

Brockton Housing Authority  
Request to Revise  
Designated Housing Plan  
August 1, 2014

## **Proposed Amendment**

In its original application the Brockton Housing Authority addressed an undue concentration of disabled persons within our elderly disabled complexes by designating 75% of the non-wheelchair units for elders and 25% of those units for non-elderly disabled families. At the time of the original application 36% of the units were tenanted by non-elder disabled families. In order to reach the goals of the plan, the Authority proposed, and HUD approved, an elder preference for the units covered by the plan. The approved plan did not explicitly address how units should be assigned once the plan's ratios were met but the unstated and obvious intent of the original plan was to maintain the 75/25 ratio, once met. In 2012 the goal was achieved and an update to the plan was submitted requesting that the tenant section policy associated with the plan, to explicitly state that which was implied in the original plan, to maintain the original goal of a 75% to 25% ratio of elders to non-elders. That update was approved.

This update maintains all the aspects of the 2012 update of the plan and the aspects of the original plan except that this update is proposing to add a newly federalized building, Belair Tower. There are 269 units in that building and 258 of those units would be subject to the ratios of the original plan. The other 11 units are specially designed wheelchair units.

The Brockton Housing Authority further attests that this amendment meets the statutory requirements of the plan and there are no unanticipated adverse impacts on the housing resources for the groups not being serviced due to the designation, in fact, the amendment will make more resources available for non-elderly disabled families.

As of June 30, 2014, 20% of the designated units were tenanted by non-elder disabled families. As of June 30, 2012, 17% of the designated units were tenanted by non-elder disabled families, in addition 2% of our population were non elderly when tenanted but aged in place since 2012 and now are included in the elderly count.

The addition of Belair Tower to this plan will allow the Tenant Selector to treat Belair Tower the same as the rest of our federal development is this plan. Belair Tower was added to our Federal Portfolio in October 2012. Belair Tower, which was a Commonwealth of Massachusetts building, had a 93% to 7% ratio of elders to non-elders when it was federalized. Today the ratio is 88% to 12% elders to non-elders.

In 2013 the Authority adopted a tenant selection plan which stated that the Authority would offer available units to non-elder disabled families at a ratio of 66% elder to 34% non-elder until the 75% to 25% ratio was met. Once the ratio is met, the Tenant Selector will print out the tenant statistical report detailing the ratio of elders to non-elders as each unit becomes available. The Tenant selector uses real time data which accurately reflects current ratios based upon her computerized records. The unit would then be assigned to the next qualified elder or non-elder depending on the ratio status at that time. The statistical report used to determine the next eligible family will become part of the family's permanent file.

The approval of this amendment will allow the Authority to maintain the original goal of the approved plan without unduly affecting one population over another. We believe that adding Belair Tower, a newly federalized property, is small change, to a now successful plan, and will support the original intent of the Authority, and HUD.

The following is an update of the plan addressing the issues and concerns as outlined in the U.S. Department of Housing and Urban Developments Office of Public and Indian Housing notice 2005-2(HA).

**1) Describe how the Designated Housing Plan is working. This should include, but not be limited to, the impact of designated housing on non-designated group.**

On February 12, 1997, the Brockton Housing Authority submitted an application requesting permission to designate a specified number of rental units for Elderly only with the remaining units available to disabled individuals. The plan was approved with modifications on October 27, 1997. The final plan designated 749 non-wheelchair accessible units for Elderly residents and 250 units for persons with disabilities. Specific units were not designated, as it was the intent of the Authority to reach a ratio of Elderly to disabled residents more reflective of the community. The Authority's request to amend its original designated plan will not change the ratio of the number of units available to elderly (928 non-wheelchair units) or non-elderly disabled applicants (310 non-wheelchair units). Our request is to add a newly federalized building to the existing plan.

The Allocation Plan for Designated Housing pertains to the five (5) Elderly/Disabled housing developments in the BHA's federal housing portfolio. It is fully consistent with the City of Brockton's Consolidated Plan and was developed with the intent of meeting all Fair Housing and non-discrimination requirements, which apply to federal public housing programs. We are asking to add a sixth development to this plan.

The developments covered by this proposed Allocation Plan are:

- |                              |                           |
|------------------------------|---------------------------|
| Belair Heights (MA 24-2)     | Manning Tower (MA 24-3)   |
| Campello High Rise (MA 24-6) | Caffrey Towers (MA 24-7)  |
| Sullivan Towers (MA 24-8)    | Belair Tower (MA24000003) |

The conditions that existed when the Authority originally decided to prepare an Allocation Plan were:

**The overall percentage of non-elders at the original five (5) developments was 36% (370 out of 1,034 households).** This is an extremely high percentage when contrasted with the Brockton-wide population and could be considered an undue concentration of disabled individuals within the federal conventional housing program. The plan has been successful in maintaining a manageable balance within

the complexes. Today, almost seventeen years after first approval of the plan, the stated goals of the original plan have been met. As of June 30, 2014 80% of the residents of the above complexes are elderly and 20% are non-elderly disabled. It is important to remember that since the original approval of this plan, that many residents that were tenanted as non-elderly disabled are now categorized as elderly.

**The demand for dwelling units at the five (5) federal elderly/disabled by elders had significantly diminished over the last several years.**

Demographic data suggested that a greater number of income eligible elderly households live in Brockton than were reflected on the Federal elderly/disabled waiting list. The Authority had embarked on a major marketing initiative to attract elders back to the Authority's developments. The high percentages of non-elderly had been a major impediment to the attractiveness of the BHA's federal elderly/disabled developments to the elderly. The success of the plan has now made the five complexes attractive to both elder and non-elder families as evidence by the Authority's expanded waiting list.

The Authority's largest Elderly/Disabled complex, the Campello High Rise, was experiencing a vacancy rate of over 20% and was generally perceived as unsafe for elders.

The plan has allowed the Authority to address the concerns of the residents with regard to perceived safety, the mental health community, who had expressed concerns of an undue concentration of mentally disabled in the complexes limiting their ability to work their clients into mainstream society and the disabled, who expressed a desire to live in the community with their peers. Furthermore, the plan has allowed the Authority to maintain a demographic mix that although not reflective of the community as a whole, is closer to the areas demographic and allows for community living conditions that are acceptable to the residents and service providers.

The implementation of the Designated Housing Plan required modification to the Authority's Tenant Selection Plan. The Authority's amended plan prioritizes elderly applicants for Elderly/Disabled housing; when an elderly applicant is not available for tenanting, the Authority makes an offer to the next eligible near elderly applicant >50<62. This has caused the average age of resident to rise and create an atmosphere more representative of the community as a whole and more tolerable to the frail elders and persons with disabilities. At this time 20% of the residents are non-elderly and 80% are elderly. The in place aging of non-elder disabled applicants and the elder tenant selection preference have allowed the Authority to meet the plans goal. The Authority is now requesting to amend its plan by adding a newly federalized building that will maintain the plans original goals.

**2) Provide waiting list and occupancy data (as evidence of the continued need for designation) for affected development.**

The current waiting list for elderly/disabled housing has 269 elderly, 885 non-elderly of which 514 are Near Elderly. The current resident makeup is 20% non-elderly, 80% elderly. It is the belief of the Authority that without an approved Designated Housing Plan that the ratio would rapidly reach a ratio of over 50% non-elderly. This combined with the longer tenancies of the non-elders would severely impact the ability of the Authority to assist eligible seniors. The Authority was awarded an additional 100 vouchers for non-elderly persons with disabilities in 2010 in support of the designated housing plan and will continue to apply for units for non-elder disabled families as they become available.

**3) Provide the number of tenant-initiated requests for transfers to and from designated development(s) by elderly and non-elderly families during the designation period.**

All complexes are designated as both Elderly and non-Elderly with a ratio of 75% to 25%; therefore, the statistic is not applicable to the Brockton Housing Authority.

**4) Update of units currently available by bedroom size, including the number of accessible units (for designated and non-designated developments).**

The Authority continues to convert units to make them accessible as we modernize each development. Belair Tower was modernized to as part of the federalization process with new specially designed units being added. Major modernization has occurred at Belair Heights, Manning Tower, Sullivan Tower, comprehensive modernization is approximately 50% complete at Caffrey Towers with the conversion of special designed units a priority and the conversion of 9 additional units to accessible units at the Campello High Rise. All developments are designated as both elderly and non-elderly. As units are converted from general occupancy to special designed they will be removed from the units which the 75% - 25% ratio will be applied. At this time 735 units are available for elders and 245 units are available for non-elder disabled applicants in the designated complexes. If Belair Tower is added to the plan, then there will be 928 units are available for elders and 310 units available for non-elder disabled applicants

Development	Total Units	1 Bedroom	2 Bedroom	Accessible
Belair Heights 24-2	100	92	8	5
Manning Tower 24-3	96	96	0	5
Campello High-rise 24-6	398	396	2	21
Caffrey Towers 24-7	318	317	1	20
Sullivan Tower 24-8	122	122	0	6
Belair Tower 24-10	269	269	0	11
Totals	1303	1292	11	65

**5) Provide the number of certificates/vouchers issued to non-elderly persons with disabilities in support of Designated Housing Plan and/or Mainstream (this should be broken down by type).**

The Authority received 100 Vouchers in support of the Designated Housing Plan and an additional 100 vouchers for non-elderly persons with disabilities. At this time the Authority has leased 182 from these allocations. The Authority has also assisted an additional 428 families with vouchers from its HCVP allocation to non-elderly disabled persons. The Authority partnered with the Brockton Area Multi Service Center to obtain an additional 14 Mainstream vouchers that have been issued to non-elderly/disabled persons.

**6) Percentage of non-elderly persons with disabilities able to find suitable housing on the private market with the certificates/vouchers referenced in #5 above.**

The Authority issued 33 Vouchers in the last 18 months. Of those, 14 people have successfully leased units the other 19 vouchers have been issued and the time for being under contract has not yet expired. This represents a success rate of 42%, however this rate is not yet complete as the vouchers have not yet expired. The success rate of persons with disabilities finding suitable units has risen dramatically since the inception of the Designated Housing Plan. A number of factors have caused the rate to climb; the vacancy rate has increased in the City of Brockton. The Authority has worked with local landlords to identify suitable one bedroom units for our disabled participants. and significant outreach has been done with area agencies to assist individuals in housing search.

**7) Describe other resources employed to make the impact of the Designated Housing Plan on non-designated group minimal (assistance in finding accessible units, funding for renovations to make units accessible, etc., local preference on PHA's Section 8 waiting list for non-designated group, educating Section 8 landlords regarding needs and rights of non-designated group, etc.)**

The Authority has designated significant resources to mitigate any negative impact the Plan might have on the younger persons with disabilities. The Authority has coordinated with the Metro South Property Owners Association to make landlords aware of the program. We have also sent out mailers requesting postings of one-bedroom units. We have also worked with the Brockton Area Multi-Services Help Line to arrange housing search assistance. The Authority has directed our Elderly/Disabled Service Coordinators to work with any current resident who applies for the program to assist the resident in their housing search through outreach and referral. The Authority has also worked with the Massachusetts Department of

Mental Health, Massachusetts Rehabilitation Commission, and the local Self Help organization to ensure proper placement for the program's participants.

**8) Describe how PHA has met any conditions outlined in the approval letter (if applicable).**

As a condition for approval, the Authority was required to apply for and receive 100 Section 8 Rental Certificates or Rental Vouchers targeted for persons with disabilities under HUD's Notice of Funding availability for Fiscal Year 1997. Previous to this condition, the Authority had applied for 162 Vouchers and Certificates. As instructed, the Authority amended the request and applied for and received 100 Section 8 Rental Assistance Vouchers. The Authority has also used the Project Based Program and the Mainstream Section 8 Program made available only to non-profits to continue to build an inventory of assistance to mitigate any negative impact on the non-elderly population

The Authority has also applied for and been awarded two separate McKinney-Vento Homeless grants through HUD. The first program, locally known as the Welcome Home Program, provides housing for three chronically homeless families whose head of household is disabled. The second program known as Secure Homes provides seven vouchers to chronically homeless disabled individuals with long-term substance abuse issues. In 2010 the Authority applied for and was awarded another 100 vouchers for non-elderly persons with disabilities in support of the plan.

**9) Provide information on the pre-designation waiting time for both groups and the current waiting time.**

At the onset of the plan the Authority had a very short waiting list due to the negative perception growing within the community with regard to the undue concentration of young disabled persons in Elderly/Disabled housing. In January of 1998 the Federal Elderly/Disabled waiting list had 93 applicants. Of these applicants 31 were transfer requests. The wait time for any new applicant was determined by the ability of the Authority to obtain Criminal Offender records. If the person met the selection criteria they would be offered a unit immediately, regardless of age. Today the list consists of 1054 applicants. An average of about 150 units becomes available in any given year. The list is estimated to be over a year long. Young disabled, who do not qualify as near elderly are most likely to be assisted through the Section 8 program and other voucher programs. This list is also over 1 year long. The amended tenant selection plan would make available approximately 50 public housing units in the designated complex's each year for non-elderly until the ratio of 75% to 25% is achieved.

With the original addition of Section 8 units in support of the plan we have been able to assist more young disabled residents than we would have if the designated housing plan had not been approved. The Authority also administers a State program known

as the Alternative Housing Voucher Program (AHVP). This program assists young disabled applicants who are not eligible for the conventional elderly/disabled complexes. The Authority is administering 41 AHVP Vouchers at this time. This is an increase of 26 units from our original request. These vouchers have been issued to applicants who have applied to the State and Federal elderly/disabled housing programs.

**10) If Plan provided that near elderly families would be admitted if insufficient elderly families were available to fill the units, provide data on the number of near elderly families needed to fill units in designated development(s).**

The single most significant effect the Designated Housing Plan has had on the composition and tenancing of our complexes has been the slowing of the rate that non-elder disabled applicants have come into the Authority’s complexes over the last fifteen years and now the accomplishment of the plans goals. The Authority’s complexes would become primarily non-elderly disabled residents within a matter of months without this plan creating an undue concentration of non-elders in the BHA developments. This result is not consistent with our original application, which stated we would gradually work toward the 75% elderly, 25% persons with disabilities ratio. Many non-elder disabled residents are presented with significant need for services that are not available within the community and that the Authority is unprepared to meet. The following chart details the near elderly tenancing from 2000 to present.

Near Elderly Tenancing Statistics															
Development	2000	2001	2001	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Belair Heights 24-2	1	1	1	2	0	1	2	1	0	0	0	0	0	6	15
Manning Tower 24-3	23	12	4	6	1	5	7	6	7	0	11	1	3	1	87
Campello High-rise 24-6	34	49	24	12	10	28	11	24	6	18	12	4	4	8	244
Caffrey Towers 24-7	8	21	12	8	0	15	32	14	8	7	3	2	4	15	149
Sullivan Tower 24-8	6	8	3	5	0	4	3	9	4	2	2	1	3	4	54
Totals	72	91	44	33	11	53	55	54	25	27	28	8	14	34	547

Although the current waiting list may indicate that there are substantially more non-elderly than elderly waiting for assistance a number of factors have been considered in making this application for an amendment to our plan. First, many of the non-elderly applicants have been assisted with vouchers. It is the policy of the Authority to keep the name of a non-elderly applicant on the waiting list for conventional elderly/disabled housing even after they have received assistance through the voucher program. Second, the Authority is assisting substantially more non-elderly disabled individuals than when the plan was first approved in 1997. Many of these residents have complex service needs that the Authority is struggling to meet. If the amended plan is not approved the Authority would be overwhelmed with an unhealthy concentration of unmet service needs preventing the Authority from meeting its basic mandate of providing decent, safe and sanitary housing. Third, the Authority has taken extensive steps to assist disabled non-elderly applicants that include but are not limited to the adoption of a Section 8 project based program specifically tailored for one bedroom units to be available for non-elders, partnering with the Brockton Coalition for the Homeless, the Massachusetts Department of Mental Health and the BAMSII Help Line to provide housing search assistance for non-elders with vouchers. The Authority is also working with the Cape Verdean Association, The Spanish Center, The Latino Health Institute, and many of the local churches that provide housing search assistance. The Authority continues to work with the Metro South Property Association explaining the program and to develop listings of available apartments for non-elders. The Authority has partnered with BAMSII and obtained additional vouchers in support of the plan. We continue to work with DHCD to obtain additional resources that will be made available to the non-elder applicants. Fourth, the amended plan maintains the tenets of the original approved plan, avoids an undue concentration of unmet service needs and makes available 25% of our non-wheelchair units to non-elder disabled applicants.

The approval of this amended Designated Housing Plan is necessary to allow the Authority to meet the objectives outlined in the original application in a manner that does not inordinately disrupt the operations of the Authority or unduly effect the Elderly and Disabled applicants. The circumstances that caused the mental health community to become part of the original application have been mitigated by the steps taken by all partners to ensure appropriate services are provided within the appropriate setting. The successes achieved by the Authority and its partners would soon be reversed if the amended plan is not approved.