

Before Starting the CoC Application

The CoC Consolidated Application consists of three parts, the CoC Application, the CoC Priority Listing, and all the CoC's project applications that were either approved and ranked, or rejected. All three must be submitted for the CoC Consolidated Application to be considered complete.

The Collaborative Applicant is responsible for reviewing the following:

1. The FY 2019 CoC Program Competition Notice of Funding Available (NOFA) for specific application and program requirements.
2. The FY 2019 CoC Application Detailed Instructions which provide additional information and guidance for completing the application.
3. All information provided to ensure it is correct and current.
4. Responses provided by project applicants in their Project Applications.
5. The application to ensure all documentation, including attachment are provided.
6. Questions marked with an asterisk (*), which are mandatory and require a response.

1A. Continuum of Care (CoC) Identification

Instructions:

Guidance for completing the application can be found in the FY 2019 CoC Program Competition Notice of Funding Availability and in the FY 2019 CoC Application Detailed Instructions.

Please submit technical questions to the HUD Exchange Ask-A-Question at <https://www.hudexchange.info/program-support/my-question/>

Resources:

The FY 2019 CoC Application Detailed Instruction can be found at:

<https://www.hudexchange.info/e-snaps/guides/coc-program-competition-resources>

The FY 2019 CoC Program Competition Notice of Funding Availability at:

<https://www.hudexchange.info/programs/e-snaps/fy-2019-coc-program-nofa-coc-program-competition/#nofa-and-notices>

1A-1. CoC Name and Number: MA-508 - Lowell CoC

1A-2. Collaborative Applicant Name: City of Lowell, Massachusetts

1A-3. CoC Designation: CA

1A-4. HMIS Lead: City of Lowell, Massachusetts

1B. Continuum of Care (CoC) Engagement

Instructions:

Guidance for completing the application can be found in the FY 2019 CoC Program Competition Notice of Funding Availability and in the FY 2019 CoC Application Detailed Instructions.

Please submit technical questions to the HUD Exchange Ask-A-Question at <https://www.hudexchange.info/program-support/my-question/>

Resources:

The FY 2019 CoC Application Detailed Instruction can be found at:

<https://www.hudexchange.info/e-snaps/guides/coc-program-competition-resources>

The FY 2019 CoC Program Competition Notice of Funding Availability at:

<https://www.hudexchange.info/programs/e-snaps/fy-2019-coc-program-nofa-coc-program-competition/#nofa-and-notice>

Warning! The CoC Application score could be affected if information is incomplete on this formlet.

1B-1. CoC Meeting Participants.

For the period of May 1, 2018 to April 30, 2019, applicants must indicate whether the Organization/Person listed:

- 1. participated in CoC meetings;**
- 2. voted, including selecting CoC Board members; and**
- 3. participated in the CoC’s coordinated entry system.**

Organization/Person	Participates in CoC Meetings	Votes, including selecting CoC Board Members	Participates in Coordinated Entry System
Local Government Staff/Officials	Yes	Yes	Yes
CDBG/HOME/ESG Entitlement Jurisdiction	Yes	Yes	Yes
Law Enforcement	Yes	Yes	Yes
Local Jail(s)	Yes	No	No
Hospital(s)	Yes	No	Yes
EMS/Crisis Response Team(s)	Yes	No	Yes
Mental Health Service Organizations	Yes	Yes	Yes
Substance Abuse Service Organizations	Yes	Yes	Yes
Affordable Housing Developer(s)	Yes	Yes	Yes
Disability Service Organizations	Yes	No	No
Disability Advocates	Yes	No	No
Public Housing Authorities	Yes	No	Yes
CoC Funded Youth Homeless Organizations	Yes	Yes	Yes
Non-CoC Funded Youth Homeless Organizations	Yes	Yes	No

Youth Advocates	Yes	Yes	Yes
School Administrators/Homeless Liaisons	Yes	No	No
CoC Funded Victim Service Providers	Yes	No	Yes
Non-CoC Funded Victim Service Providers	Yes	No	No
Domestic Violence Advocates	Yes	No	Yes
Street Outreach Team(s)	Yes	Yes	Yes
Lesbian, Gay, Bisexual, Transgender (LGBT) Advocates	Yes	No	No
LGBT Service Organizations	Yes	No	No
Agencies that serve survivors of human trafficking	Yes	No	No
Other homeless subpopulation advocates	Yes	Yes	Yes
Homeless or Formerly Homeless Persons	Yes	Yes	No
Mental Illness Advocates	Yes	Yes	Yes
Substance Abuse Advocates	Yes	Yes	Yes
Other:(limit 50 characters)			
Veterans Services Officer	Yes	No	Yes
Mass Hire Lowell Career Center	Yes	No	No

1B-1a. CoC’s Strategy to Solicit/Consider Opinions on Preventing/Ending Homelessness.

Applicants must describe how the CoC:

- 1. solicits and considers opinions from a broad array of organizations and individuals that have knowledge of homelessness, or an interest in preventing and ending homelessness;**
- 2. communicates information during public meetings or other forums the CoC uses to solicit public information;**
- 3. takes into consideration information gathered in public meetings or forums to address improvements or new approaches to preventing and ending homelessness; and**
- 4. ensures effective communication with individuals with disabilities, including the availability of accessible electronic formats, e.g., PDF. (limit 2,000 characters)**

1. The CoC solicits and considers opinions from a broad array of organizations and individuals that have knowledge of, or an interest in, preventing and ending homelessness through regular participation in the Hunger and Homeless Commission (HHC) and through the City Manager’s Task Force on Homelessness. Over the past year, the CoC combined meetings of the CoC with the HHC, which has broad participation from across the City, including integrated healthcare providers. Monthly HHC meetings generally draw 45-50 people from more than 40 organizations and agencies. The meetings are open to the public and invite opportunities for formal and informal networking and collaboration.

This year, the City Manager convened the Task Force on Homelessness and Sustainable Housing, which broadened the engagement of organizations and individuals to include Sr. Management within provider organizations, the

business community, and local philanthropy along with additional resources and renewed commitment from a broad range of stakeholders. Task Force output included significant reporting to the Lowell City Council, which is a public forum with online materials and meetings broadcast on local TV. There was substantial discussion of the information collected, and solutions proposed.

2. The CoC presents to the Hunger and Homeless Commission about all things related to the CoC, including the opportunity to apply for new funding. We provide handouts including data reports, narratives, etc with the opportunity for feedback and follow up. The Task Force included extensive surveying and convening of a variety of stakeholders to get public information.

3. As a result of these efforts, the Task Force/CoC has identified key priorities on a range of topics to address both improvements and new approaches to prevent and end homelessness.

4. All materials are posted in pdf formats ensuring effective communication with individuals with disabilities.

1B-2. Open Invitation for New Members.

Applicants must describe:

- 1. the invitation process;**
 - 2. how the CoC communicates the invitation process to solicit new members;**
 - 3. how the CoC ensures effective communication with individuals with disabilities, including the availability of accessible electronic formats;**
 - 4. how often the CoC solicits new members; and**
 - 5. any special outreach the CoC conducted to ensure persons experiencing homelessness or formerly homeless persons are encouraged to join the CoC.**
- (limit 2,000 characters)**

1. The CoC is open to all interested individuals and organizations. This year, the CoC merged with the Lowell Hunger and Homeless Commission (HHC), holding the general membership meeting as a quarterly meeting of the HHC. The HHC is an official City commission, with dual participation from the CoC board. It solicits broad participation from the community, through a distribution list which includes approximately 100 organizations and agencies ranging from homeless services providers, food pantry and soup kitchen providers, the hospital and health center, workforce development programs, community-based housing providers, and others. The CoC uses these quarterly meetings as an opportunity to update the broader community and invite deeper participation in the CoC.

Each HHC meeting includes presentations by local initiatives, introductions, and opportunities for questions and discussions. In addition, attendees leave with a comprehensive packet of information on current initiatives.

2. The chair of the HHC advertises the CoC meeting through a broad email network of commissioners and stakeholders. In addition, it is also posted on the City's website and in local newspapers.

3. Materials for the CoC are made available in hard copy and through links on the City website.
4. The CoC solicits new members through the City Manager's Task Force and at the quarterly HHC meetings. The Task Force process brought many new stakeholders into the CoC conversation and led directly to CoC Advisory Board expansion with engaged participants from Greater Lowell Community Foundation, Lowell Development and Financial Corporation, Lowell Police Dept., Coalition for a Better Acre (501c3 community development corp), and City health/sanitary enforcement, which engages with unsheltered sites, among others.
5. The CoC and HHC have active participation from several organizations that include people who are experiencing homelessness, or formerly homeless persons.

1B-3. Public Notification for Proposals from Organizations Not Previously Funded.

Applicants must describe:

- 1. how the CoC notifies the public that it is accepting project application proposals, and that it is open to and will consider applications from organizations that have not previously received CoC Program funding, as well as the method in which proposals should be submitted;**
- 2. the process the CoC uses to determine whether the project application will be included in the FY 2019 CoC Program Competition process;**
- 3. the date(s) the CoC publicly announced it was open to proposal;**
- 4. how the CoC ensures effective communication with individuals with disabilities, including the availability of accessible electronic formats; and**
- 5. if the CoC does not accept proposals from organizations that have not previously received CoC Program funding or did not announce it was open to proposals from non-CoC Program funded organizations, the applicant must state this fact in the response and provide the reason the CoC does not accept proposals from organizations that have not previously received CoC Program funding.**
(limit 2,000 characters)

1. Along with instructions to submit renewals, the CoC issued an RFP on July 23rd, 2019, soliciting projects for new PSH housing projects to be created through bonus as well as reallocated funding, as well as projects for the domestic violence bonus, as described in the NOFA. The RFP was circulated widely through the City's email lists, the Hunger and Homeless Commission networks, posted on the City's website, and printed in the local newspaper. The RFP was written explicitly to contain significant background information to explain the program and requirements and included links to additional information.

2. The RFP emerged from an assessment of the needs of the community for housing to target long term and chronically homeless individuals in the City. The City Manager's Task Force on Homelessness and Sustainable Housing included a comprehensive review of all housing, and needs as demonstrated through a summer unsheltered count. The Project Review and Ranking

Committee met to review all applications to see how they align with local and HUD priorities, and meet all of the additional threshold requirements. The goal is to support as many units as possible for the target population.

3. The RFP was released to the public on July 23rd and the CoC hosted a bidder's conference on July 31st.

4. The RFP and all of the attachments, etc. are available in hard copy from the Office of Planning and Development as well as online on the City's websites.

5. The CoC actively sought proposals from a wide range of organizations, including those that have never applied for funding in the past.

1C. Continuum of Care (CoC) Coordination

Instructions:

Guidance for completing the application can be found in the FY 2019 CoC Program Competition Notice of Funding Availability and in the FY 2019 CoC Application Detailed Instructions.

Please submit technical questions to the HUD Exchange Ask-A-Question at <https://www.hudexchange.info/program-support/my-question/>

Resources:

The FY 2019 CoC Application Detailed Instruction can be found at:

<https://www.hudexchange.info/e-snaps/guides/coc-program-competition-resources>

The FY 2019 CoC Program Competition Notice of Funding Availability at:

<https://www.hudexchange.info/programs/e-snaps/fy-2019-coc-program-nofa-coc-program-competition/#nofa-and-notice>

Warning! The CoC Application score could be affected if information is incomplete on this formlet.

1C-1. CoCs Coordination, Planning, and Operation of Projects.

Applicants must select the appropriate response for each federal, state, local, private, other organizations, or program source the CoC included in the planning and operation of projects that serve individuals experiencing homelessness, families experiencing homelessness, unaccompanied youth experiencing homelessness, persons who are fleeing domestic violence, or persons at risk of homelessness.

Entities or Organizations the CoC coordinates planning and operation of projects	Coordinates with Planning and Operation of Projects
Housing Opportunities for Persons with AIDS (HOPWA)	Yes
Temporary Assistance for Needy Families (TANF)	Yes
Runaway and Homeless Youth (RHY)	Yes
Head Start Program	Yes
Funding Collaboratives	Yes
Private Foundations	Yes
Housing and services programs funded through U.S. Department of Justice (DOJ) Funded Housing and Service Programs	Yes
Housing and services programs funded through U.S. Health and Human Services (HHS) Funded Housing and Service Programs	Yes
Housing and service programs funded through other Federal resources	Yes
Housing and services programs funded through State Government	Yes
Housing and services programs funded through Local Government	Yes
Housing and service programs funded through private entities, including foundations	Yes
Other:(limit 50 characters)	
Department of Mental Health	Yes

Lowell Health Department/ Public Health	Yes
---	-----

1C-2. CoC Consultation with ESG Program Recipients.

Applicants must describe how the CoC:

- 1. consulted with ESG Program recipients in planning and allocating ESG funds;**
- 2. participated in the evaluating and reporting performance of ESG Program recipients and subrecipients; and**
- 3. ensured local homelessness information is communicated and addressed in the Consolidated Plan updates.**
(limit 2,000 characters)

1. The CoC uses the Annual Action Plan process to engage ESG program recipients in planning, prioritizing, and allocating ESG funds granted to the City of Lowell. A volunteer Advisory Board, which includes ESG program recipients and persons with lived experience of homelessness, plays a central role in the planning process. The Action Plan informs the HHC, and ESG program recipients are active participants in the HHC. Member organizations regularly communicate new opportunities, providing real-time feedback from ESG recipients in the HHC meetings with CoC members. These discussions inform funding plans and the consolidated planning process by the City’s Community Development Dept, which administers entitlement funds and provides staff support to the HHC.

2. The City is both the CoC collaborative applicant and the entitlement grantee for the ESG program responsible for the development of this Consolidated Plan and Action Plan. To effectively manage the grants and address community needs and sentiment, CoC staff review ESG program data quarterly to ensure that recipient and subrecipient activities are effectively meeting community needs.

3. Data acquired from the CoC’s Longitudinal System Analysis, Point-In-Time, and Housing Inventory Count was used to update the Plan’s Housing Gaps Analysis. This information is used to determine the unmet housing needs within the CoC and ESG Systems in close consultation with the Annual Action Plan (ESG).

1C-2a. Providing PIT and HIC Data to Consolidated Plan Jurisdictions. Yes to both

Applicants must indicate whether the CoC provided Point-in-Time (PIT) and Housing Inventory Count (HIC) data to the Consolidated Plan jurisdictions within its geographic area.

1C-2b. Providing Other Data to Consolidated Plan Jurisdictions. Yes

Applicants must indicate whether the CoC

ensured local homelessness information is communicated to Consolidated Plan Jurisdictions within its geographic area so it can be addressed in Consolidated Plan updates.

1C-3. Addressing the Safety Needs of Domestic Violence, Dating Violence, Sexual Assault, and Stalking Survivors.

Applicants must describe:

- 1. the CoC’s protocols, including protocols for coordinated entry and the CoC’s emergency transfer plan, that prioritize safety and incorporate trauma-informed, victim-centered services; and**
- 2. how the CoC, through its coordinated entry, maximizes client choice for housing and services while ensuring safety and confidentiality. (limit 2,000 characters)**

The CoC partnered with the Dept of Public Health to develop “Safelink,” a statewide database connecting 36 agencies that prioritize safety and victim-centered services and can be accessed if local shelters are full. SafeLink is a parallel coordinated entry process that ensures providers with the necessary trauma-informed and victim-centered care match housing resources with victims after engagement and vulnerability assessment. The CoC works with the Department of Transitional Assistance DV specialist who assesses families entering emergency shelter who present with DV issues, as well as Alternative House and the Asian Task Force Against DV, an active CoC participant.

The Lowell Police Dept conducts High Risk Safety Assessments with survivors to determine if they need to be removed from the home immediately. The “Safety Assessments” consider how the survivor can safely leave their home without the abuser’s knowledge or interference, collection of personal belongings and if there is a safe place to relocate to. CoC and police staff will then meet the survivor in a neutral location to insure the safety of all parties involved. They also work together to identify “High Risk” cases that may require immediate housing or relocation assistance.

When a survivor needs a longer-term housing solution, the CoC works to provide the greatest amount of choice regarding the type of housing, location, and services available to meet their needs. To ensure access to permanent housing the CoC provides support services including economic stability, healing, parenting support, and access to other critical resources. The CoC encourages landlord flexibility in renting to survivors with multiple barriers, and the City’s DV Agency, Alternative House, works closely with private landlords and the Lowell Housing Authority to place survivors into permanent housing that meets their needs.

1C-3a. Training–Best Practices in Serving DV Survivors.

Applicants must describe how the CoC coordinates with victim services providers to provide training, at least on an annual basis, for:

- 1. CoC area project staff that addresses safety and best practices (e.g., trauma-informed, victim-centered) on safety and planning protocols in**

2. Coordinated Entry staff that addresses safety and best practices (e.g., Trauma Informed Care) on safety and planning protocols in serving survivors of domestic violence. (limit 2,000 characters)

The Lowell CoC works with Alternative House, the primary agency for survivors in the region, to facilitate MOUs with community partners and City agencies to provide training on an annual basis or as needed. These agreements outline the frequency of the training and the material that will help educate program staff on the safety and planning protocols needed to successfully engage survivors using trauma-informed and victim-centered practices. Alternative House chairs a bi-annual training at the Lowell Family Resource Center that teaches a community engagement program including DV 101, Breaking Barriers and Legal Advocacy, that welcomes various neighborhood groups, HISET and ESOL students who attend classes at the Family Resource Center. The Middlesex County District Attorney's Office and Lowell Police Dept partner with the Lowell CoC at these training to provide Legal Advocacy and additional wrap around support services.

In addition to training held with individual community partners and city agencies, The Lowell CoC works with Alternative House to provide ongoing training to the Greater Lowell Evaluation and Advocacy Network (GLEAN) Case Assessment Team and the Task Force. These training events help participants address "High Risk" cases through a collaborative and coordinated effort with timely intervention and service plans that ensure long term safety for survivors.

Ongoing training goals for both the community-based training and the Task Force are to develop and implement evidence-based, trauma-informed and victim centered policies and procedures to better equip staff with the tools and guidance needed to serve this vulnerable population.

The CoC uses a prioritization system that is based on length of homelessness and vulnerability. The CoC recognizes that trauma plays a significant role for many, including survivors of domestic violence and seeks to provide trauma-informed practices generally.

1C-3b. Domestic Violence–Community Need Data.

Applicants must describe how the CoC uses de-identified aggregate data from a comparable database to assess the special needs related to domestic violence, dating violence, sexual assault, and stalking. (limit 2,000 characters)

The Lowell CoC utilizes de-identified aggregate data from an HMIS-comparable database to better understand how survivors of domestic violence, dating violence, sexual assault and stalking, access services in the local victim services shelter and transitional housing program. The database also includes information about people accessing support services, including safe house & shelter referrals, housing placement, relocation assistance and legal advocacy. Data gathered from agencies who work with survivors allow support staff to identify, separate and distinguish different types of domestic violence, including physical, emotional, sexual, financial, or psychological abuse in order to create safety planning or long-term case management.

In addition to utilizing internal data, The Lowell CoC works with local law enforcement including both police and Middlesex County District Attorney's Office in identifying "High Risk" cases and use this information to expedite support services and ongoing training opportunities for the community at large. Partnerships with local law enforcement have also helped with the tracking of information related to individuals affected by sexual exploitation.

All de-identified aggregate data is shared with the Greater Lowell Evaluation and Advocacy Network (GLEAN), The City Manager's Task Force on Domestic Violence, and the Middlesex County District Attorney's Office for resource sharing and training purposes.

***1C-4. PHAs within CoC. Attachments Required.**

Applicants must submit information for the two largest PHAs or the two PHAs with which the CoC has a working relationship within the CoC's geographic area.

Public Housing Agency Name	% New Admissions into Public Housing and Housing Choice Voucher Program during FY 2018 who were experiencing homelessness at entry	PHA has General or Limited Homeless Preference	PHA has a Preference for current PSH program participants no longer needing intensive supportive services, e.g., Moving On
Lowell Housing Authority	10.00%	Yes-HCV	No

1C-4a. PHAs' Written Policies on Homeless Admission Preferences.

Applicants must:

1. provide the steps the CoC has taken, with the two largest PHAs within the CoC's geographic area or the two PHAs the CoC has working relationships with, to adopt a homeless admission preference—if the CoC only has one PHA within its geographic area, applicants may respond for one; or

2. state that the CoC does not work with the PHAs in its geographic area. (limit 2,000 characters)

The Lowell CoC has consistently engaged the Lowell Housing Authority (LHA), the only PHA within its geographic area, in structured discussions and strategic planning around ending homelessness in Lowell. Through its CoC membership, the LHA has become an integral partner on the Task Force, which is comprised primarily of CoC members. The Task Force identified Housing First as an effective framework for the response to the homelessness crisis and is working towards creating a low-barrier approach to tenancy.

The LHA completes the annual review of its Administrative Plan for its Low Rent Public Housing and Housing Choice Voucher Program with input from the CoC. The plan includes the LHA's limited homelessness preference, which applies to a person or household involuntarily displaced from a "well-being unit" in the municipality of Lowell by natural disaster, by fire, by unwarranted landlord action

or by Government action, including capital programs of the LHA. The CoC also supports the LHA in its efforts to establish a project-based Housing Choice Vouchers preference for its permanent supportive housing at New Hope 2 apartments. The preference offers supportive services in conjunction with permanent support housing opportunities for extremely low to low income families experiencing homelessness.

The CoC and LHA are working together to expand the limited homelessness preferences in the future. With support from the CoC, the LHA seeks to expand the Housing Choice Voucher program over the next 5 years.

1C-4b. Moving On Strategy with Affordable Housing Providers.

Applicants must indicate whether the CoC has a Moving On Strategy with affordable housing providers in its jurisdiction.

Yes

If “Yes” is selected above, describe the type of provider, for example, multifamily assisted housing owners, PHAs, Low Income Tax Credit (LIHTC) developments, or local low-income housing programs. (limit 1,000 characters)

Developed with input from CoC partners, the LHA has long-term plans for assisting individual and families experiencing homelessness to integrate into regular units. The LHA has led the development and implementation of the CoC’s Moving on strategy and is committed to expanding access to housing voucher programs for single adults and families experiencing homelessness. The programs include: Emergency Shelter Grant, Veterans Affairs Supportive Housing (VASH) Vouchers (applied for 15 more), Housing Opportunities for Persons with Aids (HOPWA), Mainstream Vouchers (applied for 60 more), and Family Self- Sufficiency (FSS) Program. Over the next 5 years, the LHA will increase the number of Housing Choice Voucher (HCV) Homeownership participants by 12-15. The LHA also established a nonprofit, Revitalization Effort toward New Urbanism (RENU), that will create a mixed-use development of 40-60 units of affordable housing. The LHA currently sets aside 12 project-based vouchers for single room units that house Lowell Transitional Living Center clients.

CoC membership will help the LHA identify and enhance its moving on strategy.

1C-5. Protecting Against Discrimination.

Applicants must describe the actions the CoC has taken to address all forms of discrimination, such as discrimination based on any protected classes under the Fair Housing Act and 24 CFR 5.105(a)(2) – Equal Access to HUD-Assisted or -Insured Housing. (limit 2,000 characters)

The CoC reviews and enforces the Program Policies and Operations Manual from the Department of Planning and Development Community Development office, which oversees all aspects of HUD entitlement program administration

and from which staff members sit on the CoC Advisory Board. In addition, the City's policies regarding Fair Housing and Equal Opportunity are included in the CoC subrecipient agreements along with provisions related to the following federal laws:

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d et seq)
- The Fair Housing Act (42 U.S.C. 3601-3620)
- Equal Opportunity in Housing (EO 11063)
- Age Discrimination Act of 1975 (42 U.S.C 6101)
- HUD's Equal Access Rule of 2012

Analysis of Impediments to Fair Housing:

As a condition of receiving HUD entitlement funds, the City of Lowell certifies that the City will "affirmatively further fair housing." To achieve this, the City completes an Analysis of Impediments to Fair Housing Choice (AI) report every five years, which is submitted to HUD along with the Consolidated Plan. The Analysis of Impediments to Fair Housing Choice (AI) takes a comprehensive review of policies, practices, and procedures that affect the location, availability, and accessibility of housing and current residential patterns and conditions. The document also identifies any impediments to fair housing choice and recommends actions to address them. The AI also achieves one of the components of the City's Fair Housing Planning requirements under the 1990 National Affordable Housing Act.

The Community Development Director, with input from the Director of Housing and Energy Programs, will be chiefly responsible for conducting and recording any actions taken throughout the year to eliminate impediments identified in the AI. These actions will be documented, and records maintained in the Fair Housing file. They will also be reported to HUD as part of the CAPER.

***1C-5a. Anti-Discrimination Policy and Training.**

Applicants must indicate whether the CoC implemented an anti-discrimination policy and conduct training:

1. Did the CoC implement a CoC-wide anti-discrimination policy that applies to all projects regardless of funding source?	Yes
2. Did the CoC conduct annual CoC-wide training with providers on how to effectively address discrimination based on any protected class under the Fair Housing Act?	No
3. Did the CoC conduct annual training on how to effectively address discrimination based on any protected class under 24 CFR 5.105(a)(2) – Equal Access to HUD-Assisted or -Insured Housing?	Yes

***1C-6. Criminalization of Homelessness.**

Applicants must select all that apply that describe the strategies the CoC implemented to prevent the criminalization of homelessness in the CoC's geographic area.

1. Engaged/educated local policymakers:	<input checked="" type="checkbox"/>
---	-------------------------------------

2. Engaged/educated law enforcement:	<input checked="" type="checkbox"/>
3. Engaged/educated local business leaders:	<input checked="" type="checkbox"/>
4. Implemented communitywide plans:	<input checked="" type="checkbox"/>
5. No strategies have been implemented:	<input type="checkbox"/>
6. Other:(limit 50 characters)	
	<input type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>

1C-7. Centralized or Coordinated Assessment System. Attachment Required.

Applicants must:

- 1. demonstrate the coordinated entry system covers the entire CoC geographic area;**
 - 2. demonstrate the coordinated entry system reaches people who are least likely to apply for homelessness assistance in the absence of special outreach; and**
 - 3. demonstrate the assessment process prioritizes people most in need of assistance and ensures they receive assistance in a timely manner.**
- (limit 2,000 characters)**

Coordinated entry covers the entire geographic area of the Lowell CoC. Data is collected through HMIS and the geography.csv table includes the project location and therefore all clients within that project are part of the region and are in the by-name-list. In addition, coordinated entry connected outreach workers conduct regular street outreach within the City limits to engage people who are unsheltered.

In addition to the HMIS-driven system, Lowell is piloting mobile technology that enables a wide range of outreach workers to collaborate and work effectively as a team towards housing goals. There are approximately 20 teams doing street outreach in Lowell through a combination of homelessness and public health channels and so this significantly expands the CoC’s capacity to reach people who are least likely to apply for homelessness assistance. Flyers and other notices are posted at partner sites. Mobile technology where the data lands in a command center allows people to work together more effectively across funding streams, etc. Ultimately, this data will be integrated with HMIS to illustrate a more complete story.

The CE system includes a by-name list of people that are enrolled in projects throughout the CoC through HMIS. The data is imported into an HMIS data warehouse platform and integrated into client dashboards that include various features (e.g., length of homelessness within the region). The region uses this

list to support the prioritization process that aligns with the HUD Prioritization Notice, including length of homelessness.

There is a CE group consisting of shelter, outreach, police, and healthcare providers that meets for case conferencing to discuss clients who are on the list and those who are not because they do not have an HMIS record. Since it is a small community, the group builds consensus to identify the most vulnerable and considers health issues, time spent in the ER, vulnerability from being outside and more.

1D. Continuum of Care (CoC) Discharge Planning

Instructions:

Guidance for completing the application can be found in the FY 2019 CoC Program Competition Notice of Funding Availability and in the FY 2019 CoC Application Detailed Instructions.

Please submit technical questions to the HUD Exchange Ask-A-Question at <https://www.hudexchange.info/program-support/my-question/>

Resources:

The FY 2019 CoC Application Detailed Instruction can be found at:

<https://www.hudexchange.info/e-snaps/guides/coc-program-competition-resources>

The FY 2019 CoC Program Competition Notice of Funding Availability at:

<https://www.hudexchange.info/programs/e-snaps/fy-2019-coc-program-nofa-coc-program-competition/#nofa-and-notices>

Warning! The CoC Application score could be affected if information is incomplete on this formlet.

1D-1. Discharge Planning Coordination.

Applicants must indicate whether the CoC actively coordinates with the systems of care listed to ensure persons who have resided in them longer than 90 days are not discharged directly to the streets, emergency shelters, or other homeless assistance programs. Check all that apply (note that when "None:" is selected no other system of care should be selected).

Foster Care:	<input checked="" type="checkbox"/>
Health Care:	<input checked="" type="checkbox"/>
Mental Health Care:	<input checked="" type="checkbox"/>
Correctional Facilities:	<input checked="" type="checkbox"/>
None:	<input type="checkbox"/>

1E. Local CoC Competition

Instructions

Guidance for completing the application can be found in the FY 2019 CoC Program Competition Notice of Funding Availability and in the FY 2019 CoC Application Detailed Instructions.

Please submit technical questions to the HUD Exchange Ask-A-Question at <https://www.hudexchange.info/program-support/my-question/>

Resources:
 The FY 2019 CoC Application Detailed Instruction can be found at:
<https://www.hudexchange.info/e-snaps/guides/coc-program-competition-resources>
 The FY 2019 CoC Program Competition Notice of Funding Availability at:
<https://www.hudexchange.info/programs/e-snaps/fy-2019-coc-program-nofa-coc-program-competition/#nofa-and-notice>

Warning! The CoC Application score could be affected if information is incomplete on this formlet.

*1E-1. Local CoC Competition–Announcement, Established Deadline, Applicant Notifications. Attachments Required.

Applicants must indicate whether the CoC:

1. informed project applicants in its local competition announcement about point values or other ranking criteria the CoC would use to rank projects on the CoC Project Listings for submission to HUD for the FY 2019 CoC Program Competition;	Yes
2. established a local competition deadline, and posted publicly, for project applications that was no later than 30 days before the FY 2019 CoC Program Competition Application submission deadline;	Yes
3. notified applicants that their project application(s) were being rejected or reduced, in writing along with the reason for the decision, outside of e-snaps, at least 15 days before the FY 2019 CoC Program Competition Application submission deadline; and	Yes
4. notified applicants that their project applications were accepted and ranked on the CoC Priority Listing in writing, outside of e-snaps, at least 15 days before the FY 2019 CoC Program Competition Application submission deadline.	Yes

1E-2. Project Review and Ranking–Objective Criteria.

Applicants must indicate whether the CoC used the following to rank and select project applications for the FY 2019 CoC Program Competition:

1. Used objective criteria to review and rank projects for funding (e.g., cost effectiveness of the project, performance data, type of population served);	Yes
2. Included one factor related to improving system performance (e.g., exits to permanent housing (PH) destinations, retention of PH, length of time homeless, returns to homelessness, job/income growth, etc.); and	Yes
3. Included a specific method for evaluating projects submitted by victim services providers that utilized data generated from a comparable database and evaluated these projects on the degree they improve safety for the population served.	Yes

1E-3. Project Review and Ranking–Severity of Needs and Vulnerabilities.

FY2019 CoC Application	Page 18	09/26/2019
------------------------	---------	------------

Applicants must describe:
1. the specific severity of needs and vulnerabilities the CoC considered when reviewing and ranking projects; and
2. how the CoC takes severity of needs and vulnerabilities into account when reviewing and ranking projects.
(limit 2,000 characters)

The Lowell CoC uses a ranking tool modeled on the HUD tool and built within the HMIS data warehouse. Renewal projects being ranked are added to a project group and the tool automatically generates APR reports and pulls in outcome data for scoring. The tool follows HUD guidelines to evaluate and weight criteria based on project type. Threshold criteria are also taken from HUD requirements, including that projects are housing first and low barrier.

The CoC includes a criterion for assessing severity of needs and vulnerabilities, termed by the group as, "Serves High Need Population." The CoC allocated points based on whether the program met the following thresholds for RRH, PSH, and TH project types included in the "Serves High Need Population" group:

- Minimum percent of participants with more than one disability: RRH- 50%; PSH – 75%; and, TH-50%
- Minimum percent of participants with zero income at entry: RRH- 50%; PSH – 80%; and, TH-50% - - Minimum percent of participants who are chronically homeless: For PSH only at 95%
- Minimum percent of people who enrolled met the CoC defined TH-targeting criteria: For TH only at 95%

Each criterion has a weight of 10, except for the target criteria for PSH and TH, which were weighted at 20.

The Lowell Project Ranking and Review committee, a subgroup of the Lowell CoC, imports the results into the scoring tool, generates score cards for each project, appropriately weighted for past performance accepting individuals with higher severity of needs and vulnerability, reviews the scores and then ranks the projects accordingly. Lowell uses an HMIS warehouse to run APRs, and import the results into a scoring tool, which evaluates data quality and project performance of key metrics and generates a score card based on these criteria.

1E-4. Public Postings–CoC Consolidated Application. Attachment Required.

Applicants must:
1. indicate how the CoC made public the review and ranking process the CoC used for all project applications; or
2. check 6 if the CoC did not make public the review and ranking process; and
3. indicate how the CoC made public the CoC Consolidated Application—including the CoC Application and CoC Priority Listing that includes all project applications accepted and ranked or rejected—which HUD required CoCs to post to their websites, or partners websites, at least

**2 days before the FY 2019 CoC Program Competition application submission deadline; or
 4. check 6 if the CoC did not make public the CoC Consolidated Application.**

Public Posting of Objective Review and Ranking Process		Public Posting of CoC Consolidated Application including: CoC Application, CoC Priority Listing, Project Listings	
1. Email	<input checked="" type="checkbox"/>	1. Email	<input checked="" type="checkbox"/>
2. Mail	<input checked="" type="checkbox"/>	2. Mail	<input checked="" type="checkbox"/>
3. Advertising in Local Newspaper(s)	<input checked="" type="checkbox"/>	3. Advertising in Local Newspaper(s)	<input checked="" type="checkbox"/>
4. Advertising on Radio or Television	<input type="checkbox"/>	4. Advertising on Radio or Television	<input type="checkbox"/>
5. Social Media (Twitter, Facebook, etc.)	<input checked="" type="checkbox"/>	5. Social Media (Twitter, Facebook, etc.)	<input checked="" type="checkbox"/>
6. Did Not Publicly Post Review and Ranking Process	<input type="checkbox"/>	6. Did Not Publicly Post CoC Consolidated Application	<input type="checkbox"/>

1E-5. Reallocation between FY 2015 and FY 2018.

Applicants must report the percentage of the CoC’s ARD that was reallocated between the FY 2015 and FY 2018 CoC Program Competitions.

Reallocation: 13%

1E-5a. Reallocation–CoC Review of Performance of Existing Projects.

Applicants must:

- 1. describe the CoC written process for reallocation;**
 - 2. indicate whether the CoC approved the reallocation process;**
 - 3. describe how the CoC communicated to all applicants the reallocation process;**
 - 4. describe how the CoC identified projects that were low performing or for which there is less need; and**
 - 5. describe how the CoC determined whether projects that were deemed low performing would be reallocated.**
- (limit 2,000 characters)**

1.The CoC has a Reallocation Policy that allows the region to shift funds to align funding with an overall strategic plan in which the CoC assesses existing projects for their performance and effectiveness in ending homelessness.

As a result of the work of the Task Force, the Lowell CoC developed a reallocation process that ensured that projects submitted in the CoC

Consolidated Application:

- 1) Best aligned with the HUD CoC priorities aimed at ending chronic homelessness for individuals
- 2) Contributed to a competitive application that collaboratively secures CoC funding to improve the communities in the Lowell CoC.

The CoC considers both voluntary and involuntary reallocation as appropriate, based on criteria related to monitoring findings, unspent funds, etc.

2.The CoC approved the reallocation process through a vote at the August 29th meeting.

3.The CoC had ongoing conversations with projects prior to reallocation and worked with organizations to ensure that no one would be made homeless as a result of the shift in funding.

4.The CoC identified two projects to have grants reduced and portions reallocated. Bridgewell volunteered the reallocation of \$75,000 largely due to the ability to use other funds to cover the difference. In addition, the City reallocated \$25,000 to support a new \$100,000 PSH reallocation. City operating funds were available to cover the reallocated CoC funds. Prior to the final reallocation decision and worked with organizations to ensure that no one would be made to experience homelessness as a result of the shift in funding.

5.The CoC evaluated all the projects on the GIW by reviewing APRs and financial spending. The CoC considered the population being served, the outcomes achieved, and the cost per outcomes.

DV Bonus

Instructions

Guidance for completing the application can be found in the FY 2019 CoC Program Competition Notice of Funding Availability and in the FY 2019 CoC Application Detailed Instructions.

Please submit technical questions to the HUD Exchange Ask-A-Question at <https://www.hudexchange.info/program-support/my-question/>

Resources:

The FY 2019 CoC Application Detailed Instruction can be found at:

<https://www.hudexchange.info/e-snaps/guides/coc-program-competition-resources>

The FY 2019 CoC Program Competition Notice of Funding Availability at:

<https://www.hudexchange.info/programs/e-snaps/fy-2019-coc-program-nofa-coc-program-competition/#nofa-and-notices>

Warning! The CoC Application score could be affected if information is incomplete on this formlet.

1F-1 DV Bonus Projects.

Applicants must indicate whether the CoC is requesting DV Bonus projects which are included on the CoC Priority Listing: No

Applicant Name	DUNS Number
This list contains no items	

2A. Homeless Management Information System (HMIS) Implementation

Intructions:

Guidance for completing the application can be found in the FY 2019 CoC Program Competition Notice of Funding Availability and in the FY 2019 CoC Application Detailed Instructions.

Please submit technical questions to the HUD Exchange Ask-A-Question at <https://www.hudexchange.info/program-support/my-question/>

Resources:

The FY 2019 CoC Application Detailed Instruction can be found at:

<https://www.hudexchange.info/e-snaps/guides/coc-program-competition-resources>

The FY 2019 CoC Program Competition Notice of Funding Availability at:

<https://www.hudexchange.info/programs/e-snaps/fy-2019-coc-program-nofa-coc-program-competition/#nofa-and-notices>

Warning! The CoC Application score could be affected if information is incomplete on this formlet.

2A-1. HMIS Vendor Identification. Social Solutions - ETO

Applicants must review the HMIS software vendor name brought forward from FY 2018 CoC Application and update the information if there was a change.

2A-2. Bed Coverage Rate Using HIC and HMIS Data.

Using 2019 HIC and HMIS data, applicants must report by project type:

Project Type	Total Number of Beds in 2019 HIC	Total Beds Dedicated for DV in 2019 HIC	Total Number of 2019 HIC Beds in HMIS	HMIS Bed Coverage Rate
Emergency Shelter (ES) beds	700	92	608	100.00%
Safe Haven (SH) beds	0	0	0	
Transitional Housing (TH) beds	74	24	6	12.00%
Rapid Re-Housing (RRH) beds	130	0	23	17.69%
Permanent Supportive Housing (PSH) beds	176	19	105	66.88%
Other Permanent Housing (OPH) beds	12	0	0	0.00%

2A-2a. Partial Credit for Bed Coverage Rates at or Below 84.99 for Any Project Type in Question 2A-2.

For each project type with a bed coverage rate that is at or below 84.99 percent in question 2A-2., applicants must describe:

**1. steps the CoC will take over the next 12 months to increase the bed coverage rate to at least 85 percent for that project type; and
2. how the CoC will implement the steps described to increase bed coverage to at least 85 percent.
(limit 2,000 characters)**

1. In the upcoming merger with the BoS CoC, there will be a greater opportunity to fully integrate the TH, RRH, and PSH programs with the rest of the CoC. The proportion of these programs that are not participating will decrease automatically, although efforts to increase participation are on-going. There are also programmatic changes that will support increased HMIS participation. Specifically, the local victim services provider that runs a TH program will be transitioning to a new HMIS-compatible system and one that is used by other victim services within the BoS CoC, so their participation will be supported by a greater network of providers.

As the US Dept of Veterans Affairs and HUD formalize the process for HMIS participation of VA-funded programs, the local TH and VASH programs will be able to participate. Increased technology and “data bridges” will support

2. The Lowell CoC will be merging with the BoS who will begin managing the CoC-funded programs as well as the family programs in the region. Lowell has been awarded an HMIS capacity grant which will help provide the technical data bridges that are required to integrate data from multiple sources. This will include both HUD and non-HUD funded housing programs as well as street outreach, enabling an increase in bed coverage, as well as data about those who are unsheltered. Continued work with City Manager’s Task Force, the VA, and others will support this effort.

***2A-3. Longitudinal System Analysis (LSA) Submission.**

Applicants must indicate whether the CoC submitted its LSA data to HUD in HDX 2.0. Yes

***2A-4. HIC HDX Submission Date.**

**Applicants must enter the date the CoC submitted the 2019 Housing Inventory Count (HIC) data into the Homelessness Data Exchange (HDX).
(mm/dd/yyyy)** 04/30/2019

2B. Continuum of Care (CoC) Point-in-Time Count

Instructions:

Guidance for completing the application can be found in the FY 2019 CoC Program Competition Notice of Funding Availability and in the FY 2019 CoC Application Detailed Instructions.

Please submit technical questions to the HUD Exchange Ask-A-Question at <https://www.hudexchange.info/program-support/my-question/>

Resources:

The FY 2019 CoC Application Detailed Instruction can be found at:

<https://www.hudexchange.info/e-snaps/guides/coc-program-competition-resources>

The FY 2019 CoC Program Competition Notice of Funding Availability at:

<https://www.hudexchange.info/programs/e-snaps/fy-2019-coc-program-nofa-coc-program-competition/#nofa-and-notice>

Warning! The CoC Application score could be affected if information is incomplete on this formlet.

2B-1. PIT Count Date. 01/30/2019

Applicants must enter the date the CoC conducted its 2019 PIT count (mm/dd/yyyy).

2B-2. PIT Count Data–HDX Submission Date. 04/30/2019

Applicants must enter the date the CoC submitted its PIT count data in HDX (mm/dd/yyyy).

2B-3. Sheltered PIT Count–Change in Implementation.

Applicants must describe:

1. any changes in the sheltered count implementation, including methodology or data quality methodology changes from 2018 to 2019, if applicable; and

2. how the changes affected the CoC’s sheltered PIT count results; or
3. state “Not Applicable” if there were no changes.

(limit 2,000 characters)

1. There were no significant changes in the sheltered count implementation. However, the CoC continued to build on the work that was done in 2018, to align projects with the HIC for accuracy and continued to work on data quality. The HIC includes all of the shelter programs, including a robust inventory of State-funded family shelter beds so we were able to reliably use HMIS for the sheltered PIT Count.

2. Our change in methodology did not have a significant impact on the total number of persons counted during the shelter-portion of the PIT Count. Rather,

the change in persons counted is a result of the addition of a new state-funded family shelter. Because of the attention to data quality, including the capturing of disabilities, the CoC was able to more accurately report on chronicity.

***2B-4. Sheltered PIT Count—Changes Due to Presidentially-declared Disaster.**

Applicants must select whether the CoC added or removed emergency shelter, transitional housing, or Safe-Haven inventory because of funding specific to a Presidentially-declared disaster, resulting in a change to the CoC’s 2019 sheltered PIT count. No

2B-5. Unsheltered PIT Count—Changes in Implementation.

Applicants must describe:

- 1. any changes in the unsheltered count implementation, including methodology or data quality methodology changes from 2018 to 2019, if applicable; and**
 - 2. how the changes affected the CoC’s unsheltered PIT count results; or**
 - 3. state “Not Applicable” if there were no changes.**
- (limit 2,000 characters)**

1. There were no significant changes to the implementation of the Unsheltered PIT Count however, there were more volunteers in 2019 than in 2018 and volunteers provided blankets and other items to give out and each year brings greater participation from partners including the police department, fire department, EMS, municipal employees, and community volunteers conducted the PIT count, breaking into 5 teams. Volunteers used the Counting Us Mobile App to collect data which was captured in the regional Command Center where it was analyzed and reported over.

2. While we believe that the new methodology maximized our efforts during the unsheltered count and improved our efficiency over previous years, there was a significant snow storm on the night of the count, that we believe pushed the unsheltered count lower than would have been expected.

***2B-6. PIT Count—Identifying Youth Experiencing Homelessness.**

Applicants must:

Indicate whether the CoC implemented specific measures to identify youth experiencing homelessness in their 2019 PIT count. Yes

2B-6a. PIT Count—Involving Youth in Implementation.

Applicants must describe how the CoC engaged stakeholders serving youth experiencing homelessness to:

- 1. plan the 2019 PIT count;**
 - 2. select locations where youth experiencing homelessness are most likely to be identified; and**
 - 3. involve youth in counting during the 2019 PIT count.**
- (limit 2,000 characters)**

1.The Youth Committee of the CoC is spearheaded by Community Teamwork which runs a growing network of programs for you who are experiencing, and at risk of, homelessness. The Director of Youth Services attends Advisory Board meetings and is an active member of the CoC and HHC. She was part of the planning committee for the 2019 PIT Count and worked to make sure that young people were identified in shelter and outside.

2.CTI youth staff and members of the The Lowell Youth Action Board (LAB) have identified locations where unsheltered youth may be identified, and the hours that they can generally be located.

3.LAB is a leadership group of young people that meet monthly. This group is driving the efforts to address and end homelessness among youth in Lowell. However, the group was not active at the time of the 2019 PIT Count.

2B-7. PIT Count–Improvements to Implementation.

Applicants must describe the CoC’s actions implemented in its 2019 PIT count to better count:

- 1. individuals and families experiencing chronic homelessness;**
 - 2. families with children experiencing homelessness; and**
 - 3. Veterans experiencing homelessness.**
- (limit 2,000 characters)**

1. The CoC focused on data quality for the shelter programs in HMIS throughout the year. Accurately capturing enrollments and data related to disability, improved our count of individuals and families experiencing chronic homelessness. However, the increase in the number of chronically homeless people who are sheltered from 2018 - 2019 is largely a result of an increase in family shelter capacity in Lowell when the State contracted for an additional program.

2. The family shelter projects reviewed data to ensure that the household composition was correct for all families. This ensured that ll of the populations were counted correctly, and that the total number of individuals and households was accurate.

3. The CoC worked closely with the Coordinated Entry Coordinator from the VA to review all of the data in veterans’ programs; and the CoC trained all staff and volunteers to ask about veteran status.

3A. Continuum of Care (CoC) System Performance

Instructions

Guidance for completing the application can be found in the FY 2019 CoC Program Competition Notice of Funding Availability and in the FY 2019 CoC Application Detailed Instructions.

Please submit technical questions to the HUD Exchange Ask-A-Question at <https://www.hudexchange.info/program-support/my-question/>

Resources:

The FY 2019 CoC Application Detailed Instruction can be found at:

<https://www.hudexchange.info/e-snaps/guides/coc-program-competition-resources>

The FY 2019 CoC Program Competition Notice of Funding Availability at:

<https://www.hudexchange.info/programs/e-snaps/fy-2019-coc-program-nofa-coc-program-competition/#nofa-and-notices>

Warning! The CoC Application score could be affected if information is incomplete on this formlet.

*3A-1. First Time Homeless as Reported in HDX.

Applicants must:

Report the Number of First Time Homeless as Reported in HDX.
--

967

3A-1a. First Time Homeless Risk Factors.

Applicants must:

1. describe the process the CoC developed to identify risk factors the CoC uses to identify persons becoming homeless for the first time;
2. describe the CoC's strategy to address individuals and families at risk of becoming homeless; and
3. provide the name of the organization or position title that is responsible for overseeing the CoC's strategy to reduce the number of individuals and families experiencing homelessness for the first time. (limit 2,000 characters)

1. The CoC utilizes a risk assessment tool that screens for a wide range of needs and eligibility for services, including risk of homelessness. The tool is based on the MA Scales and Ladders assessment tool, used by providers of the State Rental Assistance to Families in Transition. Staff use the tool at Community Teamwork Inc.'s (CTI) Community Resource Center and Housing Consumer Education Center for everyone accessing services, regardless of whether they are homelessness dedicated resources. This casts a wide net for the risk of homelessness and to identify folks who are experiencing homelessness for the first time. For context, 48% of Lowell residents are rent-burdened (paying at least 40% of income on rent) and CTI's services are both

well-advertised and well-utilized in the community.

2. CTI's efforts are a central part of our strategy to address individuals and families at risk of experiencing homelessness. As an outcome of combined work of the Task Force and the CoC, the region is also investing new ESG resources into the operations of the local emergency shelter specifically for prevention services. The CoC is also transforming the Lowell Transitional Living Center to provide more prevention, diversion, triage, and rapid rehousing resources in the community. Finally, the ESG prevention program at the Lowell Housing Authority will continue to support individuals and families and CTI and other local providers will leverage their access to State resources (including the Rental Assistance for Families in Transition program (RAFT), and the State HomeBASE program) for at-risk individuals and families.

As a result of these efforts, the CoC saw a 5% drop in the number of people experiencing homelessness this year.

3. CTI is the Community Action Agency for the region and oversees the general strategy to reduce the number of individuals and families experiencing homelessness for the first time.

***3A-2. Length of Time Homeless as Reported in HDX.**

Applicants must:

Report Average Length of Time Individuals and Persons in Families Remained Homeless as Reported in HDX.

162

3A-2a. Strategy to Reduce Length of Time Homeless.

Applicants must:

- 1. describe the CoC's strategy to reduce the length of time individuals and persons in families remain homeless;**
 - 2. describe how the CoC identifies and houses individuals and persons in families with the longest lengths of time homeless; and**
 - 3. provide the name of the organization or position title that is responsible for overseeing the CoC's strategy to reduce the length of time individuals and families remain homeless.**
- (limit 2,000 characters)**

The CoC has a multi-pronged strategy: 1) It targets families that have been in shelter for more than 240 days for more aggressive rehousing plans; 2) It will leverage and invest in new PSH resources - 1 recently came online for families (House of Hope); and the CoC is working with the Housing Authority to improve access and increase capacity for high need individuals and families; 3) It will continue to reallocate resources from lower performing projects with poor outcomes towards new PSH projects—including the creating a new PSH project in this competition; 4) In partnership with the CoC, LTLC will be hiring a rehousing specialist to focus on reducing the length of time people remain homeless; and, 5) It will leverage the region's state and federal housing vouchers.

Central to the coordinated entry process, the CoC uses HMIS to identify length of time homeless. HMIS data are integrated in a data warehouse that knits together enrollments to create a person’s homelessness history within the region. This generates the by-name list we use to identify and prioritize people with the longest length of homelessness in the region for housing for CE. The region leverages CoC housing and several other housing resources including those supported through public health, mental health, and Medicaid.

This system will integrate data from street outreach and other sources in the future. A new prevention and triage model at the LTLC will identify barriers more quickly and help expedite the rehousing process.

The Director of Homelessness Initiatives at the City’s Department of Planning and Development is responsible for overseeing the CoC’s strategy to reduce the length of time individuals and families remain homeless.

***3A-3. Successful Permanent Housing Placement and Retention as Reported in HDX.**

Applicants must:

	Percentage
1. Report the percentage of individuals and persons in families in emergency shelter, safe havens, transitional housing, and rapid rehousing that exit to permanent housing destinations as reported in HDX.	42%
2. Report the percentage of individuals and persons in families in permanent housing projects, other than rapid rehousing, that retain their permanent housing or exit to permanent housing destinations as reported in HDX.	95%

3A-3a. Exits to Permanent Housing Destinations/Retention of Permanent Housing.

Applicants must:

1. describe the CoC’s strategy to increase the rate at which individuals and persons in families in emergency shelter, safe havens, transitional housing and rapid rehousing exit to permanent housing destinations;
2. provide the organization name or position title responsible for overseeing the CoC’s strategy to increase the rate at which individuals and persons in families in emergency shelter, safe havens, transitional housing and rapid rehousing exit to permanent housing destinations;
3. describe the CoC’s strategy to increase the rate at which individuals and persons in families in permanent housing projects, other than rapid rehousing, retain their permanent housing or exit to permanent housing destinations; and
4. provide the organization name or position title responsible for overseeing the CoC’s strategy to increase the rate at which individuals and persons in families in permanent housing projects, other than rapid rehousing, retain their permanent housing or exit to permanent housing destinations.

(limit 2,000 characters)

The CoC is focused on securing additional housing opportunities in the region and exiting people to permanent housing situations. Efforts include the following: increasing coordination among providers to identify and secure housing; more intensive services and housing search; and new PSH projects through reallocation and bonuses. The City will also lead a “housing surge” to rapidly place long-term stayers from the LTLC shelter into PSH before the end of 2019, with a plan to replicate the effort if successful. Lowell placed an additional 91 people in FY18 from FY17, or about a 10% increase of the persons who exited programs, with 415 people (42%) going to a permanent housing destination.

The Director of Homelessness Initiatives within the Department of Planning will oversee the CoC’s strategy to increase the rate at which individuals and persons in families in emergency shelter, safe havens, transitional housing and rapid rehousing exit to permanent housing destinations.

Preserving housing tenancy and securing permanent housing is a key focus area for the CoC. All programs incorporate one on one services designed to maximize benefits and access to mainstream resources for individuals and families. The CoC’s homeless prevention strategies used at front door access points are incorporated into permanent housing projects to help tenants retain housing. Move-on strategies help residents apply for all public housing options as part of this strategy.

The Director of Homelessness Initiatives within the Department of Planning will oversee the CoC’s strategy to increase the rate at which individuals and persons in families in permanent housing projects, other than rapid rehousing, retain their permanent housing or exit to permanent housing destinations.

***3A-4. Returns to Homelessness as Reported in HDX.**

Applicants must:

	Percentage
1. Report the percentage of individuals and persons in families returning to homelessness over a 6-month period as reported in HDX.	4%
2. Report the percentage of individuals and persons in families returning to homelessness over a 12-month period as reported in HDX.	7%

3A-4a. Returns to Homelessness–CoC Strategy to Reduce Rate.

Applicants must:

- 1. describe the strategy the CoC has implemented to identify individuals and persons in families who return to homelessness;**
- 2. describe the CoC’s strategy to reduce the rate of additional returns to homelessness; and**
- 3. provide the name of the organization or position title that is**

responsible for overseeing the CoC’s strategy to reduce the rate individuals and persons in families return to homelessness. (limit 2,000 characters)

Our current strategy to identify returns to homelessness includes the following: 1) Put stabilization services in place for individuals and families before they leave shelter; 2) Leverage the strengths of the state’s centralized family homelessness system which tracks family enrollment history each time they apply for shelter and identifies persons in families returning to homelessness; 3) Use our single HMIS platform to track individual’s enrollment history and gain insight into homelessness episodes, length of stays, and other relevant data.

Stabilization services built into housing programs (like our robust HomeBASE program funded by the State to support families) are critical to our strategy to reduce additional returns. They include case management and ongoing assessment of key risk factors, including change in income, health, community engagement and more, which are continually identified, assessed and addressed. ESG resources are being strategically allocated for 2020 to support homelessness prevention and are being allocated to the Housing Authority, Community Teamwork, and SMOC/LTLC to try to keep people housed. The resource center at CTI supports people in financial recovery, debt management, and other financial literacy needs. CTI and other programs in the CoC, support various workforce development programs to help people who are housed and who are at the highest risk of returning to homelessness.

The newly hired Director of Homelessness Initiatives at the City’s Department of Planning and Development will be responsible for overseeing the CoC’s strategy to reduce the rate at which individuals and persons in families returning to homelessness.

***3A-5. Cash Income Changes as Reported in HDX.**

Applicants must:

	Percentage
1. Report the percentage of individuals and persons in families in CoC Program-funded Safe Haven, transitional housing, rapid rehousing, and permanent supportive housing projects that increased their employment income from entry to exit as reported in HDX.	17%
2. Report the percentage of individuals and persons in families in CoC Program-funded Safe Haven, transitional housing, rapid rehousing, and permanent supportive housing projects that increased their non-employment cash income from entry to exit as reported in HDX.	14%

3A-5a. Increasing Employment Income.

Applicants must:

- 1. describe the CoC's strategy to increase employment income;**
- 2. describe the CoC's strategy to increase access to employment;**
- 3. describe how the CoC works with mainstream employment organizations to help individuals and families increase their cash income; and**
- 4. provide the organization name or position title that is responsible for**

**overseeing the CoC’s strategy to increase jobs and income from employment.
(limit 2,000 characters)**

The CoC strategy to increase employment income includes: 1) Continued operation of the Greater Lowell Workforce Development Board (GLWDB), which oversees and implements workforce development initiatives; 2) program partnerships with employers and local organizations to support people getting initial jobs and to then better jobs when they are working; and, 3) Leveraging the State’s paid Family Medical Leave (FMLA), which helps people maintain employment income through illnesses, etc, and increase employment income over time.

The Resource Center at CTI, has multiple workforce development programs and opportunities to increase access to employment. All agencies that receive funding through the CoC or ESG provide case management services to help people link to a variety of benefits and services to support employment and increased cash income. The CoC emphasizes employment at its meetings, focusing on outcome performance and prioritization of employment and relationships with local employers. It is critical to our strategy that we regularly discuss the importance of employment and increased employment income and that we are transparent about how each program is helping their clients to meet their goals.

Lowell recently received a grant from the US Dept of Labor for \$2.4M to support people directly and indirectly impacted by the opioid epidemic. Importantly, the grant will provide training, subsidized employment and more for people in recovery, as well as family members and others.

The CoC and the HHC support regular job fairs, including mainstream employment organizations, and connections with the Entrepreneurship Center and other business affiliations in the community to help people obtain and maintain employment.

The newly hired Director of Homelessness Initiatives at the City’s Department of Planning and Development is responsible for overseeing the CoC’s strategy to reduce the length of time individuals and families remain homeless.

3A-5b. Increasing Non-employment Cash Income.

Applicants must:

- 1. describe the CoC's strategy to increase non-employment cash income;**
- 2. describe the CoC's strategy to increase access to non-employment cash sources;**
- 3. provide the organization name or position title that is responsible for overseeing the CoC’s strategy to increase non-employment cash income.**

1. The CoC’s strategy to increase non-employment cash income includes: 1) Ensuring that people are effectively screened for all benefits including SNAP, Medicaid, and other benefits such as clothing allowance, etc.; 2) Ensuring that benefits are not dropped because of lack of follow-up or missed appointments; 3) increasing opportunities for tele/remote applications for all benefits; 4) Continuous assessment of enrollment and eligibility for a variety of programs.

2. The CoC's strategy to increase access to non-employment cash sources includes: 1) Ensuring DTA staff are active members of the CoC and HHC so that other members are aware of changes to the non-employment cash income sources for TANF and that all eligible persons apply for SNAP, SSI and TANF benefits; 2) Leveraging the State's new childcare benefits for working eligible families, which will have a significant impact, especially for those families impacted by opiates; 3) Ensuring programs help participants take advantage of the State's new policy to exclude the value of the first vehicle when assessing eligibility for public programs, which will increase the number of people who are eligible; and 4) Supporting all case workers to work directly with SSA regarding social security benefits and DTA for EAEDC (cash income for single adults who cannot work).

3. The newly hired Director of Homelessness Initiatives at the City's Department of Planning and Development is responsible for overseeing the CoC's strategy to increase non-employment cash income.

3A-5c. Increasing Employment. Attachment Required.

Applicants must describe how the CoC:

1. promoted partnerships and access to employment opportunities with private employers and private employment organizations, such as holding job fairs, outreach to employers, and partnering with staffing agencies; and

2. is working with public and private organizations to provide meaningful, education and training, on-the-job training, internship, and employment opportunities for residents of permanent supportive housing that further their recovery and well-being.

(limit 2,000 characters)

1. The CoC promoted partnerships and access to employment opportunities primarily through its relationship with the (GLWDB), which oversees and implements workforce development initiatives throughout the region. The City operates the Career Center, connecting job seekers to employers, through offering job openings to employers, hosting on-site recruitment for businesses, and holding job fairs.

2. The Career Center provides access to education and training, internships, and direct placement into employment. The Center recently received a substantial grant to provide training and employment opportunities to people who have been impacted by opioids. These opportunities are open to family members as well as people directly impacted with addiction, including people who are homeless, or at risk of homelessness.

Community Teamwork, a CoC partner, provides residents of permanent supportive housing with access to education and training. CTI supports on-site education through a partnership with the Lowell Public Schools for HiSET (High School Equivalency) education and with the Career Center for access to DOL funded trainings. CTI operates a Secure Jobs program, job readiness and placement support to individuals at-risk of homelessness and in our housing programs, including emergency services. House of Hope also has a learn-to-work program training individuals in culinary and retail industries.

3A-5d. Promoting Employment, Volunteerism, and Community Service.

Applicants must select all the steps the CoC has taken to promote employment, volunteerism and community service among people experiencing homelessness in the CoC’s geographic area:

1. The CoC trains provider organization staff on connecting program participants and people experiencing homelessness with education and job training opportunities.	<input type="checkbox"/>
2. The CoC trains provider organization staff on facilitating informal employment opportunities for program participants and people experiencing homelessness (e.g., babysitting, housekeeping, food delivery).	<input type="checkbox"/>
3. The CoC trains provider organization staff on connecting program participants with formal employment opportunities.	<input type="checkbox"/>
4. The CoC trains provider organization staff on volunteer opportunities for program participants and people experiencing homelessness.	<input type="checkbox"/>
5. The CoC works with organizations to create volunteer opportunities for program participants.	<input type="checkbox"/>
6. The CoC works with community organizations to create opportunities for civic participation for people experiencing homelessness (e.g., townhall forums, meeting with public officials).	<input type="checkbox"/>
7. Provider organizations within the CoC have incentives for employment.	<input type="checkbox"/>
8. The CoC trains provider organization staff on helping program participants budget and maximize their income to maintain stability in permanent housing.	<input type="checkbox"/>

3A-6. System Performance Measures Data–HDX Submission Date 05/31/2019

Applicants must enter the date the CoCs submitted its FY 2018 System Performance Measures data in HDX. (mm/dd/yyyy)

3B. Continuum of Care (CoC) Performance and Strategic Planning Objectives

Instructions

Guidance for completing the application can be found in the FY 2019 CoC Program Competition Notice of Funding Availability and in the FY 2019 CoC Application Detailed Instructions.

Please submit technical questions to the HUD Exchange Ask-A-Question at <https://www.hudexchange.info/program-support/my-question/>

Resources:

The FY 2019 CoC Application Detailed Instruction can be found at:

<https://www.hudexchange.info/e-snaps/guides/coc-program-competition-resources>

The FY 2019 CoC Program Competition Notice of Funding Availability at:

<https://www.hudexchange.info/programs/e-snaps/fy-2019-coc-program-nofa-coc-program-competition/#nofa-and-notices>

Warning! The CoC Application score could be affected if information is incomplete on this formlet.

3B-1. Prioritizing Households with Children.

Applicants must check each factor the CoC currently uses to prioritize households with children for assistance during FY 2019.

1. History of or Vulnerability to Victimization (e.g. domestic violence, sexual assault, childhood abuse)	<input checked="" type="checkbox"/>
2. Number of previous homeless episodes	<input checked="" type="checkbox"/>
3. Unsheltered homelessness	<input type="checkbox"/>
4. Criminal History	<input type="checkbox"/>
5. Bad credit or rental history	<input type="checkbox"/>
6. Head of Household with Mental/Physical Disability	<input checked="" type="checkbox"/>

3B-1a. Rapid Rehousing of Families with Children.

Applicants must:

1. describe how the CoC currently rehouses every household of families with children within 30 days of becoming homeless that addresses both housing and service needs;

2. describe how the CoC addresses both housing and service needs to ensure families with children successfully maintain their housing once

assistance ends; and
3. provide the organization name or position title responsible for overseeing the CoC’s strategy to rapidly rehouse families with children within 30 days of them becoming homeless. (limit 2,000 characters)

1. Massachusetts has a statewide response to homelessness for families. The Emergency Assistance (EA) program is administered by the MA Department of Housing and Community Development (DHCD). The CoC works closely with DHCD contracted agencies, Community Teamwork and House of Hope, in order to rapidly rehouse all homeless families who enter the emergency shelter system in Lowell within 30 days. EA utilizes congregate, scattered site, and co-housing models to provide temporary shelter. While the family is in shelter, local providers provide intensive case management focused on housing barrier reduction and trauma informed practices to transition families into safe, affordable housing as quickly as possible. Part of the strategy also utilizes State-funded HomeBASE Flexible Funding which provides a family up to \$10,000 for housing needs as well as ESG RRH funds, mobile vouchers, and other resources. House of Hope recently opened a new mixed-use housing program to meet an unmet need in the community.

2. The CoC, through the work of Community Teamwork and House of Hope, provides stabilization support services for all families that are placed out of shelters into permanent housing in Lowell. Each family receives 12 months of ongoing case management focused on improving economic stability, housing stability, and self-sufficiency. Each month a case manager and the family work together to identify goals to mitigate future housing instability.

3. As the regional designated organization for HomeBASE, Community Teamwork is the organization responsible for overseeing the CoC’s strategy to rapidly re-house families with children within 30 days of becoming homeless.

3B-1b. Antidiscrimination Policies.

Applicants must check all that apply that describe actions the CoC is taking to ensure providers (including emergency shelter, transitional housing, and permanent housing (PSH and RRH)) within the CoC adhere to antidiscrimination policies by not denying admission to or separating any family members from other members of their family or caregivers based on any protected classes under the Fair Housing Act, and consistent with 24 CFR 5.105(a)(2) – Equal Access to HUD-Assisted or -Insured Housing.

1. CoC conducts mandatory training for all CoC- and ESG-funded housing and services providers on these topics.	<input type="checkbox"/>
2. CoC conducts optional training for all CoC- and ESG-funded housing and service providers on these topics.	<input checked="" type="checkbox"/>
3. CoC has worked with ESG recipient(s) to adopt uniform anti-discrimination policies for all subrecipients.	<input checked="" type="checkbox"/>

4. CoC has worked with ESG recipient(s) to identify both CoC- and ESG-funded facilities within the CoC geographic area that might be out of compliance and has taken steps to work directly with those facilities to come into compliance.	<input checked="" type="checkbox"/>
--	-------------------------------------

3B-1c. Unaccompanied Youth Experiencing Homelessness–Addressing Needs.

Applicants must indicate whether the CoC’s strategy to address the unique needs of unaccompanied youth experiencing homelessness who are 24 years of age and younger includes the following:

1. Unsheltered homelessness	Yes
2. Human trafficking and other forms of exploitation	Yes
3. LGBT youth homelessness	Yes
4. Exits from foster care into homelessness	Yes
5. Family reunification and community engagement	Yes
6. Positive Youth Development, Trauma Informed Care, and the use of Risk and Protective Factors in assessing youth housing and service needs	Yes

3B-1c.1. Unaccompanied Youth Experiencing Homelessness–Prioritization Based on Needs.

Applicants must check all that apply that describes the CoC’s current strategy to prioritize unaccompanied youth based on their needs.

1. History of, or Vulnerability to, Victimization (e.g., domestic violence, sexual assault, childhood abuse)	<input checked="" type="checkbox"/>
2. Number of Previous Homeless Episodes	<input checked="" type="checkbox"/>
3. Unsheltered Homelessness	<input checked="" type="checkbox"/>
4. Criminal History	<input checked="" type="checkbox"/>
5. Bad Credit or Rental History	<input checked="" type="checkbox"/>

3B-1d. Youth Experiencing Homelessness–Housing and Services Strategies.

Applicants must describe how the CoC increased availability of housing and services for:

- 1. all youth experiencing homelessness, including creating new youth-focused projects or modifying current projects to be more youth-specific or youth-inclusive; and**
 - 2. youth experiencing unsheltered homelessness including creating new youth-focused projects or modifying current projects to be more youth-specific or youth-inclusive.**
- (limit 3,000 characters)**

The Lowell Continuum of Care (CoC) partners with the sub-recipient Community Teamwork, Inc. (CTI) to move young people from homelessness and housing insecurity into stable permanent housing options. CTI operates a new CoC-based joint Transitional Housing and Rapid-Rehousing (TH/RRH) program for 18-24 year-olds experiencing homelessness. Launched in fall 2018, TH/RRH includes: TH and RRH housing in scattered site apartments throughout the region; identification and outreach; diversion services to find stable housing options with kinship care providers or other adults as appropriate; and housing stabilization services for youth once they are placed in housing options. In addition to HUD funding, CTI has funding from a variety of sources to provide services to youth including additional staff and they secured funding to build an Opportunity Center which will provide a hub for all services to young people in the community for socialization, classes on topics that include financial literacy and budgeting, and case management sessions. Finally, the CoC and CTI used part of a special allocation of state resources as flexible funds to support young adult needs that are critical to their exist from homelessness but not often covered by traditional funding streams.

Both TH and RRH services, as well as supportive services, are available to youth experiencing unsheltered homelessness. CTI's identification and outreach are designed to connect with young people living in unsheltered situations and our housing and services are designed to meet young people where they are—especially those with high needs and vulnerability due in part to their experiences on the street. The TH model was specifically targeted to this purpose, offering unsheltered young people choice (to enter TH or directly into RRH) and the availability of longer runway (through TH) to meet higher needs and address life skills development if they choose it. The new Opportunity Center will also include facilities for laundry and showers to meet the needs of unsheltered youth.

With the program's inception, the availability of TH increased from 0 units to 2 units consisting of 8 beds within the City. Youth experiencing homelessness will have access to short-term TH which will accommodate up to 8 youth at once (scattered site model providing 8 beds). In addition, the CoC provides funding that enabled 15 youth and 1 child to be rapidly rehoused. Once sustainable permanent housing has been found, the youth receive first, last and security deposits on an as needed basis. CTI leverages CoC funding for RHH through multiple funding streams including RAFT, ESG, EOHHS, and private funding supports. For example, RAFT may be used for first, last, and security while CoC funds may then continue to provide ongoing rental subsidies for permanent housing. This dramatically increases the CoC 's capacity to support all youth, and to focus on the needs of unsheltered young people.

3B-1d.1. Youth Experiencing Homelessness—Measuring Effectiveness of Housing and Services Strategies.

Applicants must:

- 1. provide evidence the CoC uses to measure each of the strategies in question 3B-1d. to increase the availability of housing and services for youth experiencing homelessness;**
- 2. describe the measure(s) the CoC uses to calculate the effectiveness of both strategies in question 3B-1d.; and**
- 3. describe why the CoC believes the measure it uses is an appropriate**

way to determine the effectiveness of both strategies in question 3B-1d. (limit 3,000 characters)

1. The goal of the CoC's youth services is to move youth from homelessness to stable housing. Progress is measured through quantitative (20 youth will be served through TH, RRH, supportive services, and placement in housing) and qualitative outcomes (increased employability, educational attainment, and access to mainstream benefits such as SNAP, TANF, SSI, and SSDI).

2. The following tools are broken out by program activities:

- Transitional Housing & Rapid Rehousing: Use HMIS HUD Intake/Update/Annual and Exit Assessment. This evaluates effectiveness by demonstrating unsheltered YYAs' movement from crisis to stability over their lifetime of program engagement. Individualized Service Plans (ISP) demonstrates progress of YYA toward barrier reduction and attainment of life skills. Upon intake into TH-RRH, youth participate in an intake process for the Homeless Management Information System (HMIS), which is used to collect client-level data as well as data on the provision of housing and services to homeless youth. The HMIS system allows the CoC to measure program performance and service use and to track progress in meeting specific performance goals. The HMIS data is also used to meet reporting requirements including the Annual Performance Report (APR). Each month, HMIS data is submitted to the data warehouse www.homelessdata.com
- Outreach: Uses HMIS to identify unsheltered YYAs' needs and connect them to services within the community (such as mainstream benefits) as well as help gather key information to show gaps in services and service needs.
- Housing Stabilization: Uses ISP to develop goals to maintain housing for each YYA, including sheltered, and track attainment and progress toward goal.

3. HMIS HUD assessment is an appropriate tool used to track not only client enrollment but to evaluate client improvement or deterioration in self-sufficiency. In Transitional & Rapid Rehousing efforts, the HUD Assessment provides intake data in terms of where a YYA was when they entered the program along with re-assessing YYAs' barriers every 6-12 months or as needed when benefits or employment changes and at exiting program. Individualized Service Plans are a best practice measurement tool that tracks qualitative data that shows successes of not only the YYA but also the program's model and strategies employed during the YYA's participation. These data collection and analysis tools provide accurate indicators of success to ensure that the CoC employs effective strategies to help homeless youth quickly obtain housing and maintain it in the long-term. Through intake, assessment, and appropriate referral, Case Managers are able to track housing placements and services provided, as well as measure the effectiveness of those services in stabilizing youth. Once performance measures are established, members of the CoC are able to get a complete picture of clients served, issues, services, and outcomes over time.

3B-1e. Collaboration–Education Services.

Applicants must describe:

- 1. the formal partnerships with:**
 - a. youth education providers;**

- b. McKinney-Vento LEA or SEA; and**
- c. school districts; and**

2. how the CoC collaborates with:

- a. youth education providers;**
- b. McKinney-Vento Local LEA or SEA; and**
- c. school districts.**

(limit 2,000 characters)

1. The CoC's formal partnerships for youth include:
 - a. Youth education providers: The Justice Resource Institute's Youth Harbors program, Middlesex Community College, and UMass Lowell,
 - b. McKinney-Vento liaison at the Lowell public schools and the liaison at the MA Dept of Elementary and Secondary Education for Homeless Education
 - c. Lowell Public High School.

2. The CoC collaborates with its formal partners as follows:
 - a. Youth education providers: CTI works closely with UMass Lowell as well as Middlesex Community College to identify homeless and at-risk students. CTI operates a Secure Jobs program and has a close working relationship with the MassHire Lowell Career Center to provide job-based education to young people experiencing homelessness. CTI Youth Homeless Services staff meet twice monthly with the Justice Resource Institute's Youth Harbors staff to conduct case consults and identify youth at Lowell High School and surrounding schools who are then connected to CTI's services. Youth Harbors also provides rental supports to those students in conjunction with CoC-funded projects.
 - b. McKinney-Vento LEA or SEA: Members of the Lowell CoC work closely with the City's McKinney Vento Coordinator and the social workers in each school to identify and connect with students and families experiencing homelessness. McKinney-Vento Homeless Liaisons provide general communication, information sharing, and trainings to providers at the HHC meetings.
 - c. Lowell Public High School: Several members of the youth advisory board are students at the high school and there is close collaboration to meet the needs of homeless students. In addition to the McKinney Vento liaison, the district superintendent is involved and was a speaker at the recent youth summit. Several members of the Lowell CoC also work closely with the Lowell Public School's Adult Education Center to offer Adult Basic Education (ABE) and English as a Second Language (ESOL) classes to their clients.

3B-1e.1. Informing Individuals and Families Experiencing Homeless about Education Services Eligibility.

Applicants must describe policies and procedures the CoC adopted to inform individuals and families who become homeless of their eligibility for education services.

(limit 2,000 characters)

Families experiencing homelessness in Massachusetts, including Lowell, are in shelter as reported by the PIT and HMIS due to the state's right to shelter and comprehensive state family homelessness system. CoC shelter providers meet with each new family within 48 hours and complete a comprehensive assessment of the family's needs. For each family, it is determined if they intend to enroll their children in Lowell Public Schools, or if their children will be attending school in their prior district. During these initial conversations, we

provide all information regarding how to enroll children in school, how to access transportation to and from school, and who to contact to ensure their children can attend school. Additional information is found online and on posters that are posted at project sites.

3B-1e.2. Written/Formal Agreements or Partnerships with Early Childhood Services Providers.

Applicant must indicate whether the CoC has an MOU/MOA or other types of agreements with listed providers of early childhood services and supports and may add other providers not listed.

	MOU/MOA	Other Formal Agreement
Early Childhood Providers	No	Yes
Head Start	Yes	Yes
Early Head Start	Yes	Yes
Child Care and Development Fund	No	No
Federal Home Visiting Program	No	No
Healthy Start	No	No
Public Pre-K	Yes	Yes
Birth to 3 years	No	No
Tribal Home Visting Program	No	No
Other: (limit 50 characters)		

3B-2. Active List of Veterans Experiencing Homelessness.

Applicant must indicate whether the CoC uses an active list or by-name list to identify all veterans experiencing homelessness in the CoC. Yes

3B-2a. VA Coordination–Ending Veterans Homelessness.

Applicants must indicate whether the CoC is actively working with the U.S. Department of Veterans Affairs (VA) and VA-funded programs to achieve the benchmarks and criteria for ending veteran homelessness. Yes

3B-2b. Housing First for Veterans.

Applicants must indicate whether the CoC has sufficient resources to ensure each veteran experiencing homelessness is assisted to quickly move into permanent housing using a Housing First approach. No

3B-3. Racial Disparity Assessment. Attachment Required.

Applicants must:
1. select all that apply to indicate the findings from the CoC’s Racial Disparity Assessment; or
2. select 7 if the CoC did not conduct a Racial Disparity Assessment.

1. People of different races or ethnicities are more likely to receive homeless assistance.	<input checked="" type="checkbox"/>
2. People of different races or ethnicities are less likely to receive homeless assistance.	<input checked="" type="checkbox"/>
3. People of different races or ethnicities are more likely to receive a positive outcome from homeless assistance.	<input checked="" type="checkbox"/>
4. People of different races or ethnicities are less likely to receive a positive outcome from homeless assistance.	<input checked="" type="checkbox"/>
5. There are no racial or ethnic disparities in the provision or outcome of homeless assistance.	<input checked="" type="checkbox"/>
6. The results are inconclusive for racial or ethnic disparities in the provision or outcome of homeless assistance.	<input checked="" type="checkbox"/>
7. The CoC did not conduct a racial disparity assessment.	<input type="checkbox"/>

3B-3a. Addressing Racial Disparities.

Applicants must select all that apply to indicate the CoC’s strategy to address any racial disparities identified in its Racial Disparities Assessment:

1. The CoC is ensuring that staff at the project level are representative of the persons accessing homeless services in the CoC.	<input checked="" type="checkbox"/>
2. The CoC has identified the cause(s) of racial disparities in their homeless system.	<input checked="" type="checkbox"/>
3. The CoC has identified strategies to reduce disparities in their homeless system.	<input checked="" type="checkbox"/>
4. The CoC has implemented strategies to reduce disparities in their homeless system.	<input checked="" type="checkbox"/>
5. The CoC has identified resources available to reduce disparities in their homeless system.	<input checked="" type="checkbox"/>
6: The CoC did not conduct a racial disparity assessment.	<input type="checkbox"/>

4A. Continuum of Care (CoC) Accessing Mainstream Benefits and Additional Policies

Instructions:

Guidance for completing the application can be found in the FY 2019 CoC Program Competition Notice of Funding Availability and in the FY 2019 CoC Application Detailed Instructions.

Please submit technical questions to the HUD Exchange Ask-A-Question at <https://www.hudexchange.info/program-support/my-question/>

Resources:

The FY 2019 CoC Application Detailed Instruction can be found at:

<https://www.hudexchange.info/e-snaps/guides/coc-program-competition-resources>

The FY 2019 CoC Program Competition Notice of Funding Availability at:

<https://www.hudexchange.info/programs/e-snaps/fy-2019-coc-program-nofa-coc-program-competition/#nofa-and-notice>

Warning! The CoC Application score could be affected if information is incomplete on this formlet.

4A-1. Healthcare—Enrollment/Effective Utilization

Applicants must indicate, for each type of healthcare listed below, whether the CoC assists persons experiencing homelessness with enrolling in health insurance and effectively utilizing Medicaid and other benefits.

Type of Health Care	Assist with Enrollment	Assist with Utilization of Benefits?
Public Health Care Benefits (State or Federal benefits, Medicaid, Indian Health Services)	Yes	Yes
Private Insurers:	Yes	Yes
Non-Profit, Philanthropic:	Yes	Yes
Other: (limit 50 characters)		

4A-1a. Mainstream Benefits.

Applicants must:

- 1. describe how the CoC systematically keeps program staff up to date regarding mainstream resources available for program participants (e.g., Food Stamps, SSI, TANF, substance abuse programs) within the geographic area;**
- 2. describe how the CoC disseminates the availability of mainstream resources and other assistance information to projects and how often;**
- 3. describe how the CoC works with projects to collaborate with healthcare organizations to assist program participants with enrolling in**

health insurance;
4. describe how the CoC provides assistance with the effective utilization of Medicaid and other benefits; and
5. provide the name of the organization or position title that is responsible for overseeing the CoC’s strategy for mainstream benefits.
(limit 2,000 characters)

The CoC systematically keeps program staff up to date regarding mainstream resources or program participants through regular listservs, flyers and public announcements. This includes connecting program staff to local and statewide webinars, trainings, etc. Various state agencies including the Department of Mental Health, and the Department of Transitional Assistance are represented on the Advisory Board of the CoC In addition, the Lowell Health Center is an active participant. These providers have access to such resources as FEMA relief, housing vouchers, clothing allowances, and other seasonal, or occasional benefits. They provide verbal updates and share material for program staff.

Currently, 97% of all homeless participants receive medical benefits and CoC staff assist participants to acquire MassHealth. The CoC worked closely with Lowell General Hospital and Community Health Center to also provide this service and they provide assistance in over 28 languages. All programs funded by the CoC or ESG include case management and support services staff who help households to apply for SSI, WIC, TANF, and SNAP benefits. In addition, case managers help clients link with services related to substance use, mental health, healthcare, jobs programs, Veterans, LGBTQ+ and other programs and services.

Largely driven by the opioid crisis, healthcare is increasingly integrated with the homeless response system. The Health Center and Hospital are active in the Task Force and the hospital is launching a virtual resource directory and referral system to connect people to services. Every organization is involved in ensuring that Medicaid benefits are maximized and the community is also exploring expanding the use of Medicaid for services for chronically homeless.

The newly appointed Director of Homeless Initiatives is responsible for overseeing the CoC strategy for mainstream benefits which is approved by CoC members and is part of the CoC written policies.

4A-2. Lowering Barriers to Entry Data:

Applicants must report:

1. Total number of new and renewal CoC Program-funded PSH, RRH, SSO non-coordinated entry, Safe-Haven, and Transitional Housing projects the CoC has ranked in its CoC Priority Listing in FY 2019 CoC Program Competition.	5
2. Total number of new and renewal CoC Program-funded PSH, RRH, SSO non-coordinated entry, Safe-Haven, and Transitional Housing projects the CoC has ranked in its CoC Priority Listing in FY 2019 CoC Program Competition that reported that they are lowering barriers to entry and prioritizing rapid placement and stabilization to permanent housing.	5
Percentage of new and renewal PSH, RRH, Safe-Haven, SSO non-Coordinated Entry projects the CoC has ranked in its CoC Priority Listing in the FY 2019 CoC Program Competition that reported that they are lowering barriers to entry and prioritizing rapid placement and stabilization to permanent housing.	100%

4A-3. Street Outreach.

Applicants must:

- 1. describe the CoC’s street outreach efforts, including the methods it uses to ensure all persons experiencing unsheltered homelessness are identified and engaged;**
- 2. state whether the CoC’s Street Outreach covers 100 percent of the CoC’s geographic area;**
- 3. describe how often the CoC conducts street outreach; and**
- 4. describe how the CoC tailored its street outreach to persons experiencing homelessness who are least likely to request assistance. (limit 2,000 characters)**

There are approximately 20 street outreach teams working through a variety of public safety, public health, and homeless programs providing great coverage of our CoC geography for all persons experiencing unsheltered homelessness. Specialized teams focus on camps throughout the City. Lowell uses mobile technology to support increased coordination. The ShowTheWay mobile app allows an administrator to create a “team” where each encounter builds on previous interactions by retrieving and adding to records including the creation of alerts, and follow-ups, the ability to complete assessments, and capture information, in real time. The app and the secure cloud-based datastore provide a mechanism to have more effective and trauma-informed encounters whether the outreach worker is responding to opioids, mental health, veterans needs, or general homelessness and housing crises. The app will also be used in locations such as the CTI Resource Center and meal programs throughout the City. The data that is captured will also be integrated with data from HMIS and our by-name list. Yes – outreach covers 100% of the CoC’s geographic area.

The CoC conducts street outreach weekly, led by the Community Opiate Outreach Program, an interdisciplinary team, as well as others. The Resource Center at CTI operates from 8-5 and regularly sees people who are unsheltered.

Street outreach is driven by a housing first, low barrier, public health and public safety approach. With the introduction of technology and increased coordination with the City, local police, and others, outreach workers focus on developing trust over time. The mobile app has built in supports for workers to ensure that their engagements are trauma-informed and that they are always equipped to support people experiencing homelessness with high needs and who are least likely to request assistance.

4A-4. RRH Beds as Reported in HIC.

Applicants must report the total number of rapid rehousing beds available to serve all household types as reported in the Housing Inventory Count (HIC) for 2018 and 2019.

	2018	2019	Difference
RRH beds available to serve all populations in the HIC	9	130	121

4A-5. Rehabilitation/Construction Costs–New Projects. No

Applicants must indicate whether any new project application the CoC ranked and submitted in its CoC Priority Listing in the FY 2019 CoC Program Competition is requesting \$200,000 or more in funding for housing rehabilitation or new construction.

4A-6. Projects Serving Homeless under Other Federal Statutes. No

Applicants must indicate whether the CoC is requesting to designate one or more of its SSO or TH projects to serve families with children or youth defined as homeless under other federal statutes.

4B. Attachments

Instructions:

Multiple files may be attached as a single .zip file. For instructions on how to use .zip files, a reference document is available on the e-snaps training site:
<https://www.hudexchange.info/resource/3118/creating-a-zip-file-and-capturing-a-screenshot-resource>

Document Type	Required?	Document Description	Date Attached
_ FY 2019 CoC Competition Report (HDX Report)	Yes	Lowell 2019 CoC C...	08/29/2019
1C-4.PHA Administration Plan–Moving On Multifamily Assisted Housing Owners’ Preference.	No		
1C-4. PHA Administrative Plan Homeless Preference.	No	PHA Admin Plan Pr...	09/19/2019
1C-7. Centralized or Coordinated Assessment System.	Yes	CE Assessment and...	09/19/2019
1E-1.Public Posting–15-Day Notification Outside e-snaps–Projects Accepted.	Yes	Projects Accepted...	09/23/2019
1E-1. Public Posting–15-Day Notification Outside e-snaps–Projects Rejected or Reduced.	Yes	Project Rejected ...	09/23/2019
1E-1.Public Posting–30-Day Local Competition Deadline.	Yes	Local Competition...	09/23/2019
1E-1. Public Posting–Local Competition Announcement.	Yes	Local Competition...	09/23/2019
1E-4.Public Posting–CoC-Approved Consolidated Application	Yes		
3A. Written Agreement with Local Education or Training Organization.	No		
3A. Written Agreement with State or Local Workforce Development Board.	No	State or Local Wo...	09/24/2019
3B-3. Summary of Racial Disparity Assessment.	Yes	Racial Disparity ...	09/24/2019
4A-7a. Project List-Homeless under Other Federal Statutes.	No		
Other	No		
Other	No		

Other	No		
-------	----	--	--

Attachment Details

Document Description: Lowell 2019 CoC Competition Report

Attachment Details

Document Description:

Attachment Details

Document Description: PHA Admin Plan Preferences

Attachment Details

Document Description: CE Assessment and Approach

Attachment Details

Document Description: Projects Accepted Notification - Lowell 2019

Attachment Details

Document Description: Project Rejected or Reduced Notification - Lowell

FY2019 CoC Application	Page 50	09/26/2019
------------------------	---------	------------

2019

Attachment Details

Document Description: Local Competition Deadline - Lowell 2019

Attachment Details

Document Description: Local Competition Public Announcement

Attachment Details

Document Description:

Attachment Details

Document Description:

Attachment Details

Document Description: State or Local Workforce Agreement

Attachment Details

Document Description: Racial Disparity Assessment Summary

Attachment Details

Document Description:

Submission Summary

Ensure that the Project Priority List is complete prior to submitting.

Page	Last Updated
1A. Identification	09/16/2019
1B. Engagement	09/20/2019
1C. Coordination	09/26/2019
1D. Discharge Planning	No Input Required
1E. Local CoC Competition	09/26/2019
1F. DV Bonus	No Input Required
2A. HMIS Implementation	09/26/2019
2B. PIT Count	09/26/2019
3A. System Performance	09/26/2019
3B. Performance and Strategic Planning	09/26/2019
4A. Mainstream Benefits and Additional Policies	09/26/2019
4B. Attachments	Please Complete

Submission Summary

No Input Required

2019 HDX Competition Report

PIT Count Data for MA-508 - Lowell CoC

Total Population PIT Count Data

	2016 PIT	2017 PIT	2018 PIT	2019 PIT
Total Sheltered and Unsheltered Count	594	658	783	784
Emergency Shelter Total	481	582	689	720
Safe Haven Total	0	0	0	0
Transitional Housing Total	94	64	68	48
Total Sheltered Count	575	646	757	768
Total Unsheltered Count	19	12	26	16

Chronically Homeless PIT Counts

	2016 PIT	2017 PIT	2018 PIT	2019 PIT
Total Sheltered and Unsheltered Count of Chronically Homeless Persons	63	6	75	138
Sheltered Count of Chronically Homeless Persons	63	6	75	132
Unsheltered Count of Chronically Homeless Persons	0	0	0	6

2019 HDX Competition Report

PIT Count Data for MA-508 - Lowell CoC

Homeless Households with Children PIT Counts

	2016 PIT	2017 PIT	2018 PIT	2019 PIT
Total Sheltered and Unsheltered Count of the Number of Homeless Households with Children	134	143	166	160
Sheltered Count of Homeless Households with Children	134	143	166	160
Unsheltered Count of Homeless Households with Children	0	0	0	0

Homeless Veteran PIT Counts

	2011	2016	2017	2018	2019
Total Sheltered and Unsheltered Count of the Number of Homeless Veterans	74	36	32	30	45
Sheltered Count of Homeless Veterans	72	36	32	28	42
Unsheltered Count of Homeless Veterans	2	0	0	2	3

2019 HDX Competition Report
HIC Data for MA-508 - Lowell CoC

HMIS Bed Coverage Rate

Project Type	Total Beds in 2019 HIC	Total Beds in 2019 HIC Dedicated for DV	Total Beds in HMIS	HMIS Bed Coverage Rate
Emergency Shelter (ES) Beds	700	92	608	100.00%
Safe Haven (SH) Beds	0	0	0	NA
Transitional Housing (TH) Beds	74	24	6	12.00%
Rapid Re-Housing (RRH) Beds	130	0	23	17.69%
Permanent Supportive Housing (PSH) Beds	176	19	105	66.88%
Other Permanent Housing (OPH) Beds	12	0	0	0.00%
Total Beds	1,092	135	742	77.53%

2019 HDX Competition Report

HIC Data for MA-508 - Lowell CoC

PSH Beds Dedicated to Persons Experiencing Chronic Homelessness

Chronically Homeless Bed Counts	2016 HIC	2017 HIC	2018 HIC	2019 HIC
Number of CoC Program and non-CoC Program funded PSH beds dedicated for use by chronically homeless persons identified on the HIC	36	36	36	20

Rapid Rehousing (RRH) Units Dedicated to Persons in Household with Children

Households with Children	2016 HIC	2017 HIC	2018 HIC	2019 HIC
RRH units available to serve families on the HIC		149	0	33

Rapid Rehousing Beds Dedicated to All Persons

All Household Types	2016 HIC	2017 HIC	2018 HIC	2019 HIC
RRH beds available to serve all populations on the HIC		349	9	130

2019 HDX Competition Report

FY2018 - Performance Measurement Module (Sys PM)

Summary Report for MA-508 - Lowell CoC

For each measure enter results in each table from the System Performance Measures report generated out of your CoCs HMIS System. There are seven performance measures. Each measure may have one or more “metrics” used to measure the system performance. Click through each tab above to enter FY2017 data for each measure and associated metrics.

RESUBMITTING FY2018 DATA: If you provided revised FY2018 data, the original FY2018 submissions will be displayed for reference on each of the following screens, but will not be retained for analysis or review by HUD.

ERRORS AND WARNINGS: If data are uploaded that creates selected fatal errors, the HDX will prevent the CoC from submitting the System Performance Measures report. The CoC will need to review and correct the original HMIS data and generate a new HMIS report for submission.

Some validation checks will result in warnings that require explanation, but will not prevent submission. Users should enter a note of explanation for each validation warning received. To enter a note of explanation, move the cursor over the data entry field and click on the note box. Enter a note of explanation and “save” before closing.

Measure 1: Length of Time Persons Remain Homeless

This measures the number of clients active in the report date range across ES, SH (Metric 1.1) and then ES, SH and TH (Metric 1.2) along with their average and median length of time homeless. This includes time homeless during the report date range as well as prior to the report start date, going back no further than October, 1, 2012.

Metric 1.1: Change in the average and median length of time persons are homeless in ES and SH projects.

Metric 1.2: Change in the average and median length of time persons are homeless in ES, SH, and TH projects.

a. This measure is of the client’s entry, exit, and bed night dates strictly as entered in the HMIS system.

2019 HDX Competition Report

FY2018 - Performance Measurement Module (Sys PM)

	Universe (Persons)			Average LOT Homeless (bed nights)				Median LOT Homeless (bed nights)			
	Submitted FY 2017	Revised FY 2017	FY 2018	Submitted FY 2017	Revised FY 2017	FY 2018	Difference	Submitted FY 2017	Revised FY 2017	FY 2018	Difference
1.1 Persons in ES and SH	1627	1412	1467	182	227	257	30	118	141	168	27
1.2 Persons in ES, SH, and TH	1670	1455	1494	183	227	258	31	120	144	172	28

b. This measure is based on data element 3.17.

This measure includes data from each client's Living Situation (Data Standards element 3.917) response as well as time spent in permanent housing projects between Project Start and Housing Move-In. This information is added to the client's entry date, effectively extending the client's entry date backward in time. This "adjusted entry date" is then used in the calculations just as if it were the client's actual entry date.

The construction of this measure changed, per HUD's specifications, between FY 2016 and FY 2017. HUD is aware that this may impact the change between these two years.

	Universe (Persons)			Average LOT Homeless (bed nights)				Median LOT Homeless (bed nights)			
	Submitted FY 2017	Revised FY 2017	FY 2018	Submitted FY 2017	Revised FY 2017	FY 2018	Difference	Submitted FY 2017	Revised FY 2017	FY 2018	Difference
1.1 Persons in ES, SH, and PH (prior to "housing move in")	1637	1418	1512	221	342	391	49	130	183	225	42
1.2 Persons in ES, SH, TH, and PH (prior to "housing move in")	1647	1427	1523	221	342	391	49	130	186	228	42

2019 HDX Competition Report

FY2018 - Performance Measurement Module (Sys PM)

Measure 2: The Extent to which Persons who Exit Homelessness to Permanent Housing Destinations Return to Homelessness

This measures clients who exited SO, ES, TH, SH or PH to a permanent housing destination in the date range two years prior to the report date range. Of those clients, the measure reports on how many of them returned to homelessness as indicated in the HMIS for up to two years after their initial exit.

After entering data, please review and confirm your entries and totals. Some HMIS reports may not list the project types in exactly the same order as they are displayed below.

	Total # of Persons who Exited to a Permanent Housing Destination (2 Years Prior)		Returns to Homelessness in Less than 6 Months			Returns to Homelessness from 6 to 12 Months			Returns to Homelessness from 13 to 24 Months			Number of Returns in 2 Years	
	Revised FY 2017	FY 2018	Revised FY 2017	FY 2018	% of Returns	Revised FY 2017	FY 2018	% of Returns	Revised FY 2017	FY 2018	% of Returns	FY 2018	% of Returns
Exit was from SO	0	0	0	0		0	0		0	0		0	
Exit was from ES	306	404	12	16	4%	3	2	0%	23	6	1%	24	6%
Exit was from TH	5	3	1	0	0%	0	0	0%	1	0	0%	0	0%
Exit was from SH	0	0	0	0		0	0		0	0		0	
Exit was from PH	33	47	0	1	2%	0	1	2%	1	7	15%	9	19%
TOTAL Returns to Homelessness	344	454	13	17	4%	3	3	1%	25	13	3%	33	7%

Measure 3: Number of Homeless Persons

Metric 3.1 – Change in PIT Counts

2019 HDX Competition Report

FY2018 - Performance Measurement Module (Sys PM)

This measures the change in PIT counts of sheltered and unsheltered homeless person as reported on the PIT (not from HMIS).

	January 2017 PIT Count	January 2018 PIT Count	Difference
Universe: Total PIT Count of sheltered and unsheltered persons	658	783	125
Emergency Shelter Total	582	689	107
Safe Haven Total	0	0	0
Transitional Housing Total	64	68	4
Total Sheltered Count	646	757	111
Unsheltered Count	12	26	14

Metric 3.2 – Change in Annual Counts

This measures the change in annual counts of sheltered homeless persons in HMIS.

	Submitted FY 2017	Revised FY 2017	FY 2018	Difference
Universe: Unduplicated Total sheltered homeless persons	1685	1685	1497	-188
Emergency Shelter Total	1643	1643	1470	-173
Safe Haven Total	0		0	
Transitional Housing Total	47	47	29	-18

2019 HDX Competition Report

FY2018 - Performance Measurement Module (Sys PM)

Measure 4: Employment and Income Growth for Homeless Persons in CoC Program-funded Projects

Metric 4.1 – Change in earned income for adult system stayers during the reporting period

	Submitted FY 2017	Revised FY 2017	FY 2018	Difference
Universe: Number of adults (system stayers)	14	23	37	14
Number of adults with increased earned income	1	1	4	3
Percentage of adults who increased earned income	7%	4%	11%	7%

Metric 4.2 – Change in non-employment cash income for adult system stayers during the reporting period

	Submitted FY 2017	Revised FY 2017	FY 2018	Difference
Universe: Number of adults (system stayers)	14	23	37	14
Number of adults with increased non-employment cash income	3	8	11	3
Percentage of adults who increased non-employment cash income	21%	35%	30%	-5%

Metric 4.3 – Change in total income for adult system stayers during the reporting period

	Submitted FY 2017	Revised FY 2017	FY 2018	Difference
Universe: Number of adults (system stayers)	14	23	37	14
Number of adults with increased total income	3	8	15	7
Percentage of adults who increased total income	21%	35%	41%	6%

2019 HDX Competition Report

FY2018 - Performance Measurement Module (Sys PM)

Metric 4.4 – Change in earned income for adult system leavers

	Submitted FY 2017	Revised FY 2017	FY 2018	Difference
Universe: Number of adults who exited (system leavers)	15	15	35	20
Number of adults who exited with increased earned income	2	2	6	4
Percentage of adults who increased earned income	13%	13%	17%	4%

Metric 4.5 – Change in non-employment cash income for adult system leavers

	Submitted FY 2017	Revised FY 2017	FY 2018	Difference
Universe: Number of adults who exited (system leavers)	15	15	35	20
Number of adults who exited with increased non-employment cash income	2	3	5	2
Percentage of adults who increased non-employment cash income	13%	20%	14%	-6%

Metric 4.6 – Change in total income for adult system leavers

	Submitted FY 2017	Revised FY 2017	FY 2018	Difference
Universe: Number of adults who exited (system leavers)	15	15	35	20
Number of adults who exited with increased total income	4	5	11	6
Percentage of adults who increased total income	27%	33%	31%	-2%

2019 HDX Competition Report

FY2018 - Performance Measurement Module (Sys PM)

Measure 5: Number of persons who become homeless for the 1st time

Metric 5.1 – Change in the number of persons entering ES, SH, and TH projects with no prior enrollments in HMIS

	Submitted FY 2017	Revised FY 2017	FY 2018	Difference
Universe: Person with entries into ES, SH or TH during the reporting period.	1297	1022	967	-55
Of persons above, count those who were in ES, SH, TH or any PH within 24 months prior to their entry during the reporting year.	474	385	369	-16
Of persons above, count those who did not have entries in ES, SH, TH or PH in the previous 24 months. (i.e. Number of persons experiencing homelessness for the first time)	823	637	598	-39

Metric 5.2 – Change in the number of persons entering ES, SH, TH, and PH projects with no prior enrollments in HMIS

	Submitted FY 2017	Revised FY 2017	FY 2018	Difference
Universe: Person with entries into ES, SH, TH or PH during the reporting period.	1308	1046	1057	11
Of persons above, count those who were in ES, SH, TH or any PH within 24 months prior to their entry during the reporting year.	481	397	386	-11
Of persons above, count those who did not have entries in ES, SH, TH or PH in the previous 24 months. (i.e. Number of persons experiencing homelessness for the first time.)	827	649	671	22

2019 HDX Competition Report

FY2018 - Performance Measurement Module (Sys PM)

Measure 6: Homeless Prevention and Housing Placement of Persons defined by category 3 of HUD's Homeless Definition in CoC Program-funded Projects

This Measure is not applicable to CoCs in FY2018 (Oct 1, 2017 - Sept 30, 2018) reporting period.

Measure 7: Successful Placement from Street Outreach and Successful Placement in or Retention of Permanent Housing

Metric 7a.1 – Change in exits to permanent housing destinations

	Submitted FY 2017	Revised FY 2017	FY 2018	Difference
Universe: Persons who exit Street Outreach		0	0	0
Of persons above, those who exited to temporary & some institutional destinations		0	0	0
Of the persons above, those who exited to permanent housing destinations		0	0	0
% Successful exits				

Metric 7b.1 – Change in exits to permanent housing destinations

2019 HDX Competition Report

FY2018 - Performance Measurement Module (Sys PM)

	Submitted FY 2017	Revised FY 2017	FY 2018	Difference
Universe: Persons in ES, SH, TH and PH-RRH who exited, plus persons in other PH projects who exited without moving into housing	1165	904	995	91
Of the persons above, those who exited to permanent housing destinations	319	375	415	40
% Successful exits	27%	41%	42%	1%

Metric 7b.2 – Change in exit to or retention of permanent housing

	Submitted FY 2017	Revised FY 2017	FY 2018	Difference
Universe: Persons in all PH projects except PH-RRH	94	106	115	9
Of persons above, those who remained in applicable PH projects and those who exited to permanent housing destinations	93	102	109	7
% Successful exits/retention	99%	96%	95%	-1%

2019 HDX Competition Report

FY2018 - SysPM Data Quality

MA-508 - Lowell CoC

This is a new tab for FY 2016 submissions only. Submission must be performed manually (data cannot be uploaded). Data coverage and quality will allow HUD to better interpret your Sys PM submissions.

Your bed coverage data has been imported from the HIC module. The remainder of the data quality points should be pulled from data quality reports made available by your vendor according to the specifications provided in the HMIS Standard Reporting Terminology Glossary. You may need to run multiple reports in order to get data for each combination of year and project type.

You may enter a note about any field if you wish to provide an explanation about your data quality results. This is not required.

2019 HDX Competition Report FY2018 - SysPM Data Quality

	All ES, SH				All TH				All PSH, OPH				All RRH				All Street Outreach			
	2014-2015	2015-2016	2016-2017	2017-2018	2014-2015	2015-2016	2016-2017	2017-2018	2014-2015	2015-2016	2016-2017	2017-2018	2014-2015	2015-2016	2016-2017	2017-2018	2014-2015	2015-2016	2016-2017	2017-2018
1. Number of non-DV Beds on HIC	409	410	481	640	63	56	288	57	88	109	176	531			349	9				
2. Number of HMIS Beds	408	409	480	640	19	14	240	14	88	109	176	468			349	9				
3. HMIS Participation Rate from HIC (%)	99.76	99.76	99.79	100.00	30.16	25.00	83.33	24.56	100.00	100.00	100.00	88.14			100.00	100.00				
4. Unduplicated Persons Served (HMIS)	1584	1731	1430	1473	65	39	47	29	34	89	107	110	75	0	49	78	0	0	0	0
5. Total Leavers (HMIS)	1202	1290	837	856	14	15	27	25	7	7	5	14	69	0	46	41	0	0	0	0
6. Destination of Don't Know, Refused, or Missing (HMIS)	597	693	238	194	12	15	23	19	4	4	1	8	51	0	46	3	0	0	0	0
7. Destination Error Rate (%)	49.67	53.72	28.43	22.66	85.71	100.00	85.19	76.00	57.14	57.14	20.00	57.14	73.91		100.00	7.32				

2019 HDX Competition Report

Submission and Count Dates for MA-508 - Lowell CoC

Date of PIT Count

	Date	Received HUD Waiver
Date CoC Conducted 2019 PIT Count	1/30/2019	

Report Submission Date in HDX

	Submitted On	Met Deadline
2019 PIT Count Submittal Date	4/30/2019	Yes
2019 HIC Count Submittal Date	4/30/2019	Yes
2018 System PM Submittal Date	5/31/2019	Yes

**HOUSING CHOICE VOUCHER PROGRAM
ADMINISTRATIVE PLAN**

APPENDICES

- A. Criminal Offender Information Policy**
- B. Interstate Identification Index (III) Policy and Procedures**
- C. Section 8 Homeownership Program**
- D. Section 8 Program Allocation Plan Set-Aside Administrative Addendum**
- E. Addendum to the Section 8 Administrative Plan – Project Based Assistance**
- F. Enterprise Income Verification Security Procedures**
- G. Violence Against Women Act Policy and Emergency Transfer Plan**

APPENDIX A

CRIMINAL OFFENDER RECORD INFORMATION POLICY

This policy is adopted pursuant to the Criminal History Systems Board regulations governing requests for and use of CORI by local housing authorities (803 CMR 5.00).

Lowell Housing Authority employees may be designated to request and use Criminal Offender Record Information (CORI) only for purposes of evaluating applicants, or authorized occupants added to households for the Authority's housing programs. Dissemination of CORI for any other purposes or to individuals not involved in the tenant selection process is expressly prohibited. To ensure that CORI is handled in a lawful fashion, the Lowell Housing Authority has adopted the following guidelines for handling CORI:

1. Applicants will be informed in writing that CORI will be obtained from the Criminal History Systems Board (CHSB).
2. CORI will be obtained for all applicants and household members who are age 17 or older and other persons added to leases as authorized occupants.
3. Requests for CORI shall not be made prior to the final application screening process.
4. Requests for and use of CORI shall not have the purpose or effect of discrimination on the basis of race, religion, color, national or ethnic origin, ancestry, age, sex, handicap, sexual orientation, marital status, or receipt of public assistance.
5. Employees in the following positions are authorized to submit a written request for the CHSB on behalf of the Authority, are directly involved in the decision of an applicant's eligibility and are authorized to handle CORI in the course of their duties:

Executive Director
Assistant Executive Director
Administrative Supervisor of Leasing & Occupancy Department
General Counsel
Executive Secretary of Executive Department
Division Director Conventional Housing Programs/L&O Department
Division Director of Leased Housing Programs/L&O Department
Public Safety/Investigator

Employees in these positions shall sign an "agreement of non-disclosure" provided by the CHSB.

6. Only one copy of an individual's CORI will be kept in the LHA's file at any time.
7. CORI will be kept in a separate, locked file cabinet when not being used.
8. CORI will be destroyed when the applicant to whom it pertains has been housed. If an applicant has been deemed ineligible, the applicant's CORI shall be destroyed (3) three years from the date of the rejection, or after all administrative and judicial proceedings concerning the rejection are exhausted, whichever is later.

9. No provisions of these guidelines shall be construed to prohibit dissemination of CORI by the LHA in the course of a tenant selection appeal, or other administrative or judicial proceedings brought on by an applicant in which CORI is relevant.

APPENDIX B

Lowell Housing Authority

Interstate Identification Index (III) Policy and Procedures

On October 18, 2001, the Lowell Housing Authority received authorization from the Criminal History Systems Board to access pending and criminal conviction data from the Interstate Identification Index (III) maintained by the FBI. This authorization may be utilized to conduct criminal history screenings on adult applicants/tenants for tenant selection in Public Housing Programs and the Section 8 Program, and may also be utilized for the purposes of lease enforcement and eviction.

The procedure for accessing this information is listed as follows:

1. The Lowell Housing Authority will submit to the Lowell Police Department, information regarding tenants of and applicants for covered housing assistance, consistent with federal law. Such information includes name, date of birth, social security number, or other personal descriptors requested by the police department.
2. The Lowell Police Department will conduct name/DOB inquiries to Triple I and will notify the Lowell Housing Authority of possible matches.
3. Upon receipt of possible matches, the Lowell Housing Authority will advise the applicant/tenant of a possible match and request them to arrange to have fingerprints taken at the police department. The applicant/tenant will be provided with the name and telephone number of a contact person at the police department. They will also be requested to have the person accepting the fingerprints sign a confirmation form verifying the date that the fingerprints were submitted and to return that form to the Lowell Housing Authority.
4. The Lowell Police Department will forward the fingerprint cards to the FBI as mandated by the HUD-DOJ agreement. Fingerprint cards matching criminal records will be returned to the Police Department, along with a copy of the corresponding criminal record and the information will be forwarded to the Lowell Housing Authority.
5. The Lowell Housing Authority agrees to abide by all present rules, policies and procedures which regulate the collection, storage and dissemination of CORI and Triple I data including maintaining the confidentiality of all data.

Adopted March 14, 2007

APPENDIX C

**SECTION 8 HOMEOWNERSHIP PROGRAM
ADMINISTRATIVE PLAN
(REVISED APRIL 10, 2002)
(REVISED DECEMBER 11, 2002)**

The intent of the Plan is to develop specific local homeownership policies within program regulations designed to allow Section 8 program participants to become homeowners, while including adequate safeguards to protect program integrity, the Lowell Housing Authority and program participants.

Prior to providing details of the Administrative Plan, the LHA feels it is important to note that it has been operating an on going Homeownership Program since 1998. The Program is open to public housing residents, as well as Section 8 program participants. In terms of program requirements, the LHA's Homeownership Program is very similar to the Homeownership Option for Section 8 program participants currently in effect. The Administrative Plan has been developed in compliance with all known HUD regulations and with knowledge gained from past experiences derived from the LHA's on going Homeownership Program.

1. HUD REQUIREMENTS

Program participants will be selected from the current base of Section 8 participants. Initially the Program size will be limited to ten (10) families. The Authority will choose candidates for the Program based on the length of time of participation in the Section 8 Rental Assistance Program. Additionally, a preference for current participants of the Family Self Sufficiency Program will be granted. All participants must meet the following minimum requirements as mandated by HUD.

1. Must be a first time homeowner as defined by HUD. Specifically, applicants cannot have owned a home within the past three years.
2. Both the family and the adult members who will own the home must be able to document a minimum annual income (excluding welfare) of \$10,300.
3. One or more adult family members must be able to document that he or she has been continually employed (at least 30 hours per week) during the prior year. An interruption of 4 weeks or less is not considered a break in continuity. Considerations will be given for longer breaks in employment IF the adult family members were working an average of 20 hours per week and attending school or job training for 10 hours a week or more. Exemptions shall be granted to elderly and disabled participants.
4. Must complete a HUD certified homeownership counseling program provided free through the LHA.
5. Must not have defaulted previously on Section 8 Homeownership Assistance.
6. Program participant(s) must determine and document whether or not the unit is located in an airport runway clear zone or an airfield clear zone.

7. Program participants must determine and document whether or not the unit is located in a flood hazard area. Units in flood hazard areas must retain flood insurance.

2. LHA BRIEFINGS and HOMEOWNERSHIP COUNSELING

While the LHA realizes that not all Section 8 tenants are ready, willing and able to purchase a home, it plans to notify all current Section 8 program participants in writing, of the newly enacted Homeownership Option and provide a brief description of the program and its possible benefits.

If a tenant responds to the initial letter, the tenant will be mailed an application for entry into the Homeownership Option Program. Once the application has been completed and returned, the LHA will order and pay for a credit report in the name(s) of the applicant(s), perform an employment verification for all applicant(s) and determine the applicant's ability to qualify for financing and the amount of said financing. At this point, an individual briefing session will be scheduled.

At the LHA briefing session, the applicant(s) and at least one LHA staff person currently involved with the Authority's ongoing Homeownership Program will be in attendance. The LHA will provide the program participant(s) with information regarding geographic choice, portability and benefits of purchasing in low poverty areas. Additionally the participant's application, including their verified employment history and their current credit report, will be discussed and a determination of participant readiness to purchase will be made.

Having an active ongoing Homeownership Program, LHA staff has worked closely with local banks and are familiar with qualifying ratios and bank formulas used for evaluating home loan applications. Using income information supplied and verified by the applicant(s) employer and credit information taken from the applicant(s) credit report, LHA staff will determine if the applicant(s) income, credit history and current monthly installment debt are such that said applicant(s) is likely to qualify for a home loan and, if so, the approximate amount of the loan.

Assuming the applicant(s) is likely to qualify for a home loan in an amount sufficient to purchase a suitable home, the LHA will proceed to enroll the applicant in "Project Genesis" or any other HUD certified and approved homebuyer counseling program. Administered by Merrimack Valley Housing Partnership, "Project Genesis" consists of three, two-hour counseling sessions. Qualified professionals in the field of housing and related issues teach instructional classes.

Homebuyer counseling will include the following elements:

1. Home maintenance
2. Budgeting and money management
3. Credit Counseling
4. Negotiate purchase price
5. Financing
6. Home search
7. Advantages of purchasing in areas that do not have high concentrations of low income families
8. Information regarding fair housing
9. Information relative to settlement procedures, truth in lending laws and loan terms

The LHA will strongly consider local circumstances and the needs of individual families when providing briefing and counseling. The LHA plans to require that program participants enroll in and complete post purchase counseling for a period of one year. The one-year local requirement may be extended at the discretion of the LHA.

2. SEARCH TIME / OPTIONS FOR HOUSEHOLDS UNABLE TO BUY

The LHA has chosen not to establish a minimum/maximum search time for program participants to select and purchase a home. Also, the LHA will not require program participants to provide periodic reports regarding the home search process.

3. UNIT ELIGIBILITY / INSPECTION REQUIREMENTS

In terms of unit eligibility, the LHA is required to enforce specific unit eligibility standards. One such standard is the type of unit a program participant may purchase. Under program guidelines, participants are restricted to purchasing existing or new single-family homes, condominiums and cooperatives units. The purchase of multi unit structures, including two family dwellings, is prohibited.

In terms of unit inspections, the Homeownership Option requires two pre-purchase inspections. One will be performed by a qualified LHA employee, while the second inspection is to be performed by a privately employed qualified professional Home Inspector. There will be no fee associated with the LHA inspection. However, the program participant must pay for the cost of the inspection done by a professional Home Inspector. The LHA will review the inspection performed by the professional Home Inspector and determine if the dwelling is suitable for purchase and eligible for sale to a program participant. The LHA may disapprove a unit based on information provided in the Inspection Reports.

The Lowell Housing Authority plans to utilize the same procedure for unit inspection as it now uses for Section 8 rental units. Currently, the LHA has qualified staff persons designated to perform unit inspections prior to occupancy. The inspection conducted by the Authority will be used to determine compliance with Housing Quality Standards.

When a Section 8 unit is ready for inspection, the LHA inspector will gain access to the unit by coordinating with the property owner. The LHA inspector then conducts a thorough room-by-room inspection of the premises, including the basement and any and all mechanical systems, all common areas and the exterior. The inspection results are written on the LHA standard unit inspection form and maintained on file. The unit must meet the inspection criteria of Housing Quality Standards in order to qualify for the Homeownership Program.

If the unit fails the inspection, the owner of the property will be required to make needed repairs in order to bring the unit into compliance with Housing Quality Standards.

As part of its existing homebuyer program, the LHA requires a home inspection by a qualified home inspector. In an effort to provide the potential Section 8 buyers with a choice of qualified home inspectors, the LHA has developed a list of qualified home inspectors in the Greater-Lowell area. Each applicant will be given a copy of the list and the potential homebuyer(s) may select whomever they want. It should also be mentioned that prior to placing a home inspector's name on the list, the LHA requires said home inspector provide the LHA with their qualifications.

If the applicant wishes to utilize a home inspector who is not on the list the LHA will permit the applicant to do so. However, the LHA will require that the selected home inspector provide the LHA and the applicant with qualifications that are acceptable to the LHA.

4. CONTRACT OF SALE / BUYER PROTECTION

In terms of the contract for sale, the LHA plans to utilize the same contract for sale as it now uses for its ongoing homebuyer program.

The contract for sale will contain an additional list of provisions including the following:

1. The price and other terms of sale.
2. The purchaser will arrange for a pre-purchase inspection to be performed by an independent inspector selected and paid for by the purchaser.
3. The purchaser is not obligated to purchase the unit unless the inspection is satisfactory to the purchaser and the LHA.
4. The purchaser is not obligated to pay for any repairs.
5. The seller certifies that he or she has not been debarred, suspended, or subject to a limited denial of participation under part 24 of this title.

5. FINANCING

The LHA plans to utilize the same financing programs that are currently in effect as part of the Authority's on going Homeownership Program. Since 1997, the LHA has assisted twenty former public housing residents and Section 8 program participants in becoming first time homebuyers.

The financing packages are as follows:

A. PREFERRED ALTERNATIVE

1. First mortgage – 75% of purchase price
2. Second mortgage - 20% of purchase price
3. Third mortgage – (only if public subsidy is involved)
4. Subordinate mortgage - 2% of purchase price
5. Buyer cash - 3% of purchase price

The LHA plans to utilize the "Soft Second" Mortgage financing program funded through the Massachusetts Housing Partnership. Basically, the "Soft Second" Program utilizes the services of local participating banks. In Lowell, participating lenders will be required to be approved by the Lowell Housing Authority and MHP and offer borrowers the two point rate of interest without charging points. Section 8 Homeownership Program participants will apply for both first and second mortgages from the same participating lender. If there is a public subsidy involved, a third mortgage will be required by the participating lender. The City of Lowell will provide subordinate mortgage financing to secure its down payment assistance and closing costs loans.

The aforementioned financing package has several positive aspects, which work to the advantage of the purchaser including the following:

1. Minimum buyer cash down (3%)
2. Second mortgage requires interest only payments for first ten years
3. Purchaser not required to pay private mortgage insurance

The program participant will be required to have adequate funds (buyer cash) to meet the 3% down payment amount. Through its Downpayment Assistance Program, the City of Lowell will provide financing for all or a portion of the closing costs. Assessments of costs involved will be completed on a case-by-case basis.

B. OTHER ALTERNATIVE

This approach to financing is basically the same as the PREFERRED ALTERNATIVE with one exception. That being the "Soft Second" provider will be the Lowell

Development and Financial Corporation instead of the Massachusetts Housing Partnership. The financing breakdown is as follows:

First mortgage	80% of purchase price
Second mortgage	15% of purchase price
Third mortgage	2% of purchase price
Buyer cash	3% of purchase price

In addition to the financing packages previously described, the LHA plans to implement the following requirements:

1. Prohibit balloon payments
2. LHA to reserve the right to approve or reject financing terms and conditions
3. Allow seller financing on a case by case basis
4. Purchasers must not exceed qualifying ratio and must meet all other financing requirements established by the first mortgage lender.

6. AMOUNT OF ASSISTANCE

The amount of the Homeownership Assistance Payment shall be a sum equal to the lower of:

1. The payment standard minus the total tenant payment
2. The family's monthly homeownership expenses minus the total tenant payment

The payment standard for a family is the lower of:

1. The payment standard for the family unit size
2. The payment standard for the size of the home

If the home is located in an exception payment standard area, the LHA will use the approximate payment standard for the exception payment standard area. The LHA will use the same payment schedule, payment standard amounts and subsidy standards for the Homeownership Option as for the Rental Voucher Program. The LHA will conduct an annual reexamination of program participants in order to update income, family size and other relevant data and adjust the payment standard accordingly.

The LHA has adopted the following homeownership expenses in accordance with HUD requirements:

1. Principal and interest on initial mortgage(s) debt including refinancing if any
2. Real estate taxes

3. Sewer and water fees
3. Trash pick up and disposal fees
4. Homeowners insurance costs
5. Allowance for maintenance expenses*
6. Allowance for costs of major repairs and replacements**
7. Utility allowance
8. Principal and interest on debt incurred to finance major repairs or HCP accessible

* Monthly allowance for maintenance: new \$75 – existing \$125

** Monthly allowance for major repairs and replacements: new \$75 – existing \$125

If the home is a cooperative or condominium unit, homeownership expenses will include maintenance fees assessed by the condominium or cooperative homeowner association. Additionally, the LHA will make payment directly to the first mortgage lender or to the Section 8 Homeownership Program participant. If the assistance payment exceeds the amount due the lender, the LHA will pay the balance directly to the homeowner.

The term of homeowner assistance shall be fifteen (15) years if the term of the first mortgage is twenty (20) years or longer, except in the case of elderly and disabled program participants where the maximum term of fifteen (15) years does not apply. In all other cases, the term shall be ten (10) years.

7. POST PURCHASE REQUIREMENTS FOR FAMILIES

The family must sign a statement of homeowner obligations before the start of homeownership assistance agreeing to comply with all obligations under the program. In keeping with HUD regulations, the LHA has imposed the following post purchase requirements:

1. The family must reside in the home. If the family moves out of the home, the LHA will not continue homeownership assistance payments after the month when the family moves out.
2. The LHA will require each family receiving homeownership assistance to attend and participate in post purchase counseling. The counseling sessions will be administered by either LHA staff or a certified post purchase counseling agent and will focus on home maintenance issues, family finances and budgeting and maintaining good credit by ensuring that the family is paying off its credit card and other monthly debt in a timely fashion.
3. The family must comply with the terms of all mortgage(s) securing debt incurred to purchase the home and any refinancing debt, if applicable.
4. The family must not convey or transfer ownership of the home while receiving homeownership assistance.
5. The family may grant a mortgage on the home for debt incurred to finance the purchase of the home or any refinancing of such debt.

6. After the death of a family member who holds title to the home, homeownership assistance will continue pending settlement of the estate provided that the family continues to occupy the home.
7. The family must comply with all requirements of the Section 8 Program or be subject to termination of assistance.
8. The family must allow the LHA access to the home for the purpose of performing an inspection, if it is so required.

The family must supply the LHA with the following information upon request:

1. Information relative to any mortgage(s) secured by the property.
2. Any sale or transfer of any interest in the home.
3. The family must provide the LHA with its homeownership expenses.
4. The family must notify the LHA before moving out of the home.
5. The family must notify the LHA if it defaults on any mortgage-securing debt incurred to purchase the home. If the family defaults on the mortgage, the LHA may choose to issue a Voucher to the family to facilitate a move to a rental unit and continue rental assistance. However, the determination will be at the LHA's discretion, based on the good faith efforts of the family to meet its obligations and prevent default.
6. Proof that no family member has an ownership interest in other real estate while receiving homeownership assistance.

8. PORTABILITY

The LHA will not be accepting any new vouchers holders as part of the Homeownership Option. If a family currently participating in the LHA 's Section 8 Rental Voucher Program wants to purchase a home outside of the LHA 's jurisdiction under the Homeownership Option it may do so provided that the receiving PHA is accepting new homeownership families and provided that the family meets all the requirements of the receiving PHA.

9. RECAPTURE OF HOMEOWNERSHIP ASSISTANCE

Program recipients participating in the Homeownership Option are subject to recapture provisions if they sell their unit within ten (10) years of initially purchasing the unit.

At the time of sale, the LHA will place a lien on the property in accordance with HUD regulations. The lien will be drawn up in such a way that it is consistent with State and local law. The amount of homeownership assistance subject to recapture will be the lesser of the following two recapture alternatives:

8.

1. The amount of homeownership assistance subject to recapture will automatically be reduced over a ten-year period, beginning one year from the purchase date, in annual increments of ten percent. At the end of the ten-year period, the amount of homeownership assistance subject to recapture will be zero.
2. The difference between the sales price and the purchase price of the home minus the costs of any capital expenditures, the costs incurred by the family in the sale of the home, the amount of the difference between the sales price and purchase price that is being used, upon sale, towards the purchase of a new home under the Section 8 Homeownership Option and any amounts that have been previously recaptured.

In the case of a refinancing of the home, the recapture will be an amount equaling the lesser of:

1. The amount of homeownership assistance subject to recapture will automatically be reduced over a ten-year period, beginning one year from the purchase date, in annual increments of ten percent. At the end of the ten-year period, the amount of homeownership assistance subject to recapture will be zero.
2. The difference between the current mortgage debt and the new mortgage debt minus the costs of any capital expenditures, the costs incurred by the family in the refinancing of the home and any amounts that have been previously recaptured.

In the case of identity-of-interest transactions, the LHA will establish a sales price based on fair market value.

10. OTHER PROVISIONS

Section 8 families that currently receive Section 8 rental assistance can enter a lease-purchase agreement. Prior to closing the sale, they will receive conventional rental assistance and the Section 8 payment cannot be used to cover the "homeownership premium" (the portion of the payment used to accumulate a down payment or reduce the purchase price). Instead, the family must use its own funds for the premium. The LHA must and will exclude the homeownership premium in determining rent reasonableness.

A family receiving homeownership assistance can move to a new unit with homeownership assistance, as long as it is in compliance with program requirements, no family member has any ownership interest in the prior unit, and the LHA has sufficient funds. To move with continued homeowner assistance, families must again meet all eligibility requirements. A family may not move more than one time per year.

APPENDIX D



**LOWELL
HOUSING
AUTHORITY**

Section 8 Rental Assistance Program

Equal Housing Opportunity

**SECTION 8 PROGRAM
ALLOCATION PLAN
SET-ASIDE
ADMINISTRATIVE
ADDENDUM**

Section 8 Program Allocation Plan Set-aside: Administrative Procedures

A. Definitions

Allocation Plan for Designated Housing means the request submitted to the U.S. Department of Housing and Urban Development (HUD) and approved December 7, 2002 to designate 75% of the non-wheelchair housing units in the LHA's federal elderly disabled portfolio for elders.

Four of the five federal elderly/disabled developments are covered by the Allocation Plan. Bishop Markham (MA1-3) is not covered by the Allocation Plan. See the table in Attachment A for a summary of wheelchair, elderly and mixed units. Attachment A is provided for informational purposes only.

Development Waiting List means one of the four project-specific waiting lists established by the LHA that pertain to each of the four federal elderly/disabled public housing developments.

Elderly Household means a family whose head, spouse, or sole member is a person who is at least 62 years of age. It may include two or more persons who are at least 62 years of age living together, or one or more persons who are at least 62 years of age living with one or more live-in aides.

Near-elderly Household means a family whose head, spouse, or sole member is a person who is at least 50 years of age but below the age of 62; or two or more persons, who are at least 50 years of age but below the age of 62, living together; or one or more persons who are at least 50 years of age but below the age of 62 living with one or more live-in aides.

Non-elderly Household means a household headed by an individual under 50 years of age and possesses a disability as defined as follows:

Person with disabilities means a person who:

- (i) Has a disability, as defined in 42 U.S.C. 423;
- (ii) Is determined, pursuant to HUD regulations, to have a physical, mental, or emotional impairment that:

- (A) Is expected to be of long-continued and indefinite duration;

- (B) Substantially impedes his or her ability to live independently,
and
(C) Is of such a nature that the ability to live independently could be improved by more suitable housing conditions; or

(iii) Has a developmental disability as defined in 42 U.S.C. 6001.

(2) Does not exclude persons who have the disease of acquired immunodeficiency syndrome or any conditions arising from the etiologic agent for acquired immunodeficiency syndrome;

(3) For purposes of qualifying for low-income housing, does not include a person whose disability is based solely on any drug or alcohol dependence.

For purposes of this addendum, the definition of "individual with a disability" under 24 CFR 8.3 does not apply in terms of eligible status for offers of assistance.

Section 8 Set-aside in Support of the Allocation Plan means any Section 8 Housing Choice Vouchers either awarded by HUD for the specific purpose of mitigating the fair housing impact of the approved Allocation Plan or any Section 8 Vouchers set-aside by vote of the Board of Commissioners of the LHA for the same purpose. See Attachment A for the current number of Vouchers in the set-aside.

Set-aside Waiting List means the list for households eligible for access to the set-aside as described in this addendum and for whom no Vouchers are currently available.

Single Member Household means a household that has one member less than 50 years of age who is income eligible for the program but does not possess a disability as defined under HUD regulation for purposes of admission to housing programs. Single member households will be housed only when no other applicant household in any of three other categories defined herein are willing to accept a unit and the unit has been vacant for 30 days.

A **wheelchair accessible unit** is a dwelling unit complies with the physical accessibility standards for mobility impairment as defined in the Uniform Federal Accessibility Standards (UFAS) or any more stringent standard that is required by law, regulation or local code. More Stringent standard is one in which the level of physical design the promote ease of use by a mobility-impaired individual is maximized.

B. Consistency with Section 8 Administrative Plan

Unless specifically modified by this addendum, all Section 8 administrative procedures described in the Lowell Housing Authority's (LHA) Section 8 Administrative Plan are in effect and apply to households using Section 8 subsidies available through the set-aside in support of the HUD Approved Allocation Plan for Designated Housing.

C. Section 8 Subsidy Offer Sequence

For the initial implementation of the Section 8 Set-aside, the LHA will contact all non-elderly households currently living the LHA's four (4) elderly/disabled developments covered by the Allocation Plan and inform them of the availability of the Section 8 resources. These households will be given up to 30 days from notice of availability of the Section 8 subsidy to determine if they want to accept the Section 8 Voucher and move from the federal public housing program into the community.

After the initial implementation, the following sequence of offers assistance will be followed:

The **first** priority will be:

Non-elderly households on the federal elderly/disabled waiting list will be given next priority at the time that they are by-passed on one of the federal elderly/disabled waiting lists so that an elderly or near-elderly household located after them on the waiting list is given an offer.

The **second** priority will be:

Any non-elderly household residing in one of the LHA's four elderly/disabled developments.

Date and time of application will be the only other factor. No other preferences will apply.

No other households other than those defined above are eligible for access to this set-aside.

D. Waiting List Management

Once all Section 8 Vouchers in the set-aside are issued, the LHA will establish a waiting list for the households eligible for the set-aside.

None of the LHA preferences used for the Section 8 Housing Choice Voucher (HCV) Program apply to waiting list administration for the Section 8 Program Allocation Plan Set-aside.

Income targeting requirements as described at 24 CFR 982.201(b)(2) do not apply to household eligible for this set-aside.

This waiting list will be organized as follows:

Non-elderly households on the federal public housing waiting list that have been **by-passed** to permit the admission of an elderly or near elderly household will be given **2 points**.

Current non-elderly households residing in the LHA's four elderly/disabled developments will be given **No Points**

Non-elderly households on the waiting lists who are by-passed will be notified at the time of their household being skipped over that they are now eligible for a Section 8 Voucher from the set-aside. If there is no Voucher available at that time, they will be informed of their right to be added to a waiting list for Vouchers available under the set-aside. They may elect to be added to the waiting list for the set-aside at any time after they have been by-passed, but will be placed in the list based on date and time of their application for the set-aside and not on the date that they were by-passed.

E. Under Utilization

In the event that the full set-aside cannot be issued and households placed under lease in a timely manner, the LHA may use the budget authority for the set-aside as regular tenant-based subsidies. However, any household that is eligible for the set-aside will be provided with the next available voucher until the number of households served equals the full allotment in the set-aside. In other words, budget authority for the set-aside is not to be held back from use awaiting eligible households, but the Authority will only dedicate the next available Voucher to a household eligible under the set-aside up to the full number of Vouchers in the set-aside.

F. Increases in the number of Vouchers in the Set-aside

If the Executive Director determines that the turnover of subsidies under the set-aside is too infrequent to address the goal of the set-aside to mitigate the increased waiting time for access to affordable, or he or she estimates that the future need for Vouchers in the set-aside merits an increase, the LHA will either increase the set-aside out of the existing LHA program by vote of the Board of Commissioners or apply under a HUD NOFA or other mechanism to obtain more Vouchers appropriated by Congress for this purpose.

The Authority may increase the size of the set-aside temporarily out of its existing program prior to obtaining additional Vouchers.

Attachment A

Summary of Allocation Plan Designation Strategy

	Total Units	Wheelchair Units	Mixed Units	Elderly Only Units
Bishop Markham MA 1-3	399	20	379	0
Faulkner Street MA 1-4	27	0	7	20 (74%)*
Father Norton MA 1-5	112	0	28	84 (75%)
Dewey Archambault MA 1-6	189	2	47	140 (74%)*
Francis Gatehouse MA 1-11	90	9	20	61 (68%)*
TOTALS	817	31 (3.8%)	482 (59.9%)	305 (37.3%)

* The Allocation Plan calls for 75% of the non-wheelchair units to be set-aside. These calculations result in less than a strict 75% set-aside against the total unit count.

Current Size of Section 8 Set-aside in support of the LHA's Allocation Plan for Designated Housing: **45**

APPENDIX E

Addendum to the Section 8 Administrative Plan

Lowell Housing Authority

Section 8 Project Based Assistance

Adopted on August 11, 2004

Revised February 8, 2006

I. INTRODUCTION

On October 27, 2000, the President signed into law the Fiscal Year 2001 Departments of Veterans Affairs and Housing and Urban Development and Independent Agencies Appropriations Act (Pub. Law 106-377, 114 Stat. 1441) ("Appropriations Act"). Section 232 of the Appropriations Act substantially revises the provisions of the U.S. Housing Act of 1937 that govern the authority of a PHA to designate a portion of its available tenant-based voucher funds for project-based assistance (see 42 U.S.C. 1473f(o)(13) (as amended by "Section 232" of the Appropriations Act). The Conference Report on the Appropriations Act stated that the statutory changes to the project-based voucher program are intended to make project-basing of voucher assistance more flexible.

This Addendum to the Lowell Housing Authority's (LHA's) Section 8 Administrative Plan is a statement of its intent to operate a Project-Based Assistance Program (hereinafter referred to as PBA) and to provide information on how it intends to operate the PBA under the requirements of the new law. This Addendum also provides information to eligible families, owners, and other interested members of the public.

This Addendum is based on Section 232 and HUD's Initial Guidance Notice, dated January 8, 2001, identifying which elements of the new project-basing law are effective immediately, and states how the LHA is implement the law pending issuance of revised program regulations. In the event of changes required to this addendum because of future rulemaking concerning the project-based voucher program, the LHA will take all reasonable steps to comply with new rules without jeopardizing actions previously taken that are consistent with HUD's Initial Guidance and Section 232.

II. PROVISIONS OF THE LHA'S PBA PROGRAM

The following provisions of the LHA's PBA Program are effective on August 11, 2004, as adopted by the Board of Commissioners.

Except where this section specifies otherwise, the present project-based regulations at 24 CFR part 983 continue to apply to newly constructed and substantially rehabilitated housing and now also apply to existing housing. Upon determination of good cause and subject to statutory limitations, the LHA may seek a waiver from HUD for any provision of the applicable project-based regulations in accordance with 5 CFR 5.110. Nothing in this addendum affects the rights of owners and participants under existing contracts in HUD's Section 8 project-based certificate program.

On April 1, 2002, HUD approved various waivers and exceptions for the LHA's operation of its PBA Program. The complete text of the HUD letter, as well as the LHA's letter requesting the waivers/exceptions, is provided in Attachment A to this Addendum. The HUD approved waivers and/or exceptions are briefly summarized below:

Waiver/Exception #1: For the Jackson Appleton Middlesex (JAM) and Acre neighborhoods, HUD has granted an exception from the requirement that all new project-based assistance agreements or HAP contracts be for units in census tracts with poverty rates of less than 20 percent:

Waiver/Exception #2: For the 45 project-based units to be located at the Julian D. Steele reinvented development, HUD has approved a waiver for the LHA to "sole source" the selection of these units through the Residents First Development Corporation (RFDC) to the purchasers/owners of the 45 duplex units where the 45 project-based units will be located.

Waiver/Exception #3: For the 37 project-based units to be located at the Princeton Village (aka Redwood Terrace Apartments or Redwood Estates), HUD has approved a waiver for the LHA to "sole source" the selection of these units to Winn Development.

A. Authorization To Provide Project-Based Vouchers For Existing Housing

Consistent with Section 232 and HUD Guidance, the LHA from time-to-time may enter into HAP contracts that attach project-based voucher assistance to existing housing units that fully meet the housing choice voucher program HQS (see 24 CFR 982.401) but that would not have qualified for project-basing as newly constructed or rehabilitated units.

A housing unit will be considered an “existing unit” for purposes of the project-based voucher program if, at the time of the LHA’s written notice of selection of the project for project-based assistance, the units require a maximum expenditure of less than \$1,000 per assisted unit (including the unit’s prorated share of any work to be accomplished on common areas or systems) to comply with the HQS.

B. Unit Selection Policy, Advertising, And Owner Application Requirements For Existing Housing With Assistance Attached To 25 Percent Or Fewer Of The Units In A Building

For existing housing developments in the project-based voucher program, which have assistance attached to no more than 25 percent of the development’s units, the LHA shall advertise the availability of the project-based assistance. Such advertisements will meet standards comparable to those in 24 CFR 983.51(b); otherwise, section 983.51 does not apply to these projects.

Specifically, the LHA will advertise in a newspaper of general circulation that the LHA will accept applications for assistance for existing housing projects. The advertisement will be published once a week for three consecutive weeks; specify an application deadline of at least 30 days after the date the advertisement is last published; specify the number of units the LHA estimates that it will be able to assist under the funding the LHA is making available for this purpose; and state that only applications submitted in response to the advertisement will be considered. The LHA advertisement will also state the LHA’s selection policies. In all cases, the LHA will maintain documentation of responses to advertisements or competitive proposals received in response to the LHA notice.

NOTE: For the 45 PBA units at the Julian D. Steele reinvented site and for the 37 PBA units at Redwood Terrace Apartments (aka Redwood Estates), HUD has approved waivers to allow the LHA to “sole source” these units.

C. For Existing Housing Developments With More Than 25 Percent Project-Based Units (I.E., At This Time, For The Elderly And Special Populations Only, Since The Supportive Services Exception To The 25% Cap Is Not Implemented As Of Yet), And For Newly Constructed Or Rehabilitated Units

The LHA will establish policies for public advertisement and competitive selection of units to be assisted with project-based voucher assistance consistent with the requirements of 24 CFR 983.51.

D. 20 Percent Limit

The total cumulative number of project-based units, including units previously placed under AHAP or HAP in the LHA’s project-based certificate program, will not exceed 20 percent of the baseline number of units in the LHA’s voucher program.

E. Consistency With PHA Plan

The LHA will submit as a required attachment to the PHA Plan template, or as an amendment to the PHA Plan, depending on the circumstances, a statement of the projected number of project-based units and general locations and how project basing would be consistent with their PHA Plans.

The LHA has submitted the following statement of intent in its PHA Plan:

During Agency Plan Year 2, the Lowell Housing Authority (LHA) intends to initiate a Section 8 Project-Based Assistance (PBA) Program with the goal of eventually allocating up to the full 20% of the baseline units in the LHA's voucher program. The LHA intends to operate this PBA Program in accordance with Section 232 of the FY 2001 VA-HUD Appropriations Act; HUD's Guidance Materials; and any waivers or exceptions thereto that may be required. At this time, the LHA has only identified 45 units of this authority that will be utilized in conjunction with the redevelopment of the Julian D. Steele development as authorized under Massachusetts General Laws Chapter 193 of the Acts of 2000. All 45 of these rental units will be reserved for households with incomes in the 0-50% of Area Median Income (AMI) range. Although no specific properties have been identified, the LHA also intends to commit another 100 units of PBA authority to be used in tandem with the City of Lowell's Division of Planning and Development (DPD) housing programs in order to promote additional rental housing affordable to households in the 0-50% of Area Median Income (AMI) range. It is anticipated that an RFP or similar competitive solicitation will be issued for these units in the future, as required.

As with all programs that are covered by the PHA Plan, the PBA will be carried out in conformity with the nondiscrimination requirements specified in the PHA Plan regulations, and will affirmatively further fair housing as required by the PHA Plan regulations.

F. Consistency With The Goals Of Deconcentrating Poverty And Expanding Housing And Economic Opportunities

The LHA's PBA Program will be consistent with the goals of deconcentrating poverty and expanding housing opportunities. Until HUD issues further instructions, the LHA will implement the deconcentration of poverty requirements in Section 232 by requiring that all new project-based assistance agreements or HAP contracts be for units in census tracts with poverty rates of less than 20 percent, unless HUD specifically approves an exception. (NOTE: HUD has approved an exception to this requirement for both the JAM and Acre neighborhoods).

G. Partially Assisted Building Requirement

With the exception of the waivers and extensions for the purposes described above, the LHA will not enter into an agreement or HAP contract or other binding commitment to provide project-based voucher assistance for more than 25 percent of the units in any one building, except for single-family dwellings and projects for elderly families and disabled families. In accordance with existing program usage, single family dwellings refer to 1-4 family dwellings. For the purpose of the single family dwelling requirement, a dwelling may be part of an overall development as long as the dwelling consists of 4 units or fewer.

H. Family Choice to Move With Continued Assistance

The new law provides that assisted families may move from the assisted building, and retain federal housing assistance. For the continued assistance option, Section 232, similar to existing 24 CFR 983.206(d)(2), requires for new HAP contracts that the owner permit the assisted tenants to move from the housing at any time after the family has occupied the dwelling unit with project-based voucher assistance for 12 months.

Consistent with the law, the LHA will provide the family with housing choice voucher assistance or such other tenant-based rental assistance that is subject to comparable income, assistance, rent contribution, affordability and other requirements. HUD will set the standards as to what may qualify as comparable assistance by regulation, but, for new HAP contracts incorporating this requirement, the LHA will use voucher assistance available under the ACC to provide tenant-based assistance for the family. If no such assistance is available at the time the family moves, the LHA will give the family priority to receive the next available tenant-based voucher.

Vouchers under funding allocations targeted by HUD for special purposes (e.g., family unification, mainstream disabled) are not available for this purpose, since they are required to be used only for the targeted purpose.

I. HAP Contract Term

Consistent with the law, a HAP contract between the LHA and an owner of housing under this program may have a duration of up to 10 years (as determined by the LHA), subject to the future availability of sufficient appropriated funds under the LHA's consolidated ACC with HUD. Upon expiration of the HAP contract term and consistent with the law, the LHA may agree with the project-based housing owner to extend the HAP contract for such period as the LHA determines appropriate to expand housing opportunities (as well as an extension to assure long-term affordability of the housing, as provided under prior law). All HAP contract extensions must be contingent upon the future availability of appropriated funds.

Given this contingency and the desire of the LHA to create the longest possible affordability terms for its PBA units, it is the LHA's express intent to allow additional ten year extensions to the original ten year HAP Contract for as long a period of time as it deems necessary to preserve their affordability.

J. Rent Limits

The new law provides that the HAP contract shall establish gross rents (rent to owner plus the allowance for tenant-paid utilities) that do not exceed 110 percent of the established Fair Market Rent ("FMR"), or any HUD-approved "exception payment standard" (i.e., a payment standard amount that exceeds 110 percent of the published FMR) for the area where the housing is located.

For purpose of this section, the LHA's current payment standard is 110% of FMR; however, the LHA reserves the right to request and apply "exception payment standards" when it determines that it is in its best interest to do so in order to create and/or preserve long-term affordable rental housing.

If a unit has been allocated a low-income housing tax credit under the Internal Revenue Code of 1986 at 26 U.S.C. 42, but is not located in a "qualified census tract" as defined in the law, the rent to owner may be established at any level that does not exceed the rent charged for comparable units in the same building that receive the tax credit but do not have additional rental assistance.

Within the limitations mentioned above, the initial rent to the owner may differ from payment standard amounts in the payment standard schedule adopted for the LHA's tenant-based voucher program. However, just as in the regular tenant-based program and the project-based program under prior law, the initial and adjusted rent to owner must be reasonable in relation to rents charged in the private market for comparable unassisted units (see 42 U.S.C. 1437(f)(o)(10)(A)).

K. Rent Adjustments During The Term Of The HAP Contract

Section 232 provides that a housing assistance payments contract for project-based voucher assistance shall provide for rent adjustments and that the adjusted rent for any assisted unit shall be reasonable in comparison with rents charged for comparable dwelling units in the private, unassisted local market and may not exceed the maximum rent limits permitted under the statutory limitations summarized above. Determination of whether rent is reasonable in relation to comparable units shall be governed by 24 CFR 983.256.

The annual rent adjustment provisions at 983.254 and the special rent adjustment provisions at 983.255 shall only be applicable if the AHAP with the owner was executed before the effective date of this notice. These annual and special adjustment regulatory provisions do not apply to project-based assistance for existing housing pursuant to this notice, and do not apply if the Agreement for newly constructed or rehabilitated housing was executed on or after the effective date of this notice.

L. Family Share Of Rent And Housing Assistance Payment

The housing assistance payment is calculated in accordance with 24 CFR 983.260 as the gross rent minus the total tenant payment. The family share is calculated in accordance with 24 CFR 983.261 by subtracting the amount of the HAP from the gross rent.

M. Tenant Selection

Former Julian D. Steele (JDS) residents, who apply for Section 8 PBA units and are otherwise qualified, shall be granted top preference (categorized as #1 preference) regarding placement on the Section 8 PBA Waiting List. Additionally, special consideration shall be granted to former JDS residents for placement at the former site of the JDS development, as unit availability allows.

Preference for Services Offered: The Lowell Housing Authority will grant a preference to families with disabilities that require the services provided at a particular development. The preferences may be applied to those families, including individuals, whose disabilities significantly interfere with their ability to obtain and maintain themselves in housing; and for whom such services cannot be provided in a non-segregated setting. Disabled residents will not be required to accept the services offered. In addition, the development must be open to all otherwise eligible persons with disabilities who may benefit from the services offered.

Adopted by the Board of Commissioners on February 8, 2006

The LHA selection system for project-based units will comply with the requirements specified below, which in most respects (except for the income targeting provision) are a codification of present regulatory and contractual requirements.

Income Targeting: The requirements of 42 U.S.C. 1437n(b) and 24 CFR 982.201(b)(2) govern the selection of eligible families for this program, and generally provide that not less than 75 percent of families admitted annually to the LHA's combined tenant-based and project-based voucher program shall be families whose incomes do not exceed 30 percent of the area median, as determined by HUD.

Applicants may only be selected from the LHA waiting list. The LHA will only maintain a separate project-based waiting list if all LHA tenant-based assistance applicants who seek project-based housing can be placed on this list upon request and without penalty to any other application for assisted housing

they may have pending. Subject to its waiting list policies and selection preferences specified in the LHA administrative plan, the LHA may place a family referred by an owner of project-based voucher units on its waiting list.

If the LHA chooses to establish a separate waiting list for project-based assistance, the LHA will give all applicants currently on its waiting list for tenant-based assistance the opportunity to also have their names placed on the waiting list for project-based assistance in accordance with the LHA's established selection policies. As in the current project-based program, the LHA will refer families to housing units from the waiting list according to its regular applicant selection policies. If an applicant does not rent a unit with project-based assistance, or the owner turns an applicant down for admission to a project-based unit, the applicant will not be removed from the LHA's tenant-based assistance waiting list for that reason but must maintain its position on the list as though no offer of housing had been made.

Vacant units: The HAP contract will be in a form prescribed by HUD. The LHA may enter into such a contract that agrees to provide vacancy payments up to 60 days after a unit becomes vacant, in an amount not to exceed the rent to the owner as provided by the HAP contract on the day the family vacated.

The PHA may only make such payments for a vacant unit if:

1. The vacancy was not the owner's fault, and
2. The PHA and owner take action to minimize the likelihood and length of any vacancy.

Reduction Of Contract Units After Vacancy: Except for units for which an AHAP was executed before the effective date of this notice, the new law supersedes 24 CFR 983.152(b) and (c). Instead, the following provisions apply:

If no eligible family rents a vacant unit within 120 days (commencing on the first day of the month when the vacancy occurs), the LHA may terminate its commitment to make any additional housing assistance payments for the unit for the balance of the HAP contract term. The LHA may use the amounts so saved to provide other voucher assistance.

N. Future Modifications To This Addendum

The LHA's PBA Addendum remains in effect until the new project-based voucher changes in law have been fully implemented through a new regulation.

In the event of changes required to this addendum because of future rulemaking concerning the project-based voucher program, the LHA will take all reasonable steps to comply with new rules without jeopardizing actions previously taken that are consistent with HUD's Initial Guidance and Section 232.

APPENDIX 1

CHANGES TO PBA AUTHORIZED BY SECTION 232

The important changes made by section 232 of the Appropriations Act to the project-based program include:

A. Existing Housing

Prior law granted a PHA authority to project-base a portion of its available tenant-based funding only for (1) newly constructed units; or (2) rehabilitated units. Section 232 provides that a PHA may also use tenant-based funding to attach assistance to existing units.

B. Percent Limit

Under prior law, the number of units that a PHA could project-base was capped at the number supported by 15 percent of the total funding available to the PHA under its consolidated Annual Contributions Contract (ACC) for tenant-based assistance. The new law raises this cap to 20 percent of the funding available, and consequently to 20 percent of the baseline number of units in the PHA's voucher program. A PHA may now utilize funding for project-basing up to this new percent limit.

C. PHA Plan and Deconcentration Goals

The new law integrates the project-based voucher option with the PHA Plan requirements. A PHA may enter into a housing assistance payments (HAP) contract to provide project-based voucher assistance only if the HAP contract is consistent with the PHA Plan (see 42 U.S.C. 1437c-1, implemented at 24 CFR part 903). Consistency with the PHA Plan means that there are circumstances indicating that project-basing of the units, rather than tenant-basing of the same amount of assistance, is an appropriate option. In addition, project-basing must be consistent with the statutory goals of "deconcentrating poverty and expanding housing and economic opportunities."

D. Partially Assisted Buildings

The new law places a new cap of 25 percent on the number of dwelling units in any one building that may have project-based voucher assistance. However, the following types of housing are exempt from this cap:

1. Project-based dwelling units in single family properties; and
2. Dwelling units specifically for elderly families, disabled families (as defined in 5 CFR 5.403(b)), or families receiving supportive services.

E. Family Choice To Move With Continued Assistance

The family choice requirement has two components, a "mobility" component and a "continued assistance" component.

1. **Mobility:** The HAP contract must provide that a family may move out of a project-based unit after 12 months.
2. **Continued assistance:** If a family moves out of its project-based unit at any time after the first year of assisted occupancy, the PHA must offer the family available tenant-based rental assistance, either under the voucher program or under another comparable form of tenant-based assistance as will be defined in HUD regulations. Such alternative tenant-based assistance must be comparable to assistance under the voucher program in terms of income, assistance, rent contribution, affordability and other requirements.

F. Contract Term

HUD's present regulations only permit a PHA to provide project-based assistance within funding currently available under the ACC. Since voucher funding has recently been provided in one-year increments, PHAs have been permitted to enter into HAP contracts for the same period. Section 232 provides that the HAP contract between the PHA and the owner may be for a term of up to 10 years, although payments under that contract are subject to the future availability of appropriations and future availability of funding under the ACC.

G. Extension Of Contract Term

Section 232 revised the former statutory provision on extension of the HAP contract term (former 42 U.S.C. 1437f(o)(13)(B)). The new law provides that the PHA may contract with the owner of a project-based unit to extend the term of the HAP contract for such period as the PHA determines appropriate to achieve long-term affordability of the housing or to expand housing opportunities. All HAP contract extensions, however, must be contingent upon the future availability of appropriated funds.

H. Maximum Initial Gross Rent, Rent To Owner And Rent Adjustments

The new law provides that the HAP contract shall establish gross rents that do not exceed 110 percent of the established Fair Market Rent ("FMR"), or any HUD-approved "exception payment standard" (i.e., a payment standard amount (for the PHA's tenant-based voucher program) that exceeds 110 percent of the published FMR) for the area where the project is located. In addition, if a unit has been allocated a low-income housing tax credit under the Internal Revenue Code of 1986 at 26 U.S.C. 42, but is not located in a "qualified census tract" under that law, the rent to owner may be established at any level that does not exceed the rent charged for comparable units in the same building that receive the tax credit but do not have additional rental assistance.

The new law provides that a HAP contract between the PHA and an owner must provide for adjustments of rent to owner during the contract term, and the adjusted rents must be reasonable in comparison with rents charged for comparable units in the private, unassisted local market.

The statutory maximum rent limits apply both to the establishment of the initial rent to owner (as defined in 24 CFR 982.4) at [[Page 3607]] the beginning of the HAP contract term, and to adjustments of rent to owner during the HAP contract term.

Within the limitations mentioned above, the initial gross rent to owner may differ from payment standard amounts for the PHA's tenant-based voucher program. However, just as in the regular tenant-based program, and in the project-based program under prior law, the initial and adjusted rent to owner must be reasonable in relation to rents charged in the private market for comparable unassisted units (see 42 U.S.C. 1437(f)(o)(10)(A), 24 CFR 982.507, and the "reasonable rent" element of SEMAP, 24 CFR 985.3(b)).

I. Tenant Selection

Section 232 revises and substantially codifies the tenant selection process for project-based voucher units. The new law states that the PHAs may place applicants referred by owners on the PHA's waiting list in accordance with the PHA's local waiting list policies and selection preferences.

As under the current program regulations, a PHA may not penalize applicants who reject an offer of a project-based unit or who are rejected by the owner of the housing. The PHA must maintain such applicant in the same position on the tenant-based assistance list as if an offer had not been made. In accordance with existing admission requirements, PHAs may establish selection preferences for project-based units that are consistent with the selection preferences in the PHA Plan.

As under the current program regulations, the PHA may elect to establish a separate waiting list for project-based voucher assistance, or to use a single common list for admission to the PHA's tenant-based and project-based assistance programs. If the PHA chooses to maintain a separate waiting list for project-based units, all PHA tenant-based assistance waiting list families who want project-based units must be permitted to place their names on the separate list.

The new law provides that admission to the project-based voucher program is subject to the same statutory income targeting requirement as the tenant-based program (42 U.S.C. 1437n(b)), instead of the individual project income targeting requirement that applies to other Section 8 project-based assistance (42 U.S.C. 1437n©(3)). The income targeting requirement provides, in general, that in any PHA fiscal year, at least 75% of the families admitted to a PHA's voucher program (which would include project-based voucher assistance) must be families whose annual income does not exceed 30 percent of median income for the area, as determined by HUD (see HUD definition of "extremely low income families" at 24 CFR 5.603).

J. Unit Inspection And Housing Quality Standards

Units assisted with tenant-based or project-based voucher assistance must meet or exceed housing quality standards (HQS) established by HUD (42 U.S.C. 1437f(o)(8)). Section 232 states that the same HUD-prescribed HQS standards apply to project-based voucher assistance as apply to tenant-based voucher assistance (42 U.S.C. 1437f(o)(13)(F)).

Before and during the term of assistance, units are inspected for compliance with the HQS. In general, the same statutory PHA inspection requirements apply to project-based voucher assistance as to the tenant-based voucher program (42 U.S.C. 1437f(o)(8) and 1437f(o)(13)(F)). As in the tenant-based voucher program, a PHA must inspect 100 percent of project-based voucher units before entering into the HAP contract, and may only enter into a HAP contract for units that fully comply with the HQS. There is, however, a change in the annual HQS inspection requirements for the project-based voucher program. In the tenant-based program—where each unit is assisted under a separate HAP contract for each individual assisted family—the PHA must inspect each assisted unit annually. The new law provides that in the project-based voucher program, a PHA is not required to inspect each assisted unit in a project annually, thus allowing annual inspection of a representative sample of the project-based voucher units in a project.

K. Vacant Units

The new law permits a PHA, at its discretion, to continue providing assistance for a unit that becomes vacant (after commencement of assisted occupancy by a family) for up to a maximum of 60 days. Such payments may only be made if the vacancy is not the fault of the owner, and the owner takes "every reasonable action" to minimize the likelihood and extent of vacancies.

APPENDIX 2:

NEW STATUTORY PROVISIONS EFFECTIVE IMMEDIATELY

This section provides guidance regarding implementation of provisions on project-basing in Section 232 of the Appropriations Act that are immediately effective. Except where this section specifies otherwise, the present project-based regulations at 24 CFR part 983 continue to apply to newly constructed and substantially rehabilitated housing and now also apply to existing housing. Upon determination of good cause and subject to statutory limitations, HUD may waive any provision of the applicable project-based regulations in accordance with 5 CFR 5.110. Nothing in this addendum affects the rights of owners and participants under existing contracts in HUD's Section 8 project-based certificate program.

In the event of changes required to this addendum because of future rulemaking concerning the project-based voucher program, the PHA will take all reasonable steps to comply with new rules without jeopardizing actions previously taken that are consistent with HUD's Initial Guidance and Section 232.

Authorization To Provide Project-Based Vouchers For Existing Housing: Consistent with the project-based statute before amendment by Section 232, present regulations at 24 CFR part 983 only authorize project-based voucher assistance for newly constructed or rehabilitated units. Section 232 now also authorizes project-based assistance for existing housing. In accordance with the new law, a PHA may now enter HAP contracts that attach project-based voucher assistance to existing housing units that fully meet the housing choice voucher program HQS (see 24 CFR 982.401) but that would not have qualified for project-basing as newly constructed or rehabilitated units.

A housing unit will be considered an "existing unit" for purposes of the project-based voucher program if, at the time of the PHA's written notice of selection of the project for project-based assistance, the units require a maximum expenditure of less than \$1,000 per assisted unit (including the unit's prorated share of any work to be accomplished on common areas or systems) to comply with the HQS.

A. Inapplicability of Certain Current Part 983 Regulations to New Commitments of Project-Based Vouchers

1. 24 CFR 983.3 © and (d) of the present regulation, which are designed to assure that commitments of project-based assistance do not exceed amounts currently appropriated and available under the ACC, are inapplicable because the new law authorizes PHAs to enter into project-based HAP contracts for up to ten years, subject to the future availability of appropriations. In addition, the maximum percentage limit for project-based assistance has been raised to twenty percent of the baseline number of units in the PHA's voucher program.
2. 24 CFR 983.4, HUD review of PHA plans to attach assistance to units, is inapplicable.
3. 24 CFR 983.9(a) implemented the prior statutory prohibition of project-based assistance for units to be [[Page 3608]] constructed or rehabilitated with U.S. Housing Act funds. This requirement is eliminated in the new law. Consequently section 983.9(a) is no longer applicable.
4. 24 CFR 983.151(b) and (c), on term and renewal of HAP contracts, have been modified as described in this notice. The maximum potential term is now 10 years, subject to the future availability of appropriations and future availability of funding under the PHA's ACC. The PHA will determine the initial HAP contract term. The new law allows PHAs to determine the appropriate period for an extension, whereas previously (within the constraints imposed by available funding under a current ACC), HUD decided whether and for what period to approve renewals of expiring HAP contracts.
5. 24 CFR 983.203(a)(6) is inapplicable, and 983.203(d)(3)'s declaration that a family that moves does not have any right to continued assistance is inapplicable.

B. Inapplicability Of Certain Current Regulations To Project-Based Assistance For Housing In Existing Structures

The provisions of the present regulation that restrict assistance to newly constructed or rehabilitated units (see 24 CFR 983.7(b)(1) and (2)) do not apply to project-based voucher assistance for housing in an existing structure in accordance with Section 232 and this notice. In addition, the following regulatory provisions of 24 CFR part 983 do not apply to project-based assistance for housing in an existing structure:

1. Site and neighborhood standards at Sec. 983.6;
2. Rehabilitation requirements at section 983.8;
3. Requirements for minimizing displacement because of rehabilitation in section 983.10(a); Subpart B—Owner Application Submission to Agreement, except 24 CFR 983.51, which is discussed further below; and
4. Subpart C—Agreement and New Construction or Rehabilitation Period, except the provisions of paragraphs 983.103(d) regarding notification of vacancies and 983.104© regarding inspection to meet HQS.

Unit Selection Policy, Advertising, And Owner Application Requirements For Existing Housing With Assistance Attached To 25 Percent Or Fewer Of The Units In A Building: For existing housing developments in the project-based voucher program, which have assistance attached to no more than 25 percent of the development's units, the PHA must advertise the availability of the project-based assistance. Such advertisements must meet standards comparable to those in 24 CFR 983.51(b); otherwise, section 983.51 does not apply to these projects.

Specifically, the PHA must advertise in a newspaper of general circulation that the PHA will accept applications for assistance for existing housing projects. The advertisement must be published once a week for three consecutive weeks; specify an application deadline of at least 30 days after the date the advertisement is last published; specify the number of units the PHA estimates that it will be able to assist under the funding the PHA is making available for this purpose; and state that only applications submitted in response to the advertisement will be considered. The PHA advertisement must also state the PHA's selection policies. In all cases, PHAs must maintain documentation of responses to advertisements or competitive proposals received in response to the PHA notice.

For Existing Housing Developments With More Than 25 Percent Project-Based Units (I.E., At This Time, For The Elderly And Special Populations Only, Since The Supportive Services Exception To The 25% Cap Is Not Implemented In This Notice), And For Newly Constructed Or Rehabilitated Units: The PHA must establish policies for public advertisement and competitive selection of units to be assisted with project-based voucher assistance. 24 CFR 983.51 is applicable.

C. 20 Percent Limit

Section 232 requires PHAs that participate in the project-based voucher program to comply with the statutory language that states that “[n]ot more than 20 percent of the funding available for tenant-based assistance under this section that is administered by the [public housing] agency may be attached to structures pursuant to this paragraph” [bracketed material added]. This language supersedes 24 CFR 983.3(b), and is effective immediately. Therefore, the total cumulative number of project-based units, including units previously placed under AHAP or HAP in the PHA's project-based certificate program, may not exceed 20 percent of the baseline number of units in the PHA's voucher program.

D. Consistency With PHA Plan

Until HUD issues further instructions, PHAs submitting PHA Plans that wish to use the project-based voucher program (as revised by Section 232) must include—as a required attachment to the PHA Plan template—a statement of the projected number of project-based units and general locations and how project basing would be consistent with their PHA Plans. If a PHA wishes to use the project-based voucher program before the anticipated approval date of the PHA's next PHA Plan, the PHA may do so by adding the information as an amendment to the PHA Plan and following the regulations and notices for such PHA Plan amendments.

As with all programs that are covered by the PHA Plan, the program must be carried out in conformity with the nondiscrimination requirements specified in the PHA Plan regulations, and must affirmatively further fair housing as required by the PHA Plan regulations.

E. Consistency With The Goals Of Deconcentrating Poverty And Expanding Housing And Economic Opportunities

Section 232 requires, in addition to consistency with the PHA Plan, that a contract for project-basing under the voucher program be consistent with the goals of deconcentrating poverty and expanding housing opportunities. Until HUD issues further instructions, HUD will implement the deconcentration of poverty requirements in Section 232 by requiring that all new project-based assistance agreements or HAP contracts be for units in census tracts with poverty rates of less than 20 percent, unless HUD specifically approves an exception.

F. Partially Assisted Building Requirement

A PHA may not enter into an agreement or HAP contract or other binding commitment to provide project-based voucher assistance for more than 25 percent of the units in any one building, except for single-family dwellings and projects for elderly families and disabled families.

HUD is not implementing through this notice the exception for buildings for families receiving supportive services. HUD will address that exception through rulemaking, which will define "supportive services." In accordance with existing program usage, single family dwellings refer to 1-4 family dwellings.

If the PHA had entered into an agreement for project-based units prior to the effective date of this notice, section 232 provides that such buildings may have the assistance extended or renewed, notwithstanding this section on partially assisted buildings, 42 U.S.C. 1437f(o)(13)(D), as amended by the Appropriations Act. [[Page 3609]]

G. Family Choice to Move With Continued Assistance

The new law provides that assisted families may move from the assisted building, and retain federal housing assistance. For the continued assistance option, Section 232, similar to existing 24 CFR 983.206(d)(2), requires for new HAP contracts that the owner permit the assisted tenants to move from the housing at any time after the family has occupied the dwelling unit with project-based voucher assistance for 12 months.

The law now provides that the PHA must provide the family with housing choice voucher assistance or such other tenant-based rental assistance that is subject to comparable income, assistance, rent contribution, affordability and other requirements. HUD will set the standards as to what may qualify as comparable assistance by regulation, but, for new HAP contracts incorporating this requirement, the PHA must in the interim use voucher assistance available under the ACC to provide tenant-based assistance for the family. If no such assistance is available at the time the family moves, the PHA must give the family priority to receive the next available tenant-based voucher.

Vouchers under funding allocations targeted by HUD for special purposes (e.g., family unification, mainstream disabled) are not available for this purpose, since they are required to be used only for the targeted purpose.

H. HAP Contract Term

The new law provides that, for HAP contracts entered after the effective date of the law, a HAP contract between a PHA and an owner of housing under this program may have a duration of up to 10 years (as determined by the PHA), subject to the future availability of sufficient appropriated funds under the PHA's consolidated ACC with HUD.

Upon expiration of the HAP contract term, the new law provides that the PHA may agree with the project-based housing owner to extend the HAP contract for such period as the PHA determines appropriate to expand housing opportunities (as well as an extension to assure long-term affordability of the housing, as provided under prior law). All HAP contract extensions must be contingent upon the future availability of appropriated funds.

I. Rent Limits

The new law provides that the HAP contract shall establish gross rents (rent to owner plus the allowance for tenant-paid utilities) that do not exceed 110 percent of the established Fair Market Rent ("FMR"), or any HUD-approved "exception payment standard" (i.e., a payment standard amount that exceeds 110 percent of the published FMR) for the area where the housing is located.

If a unit has been allocated a low-income housing tax credit under the Internal Revenue Code of 1986 at 26 U.S.C. 42, but is not located in a "qualified census tract" as defined in the law, the rent to owner may be established at any level that does not exceed the rent charged for comparable units in the same building that receive the tax credit but do not have additional rental assistance.

Within the limitations mentioned above, the initial rent to the owner may differ from payment standard amounts in the payment standard schedule adopted for the PHA's tenant-based voucher program. However, just as in the regular tenant-based program and the project-based program under prior law, the initial and adjusted rent to owner must be reasonable in relation to rents charged in the private market for comparable unassisted units (see 42 U.S.C. 1437(f)(o)(10)(A)).

J. Rent Adjustments During The Term Of The HAP Contract

Section 232 provides that a housing assistance payments contract for project-based voucher assistance shall provide for rent adjustments and that the adjusted rent for any assisted unit shall be reasonable in comparison with rents charged for comparable dwelling units in the private, unassisted local market and may not exceed the maximum rent limits permitted under the statutory limitations summarized above. Determination of whether rent is reasonable in relation to comparable units shall be governed by 24 CFR 983.256.

The annual rent adjustment provisions at 983.254 and the special rent adjustment provisions at 983.255 shall only be applicable if the AHAP with the owner was executed before the effective date of this notice. These annual and special adjustment regulatory provisions do not apply to project-based assistance for existing housing pursuant to this notice, and do not apply if the Agreement for newly constructed or rehabilitated housing was executed on or after the effective date of this notice.

K. Family Share Of Rent And Housing Assistance Payment

The housing assistance payment is calculated in accordance with 24 CFR 983.260 as the gross rent minus the total tenant payment. The family share is calculated in accordance with 24 CFR 983.261 by subtracting the amount of the HAP from the gross rent.

L. Tenant Selection

The PHA selection system for project-based units must comply with the requirements specified below, which in most respects (except for the income targeting provision) are a codification of present regulatory and contractual requirements.

Income Targeting: The requirements of 42 U.S.C. 1437n(b) and 24 CFR 982.201(b)(2) govern the selection of eligible families for this program, and generally provide that not less than 75 percent of families admitted annually to the PHA's combined tenant-based and project-based voucher program shall be families whose incomes do not exceed 30 percent of the area median, as determined by HUD.

Applicants may only be selected from the PHA waiting list. A PHA may only maintain a separate project-based waiting list if all PHA tenant-based assistance applicants who seek project-based housing can be placed on this list upon request and without penalty to any other application for assisted housing they may have pending. Subject to its waiting list policies and selection preferences specified in the PHA administrative plan, the PHA may place a family referred by an owner of project-based voucher units on its waiting list.

If a PHA chooses to establish a separate waiting list for project-based assistance, the PHA must give all applicants currently on its waiting list for tenant-based assistance the opportunity to also have their names placed on the waiting list for project-based assistance in accordance with the PHA's established selection policies.

As in the current project-based program, the PHA must refer families to housing units from the waiting list according to its regular applicant selection policies. If an applicant does not rent a unit with project-based assistance, or the owner turns an applicant down for admission to a project-based unit, the applicant may not be removed from the PHA's tenant-based assistance waiting list for that reason but must maintain its position on the list as though no offer of housing had been made.

Vacant units: A HAP contract must be in a form prescribed by HUD. The PHA may enter into such a contract that agrees to provide vacancy payments up to 60 days after a unit becomes vacant, in an amount not to exceed the rent to the owner as provided by the HAP contract on the day the family vacated. [[Page 3610]]

The PHA may only make such payments for a vacant unit if:

1. The vacancy was not the owner's fault, and
2. The PHA and owner take action to minimize the likelihood and length of any vacancy.

Reduction Of Contract Units After Vacancy: Except for units for which an AHAP was executed before the effective date of this notice, the new law supersedes 24 CFR 983.152(b) and (c). Instead, the following provisions apply:

If no eligible family rents a vacant unit within 120 days (commencing on the first day of the month when the vacancy occurs), the PHA may terminate its commitment to make any additional housing assistance payments for the unit for the balance of the HAP contract term. The PHA may use the amounts so saved to provide other voucher assistance.

NOTE: The policy guidance and implementation directives of this notice remain in effect until the new project-based voucher changes in law have been fully implemented through a new regulation. HUD will endeavor to answer any questions PHAs may have that arise that are not anticipated in this notice. HUD will soon issue a new required tenancy addendum and HAP contract for the project-based voucher program as implemented by this notice.

APPENDIX 3:
EXCERPTS FROM SECTION 232 OF THE 2001 VA-HUD
APPROPRIATIONS ACT

On October 27, 2000, the President signed into law the Fiscal Year 2001 Departments of Veterans Affairs and Housing and Urban Development and Independent Agencies Appropriations Act (Pub. Law 106-377, 114 Stat. 1441) ("Appropriations Act"). Section 232 of the Appropriations Act substantially revises the provisions of the U.S. Housing Act of 1937 that govern the authority of a PHA to designate a portion of its available tenant-based voucher funds for project-based assistance (see 42 U.S.C. 1473f(o)(13) (as amended by "Section 232" of the Appropriations Act). The Conference Report on the Appropriations Act stated that the statutory changes to the project-based voucher program are intended to make project-basing of voucher assistance more flexible.

The following is the Section 232 excerpt from the 2001 VA-HUD Appropriations Act:

SEC. 232.

(a) IN GENERAL- Paragraph (13) of section 8(o) of the United States Housing Act of 1937 (42 U.S.C. 1437f(o)(13)) is amended to read as follows:

(13) PHA PROJECT-BASED ASSISTANCE-

(A) IN GENERAL- A public housing agency may use amounts provided under an annual contributions contract under this subsection to enter into a housing assistance payment contract with respect to an existing, newly constructed, or rehabilitated structure, that is attached to the structure, subject to the limitations and requirements of this paragraph.

(B) PERCENTAGE LIMITATION- Not more than 20 percent of the funding available for tenant-based assistance under this section that is administered by the agency may be attached to structures pursuant to this paragraph.

(C) CONSISTENCY WITH PHA PLAN AND OTHER GOALS- A public housing agency may approve a housing assistance payment contract pursuant to this paragraph only if the contract is consistent with--

(i) the public housing agency plan for the agency approved under section 5A; and

(ii) the goal of deconcentrating poverty and expanding housing and economic opportunities.

(D) INCOME MIXING REQUIREMENT-

(i) IN GENERAL- Not more than 25 percent of the dwelling units in any building may be assisted under a housing assistance payment contract for project-based assistance pursuant to this paragraph.

(ii) EXCEPTIONS- The limitation under clause (i) shall not apply in the case of assistance under a contract for housing consisting of single family properties or for dwelling units that are specifically made available for households comprised of elderly families, disabled families, and families receiving supportive services.

(E) RESIDENT CHOICE REQUIREMENT- A housing assistance payment contract pursuant to this paragraph shall provide as follows:

(i) MOBILITY- Each low-income family occupying a dwelling unit assisted under the contract may move from the housing at any time after the family has occupied the dwelling unit for 12 months.

(ii) CONTINUED ASSISTANCE- Upon such a move, the public housing agency shall provide the low-income family with tenant-based rental assistance under this section or such other tenant-based rental assistance that is subject to comparable income, assistance, rent contribution, affordability, and other requirements, as the Secretary shall provide by regulation. If such rental assistance is not immediately available to fulfill the requirement under the preceding sentence with respect to a low-income family, such requirement may be met by providing the family priority to receive the next voucher or other tenant-based rental assistance amounts that become available under the program used to fulfill such requirement.

(F) CONTRACT TERM- A housing assistance payment contract pursuant to this paragraph between a public housing agency and the owner of a structure may have a term of up to 10 years, subject to the availability of sufficient appropriated funds for the purpose of renewing expiring contracts for assistance payments, as provided in appropriations Acts and in the agency's annual contributions contract with the Secretary, and to annual compliance with the inspection requirements under paragraph (8), except that the agency shall not be required to make annual inspections of each assisted unit in the development. The contract may specify additional conditions for its continuation. If the units covered by the contract are owned by the agency, the term of the contract shall be agreed upon by the agency and the unit of general local government or other entity approved by the Secretary in the manner provided under paragraph (11).

(G) EXTENSION OF CONTRACT TERM- A public housing agency may enter into a contract with the owner of a structure assisted under a housing assistance payment contract pursuant to this paragraph to extend the term of the underlying housing assistance payment contract for such period as the agency determines to be appropriate to achieve long-term affordability of the housing or to expand housing opportunities. Such a contract shall provide that the extension of such term shall be contingent upon the future availability of appropriated funds for the purpose of renewing expiring contracts for assistance payments, as provided in appropriations Acts, and may obligate the owner to have such extensions of the underlying housing assistance payment contract accepted by the owner and the successors in interest of the owner.

(H) RENT CALCULATION- A housing assistance payment contract pursuant to this paragraph shall establish rents for each unit assisted in an amount that does not exceed 110 percent of the applicable fair market rental (or any exception payment standard approved by the Secretary pursuant to paragraph (1)(D)), except that if a contract covers a dwelling unit that has been allocated low-income housing tax credits pursuant to section 42 of the Internal Revenue Code of 1986 (26 U.S.C. 42) and is not located in a qualified census tract (as such term is defined in subsection (d) of such section 42), the rent for such unit may be established at any level that does not exceed the rent charged for comparable units in the building that also receive the low-income housing tax credit but do not have additional rental assistance. The rents established by housing assistance payment contracts pursuant to this paragraph may vary from the payment standards established by the public housing agency pursuant to paragraph (1)(B), but shall be subject to paragraph (10)(A).

(I) RENT ADJUSTMENTS- A housing assistance payments contract pursuant to this paragraph shall provide for rent adjustments, except that--

(i) the adjusted rent for any unit assisted shall be reasonable in comparison with rents charged for comparable dwelling units in the private, unassisted, local market and may not exceed the maximum rent permitted under subparagraph (H); and

(ii) the provisions of subsection (c)(2)(C) shall not apply.

(J) TENANT SELECTION- A public housing agency shall select families to receive project-based assistance pursuant to this paragraph from its waiting list for assistance under this subsection. Eligibility for such project-based assistance shall be subject to the provisions of section 16(b) that apply to tenant-based assistance. The agency may establish preferences or criteria for selection for a unit assisted under this paragraph that are consistent with the public housing agency plan for the agency approved under section 5A. Any family that rejects an offer of project-based assistance under this paragraph or that is rejected for admission to a structure by the owner or manager of a structure assisted under this paragraph shall retain its place on the waiting list as if the offer had not been made. The owner or manager of a structure assisted under this paragraph shall not admit any family to a dwelling unit assisted under a contract pursuant to this paragraph other than a family referred by the public housing agency from its waiting list. Subject to its waiting list policies and selection preferences, a public housing agency may place on its waiting list a family referred by the owner or manager of a structure and may maintain a separate waiting list for assistance under this paragraph, but only if all families on the agency's waiting list for assistance under this subsection are permitted to place their names on the separate list.

(K) VACATED UNITS- Notwithstanding paragraph (9), a housing assistance payment contract pursuant to this paragraph may provide as follows:

(i) PAYMENT FOR VACANT UNITS- That the public housing agency may, in its discretion, continue to provide assistance under the contract, for a reasonable period not exceeding 60 days, for a dwelling unit that becomes vacant, but only (I) if the vacancy was not the fault of the owner of the dwelling unit, and (II) the agency and the owner take every reasonable action to minimize the likelihood and extent of any such vacancy. Rental assistance may not be provided for a vacant unit after the expiration of such period.

(ii) REDUCTION OF CONTRACT- That, if despite reasonable efforts of the agency and the owner to fill a vacant unit, no eligible family has agreed to rent the unit within 120 days after the owner has notified the agency of the vacancy, the agency may reduce its housing assistance payments contract with the owner by the amount equivalent to the remaining months of subsidy attributable to the vacant unit. Amounts deobligated pursuant to such a contract provision shall be available to the agency to provide assistance under this subsection. Eligible applicants for assistance under this subsection may enforce provisions authorized by this subparagraph.

(b) APPLICABILITY- In the case of any dwelling unit that, upon the date of the enactment of this Act, is assisted under a housing assistance payment contract under section 8(o)(13) of the United States Housing Act of 1937 (42 U.S.C. 1437f(o)(13)) as in effect before such enactment, such assistance may be extended or renewed notwithstanding the requirements under subparagraphs (C), (D), and (E) of such section 8(o)(13), as amended by subsection (a).

ATTACHMENT A:

**APRIL 2, 2002 LETTER FROM HUD REGARDING APPROVED
WAIVERS AND EXCEPTIONS AND DECEMBER 31, 2001 LHA LETTER
TO HUD REQUESTING THE WAIVERS AND EXCEPTIONS**



U.S. Department of Housing and Urban Development

Massachusetts State Office
Thomas P. O'Neill, Jr. Federal Building
10 Causeway Street
Boston, Massachusetts 02222-1092

New England

APR 2 2002

Gary K. Wallace
Executive Director
Lowell Housing Authority
P.O. Box 60
Lowell MA 01853-0060

Dear Mr. Wallace:

The Office of the Assistant Secretary for Public and Indian Housing has responded to our transmittal of the Lowell Housing Authority's (LHA) January 3, 2002 requests for an exception, waivers and general guidance concerning your proposed Project-Based Assistance (PBA) Program.

Section 232 of the fiscal year 2001 Appropriations Act requires that a contract for project-basing under the voucher program be consistent with the goals of deconcentrating poverty and expanding housing opportunities. HUD's implementation of this requirement, transmitted in the January 16, 2001 Federal Register, requires that all new project-based assistance agreements or contracts be for units in census tracts with poverty rates of less than 20 percent, unless HUD specifically approves an exception.

Your request for an exception to this requirement for the Jackson Appleton Middlesex and Acre neighborhoods is granted based upon a finding that the neighborhood urban revitalization and development plans, involving public financing of almost \$55 million and private investment of as much as \$76 million, are consistent with the goal of deconcentrating poverty.

You also requested a waiver to limit selection of the owner to Residents First Development Corporation (RFDC), a non-profit affiliate of the LHA for 45 project-based duplex units in a 180-unit development of new construction. The waiver is necessary because of the RFDC's relationship to the LHA. Pursuant to the waiver authority of 24 CFR 5.110 the Assistant Secretary has waived 24 CFR 983.51(a) and (b) as necessary to permit the LHA to select these RFDC units. Since the units will be substantially controlled by the LHA all provisions of 24 CFR 983.7(f), with the exception of 983.7(f)(ii), will apply.

Review of other site issues [listed at 24 CFR 983.6(b)] for this development and other new construction projects will be conducted by the Boston Offices of Fair Housing and Equal Opportunity (FHEO) and Public Housing.

Regarding the issue of ownership, it is the intent of the RFDC that one unit in each duplex will be occupied by a family assisted under the PBA program. The other unit will be occupied by an owner who will purchase the unit from the RFDC and enter into a PBA Housing

Assistance Payments (HAP) Contract with the LHA for the assisted family's unit.

A waiver was also requested to limit selection of the owner to Winn Development (owner of Princeton Village) for 37 project-based units in this 151-unit project. Because this development was competitively selected for Low Income Housing Tax Credits, the Assistant Secretary has determined, pursuant to the waiver authority provided at 24 CFR 5.110, that there is good cause to waive 24 CFR 983.51(a) and (b), as necessary, to permit the LHA's selection of Princeton Village. Although eligible families were issued enhanced vouchers during the housing conversion process in 2000, the gross rents for the PBA units must be set in accordance with Section I of the initial guidance published in the January 16, 2001 Federal Register.

In regard to contracting the units at Princeton Village, it is anticipated that at least 12 of the 37 units will come under an Agreement to Enter into a Housing Assistance Payments (AHAP) Contract immediately, with the remaining units going under contract at later dates. In order to do this, the AHAP and HAP contracts could be staged. Section c of the PBA HAP for New Construction or Rehabilitation, form HUD-52530-A, provides for single and multi-stage projects.

Please call Gail Wholey at 617 994-8405 or at gail_wholey@hud.gov if you have any questions.

Sincerely,

for *RPC 4.1.02*
Donna J. Ayala
Director
Office of Public Housing
New England

WHOLEY
gnw
4.1.02

BLANCHETTE
for
4/1/02

Addendum to Section 8 Project Based Administrative Plan
Permanent Supportive Housing Program

Within the city of Lowell there is evidence of a growing need to provide supportive services to enable families to acquire and maintain permanent housing. New Hope 2 Apartments, situated at 391 Pawtucket Street, Lowell, is owned and operated by House of Hope Housing Inc. New Hope 2 Apartments will offer supportive services in conjunction with permanent housing opportunities for extremely low and low income homeless families living in the city of Lowell. New Hope 2 Apartments will evaluate applicant families, develop a supportive services plan specific to the needs of the family and conduct on-site case management for all families residing at this new location. Family support services will be offered to all; however, family participation is voluntary. The Lowell Housing Authority will enter into a contract to provide project based rental assistance for seven (7) two and three bedroom units at New Hope 2 Apartments. The ultimate goal of the program is to assist families with maintaining tenancy and increasing self-sufficiency.

House of Hope, Inc., will screen potential applicants for participation in the program and will refer all qualified families to the Lowell Housing Authority for a determination of Section 8 Program eligibility. A separate Waiting List will be maintained by the Lowell Housing Authority for this program.

Preference

The Lowell Housing Authority will establish a preference for homeless families meeting program criteria for the Permanent Supportive Housing Program at New Hope 2 Apartments. The preference will apply to those families whose circumstances require supportive housing services to address:

- Significant/chronic mental health issues
- A history of domestic violence
- A history of substance abuse issues
- Significant and/or chronic health issues
- Significant barriers to work and to obtain permanent affordable housing
- Extremely limited support network
- Extremely limited financial management skills

Waiting List

The Lowell Housing Authority will notify all applicants on the two and three bedroom Section 8 Project Based waiting list of this new program. Upon receiving responses from interested applicants, LHA will submit the names of these applicants to House of Hope Housing, Inc., for

screening and a determination of eligibility for the Permanent Supportive Housing Program at New Hope 2 Apartments. Once an evaluation for program participation is completed, a written referral from House of Hope, Inc, will be submitted to the Lowell Housing Authority and the applicant family will be screened for eligibility in accordance with the requirements of 42 U.S.C. 1437n(b) and 24 CFR 982.201(b)(2) governing the selection of eligible families for the Section 8 program.

The LHA will utilize a newly established preference to accept applicants referred by the House of Hope, Inc., in order to create a sub-list for program applicants. All applicants from the existing two and three bedroom Section 8 Project Based Waiting List will be given first priority based on their current placement on the Waiting List. Other applicants not currently on the Waiting list will be added based on date and time of application.

Lowell Housing Authority

Section 8 Project Based Program

Preference for the Permanent Supportive Housing Program

The Lowell Housing Authority will grant a preference to homeless families screened and approved by House of Hope, Inc., for participation in a permanent housing program offering supportive services and case management to extremely low and very low income families, within the municipality of Lowell. Proof of homeless status will be required through written verification from a local shelter or the Department of Transitional Assistance. The preference will only apply to those families whose circumstances require supportive housing services to address:

- Significant/chronic mental health issues
- A history of domestic violence
- A history of substance abuse issues
- Significant and/or chronic health issues
- Significant barriers to work and to obtain permanent affordable housing
- Extremely limited support network
- Extremely limited financial management skills

Participation in Family Supportive Services is voluntary and cannot be required.

APPENDIX F

Lowell Housing Authority

ENTERPRISE INCOME VERIFICATION SECURITY PROCEDURES

ENTERPRISE INCOME VERIFICATION (EIV) & OTHER DATA COVERED BY THE PRIVACY ACT:

EIV contains personal information concerning program participants (Housing Choice Voucher Program and Public Housing Program), which are covered by the Privacy Act¹ such as wage and income data about private individuals, as well as identifying name, address, social security number and employment information which must only be used to verify eligibility for participation in a HUD rental assistance program and to determine the level of assistance. Employees must not share information with governmental entities or anyone else that is not directly involved in the recertification process.

A PHA employee can be found guilty of a misdemeanor or felony if that employee knowingly and willfully discloses tenant records to an unauthorized party.

USER ACCOUNTS:

User accounts for the EIV system are provided on a need-to-know basis; each user must have their own user ID and password. The system requires changed passwords every 21 days. Appropriate levels of approval and authorization are given. The EIV System Access Authorization HUD/PHA Form is used to request additions, deletions, or modifications of user accounts. All computer resources are monitored and audited.

1. All EIV system users shall be personally accountable for their actions while accessing the system. All users who have access to the EIV system have a

¹
The complete text of the Privacy Act is available at <http://www.usdoj.gov/privstat.htm>

current signed User Access Authorization form on file which is updated annually by December 31, and uses their own password.

- A. Do not disclose passwords to other staff members, employees, or contractors.
 - B. Staff shall not override the authorized access levels by providing UIV data to others who have limited or no access to data.
2. A list of all EIV system users and their roles is maintained and reviewed the first month of each calendar quarter.
 3. Users will be required to certify with HUD the first month of each quarter. If user account is not certified within 30 days access to EIV system will be denied.
 4. EIV users will only access EIV or other systems if HUD Form 9886 or equivalent consent form is on file for the household whose income information is being accessed.
 5. Access rights will be added or revoked as appropriate.

USERS ACCESSING INFORMATION:

Computerized data must be afforded the same levels of protection given to paper documents or any other media that contains UIV data.

A. If an authorized user is viewing UIV data and an unauthorized user approaches the work area, the authorized user shall lessen the chance of inadvertent exposure of UIV data by minimizing or closing out the screen on which the UIV data is being displayed.

B. Always log-out of computer when not in use. Do not leave a computer unattended when access to sensitive data is possible. Activate a screen saver to protect access if computer is unattended.

RESTRICTED AREAS:

Access to areas where UIV data is maintained is limited even during work hours. File cabinets and storage facilities are labeled as CONFIDENTIAL and have

working locks. Doors to the following offices have working locks: Division of Public and Leased Housing Programs file room, office of the Division Director of Conventional Public Housing Programs, office of Division Director of Leased Housing Programs, office of the Assistant Division Director, offices of Public Housing and Housing Choice Voucher Program administrative staff and five Property Manager's site office locations. Any restricted area is clearly identified by the use of prominently posted signs or other indicators as well as maintain a log of authorized personnel which is updated the first month of each quarter.

KEYS AND LOCKED ROOMS:

The UIV data is maintained in a secure room or locked space. The designated staff maintains a key control log to track the inventory of keys available, the number of keys issued, and to whom the keys are issued. Covered data is in a locked space or office is locked (File/ Storage, PH, HCV, and Property Manager's offices) when unoccupied. All employees who have been issued keys will complete a form acknowledging key receipt.

PRINTED INFORMATION AND HARD COPIES:

Users retrieve computer printouts as soon as they are generated so information is not left lying unattended in printers where unauthorized users may access them. To minimize the unauthorized interception of printed outputs from the EIV system:

1. There is a designated printer in HCV department for UIV data
2. The PH department printer is only used for admission purposes beyond UIV data. Property Managers will have designated printers at each project site office.
3. UIV data is not to be copied.
4. There is a dedicated fax in a secure area for the transmission and receipt of sensitive data at the Division of Public and Leased Housing Programs and at each Property Managers site office.

5. Data, such as Social Security numbers, are not to be e-mailed without encryption.
6. When not in use, paper files are to be locked away from physical access.

DESTROYING DATA:

1. EIV data is destroyed as soon as it has served its purpose.
2. All EIV originals and other documents created in association with their use are shredded.
3. A log is maintained of all documents that are shredded including the name of the employee who conducted the disposal, the method of disposal, and the date of disposal.
4. The log of destroyed documents are to be maintained as prescribed by the Records Monitoring and Retention Procedure.

SECURITY AWARENESS TRAINING:

All EIV users will receive training at employment and annually thereafter. Training records will be maintained. Any Housing Authority EIV Security Procedure will be provided to all system users.

IMPROPER DISCLOSURES

All evidence of unauthorized access or security violations shall be reported to the Office of the Executive Director and the Computer Data Technician in writing or via e-mail whether intentional or unintentional.

QUALITY CONTROL:

The Computer Data Technician is responsible for monitoring that the procedures above are implemented and followed accordingly.

He/she will check:

1. Locks on doors to file rooms of the Division of Public and Leased Housing Programs, office of the Division Director of Conventional Public Housing Programs , office of the Division Director of Leased Housing Programs, office of the Assistant Division Director, offices of the Public Housing and Housing Choice Voucher Program administrative staff and five Property Managers site offices.
2. Locks on file cabinets with confidential information.
3. Make sure the person assigned the keys has them in their control.
4. Unattended computer screens do not display confidential information and that only an authorized person with access is at screen when information is available.
5. Files are locked away when not in use.
6. Information is properly disposed of and documented as such on log.
7. That information is not being retained for longer than necessary.
8. List of EIV users and roles updated quarterly.
9. HUD 9886 on is file and completed accurately.
10. Rights are revoked or terminated as appropriate.
11. Key control log is updated quarterly.
12. Annual Security Awareness Training is provided to staff.

Adopted March 14, 2007

APPENDIX G

VIOLENCE AGAINST WOMEN ACT

ADMINISTRATIVE POLICY

LOW RENT PUBLIC HOUSING

SECTION 8 HOUSING CHOICE VOUCHER PROGRAM

"The Lowell Housing Authority will not evict, or remove assistance from certain persons living in public housing or in a unit subsidized under the Housing Choice Voucher Program if the asserted grounds for such action is an instance of domestic violence, dating violence, sexual assault, or stalking as those terms are defined in Section 3 of the United States Housing Act of 1937 as amended by the Violence Against Women and Justice Department Reauthorization Act 2005.

The Lowell Housing Authority and/or an HCV (Section 8) landlord may bifurcate a lease in order to evict, remove, or terminate the assistance of the offender while allowing the victim, who is a tenant or lawful occupant, to remain. In addition, the Lowell Housing Authority will provide information to any Receiving PHA concerning a victim under the Act who is using the portability provision of the HCV program, subject to confidentiality requirements.

Before complying, the Lowell Housing Authority and/or the HCV landlord may ask an individual for documentation that he or she is or has been a victim of domestic violence, dating violence, or stalking, subject to certain statutory requirements related to confidentiality and the types of documentation that may be used."

Adopted March 14, 2007

Denial of housing prohibited.

These housing statutes now provide that an individual's status as a victim of domestic violence, dating violence, or stalking is not an appropriate basis for denial of admission or denial of housing assistance.

Eviction for criminal activity prohibited.

The statute establishes an exception to the federal one-strike criminal activity eviction rule for tenants who are victims. VAWA explicitly provides that an incident of actual or threatened domestic violence, dating violence, or stalking does not qualify as a serious or repeated violation of the lease or good cause for terminating the assistance, tenancy, or occupancy rights of the victim. VAWA also provides that criminal activity directly relating to domestic violence, dating violence, or stalking does not constitute grounds for terminating a tenancy.

Definitions; court orders; leases.

The amendments follow the federal definitions of domestic violence, dating violence, and stalking as the terms have been defined in VAWA. They also seek to ensure that public housing agencies (PHAs) and Section 8 landlords honor civil protection orders and other court orders from domestic violence and family court judges that address rights of access to or control of the property.

The amendments provide that a PHA or Section 8 landlord may bifurcate a lease in order to evict, remove, or terminate the assistance of the offender while allowing the victim, who is a tenant or lawful occupant, to remain.

Documentation and confidentiality.

Before complying, a PHA or Section 8 landlord may ask an individual for documentation that he or she is or has been a victim

of domestic violence, dating violence, or stalking, subject to certain statutory requirements related to confidentiality and the types of documentation that may be used.

Voucher Portability.

VAWA also clarifies portability for victims of domestic violence, dating violence, or stalking in the Section 8 Housing Choice Voucher Program. *PHA* plan. VAWA requires PHAs to include a description of any goals, objectives, policies, or programs they have in place to serve the housing needs of victims of domestic violence, dating violence, sexual assault, and stalking when they are developing their five-year *PHA* plans.

Consolidated Plan.

VAWA also adds the housing needs of victims of domestic violence, dating violence, sexual assault, and stalking to the consolidated planning process that local communities undertake every five years to receive HUD housing assistance.

Lowell Housing Authority
Emergency Transfer Plan for Victims of Domestic Violence,
Dating Violence, Sexual Assault, or Stalking

Emergency Transfers

Lowell Housing Authority (LHA) is concerned about the safety of its tenants, and such concern extends to tenants who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA),¹ LHA allows tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the tenant's current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation.² The ability of LHA to honor such request for tenants currently receiving assistance, however, may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether LHA has another dwelling unit that is available and is safe to offer the tenant for temporary or more permanent occupancy.

This plan identifies tenants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to tenants on safety and security. This plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development

¹ Despite the name of this law, VAWA protection is available to all victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

² Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.

availability and safety of a unit. If a tenant reasonably believes a proposed transfer would not be safe, the tenant may request a transfer to a different unit. If a unit is available, the transferred tenant must agree to abide by the terms and conditions that govern occupancy in the unit to which the tenant has been transferred. LHA may be unable to transfer a tenant to a particular unit if the tenant has not or cannot establish eligibility for that unit.

If LHA has no safe and available units for which a tenant who needs an emergency is eligible, LHA will assist the tenant in identifying other housing providers who may have safe and available units to which the tenant could move. At the tenant's request, LHA will also assist tenants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are attached to this plan.

Safety and Security of Tenants

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the tenant is urged to take all reasonable precautions to be safe.

Tenants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).

Tenants who have been victims of sexual assault may call the Rape, Abuse & Incest National Network's National Sexual Assault Hotline at 800-656-HOPE, or visit the online hotline at <https://ohl.rainn.org/online/>.

Tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

Attachment: Local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking.

LOWELL HOUSING AUTHORITY

AREA NON-PROFIT GROUPS PROVIDING SUPPORT
AND ADVOCACY FOR VICTIMS OF DOMESTIC ABUSE

Alternative House

P.O. Box 2100

Lowell, MA 01851

Hotline Numbers: 1-888-291-6228

978-454-1436

The Center for Hope and Healing, Inc.

21 George Street, 4th floor

Lowell, MA 01852

Telephone Number: 978-452-7721



City of Lowell: Partnership for Change to End Homelessness *Lowell Continuum of Care ~ MA-508*

CoC Program: Coordinated Entry System (CES) *Policies & Procedures*

Purpose:

Coordinated Entry (CE), or a Coordinated Entry System (CES), is a systematic approach to address and end homelessness. CE involves comprehensive coordination among Continuum of Care (CoC) providers to help people experiencing homelessness and those at-risk of homelessness. The Coordinated Entry System covers the geographic area for HUD CoC MA-508, which is the City of Lowell, MA.

The purpose of the Lowell CoC's CE is to ensure that people who have the longest histories of homelessness and those with a disabling condition are assessed, prioritized and matched to appropriate housing and service related resources, first, and that ultimately, homelessness is rare, brief, and non-recurring. Use of CE is required for access to Continuum of Care (CoC) and Emergency Solutions Grant (ESG) funded resources.

These Policies and Procedures complement the CoC's Written Standards and Governance Charter which details the overarching principles and structure of the CoC. The Governance Charter includes the CoC Program Operating Standards, which establishes the CoC as taking a Housing First and low barrier approach to housing and services. The GC also establishes the CoC Order of Priority Policy that adheres to the guidance outlined within the [HUD CPD-16-11: Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing \(HUD Notice\)](#).

No Wrong Door:

Lowell has an active and engaged network of homeless services providers, first responders, and public health officials who all interact with people experiencing homelessness in the City. The Coordinated Entry system in Lowell provides access to housing through multiple portals into a shared Coordinated Access Network.

HomelessData.com is a robust platform to support a wide range of activities of the Continuum of Care. This image shows a fully built, data-driven system that includes Coordinated Entry as well as ongoing data management, and full integration with a wide range of community resources and networks.

Shelter:

Within each shelter program, client information is entered and maintained into a Homeless Management Information System (HMIS). HomelessData.com can accept data from any HMIS system that complies with the data exchange format. Complete and accurate data is essential to creating a client history, establishing prioritization, and knowing where people are, in order to build and sustain an effective CE system.

Consent to Participate and Authorization to Share Protected Health Information

At the time that the VISPDAT or MABoS assessment is completed, the assessor should also request that the homeless individual or family sign a Consent to Participate. Once that consent is obtained, the record is referred into a designated Coordinated Entry Consent program that are maintained on the organization's HMIS datasource.

Each of the programs will do regular data exports to the HomelessData.com platform as part of the ongoing data monitoring and HUD reporting. HomelessData.com is an HMIS warehouse that supports the integration of data from multiple sources. By including the CE Consent program as part of the export, the system will match these records with all of the program history that is in the system.

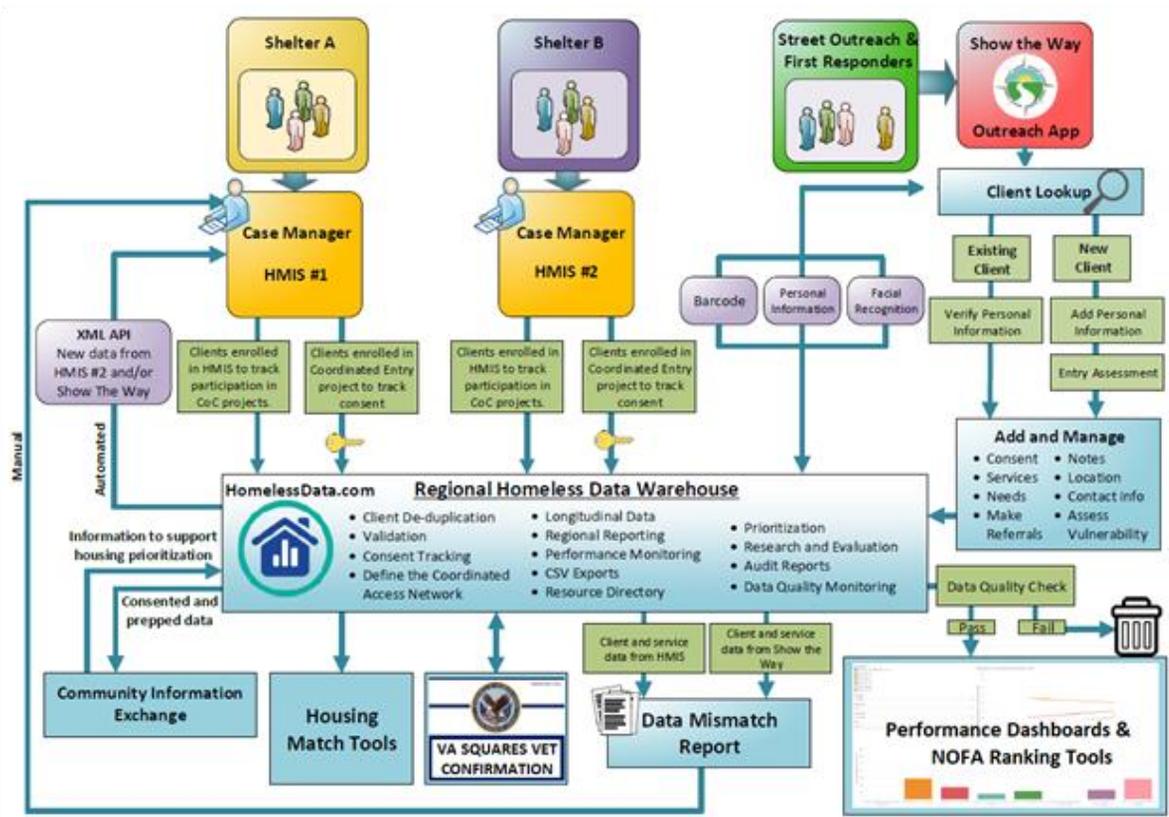
Outreach:

Lowell has a significant population of people living outside and in places not meant for human habitation, including people that are not eligible for year-round shelter services. Individuals that are not in shelter often receive services through the meal programs or housing programs that target chronic homeless. The Show the Way Mobile app allows street outreach teams, first responders, and others (“Navigators”) to quickly capture information about the exact location of an interaction, identify the person they are engaging with, conduct a “light touch” assessment, and track whatever services or resources were provided. This will help ensure that people who are living outside are part of the list, and that their length of homelessness is tracked.

There are multiple opportunities in Lowell to use the app to expand data collection:

- ESG: Outreach grant to SMOC/ LTLC (for 2020)
- Youth: As part of the new youth initiative at CTI
- First Responders/ Police: The Lowell PD is an active participant in the City’s response system.
- Community Services: Living Waters and other programs that do not use HMIS

The image below illustrates how data from multiple sources integrate on the platform, and can be used for matching and to support a range of activities. This is a robust system with various components, not all of which may be determined necessary or desired. It represents a vision that can be built over time.



Using Existing HMIS Data for Housing Prioritization

To use existing data for prioritization, the data that has already been entered in HMIS is exported to [HomelessData.com](https://www.homelessdata.com). On the platform, HMIS data is integrated from multiple sources and enrollments to show a longitudinal picture of someone's homelessness and housing history through enrollments, dismissals, and encounters. The list can be filtered by numerous variables including project type, population, etc. It can also be sorted by total length of homelessness and it includes data from both HMIS histories as well as self-reported data. The flexibility of the dashboard allows it to be used to meet both operational and reporting requirements.

After ensuring the data is both complete and accurate, the Coordinated Entry manager uses the By Name List functionality to prioritize the data according to the community's prioritization model, active clients with the longest length of homelessness, with a disabling condition, will be prioritized first for new housing opportunities.

The image below demonstrates how filters can be applied to display a prioritized list of clients that are eligible for a housing opportunity.

The screenshot shows the HomelessData.com interface. The 'Clients' section is active, displaying a list of clients with columns for 'Days Homeless w/ Self Report', 'Enrollments', 'Disabled?', and 'Chronic at Entry'. The 'Disabled?' column is highlighted in yellow. The 'Quick Filters' section is open, showing various filters. The 'Disabled' filter is set to 'Yes' and the 'Temporary' project type is selected. The 'Days Homeless w/ Self Report' column is sorted in descending order.

Days Homeless w/ Self Report	Enrollments	Disabled?	Chronic at Entry?
239	1	Yes	No
202	1	Yes	No
483	1	Yes	No
730	3	Yes	No
224	2	Yes	No
181	2	Yes	No
8	1	Yes	No
324	1	Yes	No
315	1	Yes	No
-147	2	Yes	No
171	1	Yes	No
735	2	Yes	Yes
241	1	Yes	No
955	1	Yes	Yes
35	1	Yes	No
35	1	Yes	No
952	1	Yes	Yes
11	1	Yes	No
259	1	Yes	No

Filtering the prioritized "By Name List" in HomelessData.com for eligible housing candidates

People Fleeing/ Attempting to Flee Domestic Violence

People that are homeless and accessing services through a domestic violence program will not appear on the BNL as their data is not in HMIS. However, Alternative House and other agencies with DV-specific programs that participate in CE will use similar criteria to identify the most vulnerable individuals and families, so they can be prioritized for housing units. As housing units become vacant and available, the CES PM will coordinate with the designated liaison at DV programs to identify the most appropriate candidate.

Notification of Housing Vacancies:

Permanent Supportive Housing Programs that participate in the CES are required to report vacancies to the CES- PM within 12 hours of unit/bed availability. If providers know of an impending vacancy, they

are required to report the anticipated availability date within 72 hours of being made aware of such availability. For projects tracked within HMIS, project staff must enroll clients within the appropriate project within one business day of a unit/bed being filled and exit clients within one business day of a unit/bed becoming vacant.

In all cases, PSH units must be prioritized for chronically homeless (CH) eligible applicants residing in the CoC over eligible applicants residing in another CoC. In all cases the Lowell will follow the prioritization process detailed in the [Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Housing](#).

APPENDIX

LIST OF ACRONYMS

ACRONYM	MEANING
BNL	By Name List
CE	Coordinated Entry
CES	Coordinated Entry System
CES-PM	Coordinated Entry System – Project Manager
CH	Chronic Homeless
CFR	Code of Federal Regulations
CoC	HUD Continuum of Care
CPD	HUD office of Community Planning and Development
CTI	Community Teamwork, Inc
DHCD	MA Department of Housing and Community Development,
DV	Domestic Violence
EA	MA Emergency Assistance program for families
ES	Emergency Shelter
ESG	Emergency Solutions Grant
FMR	Fair Market Rent
GC	Governance Charter
HMIS	Homeless Management Information System
HOPWA	Housing Opportunities for Persons With AIDS
HUD	[Department of] Housing and Urban Development
LTLC	Lowell Transitional Living Center
MRVP	Massachusetts Rental Voucher Program
PSH	Permanent Supportive Housing
RR / RRH	Rapid Rehousing
TH	Transitional Housing
TTY	Teletypewriter (For hearing impaired telephone use)
UMass	University of Massachusetts (Lowell)
VA	[Department of] Veterans Affairs
VASH	Veterans Assistance Supportive Housing
VAWA	Violence Against Women Act
VNOC	Veterans Northeast Outreach Center

Project-Ranking-FY-19-CoC-applications 1 / 1

Hello Lowell Continuum of Care:

The Ranking and Review Committee met several times over the last few weeks to review all new, reallocation, and renewal applications submitted for inclusion in the collaborative application to HUD. The Committee ranked renewal applications with a tool based upon HUD guidance and ranked reallocation/bonus applications with the criteria in the RFP for permanent supportive housing. The Committee agreed on the following ranking:

New PSH/Reallocated (SMOC)	\$100,000.00
New PSH/Bonus (CTI)	\$75,602.00
Pathfinder - Bridgewell	\$263,021.00
CTI Youth RRH-TH	\$194,700.00
Alternative House - TH	\$169,754.00
Coordinated Entry/HMIS	\$41,224.00
Tier 1 Total:	\$734,259.06
Tier 2 Total:	\$110,041.94
Total Application:	\$844,301.00

Please note that the project highlighted yellow is split between Tier 1 and Tier 2; the project highlighted

DOCUMENT CENTER

[VIEW SITE](#)

MAIN

BACK

Document Center > Community Development > Modify Document

Display Name

Project Ranking FY 19 CoC applications

Replace File

No file chosen Convert To PDF

Current Document

Project Ranking FY 19 CoC applications.pdf (148 KB)

Date Uploaded: 9/12/2019 11:22:48 AM

By Tom Lamond

Folder: Home\Planning & Development\Community Development

Description (Optional)

You have 200 characters left

SAVE

SPELL CHECK

CANCEL

Document Details

Last Modified:
By Tom Lamond
On September 12, 2019

Created:
By Tom Lamond
On September 12, 2019

Project-Ranking-FY-19-CoC-applications 1 / 1

Hello Lowell Continuum of Care:

The Ranking and Review Committee met several times over the last few weeks to review all new, reallocation, and renewal applications submitted for inclusion in the collaborative application to HUD. The Committee ranked renewal applications with a tool based upon HUD guidance and ranked reallocation/bonus applications with the criteria in the RFP for permanent supportive housing. The Committee agreed on the following ranking:

New PSH/Reallocated (SMOC)	\$100,000.00
New PSH/Bonus (CTI)	\$75,602.00
Pathfinder - Bridgewell	\$263,021.00
CTI Youth RRH-TH	\$194,700.00
Alternative House - TH	\$169,754.00
Coordinated Entry/HMIS	\$41,224.00
Tier 1 Total:	\$734,259.06
Tier 2 Total:	\$110,041.94
Total Application:	\$844,301.00

Please note that the project highlighted yellow is split between Tier 1 and Tier 2; the project highlighted

DOCUMENT CENTER

[VIEW SITE](#)

MAIN

BACK

Document Center > Community Development > Modify Document

Display Name

Project Ranking FY 19 CoC applications

Replace File

No file chosen Convert To PDF

Current Document

Project Ranking FY 19 CoC applications.pdf (148 KB)

Date Uploaded: 9/12/2019 11:22:48 AM

By Tom Lamond

Folder: Home\Planning & Development\Community Development

Description (Optional)

You have 200 characters left

SAVE

SPELL CHECK

CANCEL

Document Details

Last Modified:
By Tom Lamond
On September 12, 2019

Created:
By Tom Lamond
On September 12, 2019

Along with the collaborative application and renewal projects, Lowell intends to submit three separate applications for new projects. This RFP is soliciting qualified applicants for:

1. Permanent Supportive Housing for chronically homeless adults, which would be funded through a reallocation process
2. Permanent Supportive Housing for chronically homeless adults, which would be funded through a housing bonus project, if awarded

3. A DV bonus project to provide either a Permanent Housing - Rapid Rehousing Program (PH-RRH) or a combined Transitional Housing (TH) and Rapid Rehousing (RRH) program people fleeing domestic violence.

AVAILABLE FUNDS

HUD New Housing Bonus:	Up to \$75,602
Housing project through reallocated funds:	Up to \$100,000
Domestic Violence Housing Project:	Up to \$151,204

As always, we encourage both new and existing applicants to consider applying for funds

SUBMISSION REQUIREMENTS

DEADLINE: 5:00 PM Monday, August 26th, 2019
 Please submit completed form electronically to Christopher Samaras csamaras@lowellma.gov and Betty Rawnsley-Eraza brawnsley@lowellma.gov

ALL PROPOSALS MUST BE RECEIVED BEFORE
 5:00 PM on MONDAY, AUGUST 26th, 2019

LATE PROPOSALS WILL NOT BE ACCEPTED!
FOR FURTHER INFORMATION OR QUESTIONS PLEASE CONTACT:
 Christopher Samaras, Community Development Director
 Or
 Betty Rawnsley-Eraza, Community Development Assistant
 Department of Planning and Development
 JFK Civic Center, 50 Arcand Drive, Lowell, MA 01852

DOCUMENT CENTER

[VIEW SITE](#)

Document Center > Community Development > Modify Document

Display Name

Replace File
 No file chosen Convert To PDF

Current Document
 Project Ranking FY 19 CoC applications.pdf (148 KB)
Date Uploaded: 9/12/2019 11:22:48 AM
 By Tom Lamond
 Folder: Home\Planning & Development\Community Development

Description (Optional)

 You have 200 characters left

SAVE

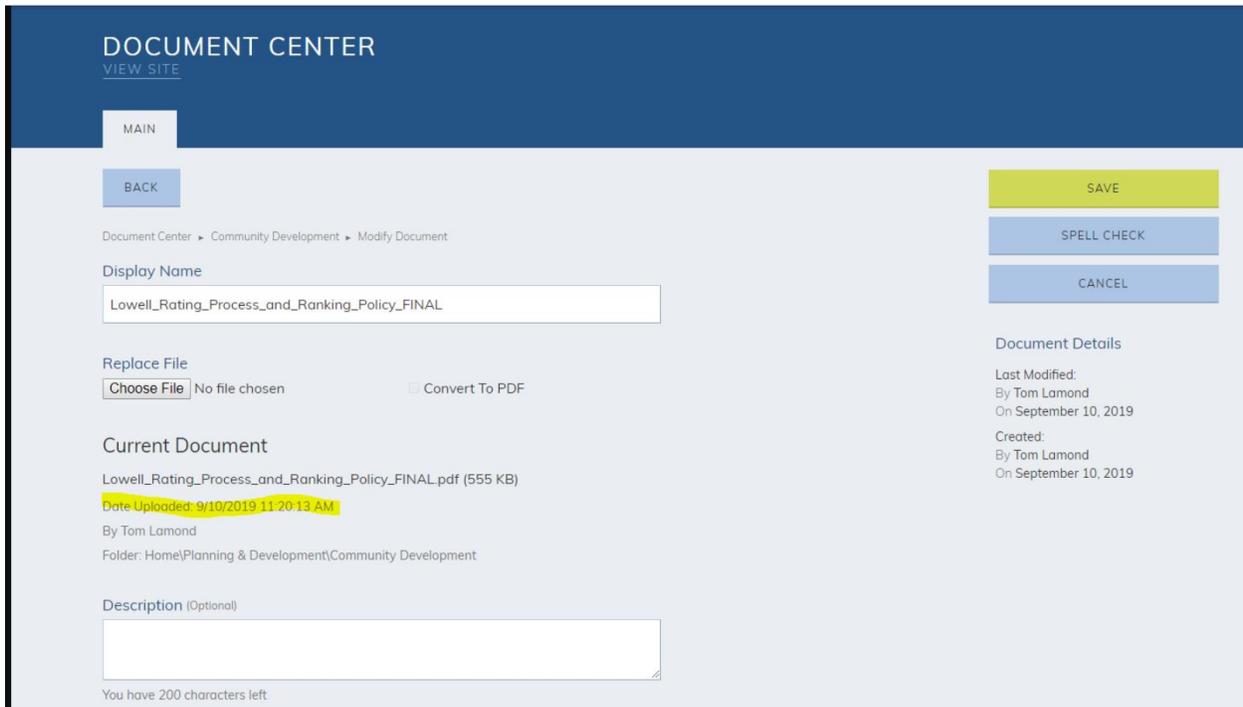
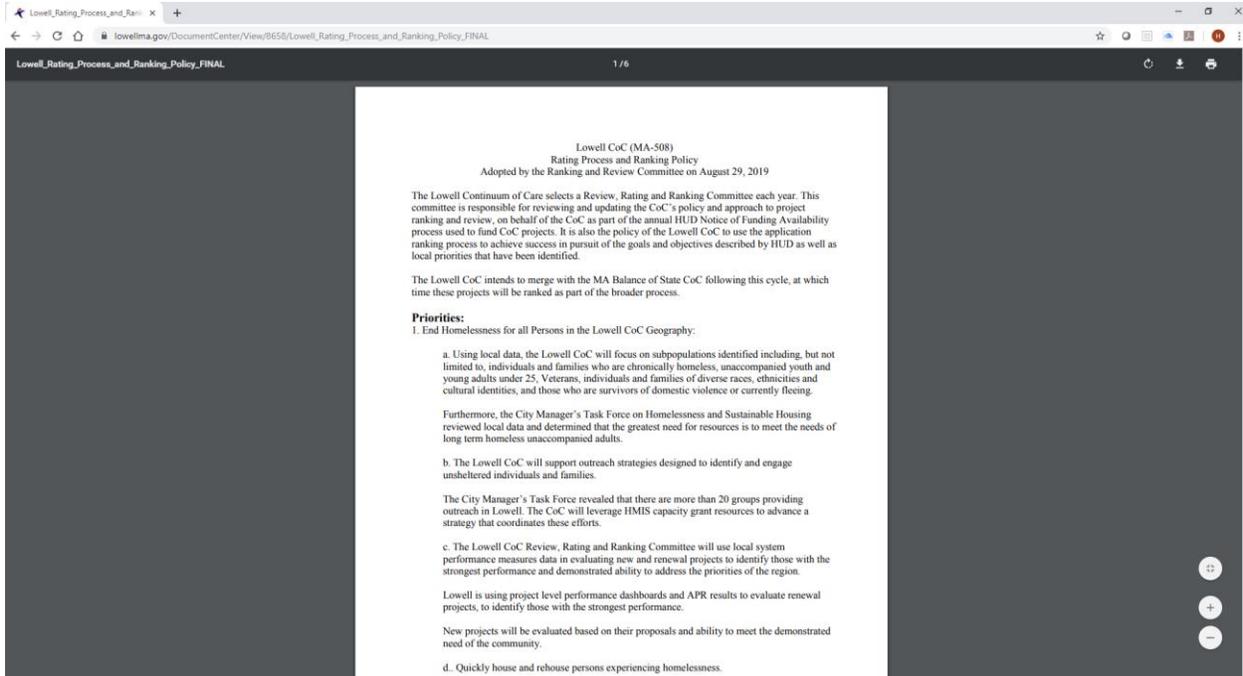
SPELL CHECK

CANCEL

Document Details

Last Modified:
 By Tom Lamond
 On September 12, 2019

Created:
 By Tom Lamond
 On September 12, 2019



COMMONWEALTH OF MASSACHUSETTS

CITY OF LOWELL

"A"

In City Council

VOTE

Authorizing the City Manager to Execute a new Memorandum of Agreement between Greater Lowell Workforce Investment Board and the City of Lowell.

WHEREAS, the City in 2003 took back control of the Career Center of Lowell ("CCL") and made its employees City employees; and

WHEREAS, a new five (5) year Memorandum of Agreement ("MOA") defines the roles of the Greater Lowell Workforce Investment Board ("GLWIB"), the CCL and the City of Lowell; and

WHEREAS, the new MOA attached hereto marked "A" has provisions for the above and also requires CCL to follow the fiscal management and audit systems of the City and that all funds received by GLWIB and CCL shall be accounted for as grant funds;

NOW, THEREFORE, IT IS VOTED BY THE CITY COUNCIL OF THE CITY OF LOWELL as follows:

The City Manager be and is hereby authorized to execute the attached Memorandum of Agreement with Greater Lowell Workforce Investment Board for a five (5) year period.

**MEMORANDUM OF AGREEMENT
BETWEEN THE
CITY OF LOWELL
AND THE
GREATER LOWELL WORKFORCE INVESTMENT BOARD**

This Agreement is entered into as of the first day of November 2011 between the City of Lowell ("City") and the Greater Lowell Workforce Investment Board ("GLWIB") for the purpose of carrying out the provisions of the Workforce Investment Act of 1998 (WIA), Public Law 105-220, as amended, and the enactment of Local Workforce Investment Boards (LWIB).

WHEREAS, the GLWIB, agrees to provide policy guidance and oversight for the Workforce Investment System and other Workforce Development activities within the Greater Lowell Workforce Investment Area (GLWIA)

WHEREAS, the City, as the administrative entity and grant recipient, agrees to receive and accept responsibility for funds expended under these grants.

I. PURPOSE

This Agreement is to formally define the understanding between the appropriate Lead Elected Official ("LEO") (City Manager of the City of Lowell) representing the municipalities within the Greater Lowell Workforce Investment Area and the Greater Lowell Workforce Investment Board

The City, having been designated by the Governor as the Workforce Investment Area to receive Workforce Investment Act (WIA) funds from the United States Secretary of Labor, through the Executive Office of Labor and Workforce Development and having been delegated the provisions of the Workforce Investment Act (Public Law 105-220), as amended, hereby enters into an Interagency Agreement with the GLWIB. The GLWIB, as agreed upon by the City, will provide policy guidance and oversight for the WIA system and other Workforce Development activities, to serve the residents within the GLWIA. The municipalities included within the GLWIA's geographical area are as follows: City of Lowell, Town of Billerica, Town of Chelmsford, Town of Dracut, Town of Dunstable, Town of Tewksbury, Town of Tyngsboro and Town of Westford.

II. DURATION

This Agreement shall remain in effect from November 1, 2011 for a five (5) year period or until such time as the Governor re-designates the above named Workforce Investment Area.

The Commonwealth of Massachusetts, Department of Workforce Development requires modifications to the Memorandum of Agreement if any of the following conditions change.

- There is a new Chief Elected Official
- There has been a change in the entity named to assist in the administration of the grants funds, to act as the local grant subrecipient or local fiscal agent
- The term of the document has expired and not been properly modified

III. RESPONSIBILITIES

A. Lead Elected Official (City Manager)

The City Manager of Lowell holds as required and designated in federal legislation, the responsibilities of the "LEO" for the GLWIA.

The City is designated as the administrative entity and grant recipient for the GLWIA.

The Career Center of Lowell will act on behalf of the City Manager and the City as the Title One Grant Administrator Fiscal Agent as described under the WIA Public Law 105-220. The Career Center of Lowell will provide staff support to the LEO where and when appropriate in the planning process and other related administrative duties. The Executive Director of the Career Center of Lowell under direction from the City Manager will represent the City Manager of Lowell in all matters related to the administration of funds. As such, the City will be responsible for receipt of WIA funds directly from the Governor along with other such funds requiring a municipal pass-through. In addition, the City will be responsible for the accountability of these funds through the utilization of a sound financial management system including audit provisions.

The Career Center of Lowell as designated by the LEO/City Manager acts as the fiscal agent for receipt and disbursement of WIA Title I grant funds and other state and federal training grants for the GLWIB.

The LEO/City Manager shall appoint members from the business sector after conferring with and working in cooperation with local business membership organizations and business trade organizations. These organizations shall nominate said private sector members for consideration to the Board to the LEO/City Manager. Candidates shall be reflective of the industrial and geographic composition of the business community and represent business with employment opportunities that reflect the employment opportunities in Greater Lowell. Demographic, geographic and industry composition shall be extrapolated from the most current census information as well as size of the region and industry base according to current labor market analysis.

The LEO/ City Manager shall instruct the GLWIB to notify the units of government encompassing the Greater Lowell Workforce Investment Area of all services involved in workforce development issues.

This shall include invitation to and notification of WIB meetings, provide notification of grant opportunities, and encourage the involvement of the seven towns in the GLWIA to participate in all workforce development opportunities on a regional basis.

The LEO/City Manager has designated the Career Center of Lowell as the fiscal agent for the Greater Lowell Workforce Investment Area ("WIA"), the Career Center of Lowell acting on behalf of the City, shall have the following functions and responsibilities:

- Act as the Fiscal Agent for the Greater Lowell WIB.
- Act on behalf of the Chief Elected Official as the fiscal and administrative agency for employment and training funds for which the grant recipient is the City of Lowell, Massachusetts.
- Pay bills, invoice for payments, and maintain all financial records. Take a lead role in any state and federal audits.
- Provide staff support to the Greater Lowell WIB in planning, grant writing and policy development.

- Ensure compliance with all applicable federal, state and local regulations to ensure the fiscal and programmatic integrity of the City of Lowell and the Greater Lowell Workforce Investment Board.
- Meet City, WIB, state and federal legislative, regulatory, and program requirements.
- Operate management information systems and file fiscal and program reports which are timely and in compliance with City, WIB, state, and federal requirements.
- Monitor and report on program performance for all funding streams administered by the Greater Lowell WIB and Chief Elected Official on a quarterly basis.
- Work in collaboration with the WIB in managing the procurement and contracting process.
- Manage contracts with state agencies funding career centers and maintain a career center budget

B. Greater Lowell Workforce Investment Board

The GLWIB in collaboration with the Lead Elected Official shall provide oversight of the one stop system including youth activities and all local employment and training activities funded under the Workforce Investment Act as well as other federal and state employment and training grants administered by the Career Center of Lowell.

For the purposes of the terms oversight and/or oversee in regards to the Workforce Investment Act; the definition shall be to survey, watch, examine and inspect as opposed to supervise and/or manage.

The GLWIB with input from all local Career Center partners shall develop the Annual Business Plan for the workforce development system including the operation of the One-Stop Career Center service delivery system in accordance with the general provisions of this Agreement and applicable law and regulations

The Plan will be presented to the GLWIB for their review and approval. The GLWIB shall adhere to the requirements set forth by the Department of Workforce Development when developing yearly modifications to the Business Plan. The plan shall be submitted to the Workforce Issues Committee for comment and review. The Chair of the WIB and or his/her designee shall meet with the LEO/City Manager and or his/her designee to review the Plan. The draft plan will be presented to the full Board at its annual meeting and or meeting set for the approval of the Plan. A vote shall be required to approve the plan for submission to the Department of Workforce Development.

Included in the Business Plan annual review is the negotiation of performance measures with the Commonwealth of Massachusetts. GLWIB shall present to the Workforce Issues Committee statistical information based on a list of measures determined by the local customer demographics. GLWIB in cooperation with the One Stop operator negotiates the local performance measures. They are approved through the Annual Business Plan.

The Annual Business Plan will be made available for review by the public, interested locally elected officials and the state legislature. This review process will be completed in a timely manner and the final Plan will be submitted to the state for approval.

The Greater Lowell Workforce Investment Board and the Title One Fiscal Agent/Career Center of Lowell shall make available and provide to the LEO/City Manager an annual report. The report will be presented to the LEO/City Manager and any designee as directed. The GLWIB and Career Center of Lowell shall in addition to a written report, be available to made oral presentations to units of government as requested by the LEO.

The GLWIB shall be responsible for establishing program, policy and performance standards and reports consistent with but not limited to State and Federal requirements.

The GLWIB shall promote the participation of private sector employers in the workforce investment system and ensure the effective provision, through the system, of connecting and brokering activities, through intermediaries such as the one-stop operator or through other organizations to assist employers in meeting hiring needs.

The GLWIB shall conduct business in an open manner consistent with the Massachusetts Open Meeting Law (MGL c. 30A, §§ 18-25) and the Workforce Issuance No. 11-05

issued on January 11, 2011 and consistent with the Sunshine Provisions defined under the Workforce Investment Act, Section 117(e).

The GLWIB shall make available to the public on a regular basis through open meetings, information regarding the activities of the Board, including information regarding the local plan, membership, certification of the local one stop operator and the award of grants and contracts to providers of youth services. A public notice of all meetings shall be posted on the GLWIB website (www.glwib.org) and be made available on request in hard copy no less than seven business days prior to the meeting date.

At the time this MOA is signed, the GLWIB does not solicit and directly operate non-WIA/non State designated workforce programs outside the One Stop Career Center system.

The Greater Lowell WIB and its dedicated staff shall have total autonomy necessary to perform its oversight function of the One Stop Career Center Operator. This shall be accomplished through a separation of duties and functions as shown in the Greater Lowell Workforce Development Organization Chart. The GLWIB staff shall report to the WIB Director and the WIB Director shall continue to report directly to the Chairperson of the WIB.

C. Joint Responsibilities

The GLWIB and the LEO shall be responsible for designating and certifying the local One-Stop operator(s) to include: reviewing and approving the Career Center's business plans, negotiating and signing the Career Center Charter and renewing the Charter. The GLWIB shall have in place a Charter Agreement with the One Stop operator. The GLWIB following regulations set forth in the chartering process shall develop the agreement. The GLWIB/One Stop Career Charter shall be in effect for the three-year period. The GLWIB utilizing input from its Workforce Issues Committee provides policy and program development, monitoring of the charter, capacity building, program review and performance results of the One-Stop operator.

The GLWIB shall consult with the LEO/City Manager on all matters of the charter including approval of the charter, approval of any amendments/changes to the charter and may convene the involvement of stakeholders including employers and job seekers and other interested parties.

Both the GLWIB and LEO/City Manager shall review the charter progress and outcomes on a regular basis. The One Stop Career Operator shall provide a report to the Workforce Issues Committee on a monthly basis. The One Stop operator shall provide a report to the full board at each regularly called meeting.

The GLWIB in cooperation with the LEO/City Manager shall establish a Youth Council as a sub-group of the Board in accordance with WIA, Section 117(h). Youth Council members shall be recruited to the Board in cooperation with the LEO/City Manager.

Youth Council members shall be nominated and reflect membership as required under WIA Law. Members shall be appointed accordingly and voted upon by the full board.

The GLWIB shall develop an annual budget for its operation. This budget will include the costs associated with the performance of its duties as described in the WIA under Section 117 (d)(3)(A). The budget shall be approved by the GLWIB Executive Committee and submitted to the City Manager for review and approval prior to submission to the State as part of the annual plan. The GLWIB shall take into consideration the size of allocations anticipated for the fiscal year in question, and shall ensure that as a first priority sufficient funding is available at the Career Center for services to customers. GLWIB dedicated staff shall be paid from the GLWIB budget.

The GLWIB membership shall be reflective of the WIB area's demographic, geographic region and industries. Census data indicates 85% of the population is Caucasian and 15% minority. The GLWIB's membership consists of a minority representation of 20%. Future nominations and appointments made by the LEO to the Board shall be reflective of the area's demographics.

The GLWIB's Strategic Plan 2009-2014 issued in 2009 indicates critical private sectors in the area as manufacturing, health care, professional and technical services, financial, and retail trade, as well as new and emerging industries such as green jobs, alternative energy, biotech, life sciences, and medical devices. The GLWIB's private sector membership reflects 94% of these categories.

The overall private sector membership reflects representation of almost 88% of the area (with the exception of Dunstable). Future nominations and appointments by the LEO to the Board shall be reflective of the geographic area.

D. Title One- WIA Governance Structure

The GLWIB will be responsible for policy formulation and for other workforce development initiatives as mandated through the WIA Act, while the administrative entity/grant recipient, the City, will be responsible for the funds expended under the various grants including WIA and other job training funds.

Career Center of Lowell staff (with the exception of State DWD employees) shall be considered employees of the City. The authority for hiring and firing Career Center of Lowell staff will be the responsibility of the City. All staff will be subject to personnel policies and practices approved by the City. Staff shall report to the authority of the Career Center of Lowell Executive Director.

The Career Center of Lowell Executive Director shall be considered a City Department Head and report to the LEO/City Manager and/or his/her designee.

The City of Lowell as Grant Recipient of WIA funding for the Greater Lowell Workforce Investment Area, shall through cooperation with the Gr. Lowell Workforce Investment Board, be the organizational employer of record for dedicated staff performing the duties /functions of the WIB as outlined in Section 117 of the Federal WIA Public Law 105-220. WIB Staff performing functions as required under said law, including the Director of the WIB shall from a reporting standpoint report directly to the Chairperson of the Greater Lowell WIB acting on behalf of the LEO/City Manager of Lowell.

GLWIB staff shall follow the tenants of the Personnel policy approved by the City of Lowell Humans Relations Office. A copy of this policy shall be on file at the GLWIB offices and the City of Lowell Human Relations Office. WIB staff shall also follow the policies of the ordinance adopted by the Lowell City Council in June of 2003.

Staff performing dedicated GLWIB duties shall number from three to five employees based on yearly funding allocations. GLWIB staff shall be located in space at 107 Merrimack Street and/or any future location of the Career Center of Lowell.

If additional dedicated GLWIB staff is required and federal or state funding is made available, the GLWIB shall confer with the LEO/City of Lowell. The final decision on all personnel matters both Career Center of Lowell and dedicated GLWIB staff remain with the LEO and/or his/her designee.

The Career Center of Lowell and GLWIB staff, programs and costs associated as such shall be considered 100% grant funded. All funds received by the GLWIB and the Career Center of Lowell shall be accounted for as grant funds.

Programs and staff shall increase and decrease as annual allocations are made available. The City shall not incur any non-grant funded costs for the daily operation of the GLWIB or Career Center.

Budget Development Process

The GLWIB and the Career Center of Lowell on behalf of the City Manager shall develop a budget for all programs and grants provided to the region for each fiscal year. The budget shall be based upon the approved WIA plan and any further documents developed for programs and services offered under GLWIB jurisdiction. Included in this budget will be funds necessary to support the GLWIB role, the Career Center of Lowell functions and services provided through other program vendors. This budget shall be prepared prior to the start of each fiscal year. Subsequent modifications to the approved budget, if necessary, shall be made as the fiscal year progresses in a manner similar to the preparation of the original budget as described above.

The parties understand that neither is in control of the fluctuations of the state and federal budget processes. Thus, each party pledges to use their best efforts to work within any such constraints due to budgetary issues to achieve the ends envisioned in this agreement.

E. Local Oversight/Provisions

The GLWIB will select eligible youth service providers based on the recommendations of the Youth Council. The procurement of these and any other group intensive or training services for youth and adults will be the responsibility of the GLWIB through the development and issuance of a Request for Proposal. The GLWIB shall administer the Youth Programs through the development of contracts and monitoring of all youth providers. The Career Center of Lowell shall provide any and all core and direct services as required under the federal act. The GLWIB staff shall not participate in nor provide any core or direct services as prohibited under WIA law.

(Local Oversight-Youth)

The Greater Lowell WIB conducts a competitive procurement process for in school and out of school programs. GLWIB Youth staff shall provide technical assistance to program providers through monthly youth provider meetings, conduct monthly desk reviews, and meet with each vendor on site on a monthly basis and monitor both in and out of school youth programs. The Career Center of Lowell as the Title I Fiscal Agent shall also provide staff support for the oversight items mentioned above.

The GLWIB shall develop standardized oversight report in regards to monitoring the programs. Comparison of actual performance to WIA performance standards shall be utilized. Youth Council members shall receive performance updates on a quarterly basis.

(Local Oversight-Adults and Dislocated Workers/employment and training activities and the One-Stop Delivery System)

The Greater Lowell Workforce Investment Board through its Workforce Issues Committee review and monitor the results of Dislocated Workers and Adult activities along with all other employment and training services provided by the Career Center of Lowell. The GLWIB shall review the results of each month through a desktop review. This is done through a meeting of the GLWIB Director and the Career Center of Lowell Director. The review takes into consideration the number of persons utilizing the Career Center monthly, number of Career Center orientations, number of persons approved for Individual Training Accounts, the plan vs. actual for ITA enrollments and all other core and intensive services offered at the Career Center of Lowell.

The WIB, through its Workforce Issues Committee, shall monitor and comment on the quarterly program performance standards results of the Career Center of Lowell. The Career Center of Lowell provides a quarterly report at all full board meetings including performance results. The WIB shall review the MOU's (Memorandum of Understanding) established for each Career Center partner. The WIB through its Workforce Issues Committee shall review the charter annually and report to the full Board.

The GLWIB shall identify eligible providers of adult and dislocated worker intensive services and training services which will be handled through Individual Training Accounts (ITAs) and maintain a list of eligible providers with performance and cost

information. This list will be reviewed and updated by the GLWIB each year as mandated under WIA.

In addition to the ITA list, Request for Proposals (RFPs) will be utilized to select service providers. The selection process will be in accordance with the state approved Procurement Policy.

Service Providers

Agencies and organizations shall be selected to deliver services within the GLWIA following local, state and federal procurement requirements based on their demonstrated success and cost effectiveness in providing job training and related activities. Community based organizations and educational agencies following local, state and federal procurement requirements shall be given proper consideration.

Occupational Skills training programs shall be funded by the GLWIB only if they meet the specific guidelines established by the GLWIB and the Career Center of Lowell for such programs.

Agencies and organizations shall not be funded which duplicate facilities or services available in the area from federal, state or local sources unless the GLWIA performance goals can be achieved more effectively by using such an agency or service provider. When selecting the providers of services for youth, priority shall be given to fund school and community based organization programs, which are both cost-effective and have demonstrated success and which otherwise meet the established criteria.

Eligibility Determination

The Career Center of Lowell will complete and maintain a record of each participant's enrollment into a WIA or workforce development program, which ensures compliance with relevant eligibility criteria.

Only eligible individuals residing in the Greater Lowell Workforce Investment Area or displaced from a company located in the GLWIA and Title I Dislocated Workers shall be provided services with funds unless an exception to this requirement is stipulated in the Annual Business Plan, or by state/federal or funding source guidelines.

Maintenance of Records

The Career Center of Lowell/City of Lowell and the GLWIB will retain records that are sufficient to permit the preparation of reports and the tracking of expenditures that are adequate to ensure that funds have been spent appropriately for a minimum period of six years or until the resolution of any audit, whichever is longer. The Workforce Investment Board beyond the six years will retain records if any litigation or audit is begun, or if a claim is instituted involving funds. In such instances, the records will be retained until the audit, litigation or claim has been fully resolved. Any and all financial records will be made available for City of Lowell review. Included under the above, are all non-WIA funds administered by the Career Center of Lowell.

Conflict of Interest

No member of the GLWIB shall cast a vote on the provision of services by that member (or any organization which that member directly represents) or vote on any matter, which would provide direct or indirect financial benefit to that member.

Management and Administrative Systems

Management and administrative systems necessary for the proper functioning of all relevant WIA and workforce development programs including the overall Workforce Investment Area governance structure have been developed and implemented. These systems will be consistent with this Agreement and will conform to any applicable state and local standards.

In accordance with the terms and provisions of this Memorandum of Agreement the Greater Lowell Workforce Investment Board and the Lead Elected Official for the City of Lowell, have executed this Agreement as of the first day of November 2011.

**FOR THE GREATER LOWELL
WORKFORCE INVESTMENT BOARD**

FOR THE CITY OF LOWELL

By: _____

By: _____

Kevin E. Coughlin
Chairman

Bernard F. Lynch
City Manager

Date: _____

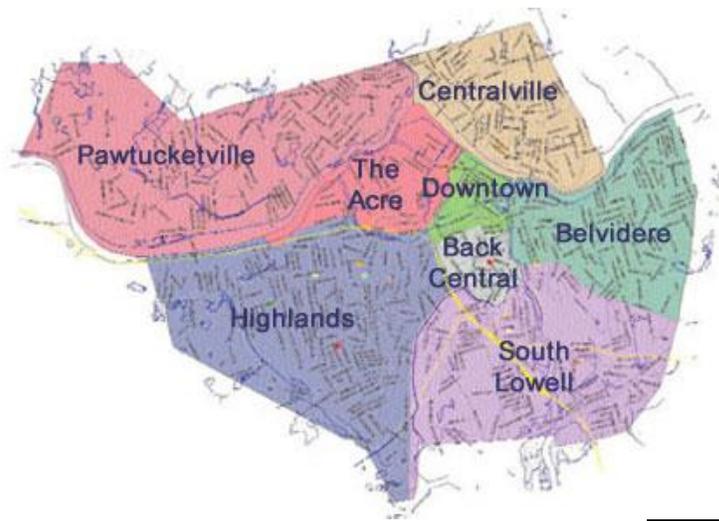
Date: _____

APPROVED AS TO FORM:

By: _____

David J. Fenton
Assistant City Solicitor

Date: _____



Lowell CoC

Racial Disparities Among Homeless Population Analysis

Race and Hispanic Origin in Lowell			
Race	Lowell Population %	Homeless Population - Unhoused	Formerly Homeless Population (Housed)
White	60.80%	73.6%	76.02%
Black/African Amer	7.3%	22.08%	12.76%
Amer Ind/ Alaska Native	0.5%	0.06%	0.00
Asian	21.0%	2.08%	4.59%
Native Hawaiian	0.1%	0.00	4.08%
Multiple Races	2.6%	1.73%	0.00
Unknown/ Refused	N/A	0.30%	0.00
Hispanic	20.3%	42.32%	36.22%
Not Hispanic	49%	57.20%	63.78%
Population estimates, July 1, 2018			
https://www.census.gov/quickfacts/fact/table/lowellcitymassachusetts/PST045218			



Date Range: October 1, 2017 - September 30, 2018

Filters

Year
2018

Population
All Clients

Grouping
By Project Type

Project Type Category
Not Housed

Project Type
All

Project Name
All

Project or Project Type
Emergency Shelter
Transitional Housi..

Total

1,680

Veterans

18

Chronic

77

Youth

97

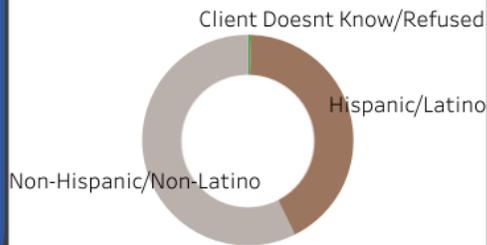
Households

628

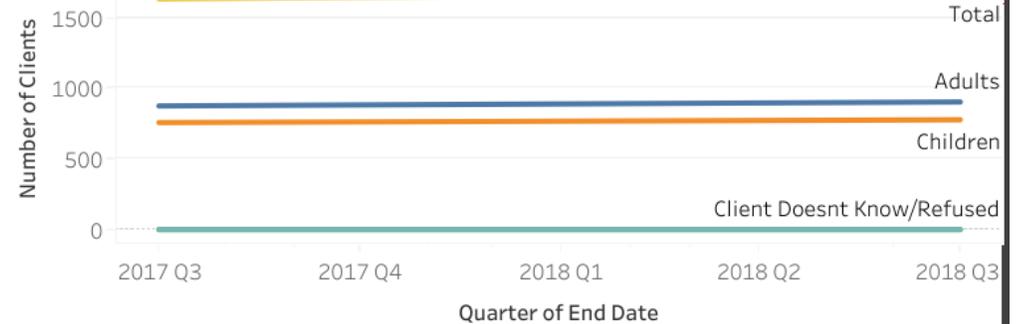
Race



Ethnicity



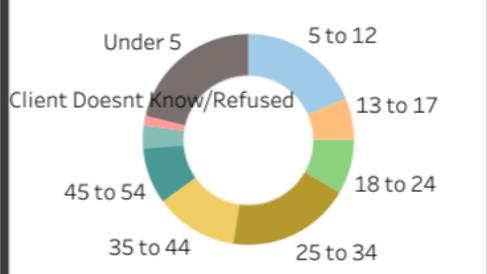
Total Served Over Time



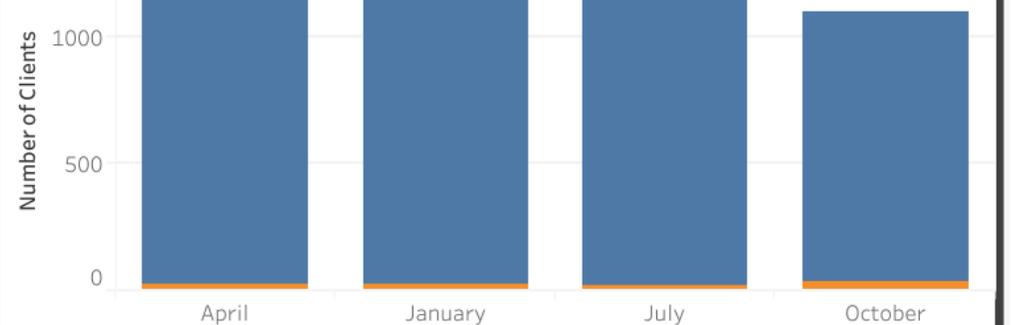
Gender



Age



Quarterly System Usage



* Client counts across multiple projects are not deduplicated





Date Range: October 1, 2017 - September 30, 2018

Filters

- Year: 2018
- Population: All Clients
- Grouping: By Project Type
- Project Type Category: **Housed**
- Project Type: All
- Project Name: All
- Project or Project Type:
 - Permanent Suppor..
 - PH - Housing with ..
 - Rapid Re-Housing

Total

196

Veterans

31

Chronic

24

Youth

10

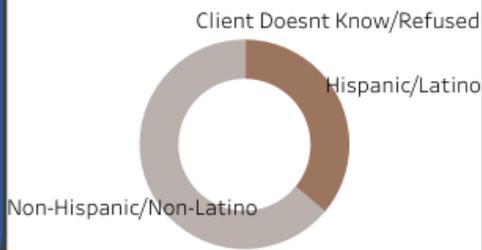
Households

112

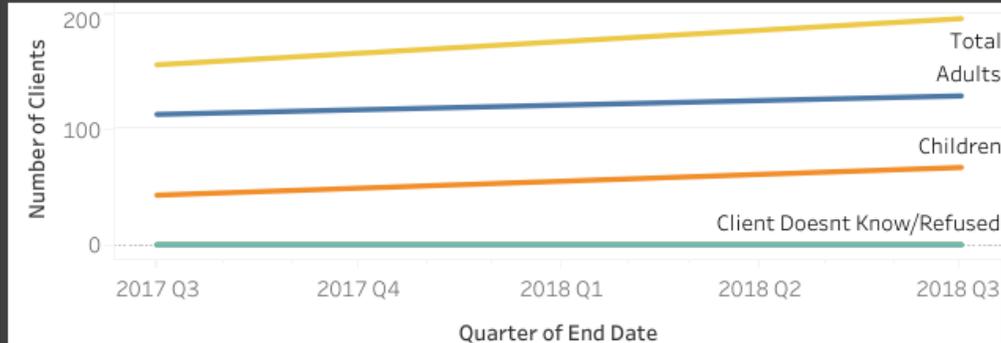
Race



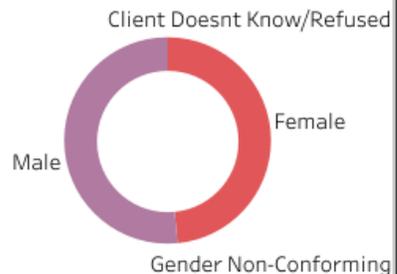
Ethnicity



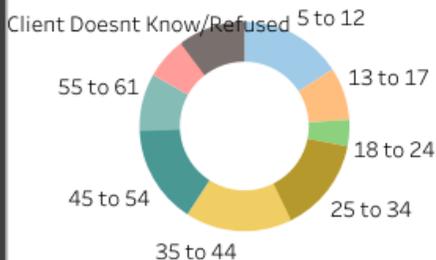
Total Served Over Time



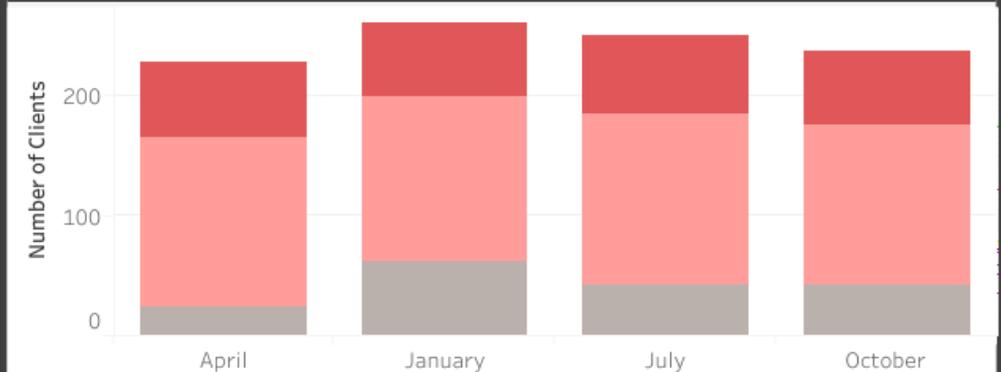
Gender



Age



Quarterly System Usage



* Client counts across multiple projects are not deduplicated

Select Population Type to View Outcomes for: Race

Filters

Year
2018

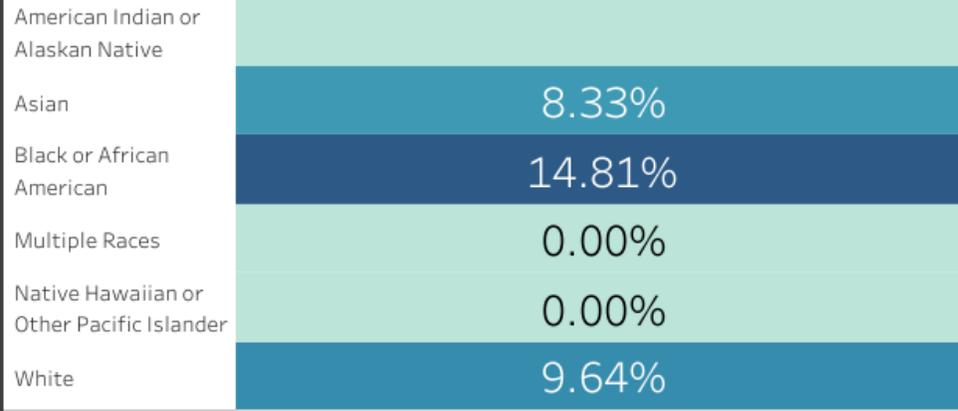
Project Type Category
Housed

Project Type
All

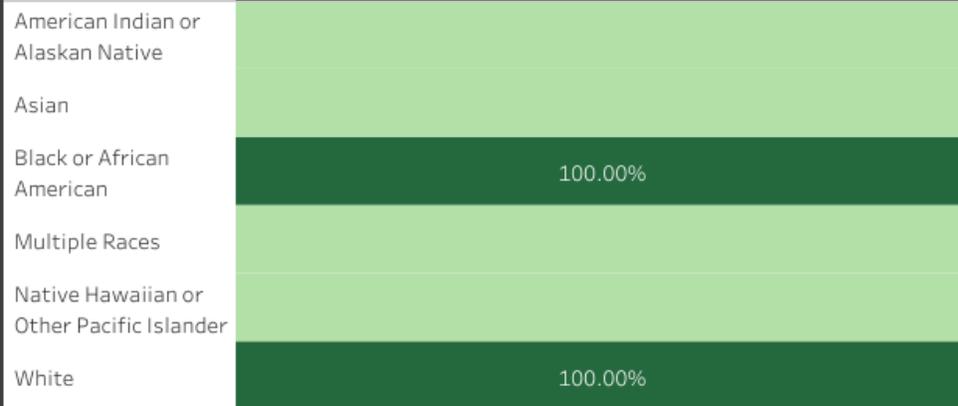
Project Name
All



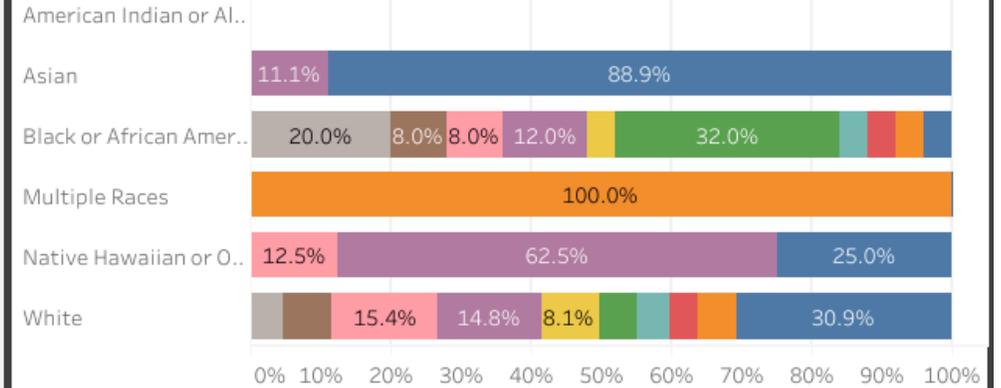
Percentage of Clients Who Increased Income



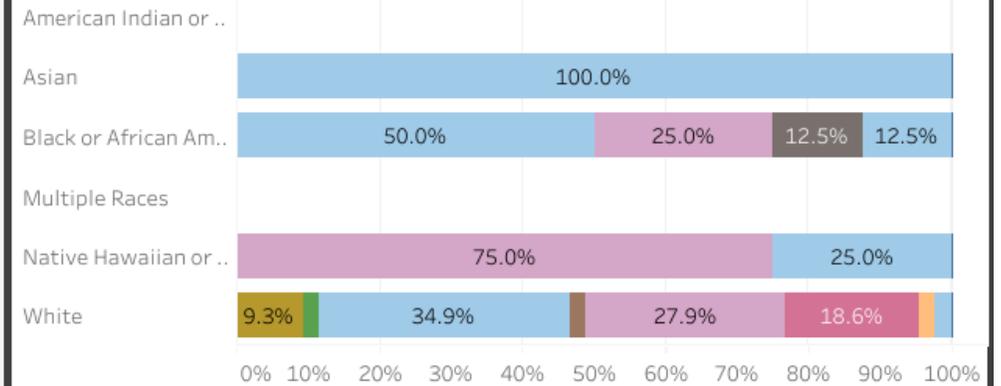
Percentage of Clients with Positive Destinations



Length of Stay



Exit Destinations



Date Range: October 1, 2017 - September 30, 2018

Select Population Type to View Outcomes for: Race

Filters

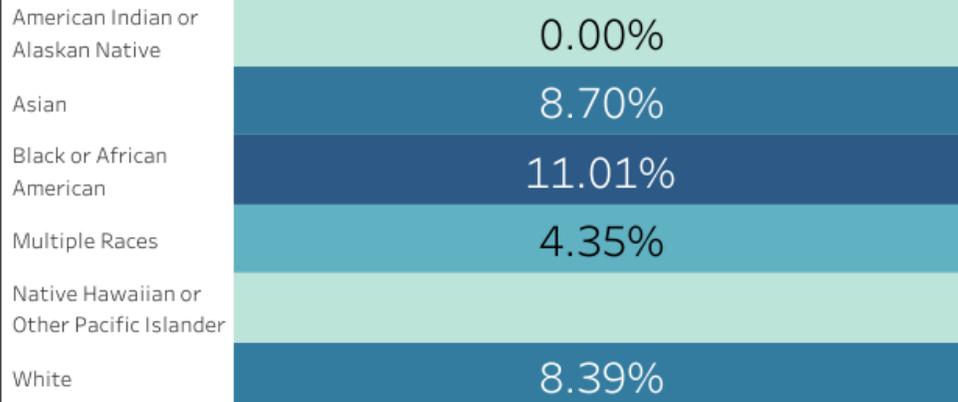
Year
2018

Project Type Category
Not Housed

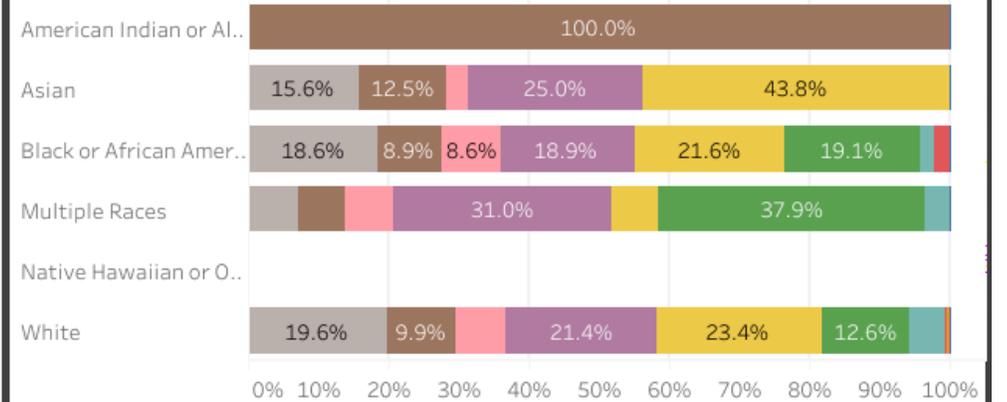
Project Type
All

Project Name
All

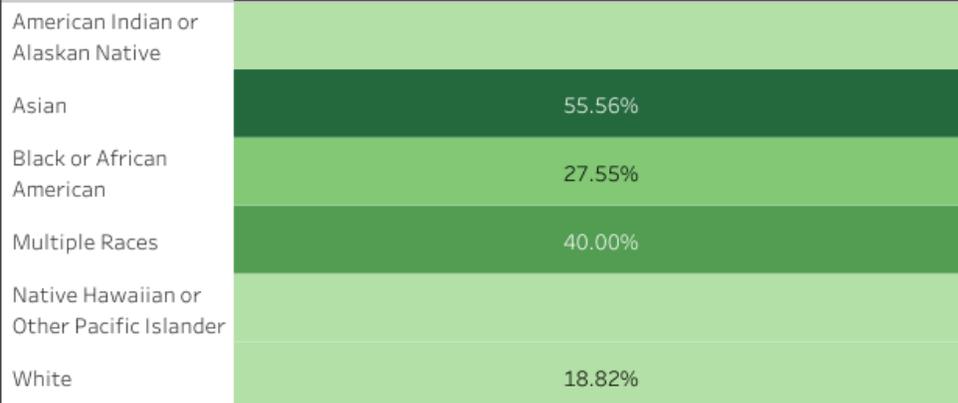
Percentage of Clients Who Increased Income



Length of Stay



Percentage of Clients with Positive Destinations



Exit Destinations

