

**BROCKTON HOUSING AUTHORITY**  
**Amended Annual Plan**

The Brockton Housing Authority has amended its 2021 Annual Plan to include information regarding the applications submitted by the Authority to the US Department of HUD Special Application Center for the disposition of the Campello High-rise. This plan outlines the accomplishments of the Authority along with the Authority's policies, future plans in providing housing services. These plans are available for public review and comment. Any interested person may review the plans at the Authority's Administrative Offices at 45 Goddard Road, Brockton, Massachusetts 02301 or by visiting the Authority's web site at [WWW.Brocktonhousingauthority.com](http://WWW.Brocktonhousingauthority.com). Copies of the plan are also available at no cost by writing to the above address or calling the Authority at (508) 588-6880. A public hearing will be held on **Thursday June 24 2021 2:00 PM.**

The Authority will accept both written and oral comments at the meeting. Written comments are encouraged for submission prior to and on the date of the meeting. All comments and the Brockton Housing Authority's response will become part of the plan.

Thomas G. Thibeault  
Executive Director

<b>Annual PHA Plan</b> <i>(Standard PHAs and Troubled PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 02/29/2016
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**Purpose.** The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

**Applicability.** Form HUD-50075-ST is to be completed annually by **STANDARD PHAs** or **TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

**Definitions.**

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceeds 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined, and is not PHAS or SEMAP troubled.

A.	PHA Information.																										
A.1	<p>PHA Name: <u>Brockton Housing Authority</u> PHA Code: <u>MA024</u>            PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA            PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>01/2021</u>            PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)            Number of Public Housing (PH) Units <u>1626</u> Number of Housing Choice Vouchers (HCVs) <u>1933</u> Total Combined Units/Vouchers <u>3559</u>            PHA Plan Submission Type: <input type="checkbox"/> Annual Submission <input checked="" type="checkbox"/> Revised Annual Submission</p> <p><b>Availability of Information.</b> PHAs must have the elements listed below in sections B and C readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p>The Brockton Housing Authority <b>2021 Annual Plan (REVISION 1)</b> is available on the agencies website <a href="http://www.brocktonhousingauthority.com/">http://www.brocktonhousingauthority.com/</a>, at our main office located at 45 Goddard Rd, Brockton MA 02301, at each Asset Managers offices and at our Admissions and Rental Assistance office located at 1090 Main Street Brockton MA 02301</p> <p><input type="checkbox"/> <b>PHA Consortia:</b> (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2">Participating PHAs</th> <th rowspan="2">PHA Code</th> <th rowspan="2">Program(s) in the Consortia</th> <th rowspan="2">Program(s) not in the Consortia</th> <th colspan="2">No. of Units in Each Program</th> </tr> <tr> <th>PH</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																	
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**B. Annual Plan Elements**

**B.1 Revision of PHA Plan Elements.**

(a) Have the following PHA Plan elements been revised by the PHA?

Y N

- Statement of Housing Needs and Strategy for Addressing Housing Needs
- Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
- Financial Resources. See Attachment (MA024b01)
- Rent Determination.
- Operation and Management.
- Grievance Procedures.
- Homeownership Programs.
- Community Service and Self-Sufficiency Programs.
- Safety and Crime Prevention.
- Pet Policy.
- Asset Management.
- Substantial Deviation.
- Significant Amendment/Modification

(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):

*The Financial resources have been updated using the most recent known financial information.*

*The Annual Plan is being amended to provide information regarding the submittal of a Section 18 disposition application to the U.S. Department of HUD Special Application Center for the Campello High-rise Elderly-Disabled Public Housing Complex 24-6. Please see section B2 New Activities for more details on this submission.*

Based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data, make a reasonable effort to identify the housing needs of the low-income, very low-income, and extremely low-income families who reside in the jurisdiction served by the PHA, including elderly families, families with disabilities, and households of various races and ethnic groups, and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location.

In June of 2010 The Brockton Housing Authority, along with the City of Brockton and Building a Better Brockton published an Analysis of Impediments to Fair Housing Choice. The Analysis confirmed the most significant barrier to fair housing continues to be the limited supply of affordable housing. The City, along with the Brockton Housing Authority had created and submitted an Affirmatively Furthering Fair Housing Plan in October of 2017. As part of this draft plan the Authority has identified certain goals which are included in attachment MA024c01. Since the time that the plan was submitted we have been informed that the template used and the data available was not entirely accurate, therefore, HUD has suspended the updated AFFH requirements. We have now re-engaged with the City to update the Analysis of Impediments. We will proceed with our annual plan using the local information that was collected during the AFFH process and any new information gathered through further analysis..

Furthermore, in Brockton, non-whites are more likely than white residents to be low-income, so the housing problems of low-income people are most prevalent in minority households. The limited funding for the development of new affordable housing serves to restrict fair housing choice for lower income, minority households as well as people with disabilities. The Authority continues to explore options for low income families in the Low Income Tax Credit area, the award of additional Housing Choice Vouchers and other section voucher programs along with using our existing portfolio as leverage for capital improvements and the development of additional units. The Authority has applied and been awarded additional mainstream vouchers.

The greatest barriers to increased availability of high-quality, affordable housing continues to be limited public funding and more limited private sector interest in developing affordable housing in Brockton or the surrounding area. The real estate market continues to remain tight, and rents and sale prices are still out of reach for many low- and moderate-income households due to rapid escalation in recent past years, combined with uncertainty in the market on the parts of buyers, sellers, financiers and investors. The Authority continues to see an increase in the number of voucher holders experiencing difficulty finding units that meet the parameters of the various rental assistance programs managed by the Authority. Increased outreach efforts are being made to recruit quality landlords with affordable units and the Authority has increased our payment standards to 110% of HUD's fair market rent for our area. The Authority has included a new outreach position in our 2020 budget to assist voucher holders find and lease units.

The Authority has no complaints of discrimination based on race, creed color, national origin or sexual preference in the past twelve months. We have not been informed or noted any problems in our rental assistance programs that could be tied to discrimination. We continue to do outreach to minority populations to ensure equal access to housing resources. Limited public funding and private investment interest are remaining barriers to increasing the supply of affordable housing.

*The inventory of available and acceptable apartments has become very tight. Many voucher holders, especially one bedroom voucher holders have had difficulty finding appropriate units, although now, with a greater degree of difficulty. The primary issue facing residents of all low income demographics is affordability and the availability of subsidized or affordable housing. These issues have been pivotal in the determination of the Authority's five year plan*

(c) The PHA must submit its Deconcentration Policy for Field Office review.

Attached as file MA024a01

**B.2 New Activities.**

(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?

Y N

- Hope VI or Choice Neighborhoods.
- Mixed Finance Modernization or Development.
- Demolition and/or Disposition.
- Designated Housing for Elderly and/or Disabled Families.
- Conversion of Public Housing to Tenant-Based Assistance.
- Conversion of Public Housing to Project-Based Assistance under RAD.
- Occupancy by Over-Income Families.
- Occupancy by Police Officers.
- Non-Smoking Policies.
- Project-Based Vouchers.
- Units with Approved Vacancies for Modernization.
- Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project based units and general locations, and describe how project basing would be consistent with the PHA Plan.

- **Mixed Finance Modernization or Development;** The Authority will use financing when available to supplement our modernization activities. The Authority continues to explore Energy Saving program that may crease utility savings that can be leveraged to supplement out capital plan.
- **Demolition and/or Disposition:**

**Language added to the Amended Annual plan:** On March 24, 2021 the Brockton Housing Authority submitted an application to the US Department of HUD's Special Application Center for the Disposition of the Campello High-rise (MA024000002) located at 1380 Main Street Brockton MA 20301. The Campello High-rise consist of 398 residential units. 377 of these units are 1 bedroom apartments, 29 are 1 bedroom apartments with special accessibility modifications for disabled families and 2 units are 2 bedroom apartments with special accessibility modifications for disabled families. This application can be reviewed in its entirety at the Brockton Housing Authority web site <https://www.brocktonhousingauthority.com/public-notice-updates>.

It is the intent of the Authority that within 360 days of the disposition approval, the BHA will transfer the ownership of Campello from the BHA to a Limited Liability Company (LLC), BHA Campello LLC. The LLC will be owned 99.99% by the tax credit investor member and 0.01% by the managing member, which will be under the control of the BHA, which will continue to operate and manage the property. The conveyance of the property will be through a 99-year ground lease between the BHA as the lessor and the LLC as the lessee. The BHA proposes that the building portion of the ground lease be secured by a Seller Note provided by the BHA and that the land portion of the ground lease be subject to annual payments, only if cash flow is available. The Tax Credit LLC will be managed by a Managing Member that is controlled by a non-profit affiliate of the BHA, which will continue to manage and maintain Campello.

Furthermore, it is the intent of the Brockton Housing Authority to explore the Section 18 Disposition program with regard to the obsolesce of several of other federal public housing units. It is the intent of the Authority to retain control of the units and seek Tenant Preservation Vouchers for any units that qualify for the Disposition program. The Authority will review its entire public housing portfolio including, 24-1 Hillside Village, 24-2 Belair heights, 24-3 Manning Tower, 24-4 Crescent Court, 24-7 Caffrey Towers, 24-8

**Sullivan Tower, 24-9 Roosevelt Heights, 24-10 Belair High-rise. An application for Demolition/disposition will only be made if it will support financial opportunities to address the large backlog of capital needs within our current federal public housing program. This is consistent with the PHA's annual and five-year plan.**

- **Designated Housing for Elderly and/or Disabled Families.** The Authority is required to resubmit an application for approval of its designated housing plan every two years. The Authority plans on resubmitting the plan this year for approval for the 2021 and 2022 plan years
- **Conversion of Public Housing to Project-Based Assistance under RAD:** The Brockton Housing Authority will explore the feasibility of used the RAD program to determine if the program will address the backlog of capital needs of its developments. If it is found that this program will provide the additional funds needed to address this backlog the Authority will submit an application to HUD's Special Application Center. The Authority will review its entire public housing portfolio including, 24-1 Hillside Village, 24-2 Belair heights, 24-3 Manning Tower, 24-4 Crescent Court, 24-6 Campello High-rise, 24-7 Caffrey Towers, 24-8 Sullivan Tower, 24-9 Roosevelt Heights, 24-10 Belair High-rise. An application for the Rental Demonstration Program will only be made if it will support financial opportunities to address the large backlog of capital needs within our current federal public housing program. This is consistent with the PHA's annual and five-year plan
- **The Authority does have one unit occupied by a Brockton Police Officer at Roosevelt Heights.** There are no plans to extend this program at this time
- **Project-Based Vouchers;** The Authority is regularly reviewing and considering the issuance of project based vouchers to address deconcentration of poverty and lack of suitable housing available to voucher holders. We have not committed to any specific development. The underlying motivation is to provide better quality housing stock and/or more diverse locations for our participants
- **Units with Approved Vacancies for Modernization;** The Authority will use hotel units when they are necessary to complete comprehensive modernization.
- **Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants);** The Authority will consider applying for any and all grants available to supplement the security activities at the agency.

**B.3 Civil Rights Certification.**

Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulations*, must be submitted by the PHA as an electronic attachment to the PHA Plan.

**B.4 Most Recent Fiscal Year Audit.**

(a) Were there any findings in the most recent FY Audit?

Y N

(b) If yes, please describe:

**B.5 Progress Report.**

Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.

The Authority has continued its training regimen for all employees to ensure that our staff is prepared to meet the challenges of shrinking resources, increased regulatory demand and an ever increasing population with multiple service needs. We have also partnered with several service agencies to ensure that our residents continue to receive the services that they need and are entitled to.

1. The Authority has received an additional 100 vouchers for families who head of household are disabled in support of our designated housing plan. We have also received 19 VASH vouchers and 521 Rental Demonstration Vouchers.
2. The Authority continues its work in buying foreclosed properties, renovating them and making them available for rent to low income families or for sale to qualified first time homebuyers
3. The Authority will engage an organizational consultant in the summer of 2020 to review the BHA's current organizational capacities and make recommendations of changes necessary to successfully transition from our current financial infrastructure to new models available to address our future needs.
4. We have refinanced our capital fund debt to fund the replacement of two aging elevators in Manning towers and to address envelope issues at Hillside village. We have completed a self-implementing energy performance contract to reduce our use of water, electricity and gas. This has allowed us to replace the aging elevators at the Campello high-rise, Caffrey Towers and Sullivan tower. A 5.6-Million-dollar Energy Service Agreement has been completed providing energy improvements throughout our federal portfolio. The Authority has entered into a net metering agreement with Sun Edison that is projected to save the Authority of \$14,000,000 over the next twenty years.
5. It is anticipated that five Family Self Sufficiency families will purchase a new homes in 2021.
6. The Authority meets with the Resident Advisory Board on a monthly to discuss the needs and issues facing the residents. Through these meetings we have addressed issues around security, infestation, modernization, training and policy development. Our regular in person meetings have been curtailed due to the COVID 19 pandemic.

	<p>7. The Authority has joined the Statewide Section 8 waiting list to ensure resources are available to all applicants. The Authority is now participating in the State wide waiting list program for state aided housing assistance. We have also continued with outreach to local churches and service agencies to ensure that the public is aware of resources available to them through the Authority. We have trained our maintenance and management staff on issues regarding Section 504 reasonable accommodation, limited English proficiency policies and many more.</p> <p>8. It is the intent of the Brockton Housing Authority to explore the Section 18 Disposition and/or HUD's RAD program with regard to the obsolesce of several of our federal public housing units. It is the intent of the Authority to retain control of the units and seek Tenant Preservation Vouchers for any units that qualify for the Disposition program and RAD Vouchers for units that qualify for that program. The Authority will review its entire public housing portfolio including, 24-1 Hillside Village, 24-2 Belair heights, 24-3 Manning Tower, 24-4 Crescent Court, 24-6 Campello High-rise, 24-7 Caffrey Towers, 24-8 Sullivan Tower, 24-9 Roosevelt Heights, 24-10 Belair High-rise. An application for Demolition/disposition and or RAD will only be made if it will support financial opportunities to address the large backlog of capital needs within our current federal public housing program. This is consistent with the PHA's annual and five-year plan.</p> <p>9. We have hired over 50 residents to perform various jobs at the Authority. We have also worked with local agencies to bring educational opportunities to the Authority to address issue that prevent our residents from becoming self-sufficient.</p>
<p><b>B.6</b></p>	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y N  <input type="checkbox"/> <input checked="" type="checkbox"/> The Annual plan was compiled with the assistance of the RAB. The Authority meets monthly with the RAB to discuss operations and policies of the Authority. There were no comments provided during the comment period.</p> <p>(c) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
<p><b>B.7</b></p>	<p><b>Certification by State or Local Officials.</b></p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p><b>B.8</b></p>	<p><b>Troubled PHA.</b></p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?  Y N N/A  <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p><b>C.</b></p>	<p><b>Statement of Capital Improvements.</b> Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p>
<p><b>C.1</b></p>	<p><b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.</p> <p>See HUD form 50075.2 2018 Capital Plan approved 5/29/2018, 2019 Capital plan approved by HUD on 4/16/2019, 2020 Capital plan approved by HUD on 3/26/2020.</p>

## Instructions for Preparation of Form HUD-50075-ST Annual PHA Plan for Standard and Troubled PHAs

### A. PHA Information. All PHAs must complete this section.

**A.1** Include the full PHA Name, PHA Code, PHA Type, PHA Fiscal Year Beginning (MM/YYYY), PHA Inventory, Number of Public Housing Units and or Housing Choice Vouchers (HCVs), PHA Plan Submission Type, and the Availability of Information, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. (24 CFR §903.23(4)(e))

**PHA Consortia:** Check box if submitting a Joint PHA Plan and complete the table. (24 CFR §943.128(a))

**B. Annual Plan.** All PHAs must complete this section.

**B.1 Revision of PHA Plan Elements.** PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the "yes" box. If an element has not been revised, mark "no." (24 CFR §903.7)

**Statement of Housing Needs and Strategy for Addressing Housing Needs.** Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income), (ii) elderly families and families with disabilities, and (iii) households of various races and ethnic groups residing in the jurisdiction or on the waiting list based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(1)) Provide a description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. (24 CFR §903.7(a)(2)(ii))

**Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.** PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b)) Describe the PHA's admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA's policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. (24 CFR §903.7(b)) Describe the PHA's procedures for maintain waiting lists for admission to public housing and address any site-based waiting lists. (24 CFR §903.7(b)). A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. (24 CFR §903.7(b)) Describe the unit assignment policies for public housing. (24 CFR §903.7(b))

**Financial Resources.** A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. (24 CFR §903.7(c))

**Rent Determination.** A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. (24 CFR §903.7(d))

**Operation and Management.** A statement of the rules, standards, and policies of the PHA governing maintenance and management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA. (24 CFR §903.7(e))

**Grievance Procedures.** A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants. (24 CFR §903.7(f))

**Homeownership Programs.** A description of any Section 5h, Section 32, Section 8y, or HOPE I public housing or Housing Choice Voucher (HCV) homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. (24 CFR §903.7(k))

**Community Service and Self Sufficiency Programs.** Describe how the PHA will comply with the requirements of community service and treatment of income changes resulting from welfare program requirements. (24 CFR §903.7(l)) A description of: 1) Any programs relating to services and amenities provided or offered to assisted families; and 2) Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs under Section 3 and FSS. (24 CFR §903.7(l))

**Safety and Crime Prevention.** Describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. (24 CFR §903.7(m)) A description of: 1) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; 2) Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and 3) Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5))

**Pet Policy.** Describe the PHA's policies and requirements pertaining to the ownership of pets in public housing. (24 CFR §903.7(n))

**Asset Management.** State how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory. (24 CFR §903.7(q))

**Substantial Deviation.** PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. (24 CFR §903.7(r)(2)(i))

**Significant Amendment/Modification.** PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. Should the PHA fail to define 'significant amendment/modification', HUD will consider the following to be 'significant amendments or modifications': a) changes to rent or admissions policies or organization of the waiting list; b) additions of non-emergency CFP work items (items not included in the current CFP Annual Statement or CFP 5-Year Action Plan) or change in use of replacement reserve funds under the Capital Fund; or c) any

change with regard to demolition or disposition, designation, homeownership programs or conversion activities. See guidance on HUD's website at: [Notice PIH 1999-51](#). (24 CFR §903.7(r)(2)(ii))

If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.

**B.2 New Activities.** If the PHA intends to undertake any new activities related to these elements in the current Fiscal Year, mark "yes" for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark "no."

**Hope VI or Choice Neighborhoods.** 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI or Choice Neighborhoods is a separate process. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>. (Notice PIH 2010-30)

**Mixed Finance Modernization or Development.** 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>. (Notice PIH 2010-30)

**Demolition and/or Disposition.** Describe any public housing projects owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition; and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA's last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. See guidance on HUD's website at: [http://www.hud.gov/offices/pih/centers/sac/demo\\_dispo/index.cfm](http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm). (24 CFR §903.7(h))

**Designated Housing for Elderly and Disabled Families.** Describe any public housing projects owned, assisted or operated by the PHA (or portions thereof), in the upcoming fiscal year, that the PHA has continually operated as, has designated, or will apply for designation for occupancy by elderly and/or disabled families only. Include the following information: 1) development name and number; 2) designation type; 3) application status; 4) date the designation was approved, submitted, or planned for submission, and; 5) the number of units affected. **Note:** The application and approval process for such designations is separate from the PHA Plan process, and PHA Plan approval does not constitute HUD approval of any designation. (24 CFR §903.7(i)(C))

**Conversion of Public Housing.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>. (24 CFR §903.7(j))

**Conversion of Public Housing.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to project-based assistance under RAD. See additional guidance on HUD's website at: [Notice PIH 2012-32](#)

**Occupancy by Over-Income Families.** A PHA that owns or operates fewer than two hundred fifty (250) public housing units, may lease a unit in a public housing development to an over-income family (a family whose annual income exceeds the limit for a low income family at the time of initial occupancy), if all the following conditions are satisfied: (1) There are no eligible low income families on the PHA waiting list or applying for public housing assistance when the unit is leased to an over-income family; (2) The PHA has publicized availability of the unit for rental to eligible low income families, including publishing public notice of such availability in a newspaper of general circulation in the jurisdiction at least thirty days before offering the unit to an over-income family; (3) The over-income family rents the unit on a month-to-month basis for a rent that is not less than the PHA's cost to operate the unit; (4) The lease to the over-income family provides that the family agrees to vacate the unit when needed for rental to an eligible family; and (5) The PHA gives the over-income family at least thirty days' notice to vacate the unit when the unit is needed for rental to an eligible family. The PHA may incorporate information on occupancy by over-income families into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: [Notice PIH 2011-7](#). (24 CFR 960.503) (24 CFR 903.7(b))

**Occupancy by Police Officers.** The PHA may allow police officers who would not otherwise be eligible for occupancy in public housing, to reside in a public housing dwelling unit. The PHA must include the number and location of the units to be occupied by police officers, and the terms and conditions of their tenancies; and a statement that such occupancy is needed to increase security for public housing residents. A "police officer" means a person determined by the PHA to be, during the period of residence of that person in public housing, employed on a full-time basis as a duly licensed professional police officer by a Federal, State or local government or by any agency of these governments. An officer of an accredited police force of a housing agency may qualify. The PHA may incorporate information on occupancy by police officers into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: [Notice PIH 2011-7](#). (24 CFR 960.505) (24 CFR 903.7(b))

**Non-Smoking Policies.** The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects. See additional guidance on HUD's website at: [Notice PIH 2009-21](#). (24 CFR §903.7(e))

**Project-Based Vouchers.** Describe any plans to use Housing Choice Vouchers (HCVs) for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 983.57(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan. (24 CFR §903.7(b))

**Units with Approved Vacancies for Modernization.** The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with [24 CFR §990.145\(a\)\(1\)](#).

**Other Capital Grant Programs** (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).



For all activities that the PHA plans to undertake in the current Fiscal Year, provide a description of the activity in the space provided.

- B.3 Civil Rights Certification.** Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulation*, must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the AFFH Certification if: it can document that it examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o))
- B.4 Most Recent Fiscal Year Audit.** If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. (24 CFR §903.7(p))
- B.5 Progress Report.** For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.7(r)(1))
- B.6 Resident Advisory Board (RAB) comments.** If the RAB provided comments to the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)
- B.7 Certification by State of Local Officials.** Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.
- B.8 Troubled PHA.** If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark "yes," and describe that plan. If the PHA is troubled, but does not have any of these items, mark "no." If the PHA is not troubled, mark "N/A." (24 CFR §903.9)
- C. Statement of Capital Improvements.** PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. (24 CFR 903.7 (g))
- C.1 Capital Improvements.** In order to comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan. PHAs can reference the form by including the following language in Section C. 8.0 of the PHA Plan Template: "See HUD Form- 50075.2 approved by HUD on XX/XX/XXXX."

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This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan.

Public reporting burden for this information collection is estimated to average 9.2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

**Privacy Act Notice.** The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.

## DECONCENTRATION OF POVERTY POLICY

The Brockton Housing Authority approach to deconcentration of poverty is a three-part strategy.

1. Through self-sufficiency efforts, utilizing partnerships with public and private organizations, the Authority intends to increase the earnings and economic standing of existing residents within our Family developments. The self-sufficiency efforts will include but not be limited to:
  - Information and referral to job search agencies, job development programs, and job preparation agencies.
  - Information and referral regarding agencies and programs providing assistance with resume preparation.
  - Information and referral regarding English classes for speakers of other languages, GED preparation classes, vocational training, and higher education programs.
  - Information and assistance regarding scholarships and funding opportunities for higher education and vocational training programs.
  - Public education from trained resident leaders regarding how to increase one's earning power.
  - Public education regarding how to prepare for eventual homeownership.
  - Information and referral regarding credit repair.
  - Information and referral regarding child care.
  - Information and referral regarding transportation.
2. The second part of our deconcentration policy has been addressed through an incentive based Tenant Selection Policy. Residents applying for Family Federal Conventional Housing are awarded points based on work status, economic uplift activities, and income. This Tenant Selection Policy will allow higher income and economically mobile families to integrate into the Conventional units.
3. Through participant education and landlord outreach, the Authority will ensure that Section 8 Participants lease units throughout the area to avoid concentration in high poverty census tracts.

The Authority will monitor outcomes of the above strategies and make adjustments to ensure an appropriate mix of income.

ATTACHMENT MA024b02

FINANCIAL RESOURCES  
BROCKTON HOUSING AUTHORITY

<b>Financial Resources: Planned Sources and Uses</b>		
<b>Sources</b>	<b>Planned \$</b>	<b>Planned Uses</b>
<b>1. Federal Grants (FYB 2019 grants)</b>		
a) Public Housing Operating Fund	8,849,679.00	
b) Public Housing Capital Fund 2020	3,584,291.00	
c) HOPE VI Revitalization		
d) HOPE VI Demolition		
e) Annual Contributions for Section 8 Tenant-Based Assistance	27,126,761.00	
f) Section 8 family Self Sufficiency Grant		
g) Resident Opportunity for Self- Sufficiency Grant FSS20MA2813	139,000.00	
h) Public Housing Family Self Sufficiency		
i) Community Development Block Grant		
Other Federal Grants (list below)		
<b>2. Prior Year Federal Grants (unobligated funds only) (list below)</b>		
Capital Fund 2019	3,078,355.00	
Capital Fund 2018	2,222,152.00	
<b>3. Public Housing Dwelling Rental Income</b>	6,847,090.00	PH Operations
<b>4. Other income (list below)</b>		
Excess Utility	41,809.00	PH Operations
Miscellaneous <b>Laundry Receipts</b>	95,755.00	PH Operations
Miscellaneous <b>Antenna Receipts</b>	357,284.00	PH Operations
Investment	60,011.00	PH Operations
Miscellaneous		PH Operations
<b>4. Non-federal sources (list below)</b>		
Gain on sale of Asset	12,750.00	
Refund on boilers	99,460.00	
<b>Total Resources</b>		

Sources: FYE 12/31/2019 FDS, Eloccs as of 12/31/2019

<u>Goal</u>	<u>Contributing Factors</u>	<u>Fair Housing Issues</u>	<u>Metrics, Milestones, and Timeframe for Achievement</u>	<u>Responsible Program Participant(s)</u>
Comprehensive Modernization of all 12 elevators in high-rise developments	Obsolete equipment malfunctions frequently and puts health and safety of mobility impaired residents at risk	Mobility impaired residents are treated differently in these cases as they are not able to use the stairs	Completed 2020	Brockton Housing Authority
Install additional automatic door openers in all high-rise doors	Rear and side entrance doors do not have automatic door openers	Mobility impaired residents are unable to utilize these doors	Beginning in 2018, Capital Funds will be allocated to install automatic door openers – Completed by 2021	Brockton Housing Authority
Construct a new Board Room for public meetings with ADA & 504 access and complaint public bathroom	Current Board room is not easily accessible.	Mobility impaired residents and members of the public are being treated differently	Completed	Brockton Housing Authority
To increase privately owned residential units adapted for families with disabilities requiring unit modifications and increase diversity of choice for these families	Dearth of private units adapted for families with disabilities requiring unit modifications which results in limited choices for families with disabilities	Lack of available privately owned units for families with disabilities requiring unit modifications causing these families to be clustered in Public Housing Units	The Authority will hold training for its Tenant Selection and Rental Assistance staff on the process for marketing and recruiting landlords who are willing to adapt their units and the process for approving exception rents. The Authority will create a position that will work directly	Brockton Housing Authority

			with landlords to make available units for this population as well as our regular population. keep records of any unit that has been converted due to this program	
<b>Discussion:</b>				

