

Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The Mayor has directed the Brockton Redevelopment Authority to work closely and collaboratively with public and private housing agencies, other municipal instrumentalities as directed, the Commonwealth's Department of Housing and Community Development and with several non-profit organizations working in the areas of affordable housing, homelessness, social services, and anti-poverty programs as in years past. The Brockton Redevelopment Authority will maintain solid working ties and relationships with the extended network of housing and social service providers operating in Brockton and within the region, while working to build new relationships for the City. The City has been faced with many new challenges and following outcomes from 2020, while the core needs of the community remain the same and amplified, there are additional needs and approaches that need to be taken. The management of these federal grants will be done so with participation from the community members, business and organization directors, surveyed needs of the community, innovative ideas to progress the City forward while curing current needs, and anything else needed to ensure best use of dollars for the community and future.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The objectives and outcomes for this Annual Action Plan include the City addressing emergency critical basic needs; stabilization of foreclosed ownership properties and neighborhoods experiencing significant numbers of foreclosures; deteriorating rental housing stock and the ongoing need for more low income housing; accessibility modifications to public facilities to enable people with mobility impairments to enjoy public assets and services; improving the vitality of the City's downtown and increasing the appeal of local businesses opportunities; supporting and providing a broad range of public service needs for lower income residents; and supporting other special needs, including housing and supportive services, of Brockton residents.

In assigning priority to projects and need categories the City considers a variety of factors including community input, the community's emerging and critical needs, like the devastating foreclosure trend,

significant public facility capital needs, and the service needs of residents; the number of low-income people served; and the number and relative percentage of people in need.

The City of Brockton intends to support efforts to reduce crime; enhance the quality of community life through the provision of better public facilities, neighborhood stabilization efforts, and infrastructure improvements aimed at supporting economic development; and reduce poverty and improve the quality of life for people living at or below the poverty level by expanding economic opportunities and supporting vital social/public service providers and facilities that help create and/or retain jobs. The City will also act to stabilize, improve and increase access to owner occupied housing for low- and moderate-income residents, including addressing the community's significant needs relating to the foreclosure crisis and stabilize, improve and increase the supply of affordable rental units for low- and moderate-income community members as well as residents with special housing and service needs.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

For many years now, the Brockton Redevelopment Authority has utilized this federal funding in very similar ways each year. The dollars are always spent to their max, or being allocated and preparing for specific larger projects, the programs and projects that run year over year operate smoothly with great satisfaction from the community. 2020 allowed us room for growth, improvement, and innovation and with trying new things and new projects to ensure that the grants are being spent to make the largest impact possible with every dollar. We will continue to push forward to evaluate and then meet the communities needs in most effective, impactful way possible with these funds.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The Citizen Participation Process for this Annual Action Plan includes the following steps:

- Publication of the proposed document will be available beginning on May 10, 2021 through June 8, 2021 for a total of thirty (30) days.
- It will was posted on the City of Brockton's website and the Brockton Redevelopment Authority's website as well as hard copies available at the Office of the Brockton Redevelopment Authority, the Brockton Housing Authority, all public libraries, the Office of the Mayor at City Hall and the Office of the City Clerk. Additionally, copies were made available free of charge for review and/or distribution to interested residents and the general public at the office of the Brockton Redevelopment Authority. If required, translation would be made available to explain segments of the Plans to non-English speaking people.

- During the thirty (30) day publication period, we were looking for and accepting comments on the proposed plan.
- At the close of the thirty (30) day period, all comments were to be added to the document and any adjustments needed to the proposed plan will be made.
- A virtual public hearing will be held on Wednesday, May 19, 2021 at which a summary of the proposed plan will presented to the attendees for any questions, comments, or concerns.
- See consultation section for participation of local organizations and entities on the plan.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

6. Summary of comments or views not accepted and the reasons for not accepting them

7. Summary

PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator		Brockton Redevelopment Authority
HOPWA Administrator		Brockton does not receive HOPWA funds
HOME Administrator		Brockton Redevelopment Authority
HOPWA-C Administrator		Brockton does not receive ESG funds

Table 1 – Responsible Agencies

Narrative (optional)

The City of Brockton has designated the Brockton Redevelopment Authority (BRA) as the lead agency with respect to the Community Development Block Grant (CDBG) program and the Home Investment Partnerships Program (HOME). It is the responsibility of the BRA, under the direction of the Mayor to prepare and submit the City of Brockton's HUD reporting, manage the tracking and spending of the funds, and all other needs and responsibilities that come with having the funds.

Consolidated Plan Public Contact Information

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AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

The City of Brockton acting through the Brockton Redevelopment Authority has continuously sought input as to the most pressing needs facing the City of Brockton and in particular, its low and moderate income and minority populations. A number of methods were employed to consult with Brockton residents, non-profit organizations, and social service providers including inter-agency meetings, public hearings and forums. The City has relied heavily on these consultations in the development of the Consolidated Five Year Plan. The City will continue to encourage and maintain open lines of communication with all citizens, organizations and agencies throughout the life of the Consolidated Plan and in the preparation and implementation of Annual Action Plans. While also using the applications for funding that comes in to see the need requests.

A notice regarding the public hearing held on the plan was published ten (10) days prior to the hearing. A link to the draft plan was placed on the BRA website at www.brocktonredevelopmentauthority.com. In addition, the draft plan was available for comment at the office of the Mayor, the Brockton Redevelopment Authority, Brockton Housing Authority, Brockton Main Public Library and the two branch libraries.

Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

The City of Brockton and the Brockton Redevelopment Authority participates in many regular group meetings to bridge between all housing providers and agencies supporting the City. Such as the Brockton Housing Partnership, South Shore Continuum of Care, Mayor's Neighborhood Stabilization Group, and Transformative Development Initiative District Group to name a few. On top of that, part of the application process for funding through CDBG and HOME requires that the applying agency disclose all working partners and explain to us their knowledge of those providing the same or similar services and how they interact or support one another in their efforts. These activities are geared to enhance coordination among public/private and assisted housing providers and governmental health, mental health, and other service agencies. As well, most all the agencies funding through public service funding, provide case management to the clients to ensure they are receiving the full wrap-around support services needed to thrive.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The Brockton Redevelopment Authority holds a board position on the Continuum of Care for the South Shore region. Collaborations with the Brockton/Plymouth Continuum of Care and Father Bills & MainSpring through the planning process has taken into consideration the assessments of homeless persons and other concerned parties with respect to the facilities, service, and program needs of homeless individuals and homeless families with children. Emergency shelter for individuals will be provided by Father Bills & MainSpring, located on North Main Street, called "MainSpring House". Emergency shelter for more than 50 families will be provided by the Old Colony YMCA David Jon Louison Center, located on Newbury Street. The David Jon Louison Center utilizes an extensive community collaborative partnership that collectively meet families' needs. An example of collaboration is the partnership with the Brockton Housing Partnership (consortium of financial lenders and community partners) who provide financial literacy, credit counseling, and individual income and expense counseling to families at the shelter. Other agencies that they collaborate with include but not limited to: NeighborWorks Housing Solutions, DOVE (Domestic Violence Ended), Family and Community Resources Inc., Northeast Behavioral Health Services, Catholic Charities, South Bay Early Intervention, Brockton Public School District, School on Wheels, St. Patrick's Church etc.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The City of Brockton does not receive ESG funding directly. We do work closely with the Continuum of Care for the region to ensure all public services that are impacted with CDBG and HOME funds are utilizing the proper HMIS policies and procedures. As a member of the Executive Committee and Board of Directors of South Shore Continuum of Care (SSCoC), we consult at a minimum once a quarter if not monthly with our local partners to evaluate funding activities, operational policies and procedures in accordance with local standards and Emergency Services Grant funds. It is the SSSCoC staff that is responsible for the administration of Homeless Management Information System (HMIS).

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Father Bill's & MainSpring Graffiti Removal Program
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-homeless Services-Health Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy HOPWA Strategy Anti-poverty Strategy

<p>Briefly describe how the Agency/Group/Organization was consulted . What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>The BRA consults with Father Bill's and MainSpring (FBMS) on a monthly basis to provide needs assessment on employment training for economic opportunity and community revitalization for public service needs in the city. The WorkExpress program by FBMS anticipated to enroll 50 participants, where 90% of graduates will gain housing and 70% will gain employment. WorkExpress also provides critical landscaping, cleanup and graffiti removal services to improve Brockton neighborhoods.</p>
<p>2 Agency/Group/Organization</p>	<p>Brockton Housing Authority</p>
<p>Agency/Group/Organization Type</p>	<p>Housing PHA Service-Fair Housing</p>

<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Anti-poverty Strategy</p>
<p>Briefly describe how the Agency/Group/Organization was consulted . What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Brockton Housing Authority and Brockton Redevelopment Authority have met to analyze and discuss the need of affordable housing in the City of Brockton. One measurable outcome from our discussions is the Housing Authority's assistance with the BRA and Father Bill's MainSpring on a pilot program to create 6 bedrooms in a two-family dwelling for chronic homeless individuals. We are also working collaboratively to address the disparities and impediments to affordable housing in the city of Brockton.</p>

3	Agency/Group/Organization	BROCKTON AREA MULTI SERVICES INC. / HELPLINE
	Agency/Group/Organization Type	Services - Housing Services-Elderly Persons Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children

<p>Briefly describe how the Agency/Group/Organization was consulted . What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Though our discussions and collaboration with BAMSI Helpline we provide community resource for individuals and families, particularly at times of financial instability. Our goal is to provide information, referral, and advocacy to residents within the City of Brockton. From our discussions we have assisted Brockton residence with housing, food, rental assistance, foreclosure assistance, and emergency services. Helpline anticipate supporting approximately 1,200 individuals annual through its Emergency Services Program that will assist low-income households in Brockton who are facing severe financial hardships which may jeopardize their housing needs. Many of the services include assistance with housing-related issues, utility issues, food and information on public assistance.</p>
<p>4 Agency/Group/Organization</p>	<p>DAVID JON LOUISON FAMILY CENTER</p>
<p>Agency/Group/Organization Type</p>	<p>Services - Housing Services-Children Services-homeless</p>

What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children
Briefly describe how the Agency/Group/Organization was consulted . What are the anticipated outcomes of the consultation or areas for improved coordination?	<p>Annually we meet with the David Jon Louison Family Center staff as part of our review process. David Jon Louison Family Center anticipates to provide shelter for twenty-three (23) families daily. All Families receive Case Management services and 24-hour support staff to provide a safe, healthy, positive environment with extensive array of support services to meet their needs. Each family has established goals and objectives to achieve as part of their "Family Care Plan". These plans include housing search, job search, child care as well as other objectives to achieve a positive environment.</p>

5	Agency/Group/Organization	ASSOCIACAO CABOVERDIANA DE BROCKTON, INC.
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Education Services-Employment Immigration Assistance Services
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy

<p>Briefly describe how the Agency/Group/Organization was consulted . What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Associacao Caboverdiana De Brockton, Inc. (CVA) and the Brockton Redevelopment Authority evaluate their after school and youth enhancement programs on a monthly basis. CVA has added immigration services as part of their mission and is now also know as the "Immigrant Assistance Center of Greater Brockton". Our consultation with Associacao Caboverdiana De Brockton on a monthly basis regarding the needs of after-school children's programs. As a result CDBG funds are provided to support after school programs (from grades 1-12) for better grades and study habits, as well as summer programs for low-income children.</p>
<p>6 Agency/Group/Organization</p>	<p>Family and Community Resources, Inc</p>
<p>Agency/Group/Organization Type</p>	<p>Services-Victims of Domestic Violence Services - Victims</p>

What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
Briefly describe how the Agency/Group/Organization was consulted . What are the anticipated outcomes of the consultation or areas for improved coordination?	<p>Our consultations with Family Community Resources, Inc. (FCR) on a monthly basis to discuss data and services to victims of domestic violence. FCR provides comprehensive services to individuals and families (women and their children) impacted by trauma at home, school or in the community. FCR specialization in supporting the needs of children, adolescents and adults affected by domestic violence. Our funds will provide FCR the ability to service women who are victims of domestic violence, substance abuse issues and parenting challenges.</p>

7	Agency/Group/Organization	BROCKTON NEIGHBORHOOD HEALTH CENTER
	Agency/Group/Organization Type	Health Agency
	What section of the Plan was addressed by Consultation?	Lead-based Paint Strategy

	<p>Briefly describe how the Agency/Group/Organization was consulted . What are the anticipated outcomes of the consultation or areas for improved coordination?</p> <p>BNHC is a non-profit, multicultural, community health center that serve low-income, diverse, medically underserved patients in Greater Brockton and surrounding communities. BNHC is consulted for their tracking data, education, knowledge regarding Brockton low income children and adults with elevated levels of LEAD. Education to this target population on the effects of LEAD (especially children under six) is essential outcome of our consultations.</p>
8	<p>Agency/Group/Organization</p> <p>Brockton Board Of Health</p>
	<p>Agency/Group/Organization Type</p> <p>Other government - Local</p>

<p>What section of the Plan was addressed by Consultation?</p>	<p>State and Local Sanitary Code Enforcement</p>
<p>Briefly describe how the Agency/Group/Organization was consulted . What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Brockton Board of Health is essential member of the City's Code Enforcement. As a member of Code Enforcement the Brockton Redevelopment Authority consults with the Board of Health on a weekly basis to address violations of the State and Local sanitary of vacant properties. The BRA continues to work with the Board of Health and other members of the City's Code Enforcement to team to address issues of distressed properties in the City of Brockton.</p>

9	Agency/Group/Organization	Brockton Housing Partnership
	Agency/Group/Organization Type	Services - Housing Business and Civic Leaders Private Sector Banking / Financing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development

<p>Briefly describe how the Agency/Group/Organization was consulted . What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Brockton Housing Partnership is consulted on a quarterly basis. As a collaboration between local financial institutions and non-profit social service organizations to foster housing resources to low and moderate-income residents in the City of Brockton. Since its formation, the BHP has focused on the development and funding of affordable and market rate housing. As a member of the BHP we continue to assistance to the restoration, rehabilitation, education and financial literacy regarding home-buying process and all housing related matters.</p>
<p>1 0 Agency/Group/Organization</p>	<p>Brockton Department of Planning and Economic Development</p>

Agency/Group/Organization Type	Housing Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Agency - Managing Flood Prone Areas Agency - Management of Public Land or Water Resources Agency - Emergency Management Other government - Local Planning organization
What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Market Analysis Economic Development Anti-poverty Strategy

<p>Briefly describe how the Agency/Group/Organization was consulted . What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Brockton Department of Planning & Economic Development is consulted on a regular/weekly basis regarding our Urban Revitalization Plan, the City's Homeless Strategy, Anti-Poverty Strategy and economic development efforts. As a result of a number of strategic revitalization efforts and plans using CDBG funds to stimulate investment, we anticipate a pipeline of housing development investment in Brockton's downtown district. The Department of Planning and Economic Development in the City of Brockton has a full time Conservation Agent whose primary responsibilities include the management of flood prone areas, public land or water resources and emergency management agencies. Additionally, the Planning Department and the BRA have been working with businesses on bringing a fiber network through Downtown Brockton to connect from Boston to New York City to enhance the cities connection and access to growing technology.</p>
<p>1 1</p> <p>Agency/Group/Organization</p>	<p>Brockton Area Branch National Association for the Advancement of Color People</p>
<p>Agency/Group/Organization Type</p>	<p>Services - Housing Services-Health Services-Education Service-Fair Housing Civic Leaders</p>

What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Anti-poverty Strategy
Briefly describe how the Agency/Group/Organization was consulted . What are the anticipated outcomes of the consultation or areas for improved coordination?	<p>Consultations are on a regular monthly basis with the Brockton Area Branch of the NAACP's Housing Committee members. Review of the City's housing strategy and its impact on the housing needs assessments. Brockton is the only city in Plymouth County and is the only city municipality in the surrounding area. Its housing policies and strategies are impacted by its abutting communities. Through our continued consultations it's important that communication of policies and economic development activity is shared. This organization also plays an important role in our Fair Housing Strategy and where residents can get assistance with housing, education, employment and health issues.</p>

1 2	Agency/Group/Organization	NeighborWorks Housing Solutions
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless Service-Fair Housing Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Economic Development Anti-poverty Strategy Lead-based Paint Strategy

<p>Briefly describe how the Agency/Group/Organization was consulted . What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>City of Brockton through the Brockton Redevelopment Authority has an ongoing relationship with NeighborWorks Housing Solutions (NHS). NHS provides housing services to city residents but is also a non-profit development organization in the City of Brockton. NHS is considered a one-stop shop for finding and maintaining safe, affordable, high quality housing and developing city residents financial skills and resources. NHS as a regional non-profit provides City residents with services to support individuals and families</p> <p>Anticipated outcomes of the consultation or areas for improved coordination include rental assistance; emergency financial help; shelter and homelessness prevention; first-time homebuyer education and counseling; financial coaching; foreclosure prevention; affordable residential and small business loans; and construction and management of high-quality rental housing across Southern Massachusetts. Through our continued consultations we anticipate knowledgeable first time homebuyers; financial and budget literate residence, income mixed residential development, commercial development, participation in the city's housing strategy and to be a major stakeholder in Brockton's revitalization efforts.</p>
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1 3	Agency/Group/Organization	MassHire Greater Brockton Workforce Board
	Agency/Group/Organization Type	Services-Education Services-Employment Business and Civic Leaders Summer Jobs and Youth Employment Services
	What section of the Plan was addressed by Consultation?	Economic Development Anti-poverty Strategy

	<p>Briefly describe how the Agency/Group/Organization was consulted . What are the anticipated outcomes of the consultation or areas for improved coordination?</p> <p>Working with MassHire Greater Brockton Workforce Board (MHGBWB) on a weekly basis through our small business assistance program, MHGBWB is a business-led, policy-setting board that oversees workforce development initiatives in Brockton and nine other communities in the region. MassHire Greater Brockton Workforce Board, along with the Mayor of Brockton, charters MassHire Greater Brockton Career Center, the One Stop Career Center operated by the University of Massachusetts Donahue Institute and YouthWorks, the youth career and educational resource center. Providing oversight and leveraging resources, MassHire Greater Brockton Workforce Board works with our community leaders to respond to current trends in our region.</p>
14	<p>Agency/Group/Organization</p> <p>Comcast Service Center</p>
	<p>Agency/Group/Organization Type</p> <p>Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide</p>

<p>What section of the Plan was addressed by Consultation?</p>	<p>Anti-poverty Strategy</p>
<p>Briefly describe how the Agency/Group/Organization was consulted . What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Comcast has a program that allows qualified low income families access to affordable broadband internet. The program is called Internet Essentials and households must meet eligibility requirements such as be recipients of SNAP, SSI. Medicaid, Assisted Housing, or others. This program helps bridge the digital divide.</p>

Identify any Agency Types not consulted and provide rationale for not consulting

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Father Bills & MainSpring	The plan includes a Housing First approach by creating permanent supportive housing for chronically homeless persons. The plan also includes energizing local businesses, the Brockton Housing Authority and housing developers to create 100 affordable housing units for low income households and last, but not least, to prevent foreclosures and create more affordable housing for low income families in order to prevent their homelessness.
Urban Revitalization Plan	City of Brockton Planning Dept/ Brockton Redevelopment Authority	The plan covers a wide range of topics including housing, transportation, economic development, land use and zoning, open space, natural resources, and municipal services. Comprehensive planning is a process that determines community goals and aspirations in terms of community development. The outcome of this process is the Comprehensive Plan which dictates public policy in terms of transportation, utilities, land use, recreation, and housing. Comprehensive plans typically encompass large geographical areas, a broad range of topics, and cover a long-term time horizon.
Brockton Housing Strategy Plan	City of Brockton Planning Dept	The housing strategy plan has been prepared in accordance with the Massachusetts Department of Housing and Community Development guidelines and provides a framework and strategy to guide its housing policies and plans to increase the production of affordable housing in Brockton over the next decade (2018-2028).

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

The Citizen Participation Process for this Annual Action Plan includes the following steps:

- Publication of the proposed document will be available beginning on May 10, 2021 through June 8, 2021 for a total of thirty (30) days.
- The Annual Action Plan will be posted on the Brockton Redevelopment Authority’s social media platforms and website as well as the City of Brockton’s website.
- The BRA has reached out to the Office of the Mayor, the Office of the City Clerk, Brockton Housing Authority, and all public libraries to see if there is a place where copies of the draft can be placed while maintaining compliance with COVID guidelines and if they are willing to post it on their website and media platforms.
- Hard copies will be made available free of charge for review and/or distribution to interested residents and the public at the office of the Brockton Redevelopment Authority. Translations of the Action Plan will be made available for limited-English speaking persons upon request.
- During the thirty (30) day publication period, we will seek out comments on the proposed plan.
- At the close of the thirty (30) day period, all comments will be added to the document and any adjustments needed to the proposed plan will be made.
- A virtual public hearing will be held on Wednesday, May 19, 2021 at 5:30PM at which a summary of the proposed plan will be presented to the attendees for any questions, comments, or concerns.
- See consultation section for participation of local organizations and entities on the plan.

Upon the closure of the comment period, the Annual Action Plan draft will be updated with any comments received.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Internet Outreach	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing				facebook
2	Internet Outreach	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing				instagram

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Internet Outreach	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing				twitter
4	Internet Outreach	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing				LinkedIn
5	Internet Outreach	Non-targeted/broad community				BRA Website

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
6	Public Meeting	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing				https://fb.me/e/TmLGIgsL

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

The Brockton Redevelopment Authority will maintain solid working relationships with the extended network of housing and social service providers operating in Brockton and within the region. The City of Brockton expects funding for CDBG at \$1,417,326.00 and HOME at \$578,441.00 during time of drafting the FY2021 Annual Action Plan. Additionally, CDBG anticipates \$1,919,324.76 and HOME anticipates \$1,255,325.13 to be remaining at the end of fiscal year 2020.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,417,326	300,000	1,919,325	3,636,651	1,500,000	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	578,441	0	1,255,325	1,833,766	600,000	

Table 5 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

Wherever possible and to the greatest extent feasible, Brockton will utilize CDBG and HOME funds so as to leverage additional state, local and private investments in support of affordable housing, public services and economic development initiatives. Currently, CDBG has been used to match park grants, along with other local developments through the Section 108 Loan, each public service has additional funding sources, and now the LEAD Program is matching homeowner rehabilitation projects. DHCD has given the BRA a grant opportunity based on the current CDBG Homeowner Rehabilitation Program model to help alleviate that waiting list.

In recent years the HOME funds have leveraged NSP funds from the Massachusetts Department of Housing and Community Development and private financing from area banks to acquire and rehabilitate vacant, foreclosed, bank owned two and three family homes for the purpose of neighborhood revitalization. Renovated properties have proven to be the catalyst in stabilizing neighborhoods and attracting private investment. Recent projects have also utilized State Chapter 40R Smart Growth Zoning and Housing Production funds. Developers are also using local HOME funds to leverage both state and historic tax credits along with DHCD State Affordable Housing Trust Funds, state HOME funds and Brownfield

funds. Continued bridge building with stakeholders in the neighborhoods is important to ensure long term vitality. The Brockton Housing Authority's Massachusetts Rental Voucher Program will fulfill the City's HOME Match Program.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

Discussion

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Promote Economic Development	2018	2022	Non-Housing Community Development	Downtown - Main Street Downtown Corridor/Business District City Wide	Economic Development		Facade treatment/business building rehabilitation: 11 Business Jobs created/retained: 50 Jobs Businesses assisted: 5 Businesses Assisted Other: 2 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Promote Services that Promotes Self Sufficiency	2018	2022	Non-Housing Community Development	Downtown - Main Street City Wide Low and Moderate Census Tracts	Homeless/HIV/Aids Public Facilities Public Services		Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 720 Households Assisted Public service activities other than Low/Moderate Income Housing Benefit: 800 Persons Assisted Public service activities for Low/Moderate Income Housing Benefit: 15 Households Assisted Homeowner Housing Rehabilitated: 1 Household Housing Unit Tenant-based rental assistance / Rapid Rehousing: 45 Households Assisted Homelessness Prevention: 15 Persons Assisted Other: 2 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Homeless Prevention	2018	2022	Homeless	Downtown - Main Street City Wide	Homeless/HIV/Aids Public Facilities Public Services		Public service activities other than Low/Moderate Income Housing Benefit: 500 Persons Assisted Public service activities for Low/Moderate Income Housing Benefit: 15 Households Assisted Homelessness Prevention: 15 Persons Assisted Other: 1 Other
4	Stabilize and Improve At-Risk Neighborhoods	2018	2022	Non-Housing Community Development	City Wide			Facade treatment/business building rehabilitation: 3 Business Other: 2 Other
5	Revitalize Target Neighborhoods	2018	2022	Affordable Housing	City Wide	Infrastructure Owner Occupied Housing Rental Housing		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 5100 Persons Assisted Facade treatment/business building rehabilitation: 6 Business Other: 2 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Homeless and At-Risk of Homelessness Services	2018	2022	Homeless	Downtown - Main Street City Wide	Homeless/HIV/Aids Public Facilities Public Services		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 500 Persons Assisted Public service activities other than Low/Moderate Income Housing Benefit: 300 Persons Assisted
7	Increase Access for Homeownership	2018	2022	Affordable Housing	City Wide	Owner Occupied Housing		Homeowner Housing Added: 1 Household Housing Unit Homeowner Housing Rehabilitated: 2 Household Housing Unit Direct Financial Assistance to Homebuyers: 20 Households Assisted Other: 4 Other
8	Preserve Existing Housing Stock	2018	2022	Affordable Housing	City Wide	Owner Occupied Housing		Rental units rehabilitated: 37 Household Housing Unit Other: 2 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
9	Increase Supply of Affordable Housing	2018	2022	Affordable Housing	Downtown - Main Street Downtown Corridor/Business District City Wide Low and Moderate Census Tracts	Economic Development Owner Occupied Housing Rental Housing		Rental units constructed: 21 Household Housing Unit Rental units rehabilitated: 2 Household Housing Unit Homeowner Housing Added: 1 Household Housing Unit Homeowner Housing Rehabilitated: 2 Household Housing Unit Other: 4 Other
10	Special Needs Housing	2018	2022	Non-Homeless Special Needs	City Wide Low and Moderate Census Tracts	Non Homeless Special Needs		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 120 Persons Assisted Homeowner Housing Rehabilitated: 1 Household Housing Unit

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Promote Economic Development
	Goal Description	

2	Goal Name	Promote Services that Promotes Self Sufficiency
	Goal Description	
3	Goal Name	Homeless Prevention
	Goal Description	
4	Goal Name	Stabilize and Improve At-Risk Neighborhoods
	Goal Description	
5	Goal Name	Revitalize Target Neighborhoods
	Goal Description	
6	Goal Name	Homeless and At-Risk of Homelessness Services
	Goal Description	
7	Goal Name	Increase Access for Homeownership
	Goal Description	
8	Goal Name	Preserve Existing Housing Stock
	Goal Description	
9	Goal Name	Increase Supply of Affordable Housing
	Goal Description	
10	Goal Name	Special Needs Housing
	Goal Description	

Projects

AP-35 Projects – 91.220(d)

Introduction

In considering funding priorities for this period, the City is attempting to focus on the following: supporting and providing a broad range of public service needs for lower income residents; supporting other special needs, improving the vitality of the City's downtown and increasing the appeal of local businesses opportunities, addressing the deteriorating rental housing stock and the ongoing need for more low income housing, accessibility modifications to public facilities, and stabilization of foreclosed ownership properties and neighborhoods experiencing significant numbers of foreclosures.

In assigning priority to projects and need categories the City considers a variety of factors including community input, the community's emerging and critical needs, significant public facility capital needs, and the service needs of residents and the number of low to moderate income people served.

The City of Brockton intends to support efforts to reduce crime, enhance the quality of community life through the provision of better public facilities, neighborhood stabilization efforts, and infrastructure improvements aimed at supporting economic development. It is also critical for the City to address the need reduce poverty and improve the quality of life for people living at or below the poverty level by expanding economic opportunities and supporting vital social/public service providers and facilities that help create and/or retain jobs. The City will also act to stabilize, improve and increase access to owner occupied housing for low- and moderate-income residents, including addressing the community's significant needs relating to the foreclosure crisis and stabilize, improve and increase the supply of affordable rental units for low- and moderate-income community members as well as residents with special housing and service needs.

While this consolidated plan anticipates that priorities may shift as current projects are completed and new projects are added in future years, the 2021 Annual Plan will accomplish these objectives through the following projects.

Projects

#	Project Name
1	Business Assistance
2	CDBG Planning and Administration
3	Public Services
4	Public Facilities
5	Homeowner Housing Rehabilitation Program
6	Lead Abatement Program

#	Project Name
7	Commercial Rehabilitation
8	Acquisition and Rehabilitation
9	Housing Administration
10	Facade Improvement Program
11	Urban Renewal
12	HUD Section 108 Loan
13	Parks Renovation
14	Architectural Barrier Removal
15	Graffiti Removal
16	HOME Administration
17	Down Payment Assistance Program
18	HOME Community Housing Development Organizations
19	Greyson Hotel
20	Lincoln School Senior Housing
21	New Construction 23-25 Park Street
22	General Housing Development

Table 7 - Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The basis for these allocation decisions lies in the ongoing consultations with the extensive network of public service agencies and public entities dealing with housing and community development issues in Brockton, public input from hearings and meetings, survey results and the experience of the lead agencies over many years.

Obstacles to meeting underserved needs are clearly attributable to insufficient resources with which to address the growing needs. Brockton’s CDBG entitlement has decreased over the past couple of years and the HOME funds have been decreased dramatically. These decreases have put a strain on the amount the City can provide for these projects. The pattern in recent years in terms of federal and state assistance to urban areas has generally been on the decline. For the FY2021, Brockton will receive an increase in funding for both CDBG and HOME and a supplement from CDBG-CV funds. With an emphasis on urban needs and on energy conservation assistance, Brockton is hopeful that with this increase in funding it will be better able to meet more of the housing and public service needs that continue to multiply in the city. As in other cities throughout the country, Brockton continues to face multiple and interrelated new housing and social problems stemming from subprime mortgages and foreclosures.

Throughout program year, the City of Brockton will continue to work as it has done in the past to pursue partnerships with an extensive network of providers and programs at all levels of government and in the private sector will be working to craft and employ effective responses to this ongoing national housing crisis. Brockton will employ any and all new public and private mechanisms that become available which

could further meet the underserved needs and it will continue to seek out creative local approaches to addressing these identified and prioritized needs.

As the City of Brockton has seen an increase in many needs due to COVID-19 exasperating financial hardship in the community, we have added in projects based on research within the community, to help fill in gaps that are unable to be filled by other funding sources at this time. This will be closely monitored and we will provide further amendments and improvements to ensure we continue to meet the communities greatest needs to the best of our ability.

AP-38 Project Summary
Project Summary Information

1	Project Name	Business Assistance
	Target Area	Downtown - Main Street Downtown Corridor/Business District City Wide
	Goals Supported	Promote Economic Development
	Needs Addressed	Economic Development
	Funding	CDBG: \$300,000
	Description	This project is designed to provide grants or loans to local Brockton businesses to boost business, ensure continued business, or add new streams to the business.
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	We are hoping to assist 15 businesses with these funds, and up to 25 individual families and households with job retention or creation. This will assist working families employed by local businesses and local business owners and their families.
	Location Description	A priority is place on the Downtown for the business assistance grants, and the Section 108 Loan Program must be located within the Downtown.
Planned Activities	The planned activities with this project comes from the \$1,500,000 in Section 108 Loan Fund, that will be for 3-6 businesses to assist in Kitchen Infrastructure to expand businesses through loans that will be repaid. The second activity is going to be for COVID-19 small business recovery efforts. We are hoping these funds will infiltrate the community and these businesses and allow them to find new ways of continuing business, make up small deficits that are occurring during their continued operations, and recovery to open up again as normal when the nation is ready for that. This will be supported by a Business Assistance position new to the City of Brockton.	
2	Project Name	CDBG Planning and Administration
	Target Area	City Wide
	Goals Supported	Promote Services that Promotes Self Sufficiency
	Needs Addressed	Economic Development
	Funding	CDBG: \$343,465

	Description	The Brockton Redevelopment Authority utilizes these funds for coordination oversight, implementation and compliance as it carries out the eligible CDBG activities identified in the One Year Action Plan.
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
3	Project Name	Public Services
	Target Area	City Wide
	Goals Supported	Promote Services that Promotes Self Sufficiency
	Needs Addressed	Public Services
	Funding	CDBG: \$256,448
	Description	This funded project will assist low and moderate income families in Brockton that need increased support to stay housed and self sufficient as a household.
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	This funded project will assist low and moderate income families in Brockton that need increased support to stay housed and self sufficient as a household.
	Location Description	
	Planned Activities	
4	Project Name	Public Facilities
	Target Area	City Wide
	Goals Supported	Promote Services that Promotes Self Sufficiency
	Needs Addressed	Public Facilities
	Funding	CDBG: \$100,000

	Description	This project is to support public facility improvements in the City of Brockton. These improvements should be made to such facilities to improve their capacity, increase community access or use, or make safety or health improvements necessary for continued use/operation.
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	We are hoping to assist public facility improvements that service or are available to service the entire city at this time, specifically with access to goods and services to maintain basic living needs. With a number of serving at least 1,100 households a year with this amount of funding, across three different locations/organizations.
	Location Description	
	Planned Activities	
5	Project Name	Homeowner Housing Rehabilitation Program
	Target Area	City Wide
	Goals Supported	Preserve Existing Housing Stock
	Needs Addressed	Owner Occupied Housing
	Funding	CDBG: \$450,000
	Description	The Brockton Redevelopment Authority will provide funding in the form of deferred payment loans to qualified low and moderate income property owners in the City of Brockton. The funds will be expended according to the scope of work to be completed and will not exceed \$30,000.00 for single family homes and \$35,000.00 for two-family homes. Lead Paint removal and energy efficiency costs may exceed this amount. For single family home owners or two family owner occupied homes, this is an interest free loan for residents who meet the U. S. Department of Housing and Urban Development income guidelines. A lien will be placed on the property, and should the owner refinance, transfer ownership or in the case of death, the total amount of the loan must be paid back in full.
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	This amount of funding should support about 18 households in need of emergency repairs.
	Location Description	

	Planned Activities	The Brockton Redevelopment Authority will provide funding in the form of deferred payment loans to qualified low and moderate income property owners in the City of Brockton. The funds will be expended according to the scope of work to be completed and will not exceed \$30,000.00 for single family homes and \$35,000.00 for two-family homes. Lead Paint removal and energy efficiency costs may exceed this amount. For single family home owners or two family owner occupied homes, this is an interest free loan for residents who meet the U. S. Department of Housing and Urban Development income guidelines. A lien will be placed on the property, and should the owner refinance, transfer ownership or in the case of death, the total amount of the loan must be paid back in full.
6	Project Name	Lead Abatement Program
	Target Area	City Wide
	Goals Supported	Preserve Existing Housing Stock
	Needs Addressed	Owner Occupied Housing Rental Housing
	Funding	CDBG: \$180,000
	Description	Lead Base-Paint Hazard Control Program grant match for 3 year grant to the City of Brockton, to deleading and health home funding gaps for low to moderate income homeowners.
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	This funding should help at least 18 households, but we would hope to help closer to 30 households if possible.
	Location Description	
Planned Activities	Match funding for deleading and health home gaps for low to moderate income homeowners going through the Lead Based Paint Hazard Control Program.	
7	Project Name	Commercial Rehabilitation
	Target Area	Downtown - Main Street Downtown Corridor/Business District
	Goals Supported	Revitalize Target Neighborhoods
	Needs Addressed	Infrastructure

	Funding	CDBG: \$512,822
	Description	CDBG funds will be used in our revitalization districts to secure and stabilize property.
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	These funds should support at least three businesses/buildings in Brockton.
	Location Description	
	Planned Activities	CDBG funds will be used in our revitalization districts to secure and stabilize properties. These properties will have development goals and plans, and the funds will be used to ensure development is possible and funding gaps that exist are filled.
8	Project Name	Acquisition and Rehabilitation
	Target Area	City Wide
	Goals Supported	Increase Supply of Affordable Housing
	Needs Addressed	Owner Occupied Housing Rental Housing
	Funding	CDBG: \$250,000
	Description	Funds will be loaned towards the acquisition, rehabilitation of vacant, abandoned and/or foreclosed housing under the Brockton "Receivership" program. After rehabilitation, property will be sold to income eligible first-time homebuyer. Brockton Receivership Program (BRP) will target blighted neighborhoods to prevent or eliminate elements of slum/blight; specifically troubled property in Brockton neighborhoods. The program is designed to repair and address unsafe and unsanitary housing per the state sanitary code, returning them as lead and asbestos free; energy efficient and properly weatherized homes. At its best the houses will become homes to low and moderate-income families. Homes that are actually foreclosed upon will remain available to low and moderate-income families through the use of restrictive covenants.
	Target Date	7/1/2022

	Estimate the number and type of families that will benefit from the proposed activities	This funding should support the rehabilitation of at least one property, which could provide housing for 2-3 families depending on the unit count of the property. If the project is completed within the fiscal year, program income from the project could fund additional properties being completed.
	Location Description	
	Planned Activities	Funds will be loaned towards the acquisition, rehabilitation of vacant, abandoned and/or foreclosed housing under the Brockton "Receivership" program. After rehabilitation, property will be sold to income eligible first-time homebuyer. Brockton Receivership Program (BRP) will target blighted neighborhoods to prevent or eliminate elements of slum/blight; specifically troubled property in Brockton neighborhoods. The program is designed to repair and address unsafe and unsanitary housing per the state sanitary code, returning them as lead and asbestos free; energy efficient and properly weatherized homes. At its best the houses will become homes to low and moderate-income families. Homes that are actually foreclosed upon will remain available to low and moderate-income families through the use of restrictive covenants.
9	Project Name	Housing Administration
	Target Area	City Wide
	Goals Supported	Preserve Existing Housing Stock Increase Supply of Affordable Housing Stabilize and Improve At-Risk Neighborhoods Increase Access for Homeownership
	Needs Addressed	Owner Occupied Housing Rental Housing
	Funding	CDBG: \$250,000
	Description	Funds will be used to support the implementation of all BRA housing programs and activities.
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	

	Planned Activities	Funds will be used to support the implementation of all BRA housing programs and activities.
10	Project Name	Facade Improvement Program
	Target Area	Downtown - Main Street Downtown Corridor/Business District Census tract 5104, 5108, 5109, 5114
	Goals Supported	Promote Economic Development
	Needs Addressed	Economic Development Infrastructure
	Funding	CDBG: \$200,000
	Description	Facade improvement program for business in Brockton.
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	This funding will assist 4 business owners the business facade improvements.
	Location Description	
	Planned Activities	Facade improvement program for business in Brockton
11	Project Name	Urban Renewal
	Target Area	Downtown - Main Street Downtown Corridor/Business District Census tract 5104, 5108, 5109, 5114
	Goals Supported	Stabilize and Improve At-Risk Neighborhoods
	Needs Addressed	Economic Development Infrastructure
	Funding	CDBG: \$200,000
	Description	Funds will be used for urban renewal acquisition/rehab/relocation as part of the City's on-going urban revitalization effort.
	Target Date	

	Estimate the number and type of families that will benefit from the proposed activities	These funds should support at least three businesses or buildings for business in Brockton.
	Location Description	
	Planned Activities	These funds should support at least three properties in commercial rehab for commercial acquisition for economic development type projects.
12	Project Name	HUD Section 108 Loan
	Target Area	Downtown Corridor/Business District
	Goals Supported	Promote Economic Development
	Needs Addressed	Infrastructure
	Funding	CDBG: \$98,916
	Description	For FY20, the Brockton Redevelopment Authority will continue to make payment related to the Section 108 Loan of \$2,600,000.00 which was awarded by HUD for the rehabilitation of the Adams Street Garage, BRA's economic development loans to Brockton businesses and the Receivership Program for acquisition and rehabilitation.
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	The downtown area benefitted from the original project, and it is one of only two parking garages in downtown. But this is just repayment of the original loan, so accomplishments are not reported for it annually.
	Location Description	
	Planned Activities	For FY21, the Brockton Redevelopment Authority will continue to make payment related to the Section 108 Loan of \$2,600,000.00 which was awarded by HUD for the rehabilitation of the Adams Street Garage, BRA's economic development loans to Brockton businesses and the Receivership Program for acquisition and rehabilitation.
13	Project Name	Parks Renovation
	Target Area	Low and Moderate Census Tracts
	Goals Supported	Revitalize Target Neighborhoods

	Needs Addressed	Public Facilities
	Funding	CDBG: \$250,000
	Description	Funding to match a city grant for rehabilitating a park in a low-moderate income neighborhood in Brockton.
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	This funding will support at least two neighborhood parks, and the number of households served can only be determined upon selection of the parks. However, one park will be a handicap accessible park and serve the special needs population.
	Location Description	
	Planned Activities	The main park will be identified by the City at a later date, but \$50,000.00 of this funding has been committed to a special needs park as a match already.
14	Project Name	Architectural Barrier Removal
	Target Area	Low and Moderate Census Tracts
	Goals Supported	Promote Services that Promotes Self Sufficiency Special Needs Housing
	Needs Addressed	Public Facilities Infrastructure
	Funding	CDBG: \$135,000
	Description	Fund reserved for any facade/barrier removal around the city for ADA compliance at businesses or homes.
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	This should assist at least one public facility or business and one homeowner. At this time there is a proposal in for the funding to support handicap accessibility improvements at two public housing locations for 120 units total.
	Location Description	
	Planned Activities	This should assist at least one public facility or business and one homeowner. At this time there is a proposal in for the funding to support handicap accessibility improvements at two public housing locations for 120 units total.

15	Project Name	Graffiti Removal
	Target Area	City Wide
	Goals Supported	Stabilize and Improve At-Risk Neighborhoods
	Needs Addressed	Public Facilities
	Funding	CDBG: \$20,000
	Description	Graffiti removal city wide done by WorkExpress, employing homeless while providing them with housing and job training and cleaning the city.
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	Graffiti removal city wide done by WorkExpress, employing homeless while providing them with housing and job training and cleaning the city.
	Location Description	
	Planned Activities	This funding will remove any reported graffiti in the City at no cost to the building owner. The program is staffed by homeless (or formerly homeless persons) and removes upwards of 100 different graffiti locations a year.
16	Project Name	HOME Administration
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	:
	Description	The Brockton Redevelopment Authority utilizes these funds for coordination oversight, implementation and compliance as it carries out the eligible HOME activities identified in the One Year Action Plan.
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	

	Planned Activities	
17	Project Name	Down Payment Assistance Program
	Target Area	City Wide
	Goals Supported	
	Needs Addressed	
	Funding	:
	Description	Down payment assistance given to low income, first time home buyers purchasing homes in Brockton, even if they were not previously Brockton residents. This is done through a partnership with NeighborWorks Housing Solutions.
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	This should support at least 20 low income, first time home buyers.
	Location Description	
	Planned Activities	Down payment assistance given to low income, first time home buyers purchasing homes in Brockton, even if they were not previously Brockton residents. This is done through a partnership with NeighborWorks Housing Solutions.
18	Project Name	HOME Community Housing Development Organizations
	Target Area	
	Goals Supported	Increase Supply of Affordable Housing
	Needs Addressed	Rental Housing
	Funding	HOME: \$87,554
	Description	City of Brockton certified Community Housing Development Organizations (CHDO) will utilize HOME funds to acquire and rehabilitate single family homes for low/moderate income families as additional affordable housing opportunities in Brockton. In cases where said units will be sold to first time homebuyers the proceeds from the sale of the HOME-assisted housing activities will be returned to the local HOME Investment Trust Fund account to be used to benefit low/moderate income families.

	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Low and moderate income persons/families in need of affordable housing.
	Location Description	
	Planned Activities	There are no planned activities at this time, we have a rolling application for HOME projects.
19	Project Name	Greyson Hotel
	Target Area	Downtown - Main Street
	Goals Supported	
	Needs Addressed	
	Funding	:
	Description	Rehab and conversion of former hotel to residential facility - 18 micro studios (3 HOME-assisted).
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	This will provide three affordable units to low income families in downtown Brockton.
	Location Description	
	Planned Activities	Rehab and conversion of former hotel to residential facility - 18 micro studios (3 HOME-assisted).
20	Project Name	Lincoln School Senior Housing
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	:

	Description	The City of Brockton designated Housing Solutions for Southeastern Massachusetts (HSSEM) to redevelop the Lincoln School property located at 70 Highland Street in Brockton. It is located within a half mile of the bus depot and train station. The property will be redeveloped into 39 units of senior housing of which three will be studios and 36 will be 1-BR apartments. HSSEM's property manager HallKeen will provide on-site Resident Services to the residents. At least 16 units will be reversed for ELI households with incomes at or below 30% of AMI. Formerly homeless households will make up at least four of the 16 ELI households. The remaining 23 units will serve 60% AMI households. The former school property is in a proposed historic district known as Blanchard Plat area. The Lincoln School is a two-story on a raised basement, Richardsonian Romanesque-style building that was constructed in two parts. The main, central block of the building was constructed in 1896 and the east and west wings were constructed in 1911. The building fronts on Highland Street on an irregularly shaped lot at the southeast corner of the intersection with Newburry Street. The lot gradually slopes to the south, providing a full-height basement at the south (rear) elevation. A sidewalk edged by concrete curbing runs along the streets. Concrete paths access the entrances in the center of the main block and each wing. A large, partially paved parking lot extends across the south and east ends of the property.
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	This will provide three HOME assisted units of affordable housing for senior citizen, very low to low income renters.
	Location Description	
	Planned Activities	The property will be redeveloped into 39 units of senior housing of which three will be studios and 36 will be 1-BR apartments. HSSEM's property manager HallKeen will provide on-site Resident Services to the residents. At least 16 units will be reversed for ELI households with incomes at or below 30% of AMI. Formerly homeless households will make up at least four of the 16 ELI households. The remaining 23 units will serve 60% AMI households.
21	Project Name	New Construction 23-25 Park Street
	Target Area	

	Goals Supported	
	Needs Addressed	
	Funding	:
	Description	The Brockton Redevelopment Authority will utilize HOME funds to develop a new construction of two units which will be sold to a first time homebuyer eligible under program guidelines. This is an initiative to increase access to homeownership and address the needs of affordable housing in the City of Brockton.
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	This will provide affordable housing for one household to purchase and one affordable housing unit for rent.
	Location Description	
	Planned Activities	The Brockton Redevelopment Authority will utilize HOME funds to develop a new construction of two units which will be sold to a first time homebuyer eligible under program guidelines. This is an initiative to increase access to homeownership and address the needs of affordable housing in the City of Brockton.
22	Project Name	General Housing Development
	Target Area	City Wide
	Goals Supported	Increase Supply of Affordable Housing
	Needs Addressed	Rental Housing
	Funding	HOME: \$538,761
	Description	To assist HOME housing development activities and projects. Our HOME program has a rolling application, so we will update the plan when projects come in to be funded.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	

	Planned Activities	Increase the number of affordable housing units available to low to moderate income persons in the City of Brockton.
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AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

Downtown Core Neighborhoods Census Tract 5109 had 87.35% of the households listed in the ACS as low and moderate income. This neighborhood is in the very core of the city. This area is a high crime area and is patrolled by the specially equipped Brockton Police Anti-Crime Unit.

Highland, Newbury, and Green Street Neighborhoods Census Tract 5108 has 80.72% of the households listed in the 2010 Census as low and moderate income. The City has made great strides in this area relative to home acquisitions and renovations. Although there is still much to do, the City has committed to completing projects by way of renovations to vacant or abandoned properties to bring them to habitable condition and demolitions of properties that are beyond repair.

Montello Neighborhood This neighborhood is made up of census tracts 5105-02 and 5103 with 61.53% of low- to moderate-income households. The City of Brockton and the Brockton Redevelopment Authority will assist homeowners in these census tracts with repairs to their homes and will concentrate on vacant or abandoned properties within these areas.

The Village Census Tract 5110 is within this neighborhood and is made up of 67.85% low- and moderate-income residents.

Campello Neighborhood Census tract 5114 and 5116 are within the Campello Neighborhood and has 61.76% of its residents low and moderate income in tract 5114 and 62.95% in Census Tract 5116.

East Side Neighborhood Census Tract 5112 has 53.3% of the residents listed as low and moderate income.

Pleasant/Prospect Neighborhood is within census tract 5104 and has over 75.63% of its residents listed as low- and moderate-income households.

SOURCE: FY 2021 ACS 5-Year 2011-2015 Low- and Moderate-Income Summary Data - HUD Exchange

Geographic Distribution

Target Area	Percentage of Funds
Downtown - Main Street	
Downtown Corridor/Business District	
City Wide	
Census tract 5104, 5108, 5109, 5114	
Low and Moderate Census Tracts	

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Overall, the population of the City of Brockton is made up of more than 51% low- to moderate-income households. Because of this, most efforts are designed to target city-wide needs due to them not being central to any one specific tract. However, we end up with a few target areas due to focusing extra efforts and funding into one area at a time for revitalization which allows for greater impact in the short term, so we could then move on to a new area. The City's Downtown area has been a major focus for the City over the last few years and will continue to be since we continue to make progress in large strides as a community. The Census tracts 5104, 5108, 5109, 5114 are located in and around Downtown and have been identified for having the highest crime rates in Brockton. Lastly, while the City as a whole is comprised of over 51% low- to moderate-income households, a few census tracts on the edges of the City do not have a majority low-income population, so we will focus on those that do for public facilities, park renovations, public services, rental housing and rental housing cost assistance when possible.

Discussion

Helping homeless individuals and families is and will continue to be a challenge in Brockton. The solution to this problem will entail a collaborative and multi-pronged effort including the creation of living wage jobs in Brockton for Brockton residents and affordable housing opportunities, along with services for those with mental health and substance abuse challenges, and assistance for persons with disabilities. Only by tackling all of these challenges in a collaborative manner will the City end homelessness.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

There are a number of services and programs that will assist in the achievement of the housing goals. Listed below are the programs that will assist in providing affordable housing to families in the City of Brockton. NeighborWorks Housing Solutions will provide 48 rental units in the downtown area in which 11 are HOME assisted units; NeighborWorks Housing Solutions will provide 39 rental housing units for senior citizens in which 3 will be HOME-assisted units; the Greyson Hotel is being looked at for rehab and conversion to residential facility as 18 micro studios with 3 HOME-assisted units; the Brockton Redevelopment Authority will utilize a combination of HOME funds and private financing to develop a new construction of 2 units in which one will be HOME-assisted; and the Rescue of Foreclosed Homes activity for rehabilitation and sale of three homes in the City for qualified potential homeowners. Additionally, we are planning on a Tenant Based Rental Assistance Program to support at least 45 households.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	19
Special-Needs	0
Total	19

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	45
The Production of New Units	19
Rehab of Existing Units	3
Acquisition of Existing Units	0
Total	67

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

The HOME funds will be used to leverage private investment for the development of units for moderate income families city wide. Brockton must create neighborhoods that are financially viable for those who inhabit them.

AP-60 Public Housing – 91.220(h)

Introduction

The Brockton Housing Authority (BHA) manages over 2,000 apartments in 16 public housing developments throughout Brockton as well as 1,000 rent-assisted apartments/houses. The approximately 85 employees of the BHA serve about 7,000 residents, or about 7% of Brockton's population. The Authority also manages programs to help develop affordable private homes for ownership and rental that enable families to move beyond public assistance and become self-sufficient. The BHA currently has list for public housing and the Housing Choice Voucher programs that are in excess of 5 years long.

Actions planned during the next year to address the needs to public housing

- Continue comprehensive modernization at Caffrey Towers
- Complete energy efficient upgrades to all federal developments
- Complete installation of new fire alarm systems in: Belair Tower, Belair Heights, Caffrey Towers and Campello High Rise;
- Installation of 15 UFAS compliant automatic door openers at Elderly/Disabled developments
- Begin installation of security cameras at Elderly/Disabled developments
- Removal of deteriorated carpet and installation of 49,000 square feet of new vinyl tile flooring at Elderly/Disabled developments
- Installation of 80 new closet doors at Belair Tower
- Continue comprehensive replacement of exterior components at 19 buildings at Hillside Village
- Begin replacement of 10 obsolete elevators in three elderly/disabled developments

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

The goal of involving public housing residents in the management of the Brockton Housing Authority began in earnest fourteen years ago. At that time the Director of Operations and the Resident Services Coordinator began to meet with tenant council presidents and leaders of the developments throughout the authority monthly. Prior to this, residents across the city were not a united group but managed the business of their buildings on a very individual basis. Having the opportunity to meet monthly with BHA staff began a journey of 14 years that bring us to a place where we have good communication, a strong ability to work together and for residents to initiate and maintain an organizational framework to successfully lead their residents.

If the PHA is designated as troubled, describe the manner in which financial assistance will be

provided or other assistance

The Public Housing Authority is not in trouble.

Discussion

The BHA continues to seek additional resources to assist in the modernization of its existing public housing stock and to work with partners to develop livable neighborhoods. The BHA recently refinanced a previous capital fund bond that has realized \$5.8 million to be utilized for improvements at several developments. The BHA also executed an energy performance contract that is allowing the BHA to borrow \$5.3 million dollars to install energy savings devices within its public housing including new refrigerators, lighting, toilets and shower heads. These funds will also enable the BHA to replace ten elevators in its high rise developments. There is substantial change proposed in the delivery of public housing in the Commonwealth of Massachusetts that could cause significant change in the way public housing is governed and managed.

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

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

Addressing the emergency shelter and transitional housing needs of homeless persons

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

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

Discussion

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

There is a state law that requires local government to have at least 10% of its housing stock subsidized and dedicated to households below 80% median income in order to retain full control over the zoning permit process when affordable units are proposed. That nature of affordability is defined by the state and generally must be for at least 15 years for rehabbed housing units and 30 years for newly created units. This law gives the state the power to override local decisions regarding affordable housing projects, whether those decisions are based on zoning by laws or other arguments such as impact on schools, environmental issues, infrastructure limitations, etc. A local community can amend its bylaws and procedures for a specific project and gain exemption from this law under what is known as and controlled by state regulations. Limited public funding and private investment interest are remaining key barriers to increasing the supply of affordable housing.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The City has taken steps to create zoning which will promote affordable housing development such as Chapter 40R. The City of Brockton has designated five “Smart Growth” development districts which provide incentives for the development of affordable housing adjacent to transportation centers.

The City has also been exploring the use of an overlay zoning to facilitate this use.

Limited public funding and private investment interest are remaining barriers to increasing the supply of affordable housing. Nevertheless, the City is taking steps to create attractive development and redevelopment opportunities including improving the appearance and curb appeal of business districts, by demolishing derelict buildings and by clearing and cleaning up vacant lots.

Discussion:

AP-85 Other Actions – 91.220(k)

Introduction:

The City has engaged in extensive, collaborative and public planning to improve economic opportunity, housing choices, and public facilities and overall quality of life. The envisioned community improvements and investments will utilize public and private resources to address the needs identified through the planning process. The City's investments will add to the revitalization of neighborhoods and provide adequate infrastructure to support private housing and economic development.

Actions planned to address obstacles to meeting underserved needs

Obstacles to meeting underserved needs are clearly attributable to insufficient resources with which to address growing needs. Brockton's entitlement amounts for CDBG and HOME as well as other federal and state assistance to urban areas have been on a downward trend over the past few years so there has been a lot of work with other organizations in the City to leverage funding and find other sources and means to meet underserved needs. The goals with most funded projects from CDBG and HOME are designed to assist more than with just that immediate financial support, but to give households the tools needed to require less support in the future or with other areas of their lives.

Actions planned to foster and maintain affordable housing

Brockton's limited supply of affordable housing is one of the community's most significant barriers to housing choice. Lower income households experience a higher rate of housing problems than other households in Brockton, and this impacts minority households and people with disabilities in the community disparately because they are more likely to be low income households.

The City of Brockton will continue to work with local and regional nonprofits and others to pursue opportunities to develop new affordable housing. Networks like the Massachusetts Smart Growth Alliance can provide resources and organizing support to promote equitable growth, including increased housing opportunities.

Actions planned to reduce lead-based paint hazards

The City of Brockton and the Brockton Redevelopment Authority will work closely with intake partners Self Help Inc. and Neighborworks of Southern MA to reduce, if not eliminate lead-based paint from properties in the City of Brockton. In the 2017 program year, the City of Brockton provided \$275,000.00 of matching funds for an award by HUD's Office Lead Hazard Control and Healthy Homes (OLHCHH).

Additionally, the Brockton Redevelopment Authority runs a Homeowner Rehabilitation program to benefit low and moderate-income residents. When lead is present in these homes, the CDBG Program Manager will inform the homeowners of the BRA's lead program to help rehabilitate and de-lead the

property.

Actions planned to reduce the number of poverty-level families

Most activities undertaken by the City with CDBG, HOME and other federal and state funds for low-income families are efforts to reduce the number of persons in poverty and improve the quality of life for Brockton residents, either directly or indirectly. City staff also work in partnership with citizens, other City departments and the public and private sectors to accomplish its goal of reducing poverty.

For this coming year, the City will be undertaking the following programs which it believes will impact those families living in poverty:

The City's new Annual Plan for FY2020 offers its support of those projects and programs that bring income stability to Brockton's low- and moderate-income households including those projects and programs that generate or retain jobs or provide workplace preparedness programming.

The City proposes funding such initiatives including the following:

Father Bill's and Mainspring – Work Express Program The Work Express program is designed to provide homeless persons with an opportunity to become productive citizens of the community through employment and independence by means of transitional housing, intensive case management, substance abuse counseling and basic skills development with a primary objective of helping unemployed homeless individuals reenter the workforce. Community Development Block Grant funds will be used to pay the salary of program employees and to supplement stipends paid to the program participants.

Old Colony YMCA David Jon Louison Family Center The Old Colony YMCA provides programs for families experiencing homelessness. The program provides emergency shelter and housing, case management and support services to families to reach a higher level of self-sufficiency.

Business Assistance MassHire is operating a program from COVID Relief funds to support local small businesses who employ low- and moderate-income employees with up to \$10,000.00 per business if they can show that they are able to hire or retain these employees. They are encouraged to attend MassHire workshops to build a better business as well.

Actions planned to develop institutional structure

The Brockton Redevelopment Authority (BRA) will carry out the FY2020 Annual Plan on behalf of the City of Brockton. The BRA is accountable to the Mayor, as Chief Executive Officer of the City of Brockton. Day-to-day responsibility for administration of the CDBG and HOME programs and certain other grant funded activities will rest with the CDBG Program Manager and the Executive Director of the BRA. The Brockton Redevelopment Authority Director will also be responsible for energy policy coordination and

long-term planning functions on behalf of the City. The BRA had the responsibility for preparing, submitting and implementing all previous Consolidated Community Development Plans and Action Plans as well as for managing the consultation and Citizen Participation processes, preparing annual CAPER(s) and interacting with HUD representatives. The BRA previously played a central and critical role in the planning, implementation and coordination of Brockton's multi-faceted and interrelated community and economic development efforts. As the BRA partners with other public agencies such as the Brockton Housing Authority and with community based and/or private organizations in order to carry out projects and programs covered by the Consolidated Plan, the BRA nonetheless will remain the agency ultimately responsible for administering those programs.

Actions planned to enhance coordination between public and private housing and social service agencies

The City will continue to work closely with its non-profit partners to both monitor the success of existing programs and generate ideas for new programs to serve the changing needs of Brockton's low income population. BRA Staff will meet with sub-grantees during the year to assess the existing program and discuss changes needed as well as ideas for new directions. The BRA Staff will also meet with non-profit and public housing providers to reassess needs and opportunities.

The Brockton Redevelopment Authority and Brockton Housing Authority regularly interacted with locally and regionally based agencies and community-based organizations seeking ideas and input as to the most pressing needs facing the City of Brockton, particularly its low- and moderate-income and minority populations. Again this year, the BRA and the BHA relied heavily on these consultations in developing this Annual Action Plan. The BRA and BHA encourage and maintain open lines of communication with all of these organizations and agencies. This has been the case in the development of the Annual Action Plan as well as the Consolidated Five Year Plan.

Discussion:

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

The BRA collected program income in FY2020, however all of those funds have been reprogrammed at this time. When program income comes in, it is reallocated to the program line that it was repaid from less 20% to go back to administrative costs. **There are no proceeds from the City's Section 108 Loan at this time to address the priority needs and objectives.**

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	99.00%

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is

as follows:

None.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

Period of Affordability

The minimum period of affordability is determined by the HOME subsidy amount per unit:

- <\$15,000 = 5 Year Minimum
- \$15,000 to \$40,000 = 10 Year Minimum
- > \$40,000 = 15 Year Minimum

Resale Provisions

Resale provisions shall be required when the subsidy is provided in the form of a development subsidy in which HOME funds are divided among each assisted unit and not provided as a direct subsidy to the homebuyer. The resale option ensures that the assisted unit remains affordable over the entire period of affordability. Affordable units shall meet the following criteria:

- The new purchaser must be low-income, meeting the HOME Program definition, and occupy the property as the family's principal residence.
- The sales price must be affordable to low-income families at 70-80% of area median income paying no more than 32% of income for principal, interest, property taxes and insurance.
- Under no circumstances may the "affordable" sales price exceed 95% of the median purchase price for the area.
- Net proceeds from the sale must provide the original homebuyer, now the home seller, a "fair return" on their investment (including any down payment and capital improvement investment made by the owner since purchase, as calculated using the following formula: Maximum Permitted Resale Price = (The initial sales price/Initial AMI) x Resale AMI

Resale requirements shall be enforced through deed restrictions, covenants, land use restriction agreements, or other similar mechanisms filed with the Registry of Deeds and the requirements within shall be triggered upon sale or transfer of the property.

Recapture Provisions

Recapture provisions shall be enforced in cases where HOME funds are provided as a direct subsidy to the homebuyers as down payment, closing costs and/or purchase price assistance. This allows the

city to recapture the subsidy, subject to net proceeds, if the recipient decides to sell the unit within the period of affordability at whatever price the market will bear. The homebuyer may sell the property to any willing buyer. The sale of the property during the period of affordability triggers repayment of the direct subsidy, subject to net proceeds, to the HOME Investment Partnerships local account. The recapture provision shall be enforced through a mortgage filed with the Registry of Deeds, and a note filed at the offices of the Brockton Housing Authority. The city elects to reduce the amount subject to recapture on a prorated basis for the time the homeowner has owned and occupied the home measured against the required affordability period. Net proceeds are the sales price minus the superior non-HOME loan and closing costs. Upon receipt of recaptured funds the city shall prepare a discharge of mortgage document for the original homebuyer to record with the Registry of Deeds.

Home Affordable Homeownership Limits

We use the HOME affordable homeownership limits provided by HUD for the Brockton, MA HUD Metro FMR area.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

City of Brockton - Resale and Recapture Guidelines for Homebuyers - 24 CFR 92.254(a)(5)

Period of Affordability - See above

The City of Brockton, acting through subrecipients, CHDOs or other entities, may use HOME Program funds to provide homeownership assistance. The forms of subsidy to be used to assist homebuyers and/or developers may include down payment and closing cost assistance, development cost subsidy, deferred payment loans or some combination of these methods. The City of Brockton shall determine, based upon the type of subsidy, whether the period of affordability shall be enforced by either Resale or Recapture provisions.

Resale Provisions

Activity Types – Resale provisions as outlined in 24 CFR Part 92.254(a)(5)(i)(A) and (B) shall be required when the HOME subsidy is provided in the form of a development subsidy in which HOME funds are divided among each HOME-assisted unit and not provided as a direct subsidy to the homebuyer.

Methods – The resale option ensures that the HOME-assisted unit remains affordable over the

entire period of affordability.

The new purchaser must be low-income, meeting the HOME Program definition, and occupy the property as the family's principle residence.

- The sales price must be "affordable to a reasonable range of low-income homebuyers", defined as a family at 70-80% of area median income paying no more than 32% of income for principal, interest, property taxes and insurance.
- Under no circumstances may the "affordable" sales price exceed 95% of the median purchase price for the area.
- Net proceeds from the sale must provide the original homebuyer, now the home seller, a "fair return" on their investment (including any down payment and capital improvement investment made by the owner since purchase. Capital improvements are not considered to be normal "wear and tear" or maintenance replacement items. In general, the City of Brockton shall consider "fair return" to be the maximum sales price as calculated using the following formula:

Initial Area Median Income is defined as the Area Median Income corresponding to a household size at the time of purchase.

Resale Area Median Income is defined as the Area Median Income corresponding to a household size at the time of intent to sell.

Enforcement Mechanisms – Resale requirements shall be enforced through deed restrictions, covenant, land use restriction agreement, or other similar mechanism filed with the Plymouth County Registry of Deeds and the requirements within shall be triggered upon sale or transfer of the HOME-assisted property.

Recapture Provisions - See above

Repayments – Repayments of recaptured funds shall be remitted directly to the City of Brockton HOME Investment Partnerships Program local trust account.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

No refinancing is proposed

Eligible applicants are individuals/families at or below the 80% AMI. Funding applications for HOME is a rolling application, and CDBG is first-come first-serve basis as long as funding is available.

Information for all programs is available on our website and at our office.

We have no limits/preferences to a particular segment of the low-income population.

