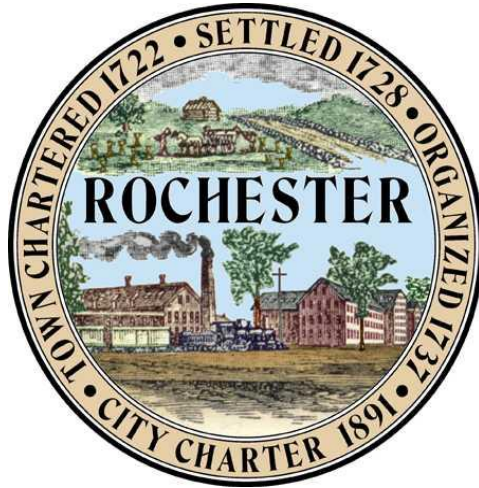


**Community Development
Block Grant Program**

Consolidated Annual Performance and Evaluation Report (CAPER)



City of Rochester, New Hampshire

July 1, 2014-June 30, 2015

Prepared for the US Department of Housing and Urban Development

September xx, 2015

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CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This FY 2014-2015 Consolidated Annual Performance Evaluation Report (CAPER) summarizes the accomplishments and financial expenditures of Year 5 of the FY 2010-2015 Consolidated Action Plan (FY 2014-2015 Annual Action Plan) of the City of Rochester.

The City of Rochester develops the Five-Year Consolidated Plan, annual Action Plan, and annual CAPER to provide a strategy for investment of federal Community Development Block Grant (CDBG) funds and review of program achievements, as required by the U.S. Department of Housing and Urban Development (HUD). The Consolidated Plan is a living document designed to identify the needs of the community, especially the low- to moderate-income residents of the City. The Consolidated Plan is the result of an eighteen-month collaborative process that includes extensive public outreach, multiple public hearings, and consultation with community agencies, neighborhood groups, and other relevant organizations. The Annual Action Plan is developed each fiscal year to describe the projects that have been funded for that year as they relate to the five-year Consolidated Plan program goals.

The Consolidated Plan under which this year's CAPER falls started July 1, 2010 and ended June 30, 2015, comprising five Annual Action Plan or program years. Programs and activities described in this report were intended to primarily benefit low- and moderate-income residents of the City of Rochester, neighborhoods with high concentrations of low- and moderate-income residents, and the City as a whole. The Community Development Block Grant award for the City of Rochester for FY 2014-2015 was \$239,000.00.

All Annual Action Plans must address the needs of the community, primarily benefiting the needs of low- to moderate- income persons (defined as those with household incomes below 80% of the area median income). For FY 2014-2015, the median income for the Portsmouth-Rochester Metropolitan Fair Market Rent Area was \$84,300.00. In addition, Consolidated Plans and Annual Action Plans must address the three national objectives set forth by HUD: (1) to provide decent housing, (2) to provide a suitable living environment, or (3) to expand economic opportunities.

All CDBG activities undertaken during FY 2014-2015 advanced one or more of the three national HUD objectives. Public service activities included funding for the region's three homeless shelters, rental assistance for low-income families, educational programs for low-income residents, and non-medical mental health supportive services. Most of these activities were aimed at providing a suitable living environment or to provide decent housing.

Economic development activities included the Job Opportunity Benefit (JOB) revolving loan fund, which promotes the retention and creation of jobs for low- and moderate-income residents, and funding the New Hampshire Small Business Development Center. These activities were aimed at expanding economic opportunities.

Housing rehabilitation funding supported the Community Action Partnership for Strafford

County's weatherization assistance program, which weatherizes the homes of low-income residents. Weatherization reduces the utility bills for the homeowner and, in many cases, allows the homeowner to remain in the home. This activity was aimed at providing decent housing.

Public facilities funding supported the construction of new playground equipment at Gonic School and a shaded pavilion at Hanson Pines Park. (The Gonic School project was originally scheduled for FY 2013-2014, and the Hanson Pines Park project was completed after the end of FY 2014-2015.) Both projects occurred in neighborhoods identified as 51% or greater low-moderate income by HUD for FY 2014-2015. These projects were aimed at providing a suitable living environment.

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

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

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	% Complete
Affordable Housing for Homeless Persons	Affordable Housing Homeless	CDBG: \$0.00	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	0	0	N/A	0	0	N/A
Affordable Housing for Homeless Persons	Affordable Housing Homeless	CDBG: \$18,850.00	Homeless Person Overnight Shelter	Persons Assisted	592	335	100.00%	119	119	100.00%
Affordable Housing for Homeless Persons	Affordable Housing Homeless	CDBG: \$0.00	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0	N/A	0	0	N/A
Affordable Housing for Homeless Persons	Affordable Housing Homeless	CDBG: \$0.00	HIV/AIDS Housing Operations	Household Housing Unit	32	35	N/A	0	0	N/A
Improving the Safety/Livability of Neighborhoods	Non-Housing Community Development	CDBG: \$93,350.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	29,752	29,752	100.00%	29,752	29,752	100.00%

Improving the Safety/Livability of Neighborhoods	Non-Housing Community Development	CDBG: \$2,000.00	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	230	335	100.00%	130	194	100.00%
Increase Access to Affordable and Quality Housing	Affordable Housing Non-Homeless Special Needs	CDBG: \$5,000.00	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	793	302	100.00%	55	77	100.00%
Increase Access to Quality Facilities and Services	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$0.00	Facade treatment/business building rehabilitation	Business	0	0	N/A	0	0	N/A
Increasing the Supply of Supportive Housing	Affordable Housing Non-Homeless Special Needs	CDBG: \$0.00	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	0	0	N/A	0	0	N/A

Public Services Concerned with Employment	Non-Housing Community Development Economic Development	CDBG: \$10,000.00	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2,300	1,409	100.00%	275	233	100.00%
Retention of Affordable Housing Stock	Affordable Housing	CDBG: \$50,000.00	Homeowner Housing Rehabilitation	Household Housing Unit	170	156	100.00%	25	12	48.00%
Small Business Establishment and Expansion	Non-Housing Community Development Economic Development	CDBG: \$134,644 (Revolving Loan Fund)	Jobs created/retained	Jobs	32	42	100.00%	unspecified	0	100.00%
Small Business Establishment and Expansion	Non-Housing Community Development Economic Development	CDBG: \$12,000	Businesses assisted	Businesses Assisted	80	74	100.00%	8	3	100.00%

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

In many categories of funding, goals were met or exceeded, both for FY 2014-2015 and for the entirety of the five-year program period. In other categories, the goals came very close to the target goal, such as the “Small Business Establishment and Expansion” category, where the five-year goal was 80 businesses assisted and the actual achievement was 74 businesses assisted. Overall, significant and substantial progress was made across all funding categories to provide decent housing, to provide a suitable living environment, and to expand economic opportunities for residents of the City of Rochester.

In a few categories, mismatches in goal units have led to accounting discrepancies, such as the tracking of individuals assisted versus households assisted. The goals set for the category of “Increase Access to Affordable and Quality Housing – Public service activities for Low/Moderate Income Housing Benefit,” for example, are higher than they should be. The subrecipients’ goals for all City residents to be served, rather than only residents served with CDBG funding, was mistakenly included in previous reports to HUD; however, the subrecipient has reported achievements only for those residents served with CDBG funding. (The target goal for FY 2014-2015 in Table 1 was corrected to the actual target goal.)

In some instances, however, there were challenges in meeting target goals. In particular, the New Hampshire Small Business Development Center (“Small Business Establishment and Expansion”) and the Community Action Partnership of Strafford County (Strafford CAP) Weatherization Assistance Program (“Retention of Affordable Housing Stock”) failed to meet the goals set for FY 2014-2015 by substantial margins.

In the case of the New Hampshire Small Business Development Center, a main cause seemed to be the relocation of the center from Rochester to the City of Dover. The Small Business Development Center also experienced issues in maintaining at least 51% low- to moderate-income clientele. The City of Rochester Community Development staff provided counseling and additional assistance to the New Hampshire Small Business Development Center and, ultimately, funding was discontinued for FY 2015-2016 due to the failure to meet established goals.

In the case of Strafford CAP, a main cause seemed to be the loss of supportive grant funds from the U.S. Department of Energy and changeover in organization personnel. The Community Development staff has provided counseling, escalated monitoring efforts, and met with the new personnel administering the weatherization assistance program. The Community Development staff has also requested a written corrective action plan from Strafford CAP and will maintain additional monitoring to ensure future goals are met. Despite these challenges, however, the weatherization assistance that has been provided has been essential in maintaining the City of Rochester’s affordable housing stock. All residents served by the program are low or very/extremely low income, and nearly half are elderly residents. As throughout New Hampshire, the City of Rochester has an aging population, so services that enable elderly residents to remain in their homes are increasingly needed.

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

In FY 2014-2015, as in previous program years throughout the FY 2010-2015 Consolidated Plan period, the City of Rochester has prioritized activities and objectives that serve the most basic needs of City residents. A large amount of funding was provided to the region's three homeless shelters, as shelter is a fundamental human need. The shelters also provide essential supportive services, such as child care, financial counseling, and health clinics. The SHARE Fund provides rental assistance with its CDBG funds, as well, which helps prevent homelessness before it occurs. Other priorities included educational and vocational opportunities, represented by the Dover Adult Learning Center and Project Pride, and addressing the mental health needs of City residents, represented by the Tri-City Consumers' Action Co-Operative.

Regarding public facility and infrastructure projects, projects that enhance educational and cultural goals (such as renovations to the public library) and pro-social recreational activities that help reduce crime and illegal substance use (such as additions to Hanson Pines Park) were prioritized. Housing rehabilitation activities prioritize and provide preference for low- to moderate-income manufactured home owners. Not only are these home owners likely to own homes that are older and in need of weatherization work, which lowers utility costs and enables these home owners to remain in their homes, but manufactured homes can be weatherized more cheaply than non-manufactured homes. This enables the maximum number of homes and residents to benefit for every funding dollar spent.

In addition, projects and activities were assigned to one of the categories below. These categories do not indicate a preference for a type of programs supported with CDBG funds; rather, they provide a framework to summarize the presumed impact of a project when making community investment decisions.

Basic Needs

Basic needs include food, shelter, and clothing. Without these, no person is able to live, let alone realize a productive existence. These basics, along with health and safety concerns, form the definition of what our most fundamental requirements are to keep alive. The burden to provide health care, safe housing, and even food on the table is a struggle for many working families and individuals.

Safety Net

These are programs which provide direct services to the City's children, elderly persons, persons with disabilities, and persons in crisis. They also augment the City's existing services, such as the police force and welfare office. These are projects that often involve intervention in emergency situations, and they create a place for accessing assistance.

Investment

Without investment in our community, the City will be compelled to exercise all of its future resources in dealing with the problems of poverty, lack of opportunity, and community stability. These activities and projects help to conserve limited resources by preventing problems before they occur or before they reach a crisis point.

CR-10 - Racial and Ethnic Composition of Families Assisted

Describe the families assisted (including the racial and ethnic status of families assisted).
91.520(a)

	CDBG
White	482
Black or African American	26
Asian	15
American Indian or American Native	8
Native Hawaiian or Other Pacific Islander	0
Total	574
Hispanic	32
Not Hispanic	542

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

Narrative

During FY 2014-2015, approximately 84% of the residents of the City of Rochester served were white, and approximately 16% of the residents served were of non-white races and/or ethnicities (predominantly Black or African-American and Asian). According to U.S. Census data, the City of Rochester is 95.4% white, 0.8% Black or African-American, 0.3% American Indian or Alaska Native, 1.2% Asian, 0.1% Native Hawaiian or other Pacific Islander, 1.8% Hispanic, and 1.7% two or more races. There has not been disproportionate services provided to white residents; the opposite has been the case. This may result, in part, from lower income levels among non-white City residents.

Please note that there may be slight discrepancies in the number provided, as several multi-racial categories were included in the demographic questionnaires provided to recipients of CDBG-funded public services. Many residents identified as belonging to two races/ethnicities, and eleven residents identified as “Other/Multiracial.”

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	CDBG	\$239,000.00	\$170,833.00
Other	Public Service Agencies	\$2,062,684.00	\$2,062,684.00

Table 3 – Resources Made Available

Narrative

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Rochester Low-Moderate Income Census Tracts	100	100	HUD-determined census tracts of 51% or greater low-moderate income residents

Table 4 – Identify the geographic distribution and location of investments

Narrative

During FY 2014-2015, \$170,833.00 of the available \$239,000.00 in CDBG grant funds was expended. The remaining amount is unexpended funds from the Strafford CAP weatherization assistance program and Rochester Public Library Heating/Cooling Unit installation projects. Both projects have experienced unexpected delays. It is anticipated that these projects will be completed and the funds expended by the end of FY 2015-2016.

During FY 2014-2015, all census tracts located within the City of Rochester were determined by HUD to be 51% or greater low- to moderate-income residents. Therefore, all CDBG-funded activities occurred within low- to moderate-income census tracts. As of FY 2015-2016, not all census tracts within the City are 51% or greater low- to moderate-income, and this change has been noted and taken into account when planning the location of future activities.

Leveraging

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

During FY 2014-2015, \$2,062,684.00 was available in leveraged funds provided by the public service agencies that received CDBG funding. This is over eight times the amount of funds received through the CDBG grant and is an excellent example of the City of Rochester's commitment to maximizing the impact and value of its CDBG grant money. The source of these leveraged funds is various and includes other federal grants, state grants, and private donations received by the public service agency CDBG subrecipients.

In the annual grant application developed by Community Development staff, CDBG applicants must state both the amount and the percentage of leveraged funds relative to the CDBG funds being requested. The percentage and amount of leveraged funds available are taken into account when grant applications are analyzed and funding decisions made.

Public facilities funding supported the construction of new playground equipment at Gonic School and a shaded pavilion at Hanson Pines Park. (The Gonic School project was originally scheduled for FY 2013-2014, and the Hanson Pines Park project was completed after the end of FY 2014-2015.) Both projects occurred on land owned by the City of Rochester and in neighborhoods identified as 51% or greater low-moderate income by HUD for FY 2014-2015.

CR-20 - Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of homeless households to be provided affordable housing units	119	119
Number of non-homeless households to be provided affordable housing units	0	0
Number of special-needs households to be provided affordable housing units	0	0
Total	119	119

Table 5- Number of Households

	One-Year Goal	Actual
Number of households supported through rental assistance	55	77
Number of households supported through the production of new units	0	0
Number of households supported through the rehab of existing units	25	12
Number of households supported through the acquisition of existing units	0	0
Total	80	89

Table 6 - Number of Households Supported

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

In all cases, the goals set were met or exceeded in terms of aggregate totals. Not all goals were met in terms of individual public service agency performance, however. My Friend’s Place, which provides homeless shelter and services, and Strafford CAP, which provides weatherization rehabilitation assistance, both fell short of their target goals for FY 2014-2015.

In the case of Strafford CAP, a main cause seemed to be the loss of supportive grant funds from the U.S. Department of Energy and changeover in organization personnel. The Community Development staff has provided counseling, escalated monitoring efforts, and met with the new personnel running the weatherization assistance program. The Community Development staff has also requested a written corrective action plan from Strafford CAP and will maintain additional monitoring to ensure future goals are met. Despite these challenges, however, the weatherization assistance that has been provided has been essential. All residents served are low or very/extremely low income, and nearly half are elderly residents. As throughout New Hampshire, the City of Rochester has an aging population, so services that enable elderly residents to remain in their homes are increasingly needed.

In the case of My Friend’s Place, a main cause seemed to be the unanticipated extended length of residency at the shelter by several homeless families who received services during FY 2014-2015. This reduced the overall number of residents able to be served during the fiscal year. The Community Development staff has provided counseling with the public service agency and discussed setting more achievable target goals for the future.

Discuss how these outcomes will impact future annual action plans.

The City of Rochester’s Community Development staff has discussed and will continue to discuss achievable, realistic goal-setting with CDBG subrecipients and grant applicants. This involves reviewing past performance, analyzing current community needs and demographics, and informal monitoring and communications that extend well beyond the formal annual monitoring of CDBG subrecipients. In particular, regular contact with subrecipients will help to identify any performance problems as early as possible so that they can be resolved efficiently and, hopefully, in such a way that target goals can continue to be met.

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

Number of Persons Served	CDBG Actual	HOME Actual
Extremely Low-income	495	0
Low-income	72	0
Moderate-income	9	0
Total	576	0

Table 7 – Number of Persons Served

Narrative Information

The overwhelming majority of Rochester residents assisted with CDBG funds during FY 2014-2015 were extremely low income (30% of area median income). Very few residents were moderate-income, and in addition to the numbers in Table 8, there were six non-low-moderate income residents assisted with CDBG funds by the New Hampshire Small Business Development Center. There is not a situation in which moderate-income residents are being assisted at disproportionate levels compared to low-income residents. The opposite is the case, which reflects the City of Rochester’s focus on providing basic needs and ensuring services are available for its most vulnerable residents.

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

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

Activities to address homelessness this year included public service agency grants to the three regional homeless shelters that provide services to Rochester residents, rental assistance for families who are threatened by homelessness via a public service grant to the SHARE Fund, and participation by Community Development staff in multiple events and coalitions addressing homelessness issues. For example, this year the Community Development Coordinator attended Balance of State Continuum of Care meetings, consulted with the Coordinated Access/Coordinated Entry staff for the Seacoast region, and joined the steering committee of the Greater Seacoast Coalition to End Homelessness.

The region's three homeless shelters and Coordinated Access/Coordinated Entry staff provide individual assessment for each homeless person or person at risk for homelessness. Based on these assessments, the person is placed with a homeless shelter that best fits their needs, referred to an organization that can provide rental assistance, or provided other relevant referrals. The adoption of the Coordinated Access/Coordinated Entry system for the entire Seacoast region has formalized this intake process and ensured that the provided resources are a good match for the individual's particular situation and needs.

Addressing the emergency shelter and transitional housing needs of homeless persons

This year CDBG public service agency grants were awarded to the three regional homeless shelters that provide services to Rochester residents. In fact, this made up the bulk of public service agency grant awards in terms of money given. All three shelters provide emergency shelter and supportive services to residents, including financial counseling, educational and vocational training, child care, and health clinics. Two of the three shelters have transitional housing units available, as well.

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

This year CDBG public service agency grants were awarded to the three regional homeless shelters that provide services to Rochester residents. Two of the three shelters have transitional housing units available, and all three shelters provide supportive services to residents, including financial counseling, educational and vocational training, child care, and health clinics.

In addition, as a region, the Seacoast area has been in the process of adopting rapid rehousing practices. The goal of rapid rehousing is to obtain permanent housing for persons experiencing

homelessness as soon as possible, and this involves shortening the length of stays in emergency shelters. Cross Roads House, the regional homeless shelter with the largest capacity, has been especially successful in reducing the amount of time residents stay at its shelter facilities.

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

Activities to address homelessness this year included rental assistance for families who are threatened by homelessness via a public service grant to the SHARE Fund, housing rehabilitation via a grant to Strafford CAP's weatherization assistance program, and participation by Community Development staff in multiple events and coalitions addressing homeless issues. In FY 2014-2015, the SHARE Fund's rental assistance program served 77 residents, 67 of whom were very low income, and Strafford CAP provided weatherization assistance to 13 homeowners, nine of whom were very low income. Without this assistance, it is likely that these Rochester residents would have lost their current housing and have become homeless.

In addition, the Community Development Coordinator has been active in multiple coalitions and groups, including the Greater Seacoast Coalition to End Homelessness and the Rochester Area Family Support Team. One of the current main projects of the Greater Seacoast Coalition to End Homelessness is the creation of Community Care Teams, which will particularly support residents with mental illness and substance abuse issues. The Rochester Area Family Support Team, which is a coalition comprised of representatives from multiple regional non-profit agencies, provides cross-agency support and coordination for Rochester's most vulnerable residents. This includes low-income youth and victims of domestic violence.

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

Actions taken to address the needs of public housing

The most recent Five Year Plan prepared by the Rochester Housing Authority (RHA) reports its goals and objectives as including: reduction in public housing vacancies, increase in affordable housing units, the creation of workforce housing, and the promotion of economic opportunities and increase in affordable healthcare access to low-income families. Also, RHA is looking to increase the number of Housing Choice Vouchers it is able to offer.

In FY 2014-2015, the Community Development staff has sought increased communications and collaboration with the Rochester Housing Authority. This has included, but is not limited to, consultation with RHA during the research and drafting of the FY 2015-2020 Consolidated Plan for the City of Rochester, encouragement given to RHA to apply for CDBG grant funds for FY 2015-2016, and other related activities. In addition, Community Development staff has attended a workforce housing legal issues training organized by the Workforce Housing Coalition of the Greater Seacoast and a Section 3 training organized by the New Hampshire Housing Finance Authority.

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

The Rochester Housing Authority maintains a Resident Advisory Board, including representatives from each of the RHA's public housing sites, that meets to review RHA One Year and Five Year Plans as well as to provide input on general RHA operations. The City of Rochester's Community Development staff has provided outreach to the Rochester Housing Authority on CDBG-related and other funding opportunities, including coordination to ensure information on bids for CDBG-funded projects is made available to RHA residents.

Actions taken to provide assistance to troubled PHAs

N/A. Rochester Housing Authority is not designated as a troubled agency by HUD.

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

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

The Community Development staff has attended a workforce housing legal issues training organized by the Workforce Housing Coalition of the Greater Seacoast. Community Development staff has also carefully monitored proposed City ordinances that might impact affordable housing, including consultation with the City's Planning Department regarding the proposal and adoption of an ordinance related to multi-family housing to ensure it would not negatively impact affordable housing availability.

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

Some of the top underserved needs within the City of Rochester are supportive services and housing for residents with mental illnesses and substance abuse issues. During the FY 2015-2020 Consolidated Plan research and consultation process, the need for more services for those with mental illnesses and substance abuse addictions came up time and time again.

The main obstacles to serving these underserved needs are lack of funding and lack of organizational capacity. These obstacles have been addressed through a variety of means. CDBG funding was awarded in FY 2014-2015 to the Tri-City Consumers' Action Co-Operative, a public service agency that provides non-medical services to residents of the City with mental illnesses. The Community Development Coordinator also has been active in the Greater Seacoast Coalition to End Homelessness, which has been spearheading the creation of Community Care Teams, which will particularly support residents with mental illness and substance abuse issues.

In May of 2015, the City of Rochester also assumed fiscal agent responsibilities for Bridging the Gaps: The Rochester Community Coalition for Alcohol and Drug Prevention. Bridging the Gaps receives federal funding through the Substance Abuse and Mental Health Services Administration to enact community-level change and reduction in substance abuse by the City's youth population. Community Development staff is involved in the fiscal management of the federal grant and in coalition planning and programming.

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

The weatherization assistance program run by the Community Action Partnership of Strafford County, which received \$50,000 in CDBG funding during FY 2014-2015, provides weatherization assistance to low-income residents of the City of Rochester. This includes updating heaters and boilers, replacing inadequate insulation, and other related rehabilitation activities. While performing this rehabilitation work, the weatherization assistance program also provides lead evaluation and abatement services when circumstances, such as the age of the home in question, indicate the need for such. In FY 2014-2015, twelve homes received weatherization assistance, including five homes constructed prior to 1978.

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

The City of Rochester engages in a multi-faceted, comprehensive approach to reducing poverty

among its residents. One prong of this approach is the provision of direct services aimed at addressing basic and immediate needs of low-income residents. This includes emergency housing assistance, in the forms of funding for the region's homeless shelters and for the SHARE Fund's rental assistance program. Another prong involves investment in activities and programs that will help prevent poverty and/or address poverty over a longer period of time. This includes funding for educational and vocational services, such as the Dover Adult Learning Center and Project PRIDE, and funding for the mental health peer-to-peer supportive services provided by the Tri-City Consumers' Action Co-operative.

A third prong involves investing funds to create and broaden economic opportunities within the City of Rochester. The City maintains a revolving loan fund, the Job Opportunity Benefit loan program, to provide funding to local businesses that commit to retaining at-risk jobs or creating new jobs specifically for low- to moderate-income residents. During FY 2014-2015, funding was also awarded to the regional office of the New Hampshire Small Business Development Center, which provided business development services to small business owners within the City of Rochester and specifically targeted services toward low- to moderate-income entrepreneurs.

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

The City of Rochester is a public entity whose purpose relative to housing and economic development involves such areas as planning and financing of economic development projects, code enforcement, planning and zoning review, financial relief assistance, and community development. Community Development staff have coordinated with various City departments, such as the Planning Department and Department of Public Works, and a multitude of public service agencies, including both agencies that receive CDBG funding subgrants and agencies that do not. This coordination has enabled the time- and cost-efficient provision of supportive services, housing rehabilitation, and public facilities improvements to low- and moderate-income Rochester residents. This coordination has also identified specific program and activity needs within the City, as well as other funding sources for City projects that may not qualify under CDBG.

In addition, the Community Development Coordinator participates as a member of the Balance of State Continuum of Care, a member of the Rochester Area Family Support Team, and a steering committee member of the Greater Seacoast Coalition to End Homelessness. The involvement of Community Development staff in these organizations and coalitions provides for the development and strengthening of cross-agency relationships and projects.

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

The City of Rochester's Community Development staff has engaged in a broad range of outreach and networking activities, including regularly forwarding relevant HUD, New Hampshire Bureau of Homeless and Housing Services, New Hampshire Housing Finance Authority, and other housing- and homelessness-related training opportunities to public service agency and local government contacts who might be interested. The Community Development Coordinator also participates as a member of Balance of State Continuum of Care, a member of the Rochester Area Family Support Team, and a steering committee member of the Greater Seacoast Coalition to End Homelessness. Both the Rochester Area Family Support Team and the Greater Seacoast

Coalition to End Homelessness are comprised of mixes of local government staff and public service agency staff, including community development, welfare, housing, health care, education, and mental health services personnel.

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

The City of Rochester's Community Development staff has undertaken a number of actions to further fair housing within the City during FY 2014-2015. Community Development staff has posted federal fair housing and housing anti-discrimination "know your rights" posters in prominent City locations, including the Rochester Community Center, the Rochester Senior Center, the City's welfare office, the SHARE Fund's offices, and the Rochester Housing Authority's offices. Community Development staff has also attended fair housing trainings, such as the Fair Housing: Accessibility First training held by HUD and the New Hampshire Housing Finance Authority, and consulted with the New Hampshire Legal Assistance's Housing Justice Project on fair housing issues within the City of Rochester.

In addition, Community Development staff has also carefully monitored proposed City ordinances that might impact fair housing choices for City residents. This includes consultation with the City's Planning Department regarding the proposal and adoption of an ordinance related to multi-family housing to ensure it would not negatively impact fair housing choice within the City.

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CR-40 - Monitoring 91.220 and 91.230

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

During the FY 2014-2015 and FY 2015-2016 subrecipient CDBG grant application processes, the City of Rochester required information as to the applicant organization's experience with federal grant requirements, and ability to comply with federal and local regulations. The applicants also certified that they would comply with the City of Rochester's anti-displacement and relocation policy.

Applications from previously-funded organizations were also analyzed for prior compliance and ability to carry out program activities as promised. During the FY 2015-2016 CDBG grant cycle, one organization in particular, the New Hampshire Small Business Development Center, did not receive funding in large part due to prior poor performance.

The City of Rochester has collected both quarterly and annual reports from its FY 2014-2015 CDBG subrecipients. In cases where the quarterly reports indicated that performance goals likely would not be met, Community Development staff reached out to the subrecipients to discuss the shortfalls, any challenges the organization was facing, and ways to improve performance.

In June 2015, Community Development staff performed annual site visits to the offices of the FY 2014-2015 CDBG grant subrecipients. During each visit, Community Development staff interviewed key agency personnel, reviewed program and financial documents, and discussed performance successes and challenges. While in a few cases performance difficulties were identified, overall the FY 2014-2015 CDBG grant subrecipients were found to be in compliance with HUD regulations and CDBG objectives and to be meeting or exceeding established program performance goals.

During FY 2014-2015, Community Development staff also performed Davis-Bacon Act wage rate compliance monitoring for all construction projects funded by CDBG. This included site visits to the construction project sites and interviews with project workers. During FY 2014-2015, Community Development staff performed a site visit and interviews for the Gonic School playground construction project. (Community Development staff also performed a site visit and interviews for the Hanson Pines pavilion construction project, although delays in project bids pushed this project into FY 2015-2016.) Full Davis-Bacon Act compliance was documented for FY 2014-2015 construction projects.

In addition, Community Development staff has maintained regular contact with the City's HUD representative and has maintained active membership on all relevant HUD email list-servs. Updates from HUD have been forwarded to CDBG subrecipients. Community Development staff also has attended a number of relevant trainings during FY 2014-2015, including Integrated Disbursement and Information System training, CDBG Basics training through the National Community Development Association, CDBG Economic Development training, workforce housing law training through the Workforce Housing Coalition of the Greater Seacoast, and Grant-Based Accounting for CDBG Grantees training.

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

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

The final draft of the Consolidated Annual Performance and Evaluation Report (CAPER) is made available to the public through a variety of means. Hard copies of the report are provided for public viewing at City Hall, the Rochester Public Library, and the Office of Economic and Community Development. Electronic copies of the report are provided for public viewing and download on the City website. Notice of the public comment opportunity is posted in a local newspaper of general circulation, as well as at City Hall, the Rochester Public Library, and the Rochester Community Center. Notice is provided via electronic means, as well, including but not limited to email announcements to community stakeholders (e.g., currently-funded non-profits and community business associations), postings to the Community Development Division webpage, and postings to the Economic and Community Development Office's social media accounts (e.g., Facebook and Twitter).

Notice will be posted no later than 15 days prior to the submission of the CAPER to HUD, and all public comments will be forwarded to HUD after the public comment period has ended.

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CR-45 - CDBG 91.520(c)

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

There have not been any changes in the jurisdiction’s program objectives during FY 2014-2015. The City of Rochester would, and has, changed its activities as a result of its experiences in implementing CDBG programs and activities, however. For example, in FY 2015-2016, the City of Rochester has discontinued CDBG funding to the New Hampshire Small Business Development Center due to ongoing performance issues and after counseling and other attempts to improve performance were unsuccessful.

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

The City of Rochester does not have any open Brownfields Economic Development Initiative grants.

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

N/A. The City of Rochester does not have any open Brownfields Economic Development Initiative grants.

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