

**Community Development
Block Grant Program**

Consolidated Annual Performance and Evaluation Report (CAPER)



**City of Rochester, New Hampshire
July 1, 2021—June 30, 2022**

Prepared for the US Department of Housing and Urban Development

submitted October 28, 2022

*Prepared by:
Community Development Division
The City of Rochester
31 Wakefield St.
Rochester, NH 03867
(603) 335-7522*

CAPER

1

CR-05 - Goals and Outcomes

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

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

This Program Year (PY) 2021 (July 1, 2021 – June 30, 2022) Consolidated Annual Performance Evaluation Report (CAPER) summarizes the accomplishments and financial expenditures of Year 2 of the PY 2021-2022 Consolidated Action Plan (PY 2021 Annual Action Plan) of the City of Rochester. The Community Development Block Grant award for the City of Rochester for PY 2021 was \$272,861.

Per the New Hampshire Employment Security the median household income for Rochester was \$62,179. Public service activities (non-construction funding for social service agencies) included funding for two of the region's homeless shelters, rental assistance for low-income families and for residents, supportive services for mental illnesses or developmental disabilities, and educational programs for low-income residents. Community Action Partnership for Strafford County's (CAP) weatherization assistance program, which weatherizes the homes of low-income residents, was funded by housing rehabilitation. CAP's goal for the weatherization program is to provide decent and affordable housing to Low-Moderate Income residents. Public Facilities funding was awarded to the Homeless Center for Strafford County to perform Ductwork for the new shelter, and for the new Drop-In Center for homeless Youth through Waypoint NH.

No comments were received during this time.

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

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

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Affordable and Quality Housing for All Residents	Affordable Housing Non-Homeless Special Needs	CDBG: \$ / CDBG-CV: \$0	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	75	0	0.00%	25	23	92.00%
Affordable Housing for Homeless/At-Risk Persons	Affordable Housing Homeless	CDBG: \$ / CDBG-CV: \$0	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	250	0	0.00%			
Affordable Housing for Homeless/At-Risk Persons	Affordable Housing Homeless	CDBG: \$ / CDBG-CV: \$0	Homeless Person Overnight Shelter	Persons Assisted	500	97	19.40%	615	332	53.98%
Affordable Housing for Homeless/At-Risk Persons	Affordable Housing Homeless	CDBG: \$ / CDBG-CV: \$0	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	10	0	0.00%			
Affordable Housing Stock Creation/Retention	Affordable Housing Public Housing	CDBG: \$ / CDBG-CV: \$0	Homeowner Housing Rehabilitated	Household Housing Unit	200	64	32.00%	25	26	104.00%

Emergency Situations Aid to LMI Residents	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG-CV: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	100	3377	3,377.00%	0	42	
Emergency Situations Aid to LMI Residents	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG-CV: \$	Homeless Person Overnight Shelter	Persons Assisted	100	429	429.00%	0	42	
Emergency Situations Aid to LMI Residents	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG-CV: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	4	0	0.00%	0	0	

Establish/Stabilize/Expand Small Businesses	Non-Housing Community Development Economic Development	CDBG: \$ / CDBG-CV: \$0	Jobs created/retained	Jobs	10	0	0.00%	2	0	0.00%
Improving the Safety/Liveability of Neighborhoods	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	10000	0	0.00%			
Increase Access to Quality Facilities/Services		CDBG: \$ / CDBG-CV: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	5				
Increase Access to Quality Facilities/Services		CDBG: \$ / CDBG-CV: \$0	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2500	0	0.00%	150	0	0.00%
Increase Access to Quality Facilities/Services		CDBG: \$ / CDBG-CV: \$0	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0		157	54	34.39%

Increase Access to Quality Facilities/Services		CDBG: \$ / CDBG-CV: \$0	Facade treatment/business building rehabilitation	Business	5	0	0.00%			
Providing Services for Residents with SUD	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	100	0	0.00%			
Public Services Concerned with Employment	Non-Housing Community Development Economic Development	CDBG: \$ / CDBG-CV: \$0	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	800	115	14.38%	165	92	55.76%

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

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

CDBG Priorityies favored public services and facilities projects serving homeless residents, rental assistance and housing rehabilitation to presever affordable housing stock and public facilities activities and projects serving extremely low and low-income residents. PY 2021 funding reflected these priorities. The greatest amount of funding went to My Friend’s Place for the amount of \$10,834.70 and Cross Roads House for the amount of \$10,000. For maintain affordable housing for low-moderate income residents, \$4,000 was allocated by the SHARE fund to provide rental assistance to lower income residents. Rental support represents an important affordable housing stragey of the city’s CDBG program; the rental market remains a large provider of affordable housing for Rochester residents. During the PY 2021 over \$60,00 was allocated to Community Action Partnership of Strafford county to provide weatherization for homes owned by low-moder income residents. This program

greatly reduces energy costs for the home, for most residents, thereby keeping the home affordable for the owner. A large majority of these residents served by this program are low-income elderly residents who are seeking to “age in place.” This weatherization program is allowing this demographic to do so in helping to keep their housing costs affordable.

The city’s focused on supporting some of Rochester’s most vulnerable residents, such as the homeless residents, with their highest-priority needs being housing and healthcare. The Homeless Center for Strafford county was awarded \$35,000, Waypoint was awarded \$50,000 to assist in the new drop in center specifically for homeless youth, My Friend’s place was awarded \$7,500, Cross-Roads House was awarded \$6,448 and Dover Adult Learning Center was awarded \$5,000 to assist in its mission to help adults across the county enhance their skills and improve their lives through not only basic education, but job training, high school completion, and college and career transitions, along with enrichment classes.

PY2021 housing rehabilitation and public facilities projects have included the ducktwork on the Homeless Center for Strafford county as well as the new drop in center for homeless teens through Waypoint NH. Both of these projects aided low-moderate income and at risk residents. Due to the COVID-19 Pandemic there were some delays in projects from the PY 2020 year that were completed during PY 2021, including the Homeless Center for Strafford County’s kitchen project and the Rochester Child Care Center’s fire door project.

We have 10,000 expected for Improving the Safety/Liveability of Neighborhoods during our 5 year Consolidated Action Plan timeframe, but we have not seen the projects started yet for this category. There is a project in the works with Rochester’s Rec Department for some Pickleball Courts that was to start in 2022 but has been delayed due to questions that have been brought up during the process. There is hope that the project will start back up late spring, early summer of 2023, once the committee in charge of the project has met and discussed options. There was a strong request for Pickleball Courts in the city as it is fast becoming a popular sport and so many people utilize the small court we currently have.

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	957
Black or African American	28
Asian	23
American Indian or American Native	8
Native Hawaiian or Other Pacific Islander	0
Total	1,016
Hispanic	34
Not Hispanic	977

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

Narrative

During PY 2020 Approximately 94.5% of residents of the City of Rochester served were white, and approximately 5.5% of the residents served were non-white races and/or ethnicities (predominantly Black/African-American and Asian). According to US Census population estimates, The City of Rochester is 93.7% white, .7% Black, 0% American Indian and Alaska Native, 1.5% Asian alone, .3% Naïve Hawaiian and other Pacific Islander, 3.1% Hispanic and 3% 2 or more races. There have not been highly disproportionate services provided to white residents over residents belonging to racial/ethnic minorities, although the demographics of families served should be closely monitored in future years to ensure that a disproportionality does not develop.

Roughly 2% of those assisted consider themselves mixed race. IDIS limits the way we can report the racial makeup of the city of Rochester. Without the option to note that in the reporting system the numbers could potentially be seen as leaning more towards assisting one race or ethnicity over another. Providing the option of adding a “Multi Race” option within IDIS would give recipients a better opportunity to show a more accurate composition of those helped by CDBG funding.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	316,056	283,484
Other	public - federal		

Table 3 - Resources Made Available

Narrative

In the adopted PY 21 Action Plan, \$316,056 in CDBG grant funds (including the \$272,861 grant allocation for PY 20, and program income from the Job Loan in the amount of \$43,195.68) were made available to the City of Rochester. The adopted PY 21 Annual Action Plan and two minor amendments (HUD award correction and reallocation of unexpended funds) can be found on the City of Rochester's website at <https://www.rochesternh.gov/community-development-division/pages/action-plans>

During PY 2021 \$228,913 was expended on regular program and activities. A total of \$54,571 of the entitlement CDBG Grant (17%) was expended on planning and administration activities. A total of \$42,492 was expended on regular public services (13% of PY 21 grant allocation). Other funding subcategories included housing rehabilitation and public facilities projects.

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.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Citywide	26	26	
Rochester Low-Moderate Income Census Tracts	74	74	HUD-determined census tracts of 51% or greater low-moderate income residents

Table 4 – Identify the geographic distribution and location of investments

Narrative

These activities were operation expenses at the region's homeless shelters, My Friend's Place, the Homeless Center for Strafford County, and Cross Road; mental health services provided by Community Partners; domestic violence services provided by HAVEN; Strafford Nutrition Meals on Wheels, which

provides meal delivery services for elderly residents and adult residents with disabilities; supportive services for elderly residents and adults with disabilities provided by Easter Seals. All of these activities, although occurring in census tracts that are not majority low-to moderate income, serve some of the most vulnerable and neediest of Rochester's residents, including residents who are homeless, elderly residents and residents with mental illnesses and/or development disabilities.

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 PY 2021, \$5,478,626 was made available in leveraged funds provided by the public service agencies that received CDBG funding. The sources of these leveraged funds are various and includes non-CDBG federal grants, state grants, municipal-level funding and private donations received by the public service agency CDBG subrecipients. The Community Action Partnership of Strafford County's weatherization assistance program, for example, receives leveraged funds through regional utility companies (such as Eversource and Until) and the state Department of Energy. The united Way of the Greater Seacoast also provides significant funding for multiple public services agencies that received Rochester CDBG funds, especially the three regional homeless service providers.

In the Annual grant application developed by the 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.

Rochester CDBG Activity | *Rochester CDBG Funding* | Leveraged Funds

Dover Adult Learning | \$5,000 | \$1, 325, 289

Court Appointed Special Advocates (CASA) | \$1,000 | \$1,265,147

Cross Roads House | \$10,000 | \$1,129,561

Homeless Center for Strafford County | \$35,000 | \$760,000

Strafford County Nutrition Meals ON Wheels | \$3,000 | \$352,956

MyTurn | \$4,000 | \$313,002

HAVEN | \$2,500 | \$213,521

Community Action Partnership of Strafford County- Weatherization Program | \$65,000 | \$150,000

My Friend's Place | \$10,834 | \$100,000

Share Fund | \$4,000 | \$19,000

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	615	334
Number of Non-Homeless households to be provided affordable housing units	40	39
Number of Special-Needs households to be provided affordable housing units	0	0
Total	655	373

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	23
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	25	39
Number of households supported through Acquisition of Existing Units	0	0
Total	25	62

Table 6 – Number of Households Supported

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

Performance goals for the year were not as high as we anticipated, hitting 69% of Rochester's goal for PY 2021. The city anticipated a higher number of residents needing support from due to the ending of the eviction moratoria ending during the PY 2021.

Regarding the number of non-homeless households provided with affordable housing units, the evictions moratoria enacted in response to the COVID-19 Pandemic likely affected the needs for

emergency rental assistance during PY 2021. The city anticipated that this moratoria would end during the PY 2021 year, however it did not appear to increase as much as anticipated, but still more than PY 2020. Regarding the number of households supported through the rehabilitation of existing units, performance goals were slightly exceeded. The goal for PY 2021 was the rehabilitation of 25 units for low-moderate income households, and the actual performance was the rehabilitation of 39 low-moderate income households. For home rehabilitation, about 65 % of households were extremely low income, and about 35% of householders were low income, with non being non low-moderate income.

Discuss how these outcomes will impact future annual action plans.

The Seacoast's homeless shelters, including current subrecipients Cross Roads House, My Friend's Place and Homeless Center for Strafford County, participate in the Balance of State Coordinated Entry system and have found it challenging to accurately estimate how many clients will be served within the given year since homeless clients are now funneled through the same organizational point of contact. Another factor that would hinder the ability to accurately report this is that many homeless residents frequently moved between various cities and towns throughout the seacoast with the help of public transportation. While a shelter maybe serving the same or great number of clients overall, there is a possibility that the specific percentage of Rochester residents would decline, likely the reason we saw a decline since last year of beds needed.

The Share Fund has received CDBG funding during the PY 2021 year to assist with rental assistance for low-moderate income households. Its anticipated that with the pandemic ending, the city will see an increase over the next several years in the need for more homeless shelters. A significant portion of the CDBG funds for PY 2021 were allocated specifically for regional homeless services and for public facilities improvements to the homeless shelters in the area, such as the Homeless Center for Strafford County that works with several cities across the Seacoast area.

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

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	653	0
Low-income	212	0
Moderate-income	27	0
Total	892	0

Table 7 – Number of Households Served

Narrative Information

The majority (97%) of Rochester residents assisted with public service agency CDBG funds during PY 2021 were extremely low or low income with a significant majority of that percentage being extremely low

income (69%). This includes residents who received weatherization assistance via Community Action Partnership's Weatherization Program.

For CDBG purposes, "extremely low income" is defined as 30% of the area median income, "low income" is defined as 50% of the area median income and "moderate income is defined as 80% of the area median income. For PY 2021, the median income for Rochester area was \$62,179.

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 in PY 2021 included public service agency grants to two of the region's homeless shelters that provide services to Rochester Residents. These services are My Friend's Place and Cross Roads House. The Share Fund also provided rental assistance for low-moderate income residents. HAVEN also provided assistance in housing for those escaping domestic violence. Public facilities funding for the duct work at the Homeless Center for Strafford County's new, larger-capacity shelter.

The region's three primary homeless shelters, in partnership with other regional social service agencies and local welfare directors, provide individual assessment for each homeless person or family, or each person or family at risk for homelessness. Based on these assessments, the person or family is placed with a homeless shelter that best fits their needs, referred to an organization that can provide emergency rental assistance, or provided other relevant referrals. The implementation of Coordinated Entry System for the entire New Hampshire Balance of State Continuum of Care region has formalized this intake process and centralized it through the use of the services of 211. In addition, all of the regional shelters work with the Continuum of Care on the annual Point IN Time count, which in recent years had focused especially on obtaining accurate counts and needs assessments of unsheltered persons not connected with shelter or other service providers.

Addressing the emergency shelter and transitional housing needs of homeless persons

During PY 2021, two of the local Public Service agencies were granted CDBG funds for their assistance in emergency shelter and transitional housing needs of homeless persons (My Friend's Place and Cross Roads House). HAVEN also received public service agency funding from CDBG funds to provide emergency shelter services for domestic violence survivors who experience homelessness while leaving their abusive partners. This program is not just for single people, but families leaving a domestic violence situation.

Two of the three shelters (My Friend's Place and the Homeless Center for Strafford County) have transitional housing units available. Cross Roads House, the regional homeless shelter with the largest capacity, also runs Housing First program.

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

During PY 2021, two of the local Public Service agencies were granted CDBG funds for their assistance in emergency shelter and transitional housing needs of homeless persons (My Friend's Place and Cross Roads House). HAVEN also received public service agency funding from CDBG funds to provide emergency shelter services for domestic violence survivors who experience homelessness while leaving their abusive partners. This program is not just for single people, but families leaving a domestic violence situation.

Two of the three shelters (My Friend's Place and the Homeless Center for Strafford County) have transitional housing units available. Cross Roads House, the regional homeless shelter with the largest capacity, also runs Housing First program.

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

During PY 2021, CDBG public service agency operating grants were awarded to two of the regions homeless shelters (My Friend's Place and Cross Roads House) that provide services to Rochester's residents as well as public facilities funding was provided for the ductwork in the new Homeless Center for Strafford County. Cross Roads House, specifically, runs a housing stabilization program that provides case management for clients who have obtained permanent housing to ensure they maintain that housing. As previously stated, HAVEN received CDBG funding to provide emergency shelter services for domestic violence survivors (both singles and families) who experience homelessness while leaving their abusive partners.

The Community Development Coordinator has also been active in multiple coalitions and groups through PY 2021, including the Home for All coalition. The focus of the Home of All coalition's work during PY 2021 has been on increasing supply and access to affordable housing for homeless residents through landlord outreach and education efforts. The goal of the program is to increase landlord acceptations of Section 8 vouchers held by chronically homeless residents. So far, several landlords and multiple rental units have been enrolled in the program.

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 of public housing vacancies, increase in affordable housing units, the creation of workforce housing, and the promotion of economic opportunities and an increase in the affordable healthcare access to low-income families. During PY 2021, CDBG funding supports the SHARE Fund's rental assistance program for low-income residents. The Community Action Partnership of Strafford County's weatherization received CDBG funding to assist with housing rehabilitation for low-income homeowners. Without these services many residents could have possibly found themselves homeless.

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 housing locations, that meet to review the RHA annual and five-year plans. The Resident Advisory Board also provides input on general RHA operations. During the PY 2021 Annual Action Plan citizen participation plan process, the City of Rochester's Community Development consulted with the RHA Executive Director and the RHA Resident Advisory Board on identifying how to increase homeownership opportunities for lower-income residents, especially residents who are racial/ethnic minorities. This planning was duly incorporated into the PY 2021 Annual Action Plan. The Community Development Coordinator also forwards program and funding opportunities regarding affordable homeownership to RHA staff, for distribution to RHA residents, as such information becomes available.

Actions taken to provide assistance to troubled PHAs

N/A. The Rochester Housing Authority is not designated as 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 Coordinator has been active in multiple coalitions and groups through PY 2021, including the Fidelity Subcommittee of the Tri-City Mayoral Homelessness Task Force. The Tri-City Mayoral Homelessness Task Force worked throughout 2018 and 2019 to draft a regional homelessness master plan that included housing and employment needs analyses for residents exiting mental health facilities and correctional programs. The Fidelity Committee successfully pushed for a new ordinance in the City of Rochester that waives fees for identification documents for homeless residents, a key barrier for homeless residents in accessing vital services that was identified in the Task Force's Master Plan on Homelessness.

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 continue to be supportive services and affordable housing for residents with mental illnesses and/or substance use disorders. 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 public service agency funding was awarded in PY 2021 to two regional homeless shelters (My Friend's Place, Cross Roads House). The Homeless Center for Strafford County and Waypoint NH were provided funding from Public Facilities CDBG funds. These public service agencies and facilities disproportionately service residents with mental illnesses or substance use disorders. CDBG Funds were also awarded to Community Partnership of Strafford County in order to assist low-income residents with housing rehabilitation/weatherization of their current homes. In Addition, PY 2021 the City of Rochester provided general municipal funding support to SOS Recovery Center, which provides recovery services for residents with substance use disorders.

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

In PY 2021, the City of Rochester continued to fund the housing weatherization work of the Community Action Partnership of Strafford County, which includes lead-safe work practices and lead remediation when applicable. The City of Rochester also has joined a workgroup led by the Strafford County Public Health Network that focuses on lead-based paint hazards on the regional level. The Rochester Community Development Coordinator will continue as part of this workgroup in PY 2021 and PY 2022.

The Community Action Partnership for Strafford County's weatherization assistance program, which received over \$65,000 in CDBG housing rehabilitation funding during PY 2021, 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, containment, and/or abatement services when circumstances, such as the age of the home in question, indicate the need for such. In PY 2021, a total of 39 housing units received housing rehabilitation assistance through Rochester CDBG funding, including 10 units constructed prior to 1978.

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

The City of Rochester supported a range of anti-poverty efforts in PY 2021. Dover Adult Learning Center, received Public Agency funding to assist with the providing High school equivalency testing to Rochester residents. My Turn also received funding to help provide vocational skills training, transportation and child care assistance as well as paid internship opportunities for lower-income young adults. Both programs assist to help ensure residents' long-term advancement out of poverty.

The City of Rochester also continued to operate and promote its Job Opportunity Benefits (JOB) Loan Program, which provides loans to small businesses to encourage the hiring of low and moderate income employees. Conditions for receiving a loan require a commitment to creating or retaining a certain number of jobs that are made available to low and moderate income employees such jobs must include the potential for advancement. Recent Job Loan Program loan recipients have had to include an investment casting company, a microbrewery and a printing company.

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

The City of Rochester is a public entity that regularly plans and finances economic development projects, code enforcement, planning and zoning review, emergency financial relief assistance, and community development activities. Rochester's Community Development Division works with other city departments, including the Planning Department and Department of Public Works, and with many regional public service agencies, including agencies that receive CDBG funding subgrants and agencies that do not. This coordination has enabled the efficient provision of supportive services, housing rehabilitation, and public facilities improvements for low- and moderate-income Rochester residents. This coordination also identifies 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 regularly participates in the New Hampshire Balance of State Continuum of Care as a Rochester representative, in the Fidelity Committee of the Tri-City Mayoral Homelessness Task Force as a Rochester staff liaison, and in a workgroup leadership position with the Home For All coalition as a Rochester representative. The involvement of Community Development staff in these organizations and coalitions provides for the development and strengthening of cross-agency relationships and projects, especially those related to reducing and eliminating homelessness, one of the top community concerns.

The Community Development Coordinator also maintains regular communications with the Rochester Welfare Director, Rochester Housing Authority Executive Director, Rochester McKinney-Vento school district liaison, and other New Hampshire entitlement community CDBG staff, among others. The Community Development Coordinator shares news and updates with all of these persons, provides and receives information on funding opportunities, and coordinates regional community development activities.

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 Division has engaged in a broad range of outreach and networking activities throughout PY 2021, which have included regularly relaying 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 agencies and other regional contacts who might be interested. The Community Development Coordinator also participates as a regular member of the New Hampshire Balance of State Continuum of Care, the Home For All coalition, and the Fidelity Committee of the Tri-City Mayoral Homelessness Task Force.

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

One of the key goals of the city's current Analysis of Impediments to Fair Housing (AI) is to monitor city ordinances and policies that affect housing development (whether positively or negatively) and impact on housing availability and affordability for various residential demographics. In December 2020 and January 2021, the City of Rochester City Council took under consideration a "disorderly residence" amendment to the city ordinances that would have penalized property owners and tenants of housing deemed to be engaged in "disorderly" activities. The Community Development Coordinator reviewed the draft ordinance amendment and contacted the City Manager and Mayor with concerns about the affordable housing and fair housing implications of the ordinance, especially for domestic violence survivors. At the January 2021 City Council meeting, the City Council voted not to adopt the ordinance amendment (<https://www.rochesternh.net/sites/g/files/vyhlif1131/f/minutes/cc20210105regmin.pdf>, p.57).

The third listed goal for the current AI is to reduce housing discrimination against residents with disabilities. In PY 2021, the city of Rochester worked with My Friend's Place and awarded CDBG funds to help fund a case manager who assists their clients with many activities, including but not limited to, applying for assistance with Vocation Rehabilitation, DHHS or the Social Security Administration, seeking mental health counseling, physical or dental appointments, etc. My Friend's Place also can help their residents with applying for eligible assistance such as food stamps, health insurance, or disability income.

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

The City of Rochester collects both quarterly and annual reports from its subrecipients. These reports include racial/ethnic, sex, income, and other demographical information of clients served, as well as expense details. In May 2022, the Community Development Coordinator performed annual site monitorings of all PY 2021 CDBG grant subrecipients, as part of its established policy to provide annual monitoring to all CDBG subrecipients.

During each visit, Community Development staff interviewed key agency personnel, reviewed program and financial documents, and discussed performance successes and challenges. Financial monitoring includes discussion and review of the subrecipient procurement policies, review of the audit trail report and CDBG trial balance report, review and discussion of the subrecipient's most recent audit or equivalent financial statements, review and discussion of the subrecipient's system of internal controls, review of CDBG expenditures on staff salary/benefits (as applicable), and review and discussion of cost allowability.

There were no significant performance issues identified during any of the PY 2021 subrecipient site visits. However, based on quarterly reports and annual site monitoring visits, the City of Rochester may identify deficiencies and formulate corrective action plans to remediate these deficiencies. Any concerns or findings are documented in a formal post-monitoring letter to the subrecipient.

Prior to the award of any CDBG funds, all potential subrecipients are subject to risk assessment during the grant application process. The City of Rochester CDBG grant application requires agencies to provide information on agency history, federal grant management experience, budget information, information on board of directors, and whether the agency currently collects client demographics data and has a conflicts of interest policy. A copy of the agency's most recent financial review and a description of any findings from the most recent financial review are also requested as grant application attachments.

Community Development staff also performed environmental reviews for all CDBG-funded projects and Davis-Bacon Act wage rate compliance monitoring for all CDBG-funded construction projects. For environmental reviews, this includes field site visits to project sites and consultations with the New Hampshire Division of Historical Resources for projects not already covered under the existing Programmatic Agreement between the City of Rochester and the Division of Historical Resources. Community Development staff also discussed environmental review procedures with all PY 2020 CDBG subrecipients prior to the beginning of the program year to ensure that all subrecipients understood that work on the projects could not begin until the completion of the environmental review.

For Davis-Bacon Act compliance, this has included interviews with laborers and review of payroll documentation for the Triangle Club's electrical system upgrades project. No compliance issues were identified from the interviews or in review of submitted payroll documentation. Due to the ongoing COVID-19 pandemic, Davis-Bacon monitoring for PY 2020 projects and those projects that have been delayed/postponed due to the pandemic were conducted remotely via laborer questionnaire forms, telephone interviews, and email communications. The Community Action Partnership of Strafford County's weatherization assistance program is currently exempt from Davis-Bacon Act requirements, as work occurs on single-family and duplex homes.

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. An electronic copy of the report is provided for public viewing and download on the City of Rochester's Community Development Division webpage at Annual Reports | Rochester NH .

Notice of the public comment opportunity on the draft CAPER is posted in a local newspaper of general circulation, *Foster's Daily Democrat*, as well as on the Community Development Division webpage. The notice also includes information in French on how to receive an oral interpretation of the plan, if needed, in accordance with the City of Rochester's Language Access Plan. Notice of the public comments period regarding the draft PY 2021 CAPER was posted in *Foster's Daily Democrat* (both online and in printed format) on October 9, 2022, more than 15 days prior to the submission of this CAPER to HUD. No comments were received.

CR-45 - CDBG 91.520(c)

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

There have not been any changes in the City of Rochester's primary program objectives during PY 2021. The ongoing pandemic, however, strongly impacted funding allocations for PY 2021. Focus was placed on homeless shelter services, rental assistance to prevent evictions for low-income households, and healthcare services. These areas have been identified as the highest need priorities due to the pandemic's effects on unemployment, health care systems, and housing stability for lower-income residents.

It should be noted that the City of Rochester has changed its activities as a result of its experiences in implementing CDBG programs in the past. For example, in PY 2015, 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. Also, in PY 2019, in minor plan amendments, unexpended prior year funds were allocated for the installation of a back-up generator at homeless shelter My Friend's Place and for the Rochester Opera House chairlift project already included in the PY 2019 Annual Action Plan. (After the Rochester Opera House chairlift project was put out to bid and the received bids were considerably higher than the original budget, it was determined that additional funding for the project was reasonable and necessary.)

Unexpected funds were reallocated for Waypoint NH and its Street Outreach Program for homeless youth (\$7,000), My Friend's Place for hazard pay for its homeless shelter employees during the COVID Pandemic (\$7,000) and for the Homeless Center for Strafford County and its acquisition of a building for use as a decompression shelter (\$2,414).

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

No