

**Barnstable County HOME Consortium  
Analysis of Impediments to Fair Housing Choice  
1997**

Overview

This report was prepared by the Barnstable County HOME Consortium. The Consortium consists of the Cape's fifteen towns and Barnstable County. The latter, through the Cape Cod Commission, serves as the Consortium's lead entity.

The area of concern for the Consortium is commonly referred to as Cape Cod. The Cape has a year-round population of nearly 200,000 people. Historically, minorities have made up a small percentage of the Cape's total population. According to the U.S. Census for 1990, 4.63% of the Cape's population was considered minority. Since 1980 this segment of the Cape's population has grown by less than 1%. The largest proportion of the Cape's 7,054 nonwhite residents in 1990 was black (2,827), followed by the "other races" category (2,079), American Indian (1,180) and Asian (968).

Although the Cape's minority population is relatively small, compared to more urban centers, the Consortium is very concerned about ensuring that equal and fair housing opportunities are provided to its minority constituents. As this analysis will demonstrate, this goal has guided the actions and policies of the Consortium since its inception.

The Consortium also recognizes that it must concerned itself with effects of bias/discrimination based on gender, source of income, sexual orientation, marital status, age and people with special needs (i.e. physically disabled or mentally ill).

As this report will show chief among the factors impacting housing opportunities is the lack of affordable housing, the area's low wages and the Not-In-My-Backyard syndrome.

Process-Citizens Participation

The Consortium relied heavily on the input it received from the Barnstable County HOME Consortium's Advisory Council in preparing this analysis. The Advisory Council is a seventeen member body, consisting of representatives from each of the Cape's fifteen towns, two at-large members and the Cape Cod Commission's affordable housing specialist as an ex-officio member.

The Council represents a broad cross section of interests including housing authorities, banking, municipal government (town and county), human services, housing non-profits, religious, social justice, elderly and tenants. The Council was established by the County to provide input/advise regarding the actions and policies of its HOME Program. The Council also serves as a clearinghouse for discussing issues, actions, policies, etc. that are related to, or have an impact on affordable housing, including equal and fair housing opportunities.

The Consortium also relied on feedback it received from several other interests in preparing this analysis. Included among these was the Cape Affordable Housing Loan Consortium. The Loan Consortium was created in 1993 to provide financing for construction and/or rehabilitation of affordable housing to rent or own. It was formed, in part, to ensure greater compliance with the federal Community Reinvestment Act. The Loan Consortium is guided by a Steering Committee consisting of the CEO's of nine lenders and five community representatives.

Other notable interests included the Housing Assistance Corporation (HAC), the region's housing non-profit housing agency. HAC administers a host of housing programs, including rental subsidies, homeownership assistance, housing development and homeless shelters. Another was the Lower Cape Cod Community Development Corporation, a sub-regional non-profit whose mission is to address the affordable housing and economic needs of Lower Cape very low and low-income residents. Finally, agencies that service the needs of people with special needs, the elderly and minorities were also relied upon in preparing this report.

### Analysis Of Impediments

In preparing this analysis, the Consortium examined a wide selection of documents, policies, plans, etc., that relate to, or would have an impact on, fair and equal housing opportunities. From this review and the discussions occurring among various interests, the Consortium was able to identify what it considers to be key impediments to fair housing opportunities.

What follows is a brief description of the documents reviewed:

**Cape Cod Commission Act of 1989:** This is the act that created the Commission. Within the act there are several provisions that pertain to fair affordable housing. Below these provisions are listed as they appear in the act. Together, they lay out the basic duties and responsibilities of the Commission in regard to this area.

The express purpose of the Commission is set forth in Section 1, (c), (d), which reads: "shall be to further: the development of an adequate supply of fair affordable housing," and, "preserve the social diversity of Cape Cod by promoting fair affordable housing for low and moderate income person"

The Act (Section 2 (X) ) defines fair affordable housing in the following manner:

"Fair Affordable Housing", any residential housing unit which meets affordability standards promulgated by the Executive Office of Communities and Development and which prohibits discrimination because of the race, color, religious creed, national origin, sex, ancestry, sexual orientation or handicap of any person."

**Regional Policy Plan (RPP):** The RPP functions as the planning and regulatory document for the Cape Cod Commission. It sets forth standards for regulating development and contains policies, actions, etc. that address specific areas related to land use policies. Each section of the RPP also contain an overview/analysis of the subject area. One important area identified in the RPP is affordable housing. The RPP's Affordable Housing Section contains the following goals dealing with the matter of fair affordable housing:

5.1 Goal: To promote the provision of fair, decent, safe, affordable housing for rental or purchase that meets the needs of present and future Cape Cod residents. At a minimum each town shall seek to raise its affordable housing stock to 10% of all year-round units by the year 2015.

#### Minimum Performance Standards

5.1.2 Residential construction and redevelopment projects of 10 units or more shall provide at least 10% of the proposed units as affordable units. In lieu of providing such units on site, the applicant may satisfy these requirements by providing

equivalent housing units off site through the sale or contribution of existing units or land.

5.1.3 Residential subdivision plans of 10 lots or more shall provide at least 10% of the proposed lots as affordable housing sites. Unless developed by the applicant, such sites shall be sold or contributed to an eligible local entity. An applicant may also satisfy these requirements through one of the options specified in Section 5.1.2.

5.2 Goal: To promote equal opportunity in housing and give special consideration to meeting the housing needs of the most vulnerable segments of the Cape's population including, but not limited to: very low income (50% of median income), low income (51% - 80% of median income), single female heads of household, racial minorities, people with AIDS, elderly, the homeless, disabled, and others with special needs.

5.2.1 In all of its actions the Commission shall work to prevent discrimination in housing because of race, color, creed, religion, sex, national origin, primary language, age, political affiliation, disability, sexual orientation or any other consideration prohibited by law, and shall not knowingly approve any development that so discriminates.

5.3 Goal: To seek out, provide support and encourage the development of innovative strategies designed to address the housing needs of Cape Cod residents, with particular attention to the needs of low and moderate income renters.

**Local Comprehensive Plans:** Each town residing with the County may elect to develop an LCP. If the town wishes to have the plan certified by the Commission the plan must be consistent with the goals and standards of the RPP. To date the Commission has certified LCP's for the following towns: Wellfleet, Eastham and Truro. In each case the plans contained sections that were similar or the same as the four goals listed above. The LCP's also contain a needs analysis which examines the causes for the lack of affordable housing, who is impacted and how to increase fair affordable housing opportunities. Towns can chose to go beyond the parameters contained in the RPP with respect to fair housing opportunities.

Additionally, the Commission has conducted preliminary reviews of the Barnstable and Falmouth LCPs. Both plans contain language that is consistent with that of the RPP's affordable housing section. The remaining ten towns have all indicated a desire to develop their own LCP and it is anticipated that most, if not all, will seek certification from the Commission.

Copies of certified LCP are on file in the Commission office.

**Consolidated Plan:** The CP is the five year housing plan for the Barnstable County HOME Consortium. The CP was developed by the Commission's affordable housing specialist in concert with the HOME Advisory Council. The CP provides a detailed description of the area's affordable housing needs, how area minorities are impacted by the lack of affordable housing, available resources, what it considers to be the top priorities for the Consortium, and strategies for how these priorities can be addressed. The Consortium's CP contains the required certifications regarding furtherance of fair housing opportunities.

#### Impediments To Fair Housing Opportunities

The Consortium has identified three factors which it believes play a major role in restricting fair

and equal affordable housing opportunities. The three factors are: insufficient income/high housing costs, lack of affordable housing and the Not-In-My-Backyard (NIMBY) attitude. Below appears a description of each of these factors.

### **1. Insufficient Income/High Housing Costs**

In the view of the Consortium one of the chief impediments to fair affordable housing is the disparity between local wages and the cost of housing on Cape Cod. Contributing to this severe situation is the Cape's tourist based economy, with its low wages and high percent of seasonal jobs and the Cape's second home market. The latter has particularly impacted the situation due to the fact that homes are being purchased by off-cape households with incomes that can support much higher housing costs, thereby driving housing costs beyond the means of local year-round residents.

This matter was extensively addressed in the Consortium's 1995 Consolidated Plan. Below are excerpts from that plan which speak directly to this impediment. The CP reported the following:

The 1980's were a tumultuous time for Cape Cod's housing market. An examination of that time reveals the depth and scope of its impact on this community. The most striking feature was the rise in housing costs. In 1984 the median sale price for a single family home was \$76,530. In a matter of five years this figure had climbed to \$135,000. This situation created terrible hardships for the area's very low, low and moderate-income households.

There were many factors which contributed to this situation. Of particular import to this region was the increase in the second home market. For the most part these units were purchased by off-Cape people with incomes far exceeding those of the year-round population. In addition, because many of these units were purchased solely for investment purposes, the percentage of all household units occupied by year-round residents dropped for the first time in thirty years. This took place despite the fact that the Cape's year-round population increased by over 26% during this decade. In the final analysis, the second home market boom resulted in pricing many low and moderate-income Cape natives out of both the sales and rental markets.

Between 1989 and 1992, housing costs dropped, providing a temporary and soft reprieve for very low and low-income people. Since then prices have begun to inch upward once again, which is not surprising.

In any event, in 1992 the median cost of housing was \$120,000 for Barnstable County. It would take an annual income of \$40,000 to afford 1992's median sales price (assumes 30 year fixed rate at 7.5%, 5% downpayment, debt to income ratio of 30%). According to the 1990 census the median household income for Barnstable County was \$31,766. From this we can see that an affordability gap of \$8,234 exists for the median income household. This gap widens considerably when applied to the household at 80% of the area's median income (\$25,413). For this household the affordability gap is \$14,587.

In late 1993 the Cape Cod Board of Realtors reported that 4.6% of all the units listed in their Multiple Listing Services (MLS) fell below \$79,999. Further, the percentage of MLS units below \$89,999 was 8.8%. Both examples demonstrate the scarcity of units available at a price affordable (\$85,000) for the low-income home buyer. The increase in housing costs over the past year does not bode well as far as increasing homeownership

opportunities for very low and low income homebuyers.

Rental costs, although more affordable than the cost of purchasing a single family home, still represent a serious hardship for low and moderate-income tenants on Cape Cod. According to the 1990 census the median rent was \$646 per month for Barnstable County. Adding utility costs, estimated to be \$150 per month, brings the median rent to \$796. Assuming that the tenant pays no more than 30% of his/her income for shelter costs, a household would need to be earning the area's median income to afford this housing cost.

For very low and low-income tenants, however, the situation is much worse as evidence by the sizable affordability gap that exists. Again assuming the tenant pays no more than 30% of income for shelter, plus utilities, the tenant at 30% of the area's median income could afford \$238.00; the tenant at 50% of the area's median income could afford \$397; and the tenant at 80% could afford \$635. In each example a serious affordability gap exists with respect to rental costs.

#### 4. Characteristics of Housing Need

##### a. Excessive Housing Cost Burdens

For the purpose of this plan HUD has defined excess cost burden to mean any household that is paying more than 30% of their gross income for shelter costs. On this basis, an analysis of Census data reveal the following:

\* Over one-third of all year-round households on the Cape are paying more than 30% of their income for shelter costs. Renter households are disproportionately affected by this cost burden. Renters comprised approximately 28% of the Cape's occupied households; the remaining 72% is owner-occupied. Nearly 46% of renter households pay more than 30% of their income for shelter costs. By comparison, only 28% of owner households pay more than 30%.

\* According to the 1990 Census 25% of all year-round households are paying more than 35% of their income for shelter costs. Again we find that renter households are being disproportionately affected by this issue. The Census reports that over 37% of all renters households are paying more than 35% of their income, while for the owner household the percentage stands at just over 20%.

##### b. Severe Cost Burden

For the purpose of this plan HUD has defined severe cost burden to mean any household that is paying more then 50% of their gross income for shelter costs. Again we find that renter households, particularly the very low and low-income renter households, are at the greatest risk of severe cost burden. This is due, in part, to the fact that a majority of these households must pay for all or some of their utilities. According to the 1990 Census more than 80% of renter households must pay for some or all of their utilities. Consequently, the vast majority of very low to moderate-income renter households are paying for all or some of their utility costs.

The Census reports that approximately 37% (7,937) of renter households are

paying more than 35% of their income for shelter costs. If we factor in at least one utility cost (e.g., heat), which we estimate to be \$120 per month, it places all of the renter households cited here of being at risk of paying more than 50% of their income for shelter costs. This analysis does not include the possibility of paying for more than one utility, which would certainly increase the numbers of very low to low -income tenants and homeowners with severe cost burden.

This situation is exacerbated by the Cape's extraordinarily high energy costs. The draft energy plan for Barnstable County reports that Cape residents pay some of the highest energy costs in the nation. The energy plan states, " for Cape Cod each person spent \$475 more, or 26% higher, than did the average Massachusetts citizen in 1992, although energy use was 11% lower".

### 3. Categories of Persons Affected

#### a. Extremely and very low-income:

The very low-income (50% or less of the median-income) comprise 21% (16,293) of all year-round occupied households living on Cape Cod. Fifty-nine percent (9,613) of these households have incomes at or below 30% of the area's median income. The Cape's extremely low-income represent approximately 13% of the Cape's year-round household population.

Nearly three-quarters (71%) of those households at 30% of the median-income are paying more than 30% of their income for shelter costs. We estimate that almost half (48%) of those households with an income between 31% and 50% of the median-income are paying more than 30% of their income for shelter costs.

#### b. Low-income

Households with an income between 51% and 80% (i.e., other low-income) of the median-income make up for over 17% of the Cape's total year-round occupied household population. We estimate that 58% of these households are paying more than 30% of their income for shelter costs.

#### c. Moderate-income

Moderate-income households (i.e., 81% - 95% of median income) comprise an estimated 8% of all year-round occupied households living on Cape Cod. Nearly 31% of these households are paying more than 30% of their income for shelter costs.

Based on the above we find that households with very low to moderate-incomes comprised over 46% of the Cape's year-round household population. The above also indicates that a significant portion of this category are paying more than 30% of their income for shelter costs.

#### d. Tenants

Renter households, particularly the very low and low-income renter households, are at the greatest risk of severe cost burden. This is due, in part, to the fact that a

majority of these households must pay for all or some of their utilities. According to the 1990 Census more than 80% of renter households must pay for some or all of their utilities. Consequently, the vast majority of very low to moderate-income renter households are paying for all or some of their utility costs.

The Census reports that approximately 37% (7,937) of renter households are paying more than 35% of their income for shelter costs. If we factor in at least one utility cost (e.g., heat), which we estimate to be \$120 per month, it places all of the renter households cited here of being at risk of paying more than 50% of their income for shelter costs. This analysis does not include the possibility of paying for more than one utility, which would certainly increase the numbers of very low to low -income tenants and homeowners with severe cost burden.

#### e. Elderly

According to the 1990 Census, Cape residents age 65 and over represented 22% of the area's population. This represented the highest percentage in the Commonwealth, significantly ahead of the Berkshire's 17% and the Statewide level of 14%. Between 1980 and 1990 this segment of the population increased by over 33%.

In 1990 the average retirement household income was \$11,208, while the mean income for Social Security was \$8,340. The Census reported that just over 6% of persons aged 65 and over were below the poverty line. Females outnumber males by more than a 2 to 1 margin.

The elderly, like those of the general population, are faced with significant cost burdens. The Census reports that just over 28% of the Cape's elderly population aged 65 and over, pay 30% or more of their income for shelter costs. Nearly 80% of this category pay more than 35% of their income for shelter costs. For homeowners the breakdown is as follows, 24% are paying 30% with over 80% of this group paying 35% of their income for shelter costs. For renters the figures stand at 49% and 41% respectively.

The above demonstrates that elderly homeowners make up for a greater portion of the elderly population with serious cost burdens. This is not surprising given that the elderly homeowner comprises over 82% of the Cape's elderly household population. Because of this cost burden, the area's elderly homeowners, particularly the low and moderate-income homeowner, are hard pressed when it comes to addressing needed repairs.

#### f. People with Disabilities

According to local agencies and advocates, the disabled make up approximately 17% of the Cape's population. Bill Henning, Director of Cape Organization for the Rights of the Disabled (CORD) suggests that the total could be even higher given the Cape's sizable elderly population. Last year the Department of Mental Health (DMH) and the Department of Mental Retardation (DMR) reported that they administer 36 group homes on Cape Cod. These facilities provide housing for approximately 260 individuals. The waiting list for these group homes is long and vacancies are quickly filled. Local data and consultation with area agencies indicates

that approximately 10% of the disabled population are in need of supportive housing.

Although housing access remains an issue, it is the lack of affordable housing that is seen as the critical need for people with disabilities. At the beginning of 1994 the LHA's provided 136 units for people with special needs. These units, for the most part, are located within elderly housing developments. This provides some relief, but doesn't come near to addressing the need. Moreover, there is disagreement over whether or not housing for the disabled should continue to be included with housing for the elderly.

The lack of affordable housing has affected disabled persons and their families in other ways as well. For example, disabled adults who are capable of living on their own, are unable to do so because of the lack of affordable housing. Remaining at home can put added pressure, emotionally and financially, on the family and lower the self-confidence and esteem of the disabled adult.

#### g. Veterans

The lack of affordable housing for area veterans has been cited as a serious problem by local agencies and advocates. In response to this need, the Nam Vets Association of Cape Cod and the Islands and the president of a Hyannis health services consulting firm in collaboration with the Barnstable Housing Authority opened a transitional housing facility for 10 homeless veterans. This project is being accomplished through the Section 8 Single Room Occupancy Moderate Rehabilitation Program.

More recently the Falmouth Housing Trust (a non-profit housing corporation) recently began rehabilitation of a large single family structure into a eight unit SRO for single adults. First preference will be for homeless veterans. The Consortium awarded \$25,000 in 1994 HOME funds for this project.

#### h. Impact on Racial/Ethnic Minorities

The Census reports that racial minorities comprise 4.63% of the Cape's population. Although significantly lower than the Statewide level of 12.24%, the Cape's minority population increased by 53% between 1980 and 1990. Blacks comprised the largest proportion of the County's nonwhite residents (2,827). The Hispanic white population totaled 1,595.

The distribution of income suggests that the Cape's minority population is faced with significant housing cost burden. This is particularly true for blacks and Hispanics. For example, although blacks represent only 1.51% of the Cape's population, nearly 47% are classified as low and moderate-income. The situation for white Hispanics isn't very different. White Hispanics comprise less than 1% of the area's population, yet 55% are considered low and moderate-income. By comparison, 38% of the Cape's white households are classified as low and moderate income.

Finally, there have been indications that the Cape's Native American community, with respect to housing and other opportunities (jobs, bank loans, etc.) has not



been treated fairly. The lack of affordable housing and the high housing costs coupled with discrimination has created real hardships for this population.

#### i. People with AIDS

Over the past five years there has been a dramatic increase in the number of people with AIDS on Cape Cod. Provincetown, with a year-round population of 3,561 has a ratio of 5,251 people with AIDS per 100,000 people. This is the highest ratio in the state. In December of 1993 the director for the Cape Cod AIDS Council (CCAC), estimated there were between 300 to 400 Cape residents who have been diagnosed with AIDS. Gay men comprise the vast majority of this total, although an increase in the number of afflicted single women and women with children, has been noted by the CCAC.

Local advocates believe the problem is getting worse rather than better. National experts assert that the annual rate of growth for people with AIDS is 100%. The CCAC reported a 10% increase in its caseload over a three month period during the summer of 1993. This issue is just now beginning to receive the attention it deserves by the Cape Cod community.

According to local advocates 35% of the people with AIDS are homeless or are at risk of becoming homeless. This would mean that approximately 100 to 120 people find themselves in such a situation. The loss of income, social ostracizing, substance abuse and the lack of affordable housing are cited as the key factors contributing to this problem.

The lack of affordable housing represents a major issue in the view of the people and agencies that service the needs of people with AIDS. Because this population is at high risk of becoming homeless, the availability of affordable housing is critical. It has been pointed out that when a person who suffers from this illness is able to locate an affordable unit his/her life improves dramatically. This is not solely due to economic reasons, but also because it allows local agencies to more effectively service the social and medical needs of this person.

This year will see Foley House, the first supportive housing program for people with AIDS, open its doors. This effort represent a collaborative undertaking involving Foley House, Inc., a non-profit entity and project developer, the Provincetown AIDS Support Group and the Provincetown Housing Authority. Once completed, the building, which is owned by the PHA, will be home to 10 individuals who have AIDS. Support services will be provided through a federal grant that was awarded to Provincetown and which will be administered by the Provincetown AIDS Support Group.

The Consortium awarded this project \$50,000 in 1994 HOME funds. Additionally, the state is providing \$300,000 in HOME funds. As a result of the project being co-funded in this manner, the Consortium is responsible for administering the entire \$350,000 joint award. It is the goal of the Consortium to continue providing support to similar projects in 1995 and thereafter.

Although there is widespread consensus that there is an acute need for programs and support services for people with AIDS, there appears to be some divergence on

whether or not this should be offered on a scattered site or concentrated basis. Many see the benefits accompanying from incorporating supportive services within a group setting, but are fearful that the residents will be stigmatized by the community at large."

## **2. Lack of Affordable Housing**

The overall lack of affordable housing also functions as an impediment to fair housing opportunities. The Consortium believes that at least one-third of the Cape's year-round household population are in need of affordable housing. The insufficient supply of affordable housing restricts where people can live and is the chief cause of the economic hardship confronting many of the area's very low and low-income households.

In 1996 the RPP reported the following regarding the lack of affordable housing:

In the 1995 Cape Cod Residents Survey, 69% of the respondents indicated that lack of affordable housing is a serious problem for the Cape, and nearly half of all the respondents (47%) indicated that housing costs had been a problem for them within the past year. When asked about the characteristics of their town, 46% of the respondents answered that the availability of affordable housing had gotten worse over the past five years.

The cutback in federal housing dollars has further exacerbated the Cape's capacity to address its lack of affordable housing. Over the past several years the federal housing budget has been cut by 25%. Some of these cuts have involved rental subsidies, which has put an enormous strain on the Cape, given its reliance on such subsidies as a primary source of housing relief.

## **3. Not-In-My-Backyard Syndrome**

Another factor contributing to the restricting of fair housing opportunities is the Not-In-My-Backyard (NIMBY) attitude. This attitude is particularly strident when the affordable housing project being proposed involves rental housing for very low and low-income people and housing for people with special needs. This is not to suggest, however, that homeownership proposals are spared the negative affects of this attitude. In the experience of local housing providers this attitude is usually grounded in biases, fears, towards households based on source income, class, marital status and social preferences.

### Actions To Address Impediments to Fair Housing

The Consortium has adopted several procedures, policies, actions, etc. designed to address what it considers impediments to fair and equal housing opportunities. This commitment is manifested through several channels including, education, program administration, and program policies. Below these activities are briefly described.

#### **1. Education**

The Consortium is committed to informing the public regarding the matter of fair , equal affordable housing opportunities. It accomplishes through a variety of means including, interaction and sharing of information with the Advisory Council, reports to the towns and county, development and distribution of written information and support of affordable housing initiatives.

## **2. Program Administration**

The Consortium seeks to achieve its objective of fair and equal affordable housing opportunities in the area of program administration through the following means:

- \* The agency which administers its Down Payment/Closing Cost and its Homeowner Repair programs are required to submit affirmative outreach plans that deal with program participants and contractors regarding the HRP.
- \* Any development project receiving the maximum award (\$50,000) is required to make a good faith effort to commit 10% of its development budget to MBE's and/or WBE's.

## **3. Program Policies**

The Consortium has adopted the following policies with respect to Affirmative Marketing and Minority Outreach.

### **Affirmative Marketing**

The Cape's minority population is much lower relative to other communities of similar size and population. Nevertheless the Consortium has consistently carried out a genuine effort to inform and invite the Cape's minority population to avail themselves of benefits offered through the HOME Program.

The Consortium in accordance with 24 CFR 92.351 (b) has adopted the following procedures to ensure fair and affirmative marketing of HOME assisted housing containing 5 or more housing units. The Consortium and its contracted agency(s) has:

1. Inform the public, owners and potential tenants about the existence of fair housing laws and the Consortium's policies;
2. Notify towns, public and non-profit agencies and organizations that server and/or represent minorities and women of the availability of HOME assisted housing;
3. Utilize local media, electronic and print, to market and promote, on widest scale possible, the availability of HOME funds;
4. To appear before local boards, tenant groups, non-profits, social service agencies and others to inform and market the Consortium's HOME program to women and minorities.

### **Minority Outreach**

The Consortium has established a statement of policy and procedures to meet the requirements for establishing and overseeing a minority and women business outreach program and affirmative marketing under 24 CFR 92.350 and 92.351 respectively; consistent with HUD responsibilities under Executive Orders 11625 and 12432 (concerning Minority Business Enterprise (MBE) ) and 12138

(concerning Women Business Enterprise (WBE) ). The Consortium has made all efforts to encourage the use of minority business and women business enterprises in connection with HOME funded activities. These will be in conformance with 24 CFR 85.36 (e).

As with the Cape's minority population the number of MBE's and WBE's is smaller relative to other communities of comparable size and population. Nevertheless the Consortium made a genuine effort to give MBE's and WBE's a fair opportunity to participate in the HOME Program. To achieve this goal the following was carried out:

1. Utilize the State Office of Minority and Women Business Assistance Directory (SOMBA) to ensure the inclusion of MBEs and WBEs in activities of the HOME Program ;
2. Use local media, electronic and print, to market and promote contract and business opportunities for MBEs and WBEs;
3. Develop solicitation and procurement procedures that facilitate opportunities for MBEs and WBEs to participate as vendors and suppliers of goods and services;
4. Maintain centralized record with statistical data on the use and participation of MBEs and WBEs as contractors/subcontractors in HOME assisted program contracted activities.

#### Ongoing Monitoring

The Consortium will rely on a variety of means to monitor the impediments to fair and equal affordable housing, as well as, the steps being taken to address this matter. In this regard there are currently in place certain built-in mechanisms that will permit ongoing monitoring. For example, the Commission Act of 1989, the Regional Policy Plan, the Consolidated Plan and Local Comprehensive Plans are all working documents, which the Consortium, County, Commission and towns are obligated to follow and enact.

Other monitoring steps to be undertaken by the Consortium will include the following:

- \* HOME Advisory Council: Continued review of the Consortium's policies and program with respect to fair and equal affordable housing opportunities.
- \* Update of Analysis of Impediments: Periodic update of the Consortium's Analysis of Impediments.