its housing stock affordable to households below 80% of median in order, to retain full control over the zoning permit process when affordable units are proposed. The nature of that affordability is defined by the state and generally must be for at least 15 years for homeownership and 30 years for rental units. The law gives the state the power to override local decisions regarding affordable housing projects, whether those decisions are based on zoning by-laws, or other arguments such as impact on schools, environmental issues, infrastructure limitations etc. A local community can amend its by-laws and procedures for a specific project and gain exemption from this law under what is known as a “Local Initiative Plan” or LIP. The current status of Attleboro in terms of the Chapter 40B law is as follows:

Table 28: State Housing Inventory [SHI] of Affordable Housing

In addition to these strategies, the City will use its rehabilitation program to work with property owners to rehabilitate multi-unit properties to create additional affordable rental units. Through the use of rehabilitation grants the City will secure up to 8 additional rental units during the next program year that will yield between 15-30 years of affordability per unit depending on the project. This equates to a total of 120-240 years of affordability for the projects.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	10
Special-Needs	0
Total	10

Table 57 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	6
The Production of New Units	0
Rehab of Existing Units	4
Acquisition of Existing Units	0
Total	10

Table 58 - One Year Goals for Affordable Housing by Support Type Discussion

The Community Development Office will continue to oversee the management of the City’s Housing Rehabilitation Program. Through project delivery funds, the program will fund, on a per project bases, a Housing Rehabilitation Specialist to complete minimum housing quality standard inspections, provide project cost analysis, assist in the development of bid packages, be present during contract walk through, review and analyze bids, oversee the rehabilitation projects, provide on site progress inspection reports, and approve work completed for payment. Project delivery funds will also cover the partial salary of the Community Development Director.

Through the use of block grant funds, the city will attempt to create 6 to 8 new affordable housing units by adopting an affordable housing restriction previously used through the Neighborhood Stabilization Program. Imposing this restriction will enable the city to not only provide financial support through a grant and low interest loan (up to 2%),paid over fifteen years, to owner investors, but will also lock in much needed affordable housing units for a period of fifteen years. Units will be targeted to individuals of 80% of the area median income with a priority and additional financial incentive, of zero percent (0%) interest, offered to investors who will designate units to individuals of 50% of median income or less.

The City will continue to allocate funds to single family owner occupied units in the form of grants and zero percent (0%) interest loans made payable over a fifty year term.

Emergency grant assistance will be offered City wide, with a priority focused on the Elderly and Veteran residence of our community.

AP-60 Public Housing – 91.220(h)

Introduction

Given the limited availability of public housing resources emanating from the Department of Housing and Community Development alternatives must be sought out in order to provide additional housing. There is constant pressure on the legislature to limit the amount of resources made available to the Authority through operating funds and capital improvement (Bond Cap) money. The Authority is prevented from encumbering its existing stock of housing to leverage investment in additional housing stock in the community as a function of Massachusetts General Law. However, its affiliated nonprofit organization, Attleboro Housing Associates, Inc. is able to pursue investment alternatives in the community in partnership with other entities.

The Authority will try to use other available existing program options, such as the establishment of a Project-Based approach to utilization of our Housing Choice Voucher inventory. This will allow it to sign contracts with landlords/developers to attach Federal vouchers to specific units in a private development to assist these landlords/developers in ensuring long-term affordability of these units. The Authority will be looking to implement other such tools in the future.

Actions planned during the next year to address the needs to public housing

The City will work closely to encourage a relationship between developers and the Attleboro Housing Authority (AHA). The City will notify AHA of any affordable housing units developed through the Multi-Family Rehabilitation Incentive Program. The City will also continue closely with AHA in connecting the clients on the AHA's self sufficiency program with homeownership funds through the HOME program.

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

Resident participation is encouraged primarily through conversation at monthly Board meetings, dissemination of notices and flyers, quarterly safety briefings, handbook publications and LTO correspondence and discussion.

Public meetings are held monthly, with special meetings scheduled for modernization projects and other special interest issues.

Our Board of Commissioners is made up of five members. One member is a Governor's appointee with the other four appointed by the Mayor. Out of the Mayoral appointees, one member must represent labor interests and one must be a tenant of the Authority

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

N/A

Discussion

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

Please see attachment page 26-27 labeled AP 65 Homeless Introduction

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

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

The ratio of sheltered homeless to unsheltered homeless in the region is seven to one. The PIT count shows that one third of the unsheltered homeless are considered chronically homeless individuals. HUD considered an individual or family to be chronically homeless if that individual or family:

- is homeless and lives or resides in a place not meant for human habitation, a safe haven, or is in an emergency shelter;
- has been homeless and living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter continuously for at least one year or on at least four separate occasions within the last three years; and
- has an adult head of household (or a minor head of household in no adult is present in the household) with a diagnosable substance use disorder, serious mental illness, developmental disability, post traumatic stress disorder, cognitive impairments resulting in brain injury, or a chronic physical illness or disability, including the occurrence of 2 or more of those conditions.

Individuals who are mentally ill or have chronic substance abuse problems are twice as likely to be unsheltered than they are sheltered. The data also shows that the homeless who are victims of domestic violence are two times as likely to be unsheltered as they are sheltered.

Addressing the emergency shelter and transitional housing needs of homeless persons

The CoC estimates that it serves approximately 300 homeless households with emergency housing, traditional housing or supportive services. The poor economy, the foreclosure crisis and a reduction of federal and state funding for essential programs (especially substance abuse detoxification services, affordable housing and core human service programs) has exacerbated homelessness for some time.

The chronically homeless are especially hard hit. Chronically homeless are individuals (or families with at least one member) with a disabling condition that has either been continuously homeless for a year or has had at least four episodes of homelessness in the past three years. Disabling conditions are usually an untreated mental illness and/or substance abuse. In 2013, the PIT number of chronically homeless was 10 and there were no recorded homeless families. Often, admission to housing and

service programs for homeless people has been based on what people deemed a potential for long term stable tenancy. This has left many of the chronically homeless separated from the programs designed to help them.

Homeless families with children accounted for 73% of all homeless individuals identified in the 2013 PIT count. While the number of homeless individuals has dropped slightly in the past five years, the number of homeless families as more than doubled. Most of these families were located in either emergency or transitional shelters.

Two homeless veterans were counted for the PIT survey. One was sheltered, while the other was not. Both were male veterans.

Unaccompanied youth is a category of homelessness that has been undercounted for many years. This category is defined as a youth not living with a parent or guardian, and include youth who are residing with a care giver who does not have legal guardianship and youth who are living alone. The youth also lack a fixed, regular and adequate nighttime residence. Often, the individuals who fall in this category do not realize they are considered homeless. Identifying unaccompanied homeless youth is a crucial first step in ensuring these youth receive the support they need. The CoCs have been working diligently with schools and other agencies to help identify these youth.

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

There were a total of 58 homeless households counted in the 2013 annual PIT survey. It showed a disproportional number of people in families that were homeless compared to individual persons that were homeless during the annual count. Almost three quarters of homeless people were in families with children and another 5% were minors and their children. Most of these households were sheltered either in emergency or transitional facilities. Three households were not sheltered during the annual count. The average household size of the families including adults was 3.6 and the average household size for families without adults was 1.8. Some shelters provide assistance for families with minor children but problems arise when children are not minors and family members are required to be housed in separate facilities.

The PIT data shows two homeless veterans were counted and no homeless veterans with families counted. Consultation with homeless advocates and discussions with the public revealed that there is assistance available for most veterans that were discharged honorably, but there are some difficulties with those whose discharge was less than honorable.

PIT data collection does not include households currently sheltered in hotels by the Commonwealth of Massachusetts and that data is unavailable. Estimating the number of families in need of housing assistance for families with children is also hampered as some families are “doubling up” with friends and families. These displaced families are not included in the PIT counts.

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

The City will continue to be an active member of the Attleboro/Taunton/Bristol County CoC, participate in the Time in Point Count and provide CDBG funds to activities that will address the need to end homelessness. The City, through the use of Block Grant Funds will continue to fund multi-family housing rehabilitation projects in an effort to create more affordable housing with it’s priority focused in meeting the housing needs to individuals whose income is low 50% of are median income.

Discussion

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

There are some common characteristics of low-income and extremely low-income individuals and families with children who are either homeless now or threatened with homelessness. The causes for homelessness almost always include one or more of the following factors: unemployment/job loss, mental illness, substance abuse, not enough money, family problems, domestic abuse, disability, eviction, and legal problems. These characteristics, while not unique to the Consortium's communities, are prevalent in the homeless (and near homeless) population throughout the region.

The Consortium recognizes that preventing homelessness, especially chronic homelessness, is the first step to solving a homeless problem. Supportive services are especially critical to assist people with mental illness, substance abuse problems, HIV/AIDs, victims of domestic violence, and former prisoners. Individuals (and families) with these issues are often among the chronically homeless and services are needed to help make a transition to permanent affordable housing. The Consortium also believes that a variety of housing types is an important factor in providing affordable, safe and decent housing that can meet the needs of individuals and families with children who are either homeless now or threatened with homelessness. Finally, education and employment are a critical component to assisting those homeless who are able to work.

Members of the Consortium, the Greater Attleboro Taunton Coalition on Homelessness (GATCH), service partners and others are continuing their coordinated efforts to combat homelessness in the region. "The Ten to End", a 10 year plan to end chronic homelessness in the Greater Attleboro and Taunton area, was prepared in 2011 as a regional effort to address and eliminate homelessness. The Plan identifies actions that must be taken to solve the homeless and chronic homeless problems in the Consortium region. The Consolidated Plan includes priority needs, goals and objectives that are consistent with the "Ten to End" Plan.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

n/a

Discussion:

AP-85 Other Actions – 91.220(k)

Introduction:

Actions planned to address obstacles to meeting underserved needs

The City will continue to fund, at the maximum 15% of current entitlement year, plus 15% of prior year program income funds collected to support public service agencies through the city.

Actions planned to foster and maintain affordable housing

Though the City's Housing Rehabilitation Program, the city will impose an affordable housing restriction on owner investor multi-family assisted projects that will enable the city to capture affordable housing units for the period of 15 years.

Actions planned to reduce lead-based paint hazards

MassHousing's *Get the Lead Out* program provides financial assistance with lead based paint abatement. First-time home buyers, low and moderate-income homeowners and investors are all eligible to apply. However due to insufficient funds, the State has recently limited the eligibility to properties which have an occupant who has been diagnosed with lead-poisoning and who is enrolled in the case management system of the Department of Public Health. Consequently, lead abatement efforts are limited in scope and insufficient to meet the identified needs of the City. Therefore, the Office of Community Development has modified its policy to include lead abatement for homes with children under the age of six, as a priority under its rehabilitation program. Prior to this change the Office of Community Development would only undertake a lead abatement project as part of a larger rehabilitation project on any home where lead existed. Below are additional actions that will be taken to reduce lead-based paint hazards in the Attleboro area:

- Encourage the Attleboro Department of Health to provide local information booklets and outreach programs to make residents aware of lead based paint hazards and to generate referrals for lead based paint identification and abatement.
- Increase awareness of the MassHousing *Get the Lead Out* program.
- Encourage code enforcement which can lead to homes being de-lead.
- Continue to address lead contamination during the course of the Attleboro Office of Community Development's rehabilitation activities.
- Create a special pool of funds to address lead abatement through the HOME Consortium.

Actions planned to reduce the number of poverty-level families

Block grant funds will be used to create new job opportunities through the support of new economic

development projects. Funding will also provide public service agencies with the opportunity to teach non English speaking residents how to read, write, and properly speak English possibly enabling them to receive better paying jobs, and will provide funding to a social service agency that will offer credit counseling assistance.

Actions planned to develop institutional structure

Funding will be set aside for public facility improvements including, but not limited to accessibility adaptations, and rehabilitation to institutions whose prime use is to serve low/moderate residents or is located in a primarily low/mod census tract.

Actions planned to enhance coordination between public and private housing and social service agencies

The Office of Community Development will continue to participate in various social service meetings in an attempt to collect referral information. The Department will also establish a relationship with local financial institutions as a way of encourage more community

Discussion:

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	80.00%

Discussion:

Appendix - Alternate/Local Data Sources

1	<p>Data Source Name</p> <p>Please see below</p>
	<p>List the name of the organization or individual who originated the data set.</p> <p>Sources: Us. census 2010, HUD Maps Data, ACS 2013 3 Yeat Estimates, Realty Trac 03/01/2014</p>
	<p>Provide a brief summary of the data set.</p> <p>There are approximately 1,295 vacant units in the City. Of the 1295 units, 50 are REO Properties. it should be noted that an additional 84 units which are in foreclosure but not in REO.</p>
	<p>What was the purpose for developing this data set?</p> <p>Data provided in HUD's table was not a fair interpretation and reflection of the community.</p>
	<p>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</p> <p>Data is not concentrated in one geographic area.</p>
	<p>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</p>
	<p>What is the status of the data set (complete, in progress, or planned)?</p>

PR-15 Citizen Participation

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

On behalf of the City, the Office of Community Development routinely disseminates information relating to its CDBG plans and programs to its residents. Information during various stages of planning and program implementation is also provided to organizations in the City including: the City's Municipal Council, local housing authority, and various non-profit agencies.

When notices of CDBG funding availability and changes to our consolidated and action plans are initiated, required public notices are made through our local newspaper, The Sun Chronicle. These notices are also made available on the City's website, at the City's Government Center, and in the Office of Community Development.

Information to be provided: The Community Development Office provides three packets of information regarding the CDBG Program: one describes the eligibility criteria, available amount of funding, and program beneficiaries; the second provides a listing of all activities and funding expended during the previous program year; and third, the range of activities that may be undertaken utilizing CDBG funds.

Publishing the Consolidated Plan for comment: A summary of the City's proposed Consolidated Plan for FY'14-18 and its Action Plan for FY14 was published the week of April 11, 2014, in the local newspaper, The Sun Chronicle. Notices were also published indicating the comment period for the Plan and two (2) public hearings on the draft plan (one conducted by the Department of Planning and Development and the second conducted by the City's Municipal Council). Additionally, this notice was sent to providers, social service agencies, the Attleboro Housing Authority, City Departments, public library branches, and others who expressed interest in receiving notification. A copy of the draft Plan was made available for public review at the Attleboro Public Library, Attleboro Senior Center, the Community Development Office, and the City's website, The Mayor, members of the Municipal Council, Director of Planning and Development, the Attleboro Housing Authority, the major housing providers, and upon request.

Notice to Citizens: Notices concerning the Consolidated and Action Plans, including preparation and availability, were sent to those who regularly receive notice of CDBG funding availability. Notices regarding amendments and performance reports will be sent at appropriate times. These notices are always made available through legal notice placed in the Sun Chronicle, and the Office of Community Development.

Comment Period: A brief summary of the Consolidated and Action Plans appeared in The Sun Chronicle on April 11, 2014 seeking the public comment for a period of thirty (30) days. Advertisement also included information to whom and where comments should be sent.

Access to Records: Following federal requirements, the CDBG program included in this Plan provides reasonable and timely access to records relating to the City's proposed and actual use of funds.

Anti-displacement: The City does not expect any displacement of persons as a result of the implementation of its CDBG activities. Appropriate procedures, as required by HUD regulations, would be followed if any displacement were to occur.

Technical Assistance: Community Development staff will provide technical assistance to those groups and agencies who request such assistance in preparing proposals for funding assistance under the CDBG program, which is covered under the Consolidated Plan.

Public Hearings: A public needs meeting was held by the Department of Planning and Development in the Municipal Council Chambers at Government Center on January 28, 2014. A public meeting conducted by the City's Municipal Council was held in its Council Chambers, Government Center 77 Park Street on March 4, 2014, to inform the public of the purpose of the Consolidated and Action Plans, to solicit comments on the City's Community Development needs and the use of future CDBG funds for the period 2014-18.

The City of Attleboro is part of the Attleboro/Taunton HOME Consortium. The HOME regulations require that the Consolidated Plan submissions from the entitlement member communities of the Consortium (Attleboro and Taunton) cover the same program years. Consequently, Attleboro and Taunton are submitting their 5-Year Plans this year. Public needs meeting seeking comment from the public in reference to the use of HOME funds was held on Tuesday, January 7, 2014

The City's Municipal Council held a public hearing on April 15, 2014. This hearing afforded an opportunity for citizens to comment on the FY'14-18 Consolidated and FY'14 Action Plans during the required thirty (30) day comment period. The Municipal Council reviewed and authorizing submission of the FY'14-18 Consolidated and FY'14 Action Plans to HUD on Tuesday, May 6, 2014. Municipal Council meetings/hearings are televised on the local cable TV channel. The cable company indicates that about 90% of Attleboro households subscribe to cable service.

Adequate Advance Notice: Notices regarding the public hearing held on March 4, 2014, were posted during the week of February 21, 2014. The public needs meeting conducted by the Department of Community Development was held in the Municipal Council Chambers on

January 29, 2014. Notice regarding the meeting was posted in the Sun Chronicle on January 8, 2014. This hearing was held in the Municipal Council Chambers. The Municipal Council Chambers is located at Government Center, 77 Park St., and accessible to physically challenged citizens. A notice of the availability of the draft PY'14-18 Consolidated and draft PY'14 Action Plans was published in The Sun Chronicle on April 11, 2014. Notice was also published indicating the comment period for the Plan (30 days). A copy of the draft Consolidated Plan to be submitted, was made available for public review on the City's website, The Attleboro Public Library, The Attleboro Senior Center and in the Community Development Office. Various non profit agencies, City departments, The Attleboro

Housing Authority, The Mayor, The City Council, The Director of Community Development were also notified via email of said draft plans.

Criteria for amendment to Plan: Should the City determine that the Plan or any of its elements should undergo significant revision or change the following criteria would be used to define “significant change:”

NA-35 Public Housing- 91.205(b) Race of Residents

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	0	88	0	88	0	0	0
Survey Attleboro Housing Authority**			390			31			
Black/African American	0	0	0	22	0	22	0	0	0
Survey Attleboro Housing Authority**			5			2			
Asian	0	0	0	4	0	4	0	0	0
Survey Attleboro Housing Authority**			5			1			
American Indian/Alaska Native	0	0	0	0	0	0	0	0	0
Survey Attleboro Housing Authority**			4						
Pacific Islander	0	0	0	0	0	0	0	0	0
Survey Attleboro Housing Authority**									
Other	0	0	0	0	0	0	0	0	0
Survey Attleboro Housing Authority**	0	0	0	0	0	12	0	0	0

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 1 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center) PHA Survey 2013

Note:** The Attleboro PHA has only State public housing and also has 46 state vouchers [MRVP]

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

The **Attleboro/Taunton/Bristol County CoC**(Continuum of Care) has established the **Greater Attleboro/Taunton Coalition on Homelessness (GATCH)** as the primary decision making group. The lead organization which manages the overall planning and submissions to HUD is **Community Counseling of Bristol County (CCBC)**. The communities served by the CoC are Attleboro, Berkley, Dighton, Mansfield, North Attleboro, Norton, Raynham, Rehoboth, Seekonk, and Taunton. Of these only Rehoboth is not in the GATHC HOME Consortium. GATHC communities not in the area covered by the CoC are Carver, Lakeville, Middleborough and Plainville. Plainville is in Norfolk County and is served by the **'Balance of State'** Continuum of Care. Carver, Lakeville, and Middleborough are in Plymouth County and are all served by the **Brockton/Plymouth City & County** Continuum of Care.

The problems of homelessness are complex, but the state's Department of Transitional Assistance (DTA), the division of the Executive Office of Health and Human Services (EOHHS) which fund services for many homeless families and individuals, categorizes the root causes as:

- *structural issues* such as high housing costs or low household income
- *personal issues* such as mental illness, substance abuse or other physical and mental disabilities, and/or
- *social policies* such as the availability and effectiveness of assisted housing, mental health programs, substance abuse treatments, and other service interventions.

For virtually all homeless individuals and families, decent, safe, affordable housing is a critical step in ending homelessness. In some cases, this is their only need. However, often, in addition to affordable housing, homeless families and individuals also need supportive services to make the transition to independent living or to deal with other problems, including substance abuse or mental illness. Finally, in order to maintain themselves, these individuals and families may require assistance with childcare, transportation, life skills, job training and other basic life skills.

In addition, the continuing loss of affordable housing in conjunction with low paying jobs has exacerbated the problem of at-risk homeless individuals and families. In situations reported by service providers, the lowest income households frequently are living in overcrowded and substandard conditions that are likely to be providing short-term housing solutions. Young families and young adult individuals are living with other family members and are likely to be displaced due to family issues or the need of the primary occupant to rent the room that the at-risk household is living in. Two and three-family homes that once provided inexpensive housing are disappearing from the marketplace. When the house is sold, increased costs force the new owner to increase the rents, forcing existing tenants out. Finally, expiring use properties continue to increase the risk of homelessness for existing tenants as well as remove a source of future affordable units from the market. In addition to those properties in the Consortium communities that have already been removed through expiring uses, additional expiring use properties that will come into play over the next five years contain 623 units.

From a financial standpoint, the households most susceptible to becoming homeless are households who are at less than 30% median income and are severely cost-burdened (paying more than 50% of their income for rent). Other populations disproportionately at risk of becoming homeless are victims of domestic violence, substance abuse, those with severe mental health problems and people leaving

prison.

In order to address this at-risk population, there is a need for long-term permanent affordable housing and supportive transitional and permanent housing for the sub-populations that are over-represented among the at-risk and homeless. Counseling, health-care, life-skills training and sustainable employment at an adequate wage are all critical to reducing homelessness within the Consortium. On January 30th 2013, The Greater Attleboro Taunton Coalition for the Homeless [GATCH], in accord with its Continuum of Care planning process, conducted its annual point-in-time survey of its homeless population for Bristol County. (Note: this did not include the GATHC communities of Plainville (in Norfolk County), Lakeville, Carver and Middleborough (in the Brockton/Plymouth City & County count)

Table NA45-A Elderly Demographics - Attleboro

Households with one or more persons 60 and over	Persons Age 65+	Persons Age 80+
5,577	5,609	1,766

Sources: US Census 2010, HUD CHAS Data 2009

Table NA45-B Elderly Population Demographics by Income

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI	Totals All HHs	Total 0- 80% Median HHs
Household contains at least one person 62-74 years of age	339	460	400	305	1,110	2,614	1,199
Household contains at least one person age 75 or older	395	330	335	205	405	1,670	1,060
Totals	734	790	735	510	1,515	4,284	2,259

Source: HUD CHAS Data 2009 and Census 2010

Table NA45-C Elderly Population Share of the Population by Age and Income

Family	% of 0-80% Median Income HHs	% of All HHs
Elderly	42%	20%
62-74 Years Old	23%	16%
75+ Years Old	20%	10%

Source: HUD CHAS Data 2009 and Census 2010

Table NA45-B above shows that there are not only do the elderly at or below 80% of median constitute 42% of the CDBG eligible households in Attleboro, but that 20% of the eligible elderly households have a person over the age of 75.

Although many elderly households require no supportive services to live independently, the continuing increase in housing costs has left many elderly severely cost burdened as has been noted in Section NA10 and in Table NA10-D. For the purpose of this analysis, the elderly with priority need are those at less than 80 percent of median income who are severely cost burdened (paying more than 50 percent of their income for housing). This was shown in earlier tables to total 665 elderly households in Attleboro. If you broaden that to include extremely low income elderly households paying more than 30% of the income for housing, the number rises to 1,170 cost burdened elderly households. These figures exclude the 319 elderly households who are living in public housing and an additional estimate of more than 212 households living in other subsidized units, since they are not cost burdened. In addition there are many elderly households with housing vouchers, exercising them in the City. Then there are a number of private landlords housing elderly households without the use of subsidies and for whom the housing cost burden is less than 30% of median income.

This is difficult to determine as there is inadequate reliable data. In meetings and in surveys, it is apparent that there are significant supportive service needs and also a need for supportive housing such as assisted living, congregate housing and nursing home care. The data is difficult to use in estimating the exact populations, especially of those in need of supportive housing or supportive services. Using the ACS data of 2011 and the 2010 Census, we have assembled the data below.

Table NA45 – D Non-Institutionalized Disability Populations

Attleboro Disability Populations	Number	%
Total civilian non-institutionalized population	5,741	13.3
SEX - Male	2,361	11
SEX - Female	3,380	15.5
RACE AND HISPANIC OR LATINO ORIGIN - One Race - White alone	5,349	14.2
Population 65 years and over	1,769	33.5
With a hearing difficulty	760	14.4
With a vision difficulty	270	5.1
With a cognitive difficulty	450	8.5
With an ambulatory difficulty	1,132	21.5
With a self-care difficulty	475	9
With an independent living difficulty	624	11.8

Source: 2011 ACS Data and Census 2010

Frail elderly are defined as those elderly with mobility or self-care limitations (although HUD tends to use the category of those 75 years old or older). Typically, this population requires some assistance in daily living. This assistance may include adaptive housing and/or supportive services. For the purposes of this analysis, frail elderly include elderly at less than 80 percent of median income, who have a mobility, self-care limitation or unable to live independently. We have estimated the percentage $\leq 80\%$ AMI at 20% of all households in Attleboro. Using this ratio there are 446 frail elderly households who meet these criteria. Of these 289 are estimated to be in need of supportive housing or are already in supportive housing. It is estimated that 273 frail elderly persons need supportive services. [These estimates are developed by using algorithms developed by the State and Federal governments for communities in Massachusetts]

Physically Disabled The 2010/2011 ACS and Census identify approximately 1,760 non-elderly people who have an ambulatory limitation. Elderly persons with an ambulatory problem totaled 1,132 (See Table NA45-C above). The PHA survey indicates that 113 households on the Attleboro Housing Authority waiting list in 2013, have a physical disability of which 91 were elderly.

Mentally ill are typically treated through the state Department of Mental Health (DMH) that currently services adults through its residential programs.

DMH has various regional service sites. The Taunton/Attleboro Site includes the community of Attleboro.

In 2014 there were 204 “Authorized and Active” Clients of the Department in the Taunton-Attleboro area with more applicants in process of determination.

Table NA45 – E: Mentally Ill being serviced by the Department of Mental Health

	GLE	Apartment	Capacity	% Group Home	% Apt
CCBC - Taunton	35	115	150	23%	77%
State Operated - Taunton	25	0	47	100%	0%
PACT - Taunton & Attleboro	0	32	80	0%	100%
Totals	60	147	405	28%	72%

Source: Department of Mental Health January 2014

GLE stands for Group Living Environment formerly known as group homes. Apartment refers to those who live in their own unit or with their family. Capacity refers to the capacity of the DMH system in the area to provide support.

The continuing shift from institutionalization to community based services and living options has placed an increasing need to create additional affordable housing in a setting that provides an opportunity for supervision and service provision. Many clients on the waiting list are residing in inappropriate living situations. The overwhelming majority of DMH clients are very low income. Over 90% of clients on the wait list across the state require rental assistance and of those two-thirds also require services. A similar breakdown is assumed for Attleboro.

There are an estimated 91 persons on the waiting lists of the AHA who 100 are probably mentally ill persons.

Developmentally Disabled are serviced through the Department of Developmental Services (DDS). DDS works with housing providers to develop community-based housing for its clients, ranging from group homes to independent apartments. DDS estimates that 80 percent of its consumers are below the poverty line. The statewide waiting list continues to grow and is exacerbated by an increasing number of individuals who have lived with parents who are now elderly and no longer able to provide care for them. Since the last 5 year plan, DDS no longer publishes data on the number of developmentally disabled whether they are in institutions, in families or on their own. It is difficult to determine the number of people with developmental disabilities in the Consortium area. The US census provides information on cognitively disabled

persons, but that does not necessarily mean it is the same number of those who are developmentally disabled. The US Census numbers are as follows:

Table NA45 – F: Cognitively Disabled

Population 5 to 17 years	268
Population 18 to 64 years	1,263
Population 65 years and over	450

Source: US Census 2010

The State DDS estimates the numbers as follows:

Table NA45 – G: Developmentally Disabled by Residence and Age

Population Cohort	Estimated Total for the City	In Residential Settings funded by the DDS	In Residential Settings funded by Others	Living with Families or Independently
Population 22 and over years	147	69	9	69

Source: Department of Developmental Disabilities 2008

Clearly there is a large discrepancy between the Census estimates of the cognitively disabled and the populations being served by the DDS.

Substance abuse problems for many households pose a high risk of homelessness. Those who undergo treatment for addiction, frequently require a transitional setting and supportive services in order to fully recover.

Table NA45 – H: Substance Abuse Estimates (Population 12+ Years Old)

Needing but not Receiving Treatment	
Illicit Drugs	938
Alcohol Abuse	2,919
Admissions to Treatment	448
Estimated Homeless receiving Treatment*	86

Source: Department of Public Health and HHS 2010

*The rate used to calculate this was based on the State-wide rate for adults. The 86 homeless number includes people between 12 and 18 years old and may also be higher or lower than the State average.

The number not accessing but needing affordable housing is quite large.

Recent reports by the Federal HHS and the State DPH portray a grim picture for users of heroin in the region. It has led to hundreds being poisoned and many deaths with huge increases in 2014. Analyses of the epidemic indicate that there is a need for early intervention, increased services and particularly increased residential treatment facilities.

MA-05 Overview

"Need" is difficult to define. The market forces of supply and demand have been the engines that have created disparities from time to time. For example, Massachusetts encountered an economic recession in 1990-1993 which resulted in a decline in housing production and an actual decline in market rents and housing prices. The opposite was true in the period 1998-2006. Now we are just emerging from a period starting in 2007 which is similar to the downturn in 1990-1993. The area saw a decline in residential construction, as the financial lending market declined, unemployment rose and housing foreclosures increased. At this time, the area is on the road to recovery although it has been slow and gradual. It is expected that over the five year period this plan covers, we will see more of equilibrium in the housing market.

When one examines more closely who were damaged by the recent housing 'bust' and who is continuing to be impacted by it, many households continue to be priced out of the market and are faced with an increasing proportion of income they have to set aside for housing.

Moreover, because of the tighter underwriting standards, the reticence of lenders to lend, the decline in resources available to subsidize rents and homeownership costs and the challenges low income households face in retaining their jobs and maintaining their income, all of these contribute to a period of difficulty for low income households to secure affordable housing.

For those households above median income, although the value of their housing dropped dramatically and now as the cost of housing is rising again, they still have sufficient income for other basic needs. In housing economics, we refer to this phenomenon as **income elasticity**. Low income families have less elasticity than higher income families. Thus, for the lower income households spending 50% of income on housing results in neglect of other more basic needs. This is discussed in more detail below.

The importance of these numbers is that they obviously exclude those households who reside in subsidized housing or who have subsidy vouchers. Consequently these unsubsidized households are dependent on the private market for housing, which has continued to see growth in costs of ownership and rents.

Coupled with these general measures are the specific circumstances some special needs populations have that further constrain their financial ability to purchase shelter. For example, frail elderly, people with HIV/AIDS, people with severe mental illness, people with substance addiction, etc., must bear the cost of needed additional services, some of which are unreimbursed.

Another measure of need is what is happening to the availability of housing and housing subsidies that serve the most cost burdened households. There are many subsidized units of housing which serve households below 80% of median. In addition there are other household

housing subsidies such as HCV (Section 8) and the state MRVP which enable a family to purchase (for HCV only) or rent housing while only paying 30% of their income. The formally subsidized housing units include those operated by Housing Authorities and HOME agencies. They also include programs such as Low Income Housing Tax Credits, Section 202 for the elderly and Section 811 for the disabled or special needs housing developed by the public and private sector, both non-profit and for profit.

There is also informal lower cost housing in the City. In some cases, owners of multiple unit properties, especially 2-5 unit properties, will often rent out units below the average for the community and at rates affordable to lower income households. Similarly, some homes sell at a value affordable to a few households below 80% of median income. This informal housing market serves a significant number of households and its housing costs rise and fall with the general economy. In the US and in the Attleboro area, there are a significant number of households below 80% of median income not receiving a subsidy to defray housing costs, yet occupying units whose rental or ownership costs amount to less than 30% of their annual income. Naturally, people who are paying less than 30% of their income for housing and who are above 80% of median income, have surplus purchasing power which they are able to use for other critical family needs.

This informal part of the market, which had been serving households with incomes less than 80% of median income, has been shrinking over the last decade due to a variety of marketplace reasons. It continues to be vulnerable to market forces and deserves to be preserved by whatever means one can utilize.

One key concern for the City will be how many of the governmentally subsidized households are at risk. The two main groups at risk are the subsidized properties (such as those built under Section 236 and Section 221(d) and other Federal programs 20 or more years ago), which had limited terms of affordability (20 – 40 years). In many cases, these terms expire within the next few years. The housing units relying upon Housing Choice Vouchers (Section 8) are also at risk. This is discussed in more detail below.

The possible 290 'expiring use' units vulnerable through 2018 can be preserved through various programs which extend use restrictions on a voluntary basis.

The issue with vouchers is more complex, but recent changes in how housing authority HCV budgets are set, coupled with the rising rental subsidies due to a growing lower income population being admitted to PHA programs (which consume more of the HCV subsidy), coupled with a growing "porting out" of vouchers to lower cost housing areas, means that it is probable that the City will see a net loss of 5-10% of its vouchers or anywhere from 40-80 vouchers in the coming five years. There are some actions which PHAs can take to reduce this

loss, but they are somewhat limited by the nature of the housing market in the area and HUD regulations (75% of federal vouchers and 40% of federal public housing units must serve those in poverty – i.e., households at less than 30% of median income).

In addition to the private, but subsidized and thus affordable units listed above, there are units which are generally affordable forever such as public housing.

The task of developing and keeping enough assisted housing to meet the state's affordable housing appeals statute threshold of 10% of all housing units in the community will be a challenge.

Up to 26% of the affordable housing units in the City may also be lost over the next 5 years due to affordability use requirements expiring by 2018. This will exacerbate the situation. Actions can be taken by community leaders to keep these units affordable, by creating and utilizing different “expiring use” strategies.

Offsetting this problem, is the action of some communities take to amend their zoning codes, requiring any new development, to include a percentage of affordable units [Inclusionary Zoning] and to develop other zoning provisions which assist the development of affordable housing. The effect of these actions will depend upon the encouragement of developers by cities and towns, to use these provisions in the future.

As Taunton has a changing housing economy, typical of what is happening in Massachusetts as a whole, the likelihood is that the percentage of households being priced out of the market will continue. Already we know that for many, household income when adjusted for inflation, has actually declined or held at about the same. Meanwhile, over the last several years, housing prices and rents have increased, albeit with some leveling off and even decline in the last year. This means that households have not increased their purchasing power to keep pace with housing prices and other goods and services (medical care for example) which have outpaced the rate of inflation. If this continues, there will be a worsening housing problem in the City.

The number of employed workers in Massachusetts during the last eight years has declined. There has been stagnant job growth over the last few years and a persistent unemployment rate, especially for employees earning less than 80% of median income. This seems to be the forecast trend for the next year or two as well.

Also during the last two decades, there has been a significant out-migration of households in Massachusetts, especially between the ages of 25 and 45. This has been offset by a large in-migration of foreign born households. According to census data 75% of the net increase in family formation is attributable to foreign immigration. This continuing population ‘exchange’ has resulted in a growing number of non-white immigrant households where English is the

second language. Also 41% of immigrants into Massachusetts since 1990 will not have a high school diploma (although 33% will have a college degree, which is a higher percentage than in prior periods of immigration).

Moreover, this new immigrant population has a significant proportion of households of lower income and a significant number whose only household head is a single female. As a result, the number of immigrants making up families in poverty is rising. The City of Attleboro is affected with a growing minority population.

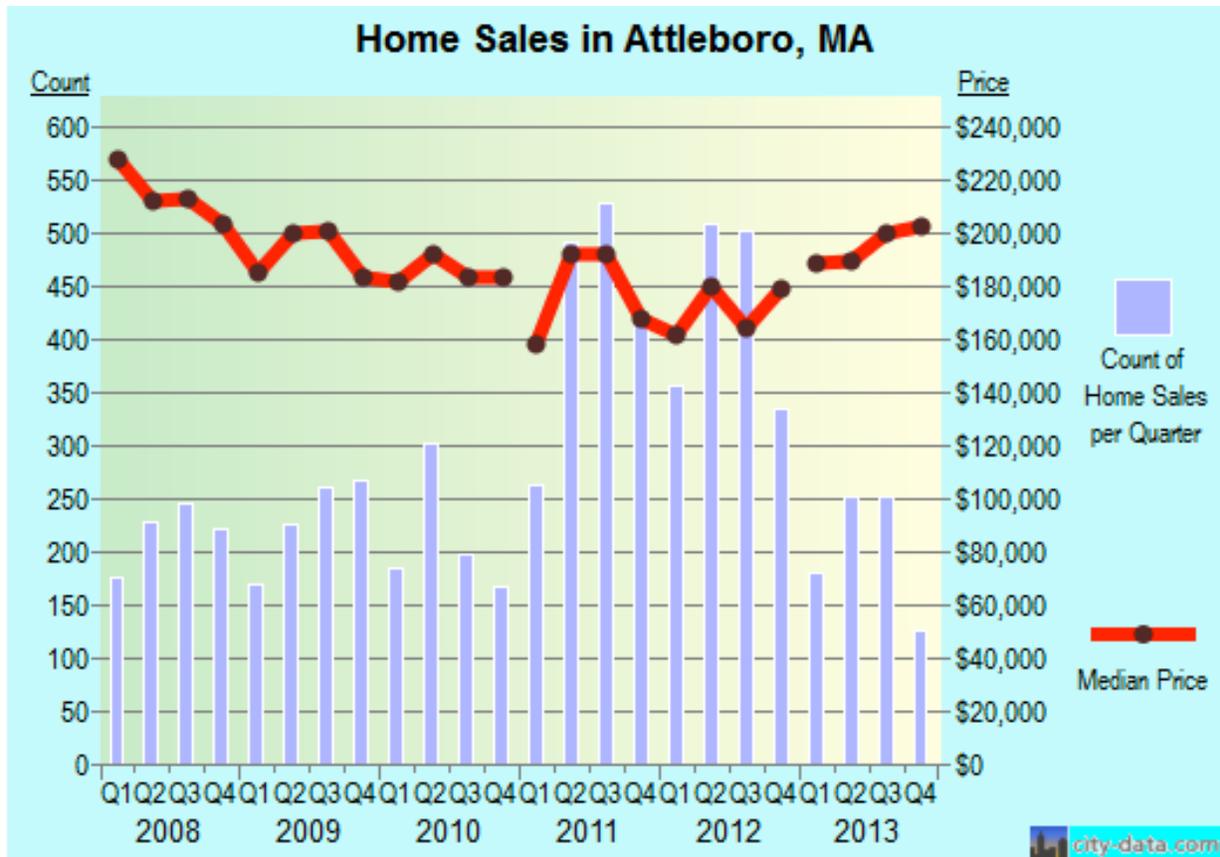
While we do not know the exact dimensions of this 'exchange' and don't know how quickly the 'immigrants' secure linguistic skills, jobs and more suitable housing, we can conclude that they present a housing, educational and employment challenge to the City.

All in all, the affordability gap has grown. The median household income trend from 2000 with projections through 2018 indicates that there has been a significant change in income over the last 10 years and projections indicate that income will continue to rise, although not as significantly as 2000-2007.

When we examine rents for modestly priced housing, a good proxy are the Fair Market Rents which HUD calculates for the area. [These are developed using census data and specific market surveys].

There are several ways of looking at the housing challenge facing households in this area.

We can examine the general rise in housing costs over the last 30 years and can see the significant challenges over time. The noticeable trends are the sharp rise in sales prices from 2002 to 2006, then the sharp drop until 2012 and now an increase again.



Another illustration of housing affordability is to look at the cost of housing divided by household income, which generates an indicator ratio that illustrates the growing cost burden on housing for purchase. This is discussed below.

One of the factors driving housing prices over 1990-2008 was the increase in the size of the average house. In 1970 the average home was 1,500 square feet. By 2008 it was 2,300 square feet. Moreover, the number of bathrooms, kitchen appliances and other amenities also increased. Construction costs also escalated, so that with the combination of rising land costs, especially in Massachusetts, increasing size of homes, multiplication of amenities and the rising cost of construction, have accounted for the rising cost of housing. Currently there is some downward pressure on that combination of housing design and we may see a leveling off in the next five years. It is also costly to build, maintain and operate housing in the Attleboro area. The housing stock is relatively old. There is poor insulation and older inefficient heating equipment which results in higher utility costs and there is a continuing discovery of lead based paint all of which add to the rehab needs and costs.

The other group of households that is impacted is that which is seeking to move from rental to homeownership. There are actually more cost burdened owners than renters. Low income residents trying to become homeowners need effective counseling and subsidies. Without a deep subsidy

program such as the Housing Choice Voucher Homeownership Program or HOME, the cost burdens and mortgage servicing troubles may continue.

In examining the rental pricing situation, we find a similar story but with the significant difference is changes in rental costs have an immediate impact on households, unless they are in public housing or certain subsidized housing situations where tenant rent payments are tied only to household income changes.

Publicly assisted housing is an important affordable housing resource for low income residents, as is the supply of affordable *unsubsidized* units. The estimated 1,055 units of private affordable, unsubsidized inventory faces price inflation and gradual transition to higher income household occupancy. One advantage of HOME/CDBG funded rehab programs is that they stabilize the occupancy for households at less than 80% of median. Reduction in public funding for the development of low and moderate income housing has meant that affordable housing production has not kept pace with affordability needs. With this reduction, the rise of inclusionary zoning as a mechanism for production becomes even more important.

As discussed above, the City's existing subsidized housing stock faces over 290 units being removed from the stock of affordable housing as their use restrictions expire in the period covered by this plan (2014-2018). This includes individual homeowner units and small rental properties rehabbed with CDBG and HOME funds as well. HUD's voluntary conversion of public housing to vouchers could also result in losses.

As noted previously, many HCV agencies will not receive sufficient funds to pay landlords for the vouchers now in use. As a result, agencies may have to find ways to scale back their programs. Some may cut the maximum amount of rent a voucher can cover; others may reduce the number of families which are assisted. Still others may close waiting lists and not reissue some vouchers as they become available when households leave the program.

Table MA10 – A Expiration of Subsidy Inventory

City	Use Restriction	Total Units	Original Subsidy Units	Current Units Assisted	Units at Risk - 2018
ATTLEBORO	LIHTC	81	41	41	0
ATTLEBORO		144	144	144	144
ATTLEBORO	40B	83	40	40	40
ATTLEBORO		100	100	100	25
ATTLEBORO		160	160	160	0
ATTLEBORO	LIHTC	N/A	38	38	75
ATTLEBORO	LIHTC	N/A	40	40	6
TOTALS		568	563	563	290

Source: ACS 2006-2010 and OECD Survey and LIHTC Database and DHCD Sources

Table MA10 - B Census Affordability Data

All Households Occupying Housing which is Affordable	0-30% AMI	>30-50% AMI	>50-80% AMI	Not Differentiated but known to be <=80% AMI	Total
All Households	1,355	1,340	2,630		5,325
30-50% Cost Burden	200	450	620		1,270
50% + Cost Burden	765	455	665		1,885
Total Burdened	965	905	1,285		3,155
No Cost Burden	390	435	1,345		2,170
Subsidized	434	16		563	1,104
Estimated Private Affordable Housing	0	419	1,345		1,066

Source: CHAS 2012 Data, USCensus 2010, DHCD and LIHTC Databases and Surveys (2013)

Table MA15 – A Estimated Supply of and Need for Affordable Housing

Subsidized Households in Taunton	Number of Extremely Low Income (0%-30% AMI) Households	Number of Very Low Income (31%-50% AMI) Households	Number of Low Income (51%-80% AMI) Households	Totals 0%-80% AMI Households
Federal Public Housing Residents	0	0	0	0
Federal Voucher Participants	N/A	N/A	N/A	91
State Public Housing Residents	389	15		404
State Voucher Participants	45	1		46
Other Subsidized Housing*	No Data	No Data	No Data	563
Total All Subsidized	434	16	-	1,104
Total Households with No Cost Burden	390	435	1,345	2,170
Estimated Private Affordable Housing	-	419	1,345	1,066
Total Household with Cost Burden	390	854	2,690	3,934
Estimated Affordable Housing Need**	0	419	1,345	1,764

*Note: All will be <=80% Median Income and most less than 60% Median Income

** Note that these totals are not taking into account the amount of other subsidized housing.

Source: US Census 2010, HUD CHAS, ACS 2011

The proportion of people in need of special services is not known with any accuracy. It can be estimated by using national and state indices of frequency. The City supplemented these calculations with actual survey information from the housing authority.

Table MA25-B Physical Needs

<u>Description</u>	<u>Estimated Dollars to Fix</u>
<u>General Physical Improvements</u>	
Special Needs Properties	\$73,685
Family Developments	\$100,000
Elderly Developments	\$775,000
<u>ADA Corrections</u>	
Family Developments	\$125,000
Elderly Developments	\$100,000
<u>Homeownership Assistance Needs</u>	
FSS Voucher Support Program	\$300,000
<u>Other Critical Needs Including Management and Operations</u>	
Admin. Support Affordable Development	\$200,000

Data Source: Attleboro Housing Authority 2014

SP24-Priority Needs

<u>Priority Need</u>	<u>Priority Level</u>	<u>Target Population</u>	<u>Goals Addressed</u>
Homeless/HIV/AIDS		Homeless or those at risk of being homeless	Assist in providing housing or services to those in need
Non Homeless Special Needs		All income eligible individuals or households <u>And</u> those defined by HUD as special needs	Assist special needs clientele with specific programming to address their needs
Owner Occupied Housing	High	All income eligible individuals or households	Maintain existing affordable housing stock through rehab and 1st time homebuyers
Rental Housing	High	All income eligible individuals or households	Create affordable housing units
Neighborhood Revitalization/Infrastructure	Moderate	Low/Mod census tracts, block group or street	Infrastructure and general public improvements
Economic Development	High	All income eligible individuals or households <u>Or</u> Business that create low/mod jobs	Create jobs or spur economic growth
Public Services	High	All income eligible individuals or households	Provide basic and essential services to income eligible individuals and families
Public Facilities	Moderate		Address needs of City

**Table 2 – Priority Needs Summary
CDBG Objectives and Strategies**

Summary of Objectives	
<u>CDBG Objectives</u>	<u>Strategies</u>
<i>Decent Housing:</i>	
Preserve existing affordable housing	Affordability/Accessibility/Availability Increase # of de-lead- ed dwelling units. Decrease # of units with code violation conditions. Increase energy efficiency. Address emergency repair with a priority show to elderly and veteran residents. Increase accessibility for disabled occupants.
Affordable Housing Production	Increase the supply of Affordable rental housing by imposing an affordable housing restriction to inventor owned rehabilitation projects. Provide grant and zero interest loans to owner occupied housing
Affordable Homeownership	Increase Access to home ownership for low and moderate income renters including PHA residents by working with PHAs, private developers, banks, and the First Time Home Buyer Program. Usually funded through HOME Program.
<i>Suitable Living Environment:</i>	
Infrastructure Improvements and Revitalization	Make improvements city wide, but concentrating in the downtown area to address needed infrastructure repairs to create a more suitable environment for residents, visitors, and businesses.
Provide public services to elderly persons to maintain or improve their health	Provide health care support to the City’s fast growing elderly population ensuring proper health care coverage.
	Provide support to the Senior Protein program through the Hebron Food Pantry
<i>Creating Economic Opportunity:</i>	
Provide public services to persons to improve their self- sufficiency	Provide programming to illiterate adults to improve their educational experience enabling them to obtain higher paying positions and promote economic self-sufficiency
	Support of credit and debt counseling agencies as a was promoting economic self- sufficiency
	Support subsidized child care programs in a effort to increase economic opportunities for low income families

Summary of Objectives	
<u>CDBG Objectives</u>	<u>Strategies</u>
Provide financial support to new businesses with a priority to the downtown area in an effort to increase job opportunities to low income residents	Economic development loans to new business as an effort to create job opportunities to low income residents which in return will enable economic self sufficiency

SP-40 Institution Delivery Structure

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs.

The City of Attleboro has received and administered federal entitlement CDBG funding since early 1980. In most recent years, the City has been in receipt of Neighborhood Stabilization funds through the Department of Community Development and became a member of the

Effective program delivery has been made possible through the efforts of Office of Community Development and many other local, state, federal and private partners. The institutional structure established to manage and deliver CDBG funded initiatives is broadly based and integrates the talents of key organizations. The Office of Community Development oversees the administration of the housing rehabilitation program, reviews applications for economic development and neighborhood revitalization projects funded through CDBG, and is a member of decision making committee in determining what public service projects to fund. In addition public services agencies are administered by talented knowledgeable non-profit agencies within our community and the Attleboro Housing Authority administers an extremely successful public housing program.

The lead agency (CCBC) for the local Continuum of Care is a non-profit that not only works locally and regionally to address homeless issues, it also works closely with the state in providing services to special needs clientele. The ARC is another local non-profit that houses and assists special needs clientele.

Local veterans' services agencies assist veterans and their families with a number of issues, including homelessness. It was recently learned that these agencies primarily assist only honorably or medically discharged vets and there is a gap in services for veterans who do not fall into those categories.

In addition, the recipients that are awarded funding work with and utilize services and resources from other government agencies, private lenders, non-profit and for-profit organizations.

Federal, state and local government agencies provide a major portion of gap funding and support for affordable housing and community development activities. They guide these activities through their policies, program guidelines and in the case of the local housing authority, through the direct provision of housing units, rental vouchers, and services.

The various government agencies typically act as "investors" in the housing and community development services provided by nonprofit and for-profit organizations.

The nonprofit and for-profit developers and service providers, in turn, develop affordable housing projects, offer supportive services and influence the type of affordable housing projects built and the services offered.

There are several projects pending that are relying on co-funding from these sources. One HOME development project is seeking federal Section 202 funding. Another is seeking federal, state, and local funds to complete its project. State and Federal Low Income Housing Tax Credits also play a major role

funding development projects. Due to the high costs of construction and the limited income derived from such projects, co-funding from various sources is a must for these projects to move forward. When these efforts prove fruitful they result in successful projects such as the PY'12 95 Park Street project that utilized NSP III funding to convert an abandoned retail property into four units of rental housing and commercial space, the development of five new affordable units located on the corner of Wall Street and South Street on a once contaminated site. Through the use of NSP III funds, the city was also able to create two additional affordable housing units through the rehabilitation of a foreclosed multi unit property.

Private lenders also play an important institutional role within the delivery system by providing primary financing and by acting as a conduit for the delivery of mortgage services to investors and low to moderate-income households who may purchase a unit in a development project or are buying their first home.

The relationship among these three groups of stakeholders forms the basis of the housing and community development delivery system and plays a significant role in the housing and community development efforts within the City. Major coordination is carried out by the organizations receiving funds from the City, but also provides coordination and support toward these efforts to leverage and manage resources from the various stakeholders.

SP-80 monitoring- 91.230

The Office of Community Development monitors all of its housing and community development projects to ensure long-term compliance with CDBG program requirements. Currently the Office of Community Development implements a rehabilitation program for multi-family housing, public facilities, and façade improvements, a small business loan program to assist with job creation, and a public services grant program to serve low and moderate income individuals and families. Each of these initiatives requires a different monitoring effort and as such the Office of Community Development has developed a process to ensure that they all comply with the CDBG minimum standards.

Rehabilitation Program Monitoring: The Rehabilitation Program is monitored from the point of application through the completion of the project. The monitoring process for rehabilitation closely follows the goals, outputs, outcomes and evaluation measures stipulated in the Consolidated Plan and in all contracts. The application process is monitored throughout to ensure that all required documentation is collected, proper underwriting review has occurred, and the applicant, contractor, and project meets all eligibility guidelines. Upon completion of the application process the rehabilitation specialist visits the project and prepares a pre-bid estimate prior to issuing a request for sealed bids. The bid process is also monitored and bids are opened publically to comply with federal procurement standards. Once the project has been awarded, the rehabilitation specialist monitors the project to ensure that it is completed to specifications before payment is released. Upon completion of the rehabilitation of the project any affordable rental units are monitored annually to ensure compliance with the project's Rent Regulatory Agreement and HUD's regulations governing affordability.

Davis Bacon Compliance:

In addition, the Office of Community Development staff oversees federally funded projects that require Davis Bacon compliance. Staff has updated its agreements to include all necessary information that must be included in a subrecipient's contract for construction projects including:

- HUD Form 4010 – Federal Labor Standards Provisions
- U.S. Department of Labor Payroll forms
- The appropriate wage determination
- A copy of the “Notice to All Employees” poster, to be posted at job site
- A copy of the “Contractor's Guide to Prevailing Wage Requirements for Federally-Assisted Construction Projects”, which is to be provided to the prime contractor

Small Business Loan Program Monitoring: As with the Rehabilitation Program, the application process is monitored throughout to ensure that all required documentation is collected and the applicant and the project meets all eligibility guidelines and that proper underwriting review has occurred. Once the loan has been disbursed the community Development Assistant collects all payments and enters them into the IDIS system on a monthly basis. Job certification forms are collected and reviewed throughout the project until the jobs creation goal has been met. Once the loan is repaid and the jobs have been created, the project is closed out and all appropriate documentation is held on file for three years after the completion of the project.

Public Services Monitoring:

Monitoring subrecipients ensures long-term compliance with program and comprehensive planning requirements. The Office of Community Development staff monitors all sub-recipients by clearly delineating the outcome measures of programs and by working collaboratively with each of its sub-grantees. Once these measures of success are agreed upon, the Office of Community Development staff requires that each subgrantee provide monthly reports on its activities which include:

- Progress toward desired outcomes
- Barriers to success
- Expenditures
- Beneficiary Data

Annually the Office of Community Development staff performs an on-site monitoring of sub-recipient's records. The formal monitoring process includes:

- Notification Letter
- Entrance Conference
- Documentation, Data Acquisition, and Analysis
- Exit Conference
- Follow-up Monitoring Letter (*with corrective actions required, if appropriate*)

As part of the annual performance assessment of each project, staff conducts employee interviews and reviews the following information:

- Progress of individual activities funded;
- Required backup documentation for project delivery cost invoices;
- Participant eligibility documentation;
- Weekly payroll forms

Rent Regulatory Monitoring

Monitoring specific completed rehabilitation projects for compliance with the CDBG Program required inspections schedule, as well as recertification monitoring for income and rent compliance ensures that our affordable housing projects are meeting their intended purpose. For housing rehabilitation projects, staff:

- Conducts on-site inspections
- Screens and qualifies clients
- Verifies annual income to ensure long term compliance with CDBG program requirements.
- Monitors Affirmative Marketing Plan compliance (for projects with 5 or more units);
- Inspects annually a sample of units and occupant records pertaining to the units

The Office of Community Development staff also works in conjunction with state (DHCD) and local agencies on any additional monitoring efforts that are required to meet state and federal regulations.

Introduction:

The **Attleboro/Taunton/Bristol County CoC**(Continuum of Care) has established the **Greater Attleboro/Taunton Coalition on Homelessness (GATCH)** as the primary decision making group. The lead organization which manages the overall planning and submissions to HUD is **Community Counseling of Bristol County (CCBC)**. The communities served by the CoC are Attleboro, Berkley, Dighton, Mansfield, North Attleboro, Norton, Raynham, Rehoboth, Seekonk, and Taunton. Of these only Rehoboth is not in the GATHC HOME Consortium. GATHC communities not in the area covered by the CoC are Carver, Lakeville, Middleborough and Plainville. Plainville is in Norfolk County and is served by the **'Balance of State'** Continuum of Care. Carver, Lakeville, and Middleborough are in Plymouth County and are all served by the **Brockton/Plymouth City & County** Continuum of Care.

The problems of homelessness are complex, but the state's Department of Transitional Assistance (DTA), the division of the Executive Office of Health and Human Services (EOHHS) which fund services for many homeless families and individuals, categorizes the root causes as:

- *structural issues* such as high housing costs or low household income
- *personal issues* such as mental illness, substance abuse or other physical and mental disabilities, and/or
- *social policies* such as the availability and effectiveness of assisted housing, mental health programs, substance abuse treatments, and other service interventions.

For virtually all homeless individuals and families, decent, safe, affordable housing is a critical step in ending homelessness. In some cases, this is their only need. However, often, in addition to affordable housing, homeless families and individuals also need supportive services to make the transition to independent living or to deal with other problems, including substance abuse or mental illness. Finally, in order to maintain themselves, these individuals and families may require assistance with childcare, transportation, life skills, job training and other basic life skills.

In addition, the continuing loss of affordable housing in conjunction with low paying jobs has exacerbated the problem of at-risk homeless individuals and families. In situations reported by service providers, the lowest income households frequently are living in overcrowded and substandard conditions that are likely to be providing short-term housing solutions. Young families and young adult individuals are living with other family members and are likely to be displaced due to family issues or the need of the primary occupant to rent the room that the at-risk household is living in. Two and three-family homes that once provided inexpensive housing are disappearing from the marketplace. When the house is sold, increased costs force the new owner to increase the rents, forcing existing tenants out. Finally, expiring use properties continue to increase the risk of homelessness for existing tenants as

well as remove a source of future affordable units from the market. In addition to those properties in the Consortium communities that have already been removed through expiring uses, additional expiring use properties that will come into play over the next five years contain 623 units.

From a financial standpoint, the households most susceptible to becoming homeless are households who are at less than 30% median income and are severely cost-burdened (paying more than 50% of their income for rent). Other populations disproportionately at risk of becoming homeless are victims of domestic violence, substance abuse, those with severe mental health problems and people leaving prison.

In order to address this at-risk population, there is a need for long-term permanent affordable housing and supportive transitional and permanent housing for the sub-populations that are over-represented among the at-risk and homeless. Counseling, health-care, life-skills training and sustainable employment at an adequate wage are all critical to reducing homelessness within the Consortium.

On January 30th 2013, The Greater Attleboro Taunton Coalition for the Homeless [GATCH], in accord with its Continuum of Care planning process, conducted its annual point-in-time survey of its homeless population for Bristol County. (Note: this did not include the GATHC communities of Plainville (in Norfolk County), Lakeville, Carver and Middleborough (in the Brockton/Plymouth City & County count).

Population	Estimate the # persons Experiencing Homelessness on a given night		Estimate the # persons experiencing homelessness each year	Estimate the # persons becoming homeless each year	Estimate the # exiting homeless each year	Estimate the # of days persons experiencing homelessness
	Unsheltered	Sheltered				
Persons in Households with Adult(s) and Child(ren)	7	175	Not avail.	Not avail.	Not avail.	Not avail.
Persons in Households with Only Children	1	13	Not avail.	Not avail.	Not avail.	Not avail.
Persons in Households with Only Adults	22	33	Not avail.	Not avail.	Not avail.	Not avail.
Chronically homeless individuals	9	1	Not avail.	Not avail.	Not avail.	Not avail.
Chronically homeless families	0	0	Not avail.	Not avail.	Not avail.	Not avail.
Veterans	1	1	Not avail.	Not avail.	Not avail.	Not avail.
Unaccompanied Youth	Not avail.	Not avail.	Not avail.	Not avail.	Not avail.	Not avail.
Persons with HIV	1	0	Not avail.	Not avail.	Not avail.	Not avail.

Source: Attleboro/Taunton/Bristol County Continuum of Care, Point-In-Time Summary (PIT) 1/30/2013 and through consultation.

Notes: The Attleboro/Taunton/Bristol CoC includes about 80% of the population of the Consortium area. Homelessness data is not available by municipality and it cannot be determined with reasonable accuracy, therefore, only A/T/B CoC data is presented in the table above. *[The estimated yearly count is included in the AHAR report but it shows an annual total about ½ that of the PIT count – the data does not include all of the region’s shelters.]*