

Draft Moving to Work Plan

Brockton Housing Authority

September 10, 2021

DRAFT

(1) Vision for PHA's Local MTW Program

The statutory objectives of the MTW Program are to:

1. Reduce costs and increased cost-effectiveness
2. Increase self-sufficiency; and
3. Increase housing choice

All of these goals are consistent and align with current objectives of the Brockton Housing Authority (BHA), as further illustrated in its most recent FY21 Annual Plan. The flexibilities offered by MTW participation, both through fungibility of public housing and housing choice voucher funds and the waivers of certain housing regulations, will enable PHA to test and implement housing and self-sufficiency strategies not otherwise available due to funding and/or regulatory restrictions. In particular, BHA is interested in:

- Expanding participation opportunities in its existing family self-sufficiency (FSS) program;
- Encouraging households to increase income without any adverse impact to their current housing status or escrow accounts
- Repositioning its public housing portfolio and expanding the supply of affordable housing in the City of Brockton
- Implementing technology enhancements to increase the efficiency and effectiveness of daily operations and provide increased reporting capabilities
- Facilitating the ability of BHA households to access rental units in non-impacted neighborhoods in Brockton and surrounding communities through changes in owner rents and payment standards
- Implementing policies and processes that incentivize owners to participate in the HCV program such as vacancy and damage payments, incentive payments for new owners in certain zip codes, the creation of an Owner's Committee and Portal

BHA wants to participate in the MTW program so that it can use its flexibilities to further its policy goals for the benefits of current households, participants and applicants. The goal is to both improve service delivery and reduce costs, which will enable BHA to stretch its funds to satisfy other initiatives, especially as it relates to preserving and expanding the supply of affordable housing.

Key Personnel

Key personnel of the Brockton Housing Authority who will be responsible for the administration and oversight of the local MTW program will include:

Thomas Thibeault, Executive Director, has been employed by the Brockton Housing Authority since July of 1990. In 2013, he was appointed to the position of Executive Director. Mr. Thibeault has his Bachelor of Arts degree in Political Science from the University of Massachusetts, Amherst and his Master of Public Administration from Bridgewater State University. He serves on several boards within the community and currently acts as the Chief Executive Officer for the Abington (MA) Housing Authority through an existing contract and

until recently, acted also as the Executive Director under contract with the Hanson (MA) Housing Authority.

Attorney Tom Plouffe, Senior Counsel and Division Director of Housing Administration – Mr. Plouffe has worked for BHA since 2005, advising the Executive Director on legal issues and exercising supervisory oversight over the Admissions (public housing and housing choice voucher), Leased Housing, Affordable Housing (scattered site housing with PBV subsidy), Family Self-Sufficiency and Human Resources departments. He has experience in multiple federal grant programs in support of both redevelopment and supportive services, has current experience and knowledge as to the Housing Choice Voucher (HCV) program and admissions functions for both public housing and HCV and has extensive contacts in the local community, both through existing BHA partnerships and through prior roles as City Solicitor and as a City Councilor.

Bruna Campbell, Rental Assistance Landlord Participant Facilitator, a newly created position within BHA in December 2020 with the goal of recruiting and increasing the current number of landlord participants in the BHA service area, promoting the BHA to owners to educate regarding the benefits of working with voucher households and maintaining an existing vacancy list to share with households searching for voucher with a housing choice voucher. Ms. Campbell was formerly the BHA Scattered Site Portfolio Manager covering 98 units, as well as a previous Leasing Agent withing the Leased Housing Program responsible for a case load of 300 families. Ms. Campbell is a NAHRO certified Public Housing Manager and also has PIC Training Certification.

Michael Pacious, Chief Financial Officer at BHA since 2014, has almost fifteen (15) years of experience in housing authority finance and budget issues. He assists with the development of annual operating budgets of the public housing (federal and state) and housing choice voucher programs, oversees preparation of monthly financial reports for over 13 funding sources, oversees monthly reporting of monthly VMS information and data and is a co-author of BHA internal controls policies and procedures. Mr. Pacious previously served as the Finance Director for the Medford (MA) Housing Authority which had about 700 federal housing units and 1,000 housing choice vouchers. He is a NAHRO certified Public Housing Manager and has a bachelor's degree in accounting.

Fair Housing

The BHA certifies that it will carry out its MTW Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990. The BHA will affirmatively further fair housing by examining our programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the BHA's involvement and maintain records reflecting these analyses and actions.

The greatest barriers to increased availability of high-quality, affordable housing continues to be limited public funding and more limited private sector interest in developing affordable housing

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

(2) Plan for Future Community/Resident Engagement

BHA will continue to engage its assisted households, the broader community and stakeholders as it further develops and implements its local MTW program. It will include the following measures:

- Monthly meetings with our Resident Advisory Board (RAB) comprised of public housing residents
- Creation of an Owner's Committee to consist of existing landlords in the HCV program
- Communications with our current service partners who interact with BHA households, as well as by BHA Service and FSS Coordinators and Property and Asset Managers who have contacts with many of BHA households with children
- Periodic mailers to HCV participants
- Outreach to City partners, including some of the current committees and Boards on which the BHA Executive Director serves

Virtual options will be provided for meetings, especially during the ongoing pandemic. Meetings will be held in accessible locations and translators will be made available for Spanish, Cape Verdean and Haitian populations, all of whom exceed 5% of BHA total households.

(3) PHA Operating and Inventory Information

The Brockton Housing Authority (BHA) is an organization that manages approximately 2,300 units of affordable housing (both federal and state) and approximately 2,700 housing choice vouchers and is funded by a variety of federal and state sources. It is governed by a five-member Board of Commissioners with the Executive Director in charge of the day-to-day operations and outside legal counsel in place to further advise the Board. BHA has two affiliated non-profit organizations, Southeastern Massachusetts Housing Assistance Corporation (SMHAC) and Montello Affordable Housing Corporation (MAHC), neither of which has a Board that mirrors that of BHA for full control, and a non-profit, Brockton Housing Development Corporation (BHDC), that is in process of being reinstated and which did have a mirror Board when it was active. BHA also provides management oversight of the Abington (MA) Housing Authority and had just ended oversight of the Hanson Housing Authority in September 2020. BHA also administers the Family Self Sufficiency (FSS) program on behalf of the Milton (MA) Housing Authority.

Demographics

For the HCV program head of households based on current 1,237 participants as of September 1, 2021:

- 9 0-BR, 344 1-BR, 393 2-BR, 389 3-BR, 96 4-BR, 5-BR 1 6-BR
- 85.7% female and 14.3% male
- 23% elderly and 77% non-elderly
- 50% disabled and 50% non-disabled
- 46.5% white, 53.1% African-American, 0.4% Other
- 21.7% Hispanic/Latino, 78.2% non-Hispanic/Latino, 0.1% declined to provide
- 39.5% families with children, 60.5% families without children

For the federal public housing program based on 3,668 households as of September 1, 2021:

- 4 0-BR, 3009 1-BR, 290 2-BR, 279 3-BR, 72 4-BR, 14-BR
- 63% female and 37% male
- 68.9% elderly and 31.1% non-elderly
- 40.5% disabled and 59.5% non-disabled
- 53.4% white, 45.7% African-American, 0.9% Other (Asian, American Indian among)
- 10% Hispanic/Latino, 90% non-Hispanic/Latino, 0.1% declined to provide
- 11.9% families with children, 89.1% families without children

BHA does not anticipate any major changes to the existing demographics, at least for the short-term. Our self-sufficiency and supportive service measures are designed to increase the level of successful tenancies of existing households (public housing) and participants (HCV). A major goal of BHA is to preserve and increase the supply of affordable housing, which many of our proposed plan measures are focused on. Achieving this goal should allow for an increase in total participants and households. Through affirmative fair housing marketing plans, efforts will be made to conduct outreach to those least likely to apply for housing, which would cover some of the groups currently included as part of the “Other” Category.

Plans for Housing Stock

The repositioning of our public housing portfolio is a top priority for BHA and one which MTW participation will help to facilitate. We have submitted an application for disposition to HUD’s Special Application Center (SAC) for the future tax credit self-development rehabilitation of the Campello high-rise consisting of 398 units for the elderly and disabled. It is BHA’s intent to explore other opportunities through RAD or HUD Mixed Finance for other properties, including:

- Hillside Village
- Belair Heights and Belair High-rise
- Manning Tower
- Crescent Court
- Caffrey Towers
- Sullivan Tower

➤ Roosevelt Heights

Identifying capital needs, determining financial feasibility and optimal structure, designing scopes of work and obtaining private and public sources of funding are all elements that can be provided by third parties for which use of MTW funds would be utilized in support.

Challenges

Major existing challenges that BHA faces as it seeks to fulfill its mission include:

- The lack of supply of affordable housing inventory given the large waiting lists for both the public housing and HCV programs; this also applies to special needs populations, especially the chronically homeless
- The current lack of private sector initiative to create affordable units in the City of Brockton, thus necessitating that BHA play an increased role moving forward
- A tight real estate market with rents out of reach for many Brockton residents which has only been exacerbated by the eviction moratorium which has further increased the already difficult task of finding a unit by voucher holders
- Fair market rents in surrounding communities outside the rent and payment standards of BHA voucher holders – many of which are located in non-impacted neighborhoods
- Difficulty in attracting local owners to participate in the HCV program

Innovation and Creativity

BHA has participated in the Capital Fund Financing Program (CFFP) and refinanced its debt to fund the replacement of two elevators in Manning Tower, as well as finance building envelope issues at Hillside Village. We have completed a self-performing energy performance contract to reduce usage of water, gas and electricity. We have completed a \$5.6 million energy services agreement to fund various energy related improvements throughout our portfolio. We have entered a net metering agreement with Sun Edison with a projected \$14 million in savings over the 20-year contract.

(4) Plan for Local MTW Program

Based upon current policy priorities of the Brockton Housing Authority, we would initially anticipate to seek to implement the following type of initiatives under the flexibilities available through participation in the MTW program:

Cost Effectiveness

1. Fungibility of public housing capital and operating funds, as well as HCV housing assistance payment funds and administrative fees, so that BHA can better allocate its resources to achieving its policy priorities of preserving and increasing the supply of affordable housing

2. Payment standards – establish small area fair market rents (FMRs) grouped by zip code areas to better allow for access to units in non-impacted census tracts in the City of Brockton and in neighboring communities whose rent levels are often out of reach for current voucher holders
3. Evaluate increasing payment standards up to 120% in certain zip codes to attract more owner units in non-impacted communities for which voucher holders would have access
4. Conduct our own rent reasonableness determination on units owned and/or managed by BHA. As BHA intensifies its efforts to reposition its existing public housing portfolio, we expect to increase the supply of units subsidized with project-based vouchers
5. Evaluate the possibility of creating an alternative schedule for re-examinations from annual to every two or three years – this could be initially tested for public housing households participants and HCV participants currently on fixed incomes
6. Evaluate the implementation of asset self-certification in an effort to streamline the re-examination process in the public housing and HCV programs
7. Eliminate the selection process for self-awards of PBV assistance
8. Allow for the ability to conduct our own HQS inspections for units owned/managed by BHA or its affiliates/instrumentalities
9. Explore the opportunity of creating our own alternative procurement policy to facilitate access to goods and services

Self-Sufficiency

1. As part of the Family Self-Sufficiency (FSS) program, modify certain terms of the current participation contract which is a HUD template document. change policies for treating increased income or amount of funds moved to escrow
2. Evaluate the viability of modifying existing selection procedures, including potentially allowing household members other than the head of household to participate in the FSS program when the head of household is not working
3. Potentially allow for an increased term of participation beyond the current five years for potentially up to an additional five-year period
4. Use of fungible funds, including funds that currently revert to the operating budget for resident training and technology enhancements
5. Extend the time period for over-income LIPH households to remain in the program as this will encourage residents to increase their income without fear of losing their existing housing in the short-term
6. Modify existing policies and procedures related to how increased income is treated as it relates to FSS escrow accounts, including use of TTP when enrolling in the FSS program as opposed to later adjustments for increased income
7. Explore use of escrow funds to pay down debt, subject to restrictions, when credit clean-up is an essential component of becoming a homeowner as part of FSS goals

Housing Choice

1. Explore the feasibility of establishing a local rental subsidy program which can further support operations of lower-performing properties in the federal portfolio, as a potential source in support of local special needs projects that add affordable units and possibly to

- maintain financial feasibility of certain state public housing properties that may become federally subsidized through Faircloth to RAD or some other repositioning structure
2. Use of funds to directly cover costs of providing supportive services to supplement existing partnerships and leveraging of funds and serviced referrals
 3. Use of funds to provide gap financing as a permanent funding source for preservation and development of additional affordable housing
 4. Creation of short-term assistance programs, especially those with supportive services for targeted populations
 5. Increase program cap to up to 50% of budget authority
 6. Increase project cap to allow for up to 100% PBV units
 7. Explore possible expansion of unit types (shared and manufactured housing);
 8. Increase PBV rent to owners to increase private developer participation for those offering affordable units, as well as to increase financial feasibility of BHA development projects
 9. Waive the requirement to give tenant-based vouchers to project- based participants after 12 months, which otherwise delays opportunities to those on the HCV waiting list
 10. Explore the possibility of establishing our own TDC limits

(5) Proposed Use of MTW Funds

BHA is expressly requesting the authority to flexibly use its eligible public housing and HCV funds across the Section 8 and 9 programs as part our application to participate in the MTW program. We have just recently undergone an organizational and operational assessment conducted by an experience outside consulting firm. Several of the recommendations that were contained as part of the final report dovetail into some of the flexibilities that would be made available as part of MYW.

Some of the anticipated use if funds would include:

- Conducting of rent surveys/studies so that more detailed information can be obtained by zip code or groups of zip codes to support future small area FMRs or increased payment standards
- Technology enhancements to increase the efficiency and cost-effectiveness of program operations – this could include the transition to paperless transactions in the admissions, occupancy and recertification processes, accessing portals not currently purchased on the current I.T. system to allow for more efficient daily transactions and the ability for system-generated reports to replace the time-consuming ad-hoc reports currently produced by BHA staff
- Creation of an Owner’s Portal to support the HCV program. This would enable landlords real-time access to check status of monthly payments, inspection schedules and results and other pertinent program information
- Creation of promotional materials to attract additional owners, membership in local landlord associations and trade groups to increase access to local owners

- Creation of promotional materials and set up trainings to promote benefits of participation in the FSS program
- Use of third parties to identify feasibility and best structure for asset repositioning of portfolio – may include development consultants, architects, engineers, capital needs assessments, market studies, appraisals, environmental consultants, construction representatives
- Provide funds as a permanent funding source for future BHA redevelopment projects
- Provide funds to directly obtain supportive services (while also continuing to use existing partners and referral) for families and special needs populations
- Technology improvements for PH an HCV inspections through the use of tablets or other similar devices that upload information directly into the I.T. system
- Various security upgrades which would involve upgraded security cameras based on a public safety plan and improved door access systems, especially as it relates to senior developments
- Use of outside executive search firms to assist BHA in identifying and hiring talented individuals to fill key senior staff vacancies

(6) Evidence of Significant Partnerships

The Brockton Housing Authority has numerous existing significant partnerships which can be utilized and expanded upon to further BHA's vision and target results for participation in the MTW program. These include:

- BHA contracts with Brockton Area Multi-Services, Inc. (BAMSI) to provide Service Coordinators as part of the BHA Resident Services Department who act as liaisons who connect residents with available resources. BAMSI makes referrals to numerous public and private service organizations with which it has relationships on behalf of BHA. BAMSI staffing consists of the Director of Resident Services, five Service Coordinators, and one clinician. All five Service Coordinators and the Clinician report to the Director of the department, Fred Welsh, an employee of BAMSI. The Director Fred Welsh reports to the Executive Director, who in turns reports to BHA executive/senior staff. The Director is a licensed mental health coordinator in addition to his position as Director of Resident Services. He responds to emergencies that asset managers and service coordinators inform him of. He makes recommendations for people in emergency situations to receive care. The service coordinators identify the needs of residents. Some of the things they help residents with are: applying for food stamps, difficulty paying rent, a problem with their monthly social security check. The coordinators identify the problem and help connect the resident with the appropriate resource. They also handle the disbursement of the food donations they receive every month (which totals over 700 bags

disbursed each month). Their main goal is to empower their tenants by addressing issues relating to health, financial insecurity and related services.

- The BHA's Executive Director is a member of the Mayor's Homeless Task Force, composed of local business persons and other stakeholders which is focused on local solutions to addressing chronic homelessness by stressing a 'housing first' approach to promote increased affordable housing opportunities, while also streamlining access to essential supportive services. Efforts have included creation of a community day center (The Haven) for a place to stay after having to leave homeless shelters during the morning hours. Fundraising for cash resources, as well as private donations of computers, electronics, furniture and literature, as well as volunteers is a key part of maintaining The Haven's existence.
- BHA is a member of the Brockton Housing Partnership a consortium of local banks, credit unions, and non-profit agencies. The group sponsors homebuyer workshops that put individuals in contact with real estate brokers, insurance agents, attorneys and loan originators and learn about various down payment assistance programs and mortgage options. They have developed a foreclosure hotline for homeowners to call and leave a message. The message is returned by a staff member who speaks the homeowner's language and the homeowner is referred the counseling or financial education programs.
- The Brockton branch of the Old Colony YMCA provide a variety of after-school and other youth programs. The Youth Focus Program offers a safe environment for comprehensive education, fitness, leadership and character development programming to support youth and families on-site in four Brockton Housing Authority developments. It also acts as an information and referral program to link youth and families to existing outside services provided by local non-profits, faith-based organizations, and educational institutions. Specific activities include homework help, operating a computer lab, mentoring groups, health and fitness activities, arts and crafts and sports leagues. BHA has previously collaborated with the YMCA on a YouthBuild program combining education and on-site work skills where students build or renovate housing units and receive a stipend.
- City Council – BHA works closely with its members and the Division Director of Administration is a former Councilor. Areas include local affordable housing issues, support for local resources to be utilized for the preservation and/or creation of affordable housing and funding for service agencies which provide resources and assistance to BHA households.
- State legislators – BHA works closely with its State representatives and senator on policies and legislation impacting both affordable housing policy and resources available to support the expansion of affordable housing.
- Brockton Area Workforce Investment Board (BAWIB) – the BHA Executive Director currently sits on the BAWIB Board of Directors. The entity is a business-led, policy-

setting board that oversees workforce development initiatives in the ten-community 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 the region.

- Brockton Redevelopment Authority is a quasi-public agency contracted by the City of Brockton, whose main mission is community development and economic revitalization, specifically for the benefit of low- and moderate-income households and areas of Brockton. The BRA works with the Mayor, the Planning Department, and other city departments to develop and achieve a strategic development vision. The BRA also works in partnership with other organizations like the Metro South Chamber of Commerce, NeighborWorks Housing Solutions, Brockton Housing Authority, public services, private businesses, and developers to further the strategic development vision. As part of the BRA's contract with the City of Brockton, it manages the city's Community Development Block Grant (CDBG) and HOME Investment Partnership Program (HOME) funding from the US Department of Housing and Urban Development (HUD). The principal purpose of the funding is to improve the lives of low- and moderate-income Brockton residents through economic development, affordable housing, and social programs. Many of the BHA's existing PBV scattered site units were acquired through BRA.
- Old Colony Elderly Services – provides numerous services through its Supportive Housing Program to elderly residents and persons with disabilities in high-rises in the areas of legal, health care and counseling areas. It includes attention to daily personal care needs such as chores, laundry and housekeeping, medication reminders and safety checks.
- City of Brockton Police Department (BPD) – BPD currently has two full-time officers assigned to BHA properties, one during the daytime and one at night, who drive the BHA public housing and Section 8 properties, including where private night-time security guards are stationed. The BPD Night-time Supervisor reviews reports provided by the private security firm(s). A good illustration of success with this partnership is where BHA worked with BPD to establish a hybrid-community policing program to address public safety concerns in the Pleasant Prospect neighborhood.

The above partnerships will help to achieve the MTW vision by providing opportunities to an increased number of households to participate in FSS programs, or access services that promote self-sufficiency even if not a formal FSS participant. This will increase the incidences of successful tenancies which is important given the scarce supply of affordable housing. They will create a network of local partners that are potential providers of funding or in-kind services that count as leverage for purposes of competitive funding applications that seek to preserve or increase affordable housing. Our partners can also promote the availability of housing assistance to those in the community who otherwise may not apply for either public housing or an HCV.

Landlord Incentive Activities Information

(1) Landlord Needs Assessment

In addition to the regulatory burdens that can act as a deterrent to owner participation in the MTW program, existing conditions in the local rental market are the major reason behind some of the proposed Landlord Incentive Activities proposed in our Plan.

A 2020 study by the National Low Income Housing Coalition ranked the Brockton area housing market as among the most unaffordable in the country for local renters. The annual study of housing costs across the country estimated the average renter in Brockton and its surrounding towns earns \$11.69 an hour, less than the state's minimum wage. To afford a typical two-bedroom apartment in the area — “affordability” by the coalition's definition meaning housing costs less than 30 percent of income — the average renter would need to work nearly 100 hours per week.

The coalition found only three metro areas in the country with more severe mismatches between rent and renter's incomes: Santa Cruz, California; Ocean City, New Jersey; and the portion of Greater Boston that stretches into southeastern New Hampshire. Renters in major cities like San Francisco, Seattle and New York City earn higher wages on average than Brockton's renters, thus making the extreme housing costs in those cities more affordable to local renters, according to the report. The housing crisis in Boston may actually be negatively impacting Brockton as rents are being charged that Boston-area households can afford in Brockton, but not in Boston.

Other notes from the report specific to Brockton include:

- 2 bedroom FMR of \$1,528 per month
- Hourly wage of \$29.38 and annual income of \$61,120 required to afford a 2 bedroom unit, which would require 2.3 full-time jobs based on estimated hourly wages earned

Landlord participants in the HCV program vary from owners of single units to owners with multiple buildings. Additionally, BHA also owns and operates units that receive project based voucher assistance and this is expected to increase going forward as BHA redevelops its existing public housing portfolio. We also provide PBVs to private owners.

Even though denial of housing is not allowed under Massachusetts State law, there is still a reluctance by many owners to participate in the program. Reasons include:

- Limits as to what HAP and total rent can be paid based on existing FMRs – this is especially so in the surrounding suburbs; as described above there is a very hot rental market so owners have options that may provide rents over and above what BHA is allowed to pay
- Regulatory process which can delay lease-up as owners wait to pass HQS inspection, which often requires a follow-up inspection; owners complain about the stringent inspection protocols overall and/or about how it is applied by the inspectors
- Concern as to potential unit damages from low-income families, even if unfounded

- Massachusetts has very strong tenant protections built-in such that Owners are concerned that it may take several months to effectuate an eviction, whether for non-payment of rent or other cause

Strengths and Weaknesses of HCV Program

BHA just had an organizational and operational assessment conducted by an independent third party consultant which included the Leased Housing Department.

Strengths of the Department included:

- Majority of staff has been with BHA for long time periods and has strong knowledge of program rules and regulations, as evidenced by long history of SEMAP high performance
- Established quality assurance process in place with dedicated staff
- Serve a variety of special needs populations through dedicated vouchers

Weaknesses were identified as:

- Need for greater automation so can transition to paperless transactions
- Better use of existing IT system so can generate reports rather than create ad-hoc which are very time-consuming for staff
- To alleviate work loads of case workers, consider streamlining the process of income verification and frequency of re-examinations for those on fixed incomes

(2) MTW Cohort #4 Activities

BHA is proposing to implement the following cohort-specific activity as identified from the 4th Cohort MTW Activities List:

- **4.a. Vacancy Loss** – pay landlord up to one-month contract rent as reimbursement for time the unit spent vacant in between HCV participants; payments will be made upon execution of the next HAP contract between the Owner and BHA and the Administrative Plan will be amended to reflect this change in policy

MTW Operations Notice Activities - Waivers that May be Requested

- **2.a. Payment Standards – Small Area Fair Market Rents (SAFMR)** – payment standards may be established up to 150% of the SAFMR; no reduction in payment standards below 90% would be anticipated; the higher payment standards would be established by zip code or groups of zip codes to provide greater access to units in non-impacted areas
- **2.b. Payment Standards – Fair Market Rents** – payment standards may be established up to 120% FMR; no reduction in payment standards below 90% would be anticipated; these could be used as well to attract units in non-impacted areas, as well as potentially for PBV units owned and/or operated by BHA and its affiliates

- **4.b. Damage Claims** – pay landlord reimbursement for tenant-caused damages after first accounting for the security deposit to cover costs; the amount of damages can not exceed the lesser of the costs of the repairs or 2 months of contract rent and payment will be made upon execution of the next HAP contract between the Owner and BHA; the Administrative Plan will be updated to reflect this policy change
- **4.c. Other Landlord Incentives** – provide incentive payments up to one month rent to incentivize landlords to join HCV program: If any issues arise i.e. issues with inspection, landlord not able to submit certain paperwork to complete lease up for month that was planned for - - BHA can pay one month’s rent upon HAP contract execution to hold the unit for new landlords - - to hold that is delayed due to inspection etc.; these incentive payments may be targeted to properties in neighborhoods where vouchers are difficult to use in order to attract new units in non-impacted areas that provide better economic and other opportunities for HCV participants
- **5.a. Pre-qualifying unit inspection** – allow units to be pre-inspected for HQS approval to accelerate the lease-up process and minimize landlord lost revenue during period of vacancy; inspection would occur within 80 days of the HCV participant occupying the unit

BHA believes that these actions will be successful in meeting policy goals to provide participant access to units in areas of economic opportunity by providing the ability to make higher HAP payments to owners in such locations through revised payment standards which are otherwise unattainable under existing regulations and existing FMRs.

Even though Massachusetts prohibits refusal to accept voucher holders, anecdotal evidence would indicate this still does take place to some extent. Owner reluctance to participate in the HCV program can sometimes be traced to reluctance to deal with the regulatory process that can sometimes delay the leasing process and cause economic loss such that incentive payments, vacancy and damage payments and pre-qualifying HQS can help to alleviate.

(3) Other Landlord Incentives and Initiatives

No other Agency Specific Waivers related to landlord incentives proposed at this time.

Non-MTW Initiatives to Implement

1. Establish Owner Committee of local owners to coordinate with the Landlord Facilitator regarding proposed initiatives, provide feedback on BHA current processes and make recommendations on methods to streamline and provide feedback on customer service issues with Leased Housing staff

2. Create an online Owner Portal so that landlords will have real-time information as to monthly payment status, scheduling of and results of HQS inspections and other relevant program information

Previously Implemented Activity

In December 2020, BHA established a Rental Assistance Landlord Participant Facilitator, a newly created full-time position with primary oversight of the Leased Housing department's efforts to recruit responsible landlords to the program, assist participants in housing search, coordinate with FSS department to increase participation, act as the department's "Homeownership" expert, maintain a caseload, in addition to other duties. Reporting to the Leased Housing Administrator, and in addition to maintaining a case load of participants, major responsibilities specific to landlord outreach and improving lease-up success rates include:

- Research apartments, landlords, and rental opportunities for HCV participants to facilitate successful lease up.
- Recruit landlords not currently working with BHA housing programs through various methods, including but not limited to networking, newspapers, on-line databases, attending landlord coalition meetings, and other methods of landlord recruitment.
- Call landlords, making a positive first impression, to promote the Brockton Housing Authority and educate them about the benefits of working with HCV participants.
- Spend time doing outreach with potential landlords by visiting them and calling them regularly, attending landlord or realtor association meetings, and maintain great landlord relationships and ensure that needs are met in a positive and timely manner.
- Maintain a listing of up to date current vacancies in the Brockton area and compile and update a landlord database.
- Propose, oversee and/or implement new strategies to recruit landlords and identify the barriers to landlords participating in programs and propose solutions.
- Assess landlords to ensure they will be a good match for participant needs.
- Assist with briefings of new voucher holders
- Monitor lease up 'success' rate and work to increase that rate for those who are issued new vouchers