

Brockton Housing Authority  
Request to Update  
Designated Housing Plan  
July 18, 2022

DRAFT

The Brockton Housing Authority is requesting an update (continuation) of its 1997 Designated Housing Plan. In its original application the Brockton Housing Authority addressed an undue concentration of disabled persons within our elderly disabled complexes by designating 75% of the non-wheelchair units for elders and 25% of those units for non-elderly disabled families. At the time of the original application 36% of the units were tenanted by non-elder disabled families. In order to reach the goals of the plan, the Authority proposed, and HUD approved, an elder preference for the units covered by the plan. The approved plan did not explicitly address how units should be assigned once the plan's ratios were met but the unstated and obvious intent of the original plan was to maintain the 75/25 ratio, once met. In 2012 the 75/25 goal was achieved and an update to the plan was submitted requesting that the tenant section policy associated with the plan be updated, to explicitly state that which was implied in the original plan, to maintain the original goal of a 75% to 25% ratio of elders to non-elders. That update was approved. In 2014 another update was submitted with the addition of the newly Federalized property at Belair Tower. That update was approved. The plan has been updated each two years following. This update maintains all the aspects of the 2020 update of the plan and the aspects of the original plan.

The Brockton Housing Authority further attests that this amendment meets the statutory requirements of the plan and there are no unanticipated adverse impacts on the housing resources for the groups not being serviced due to the designation.

As of June 30, 2022, 23.20% of the designated units were occupied by non-elder disabled families. As of October 8, 2020, 16.2% of the designated units were occupied by non-elder disabled families. Since 2013 the Authority has been tenanting at the rate of 66% elder to 34% non-elder. Due to aging in place of non-elder disabled tenants, the 75%-25% ratio is difficult to maintain. Even though we are tenanting non elder disabled applicants at a 34% rate, they age in place and are soon reported as elderly tenants. Statistics show that 45% of current residents are disabled (whether elderly or not) as compared to the general population of Brockton of under 65 yoa at 9.8% being disabled per the 2021 ACS.

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

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

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

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

The Allocation Plan for Designated Housing pertains to the six (6) Elderly/Disabled housing developments in the BHA's federal housing portfolio. It is fully consistent with the City of Brockton's Consolidated Plan and was developed with the intent of meeting all Fair Housing and non-discrimination requirements, which apply to federal public housing programs.

The developments covered by this updated Allocation Plan are:

Belair Heights (MA 24-2)	Manning Tower (MA 24-3)
Campello High Rise (MA 24-6)	Caffrey Towers (MA 24-7)
Sullivan Towers (MA 24-8)	Belair Tower (MA24-10)

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

**The overall percentage of non-elders originally was 36% (370 out of 1,034 households).** This is an extremely high percentage when contrasted with the Brockton-wide population of 9.8% non-elder disabled and could be considered an undue concentration of disabled individuals within the federal conventional housing program. The plan has been successful in maintaining a manageable balance within the complexes. Today, 25 years after first approval of the plan, the stated goals of the original plan were met in 2012. The numbers fluctuate as non-elders age in place and to account for this aging in place, in 2013, the Authority adopted a tenant selection plan which stated that the Authority would offer available units to non-elder disabled families at a ratio of 66% elder to 34% non-elder until the 75% to 25% ratio was again met. As of June 30, 2022, 76.80% of

the residents of the above complexes are elderly and 23.20% are non-elderly disabled. As stated above, this is due to fact that many residents that were tenanted as non-elderly disabled are now categorized as elderly. If we look at those tenants characterized as disabled, whether elderly or not, the percentage of current tenants non-disabled is 55% and disabled is 45%. We believe that this statistic, together with tenanting data, shows that even though the non-elderly disabled population is 16.2 percent of the total population, the disabled population is 45%, showing that the non-elderly disabled are aging in place, creating a greater proportion of elderly as their tenancy is much longer than an elder.

**When the Plan was originally submitted, the demand for dwelling units at federal elderly/disabled by elders had significantly diminished over the preceding several years.**

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

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

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

The implementation of the Designated Housing Plan required modification to the Authority's Tenant Selection Plan. The Authority's amended plan prioritizes elderly applicants for Elderly/Disabled housing; when an elderly applicant is not available for tenanting, the Authority makes an offer to the next eligible near elderly applicant 50-62. This has caused the average age of resident to rise and create an atmosphere more representative of the community as a whole and more tolerable to the frail elders and other persons with disabilities. At this time 23.20% of the residents are non-elderly and 76.80% are elderly. The in place aging of non-elder disabled applicants and the elder tenant selection

preference have made it difficult for the Authority to meet the plans goal related to the 75% to 25% ratio but it has met the goal of providing a more mainstream neighborhood without negatively effecting any one of the targeted populations.

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

The current waiting list for elderly/disabled housing has 758 elderly, 1106 non-elderly of which 606 are Near Elderly. In 2020, the waiting list for elderly/disabled housing had 871elderly, 1188 non-elderly of which 770 are Near Elderly. The current resident makeup (excluding specially designed units) is 76.80% Elderly 23.19% Non-Elderly, of these residents, 56% are not disabled and 44% are disabled. Compare this to Brockton's 2019 population of under 65, 90.2% non-disable to 9.8% disabled. It is the belief of the Authority that without the approved Designated Housing Plan that the ratio would rapidly reach a ratio of over 50% non-elderly disabled. This combined with the longer tenancies of the non-elders would severely impact the ability of the Authority to assist eligible elders. The Authority was awarded an additional 100 vouchers for non-elderly persons with disabilities in 2010 in support of the designated housing plan and has applied for several NOFAs and been awarded additional vouchers for the non-elderly disabled, including 100 NED, 51 Mainstream, 19 VASH and 31 EHV vouchers, and has also used state vouchers to house younger disabled.

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

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

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

The Authority continues to convert units to make them accessible as we modernize each development. Because of the Covid 19 Pandemic, the modernizations planned have moved forward slowly. Belair Tower was modernized to as part of the federalization process with new specially designed units being added. Major modernization has occurred at Belair Heights, Manning Tower, Sullivan Tower, comprehensive modernization is approximately 50% complete at Caffrey Towers with the conversion of special designed units a priority and the conversion of 9 additional units to accessible units at the Campello High Rise. All developments are designated as both elderly and non-elderly. As units are converted from general occupancy to special designed they will be removed from the units which the 75% - 25% ratio

will be applied. At this time 928 units are available for elders and 310 units available for non-elder disabled applicants.

Development	Total Units	1 Bedroom	2 Bedroom	Accessible
Belair Heights 24-2	100	92	8	5
Manning Tower 24-3	96	96	0	5
Campello High-rise 24-6	398	396	2	21
Caffrey Towers 24-7	318	317	1	20
Sullivan Tower 24-8	122	122	0	6
Belair Tower 24-10	269	269	0	11
Totals	1303	1292	11	68

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

The Authority has 296 vouchers for non-elderly disabled and 19 VASH vouchers. The Authority received 100 Vouchers in support of the Designated Housing Plan (DHP) and an additional 100 vouchers for non-elderly persons with disabilities (NED). At this time the Authority 193 of the 200 vouchers from these allocations are currently leased, 5 are searching. The Authority partnered with the Brockton Area Multi Service Inc. (BAMSI) for 14 Mainstream vouchers that have been issued to non-elderly/disabled persons and since that time, the BHA has absorbed those vouchers. In 2019, the Brockton Housing Authority applied for and received 51 Mainstream vouchers. The screening of applicants and issuance of those vouchers were delayed due to the pandemic, currently 47 are leased and 2 are searching. The Authority has 19 VASH vouchers of which 18 are leased for disabled homeless veterans. The Brockton Housing Authority was awarded 31 EHV vouchers, 27 are leased, and 4 are searching. In total from July of 2020 to July of 2022, we have issued federal vouchers to 112 new non-elderly disabled participants. Over the last 2 years, the Authority has also issued vouchers to 22 applicants from the regular Section 8 waitlist that are non-elderly disabled.

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

Recognizing the difficulty that all of our Section 8 participants, including the disabled, were having finding suitable units, in 20##, the Brockton Housing Authority created the position of Landlord Participant Facilitator. This position is intended to help our participants with apartment search and build a rapport with landlords. As of June 30, 2022 the following vouchers are leased;

94/100 DHP;  
99/100 NED;  
18/19 VASH;  
60/65 Mainstream;  
27/31 EHV;

The BHA also administers 135 vouchers through the Commonwealth of Massachusetts in conjunction with the Department of Mental Health, with 144 consumers are housed in SROs. The BHA also Administers 63 Alternative Housing Voucher Program (AHVP) for younger disabled with the Commonwealth of Massachusetts and 54 are housed. This is 10 more vouchers than in 2020 as the Authority was awarded an additional 11 AHVP vouchers to house younger disabled people.

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

The Authority has designated significant resources to mitigate any negative impact the Plan might have on the younger persons with disabilities. The Authority has created a position in the Rental Assistance Department's 2020 budget of Landlord Participant Facilitator to assist those voucher holders having difficulty finding a unit. It is envisioned that this position will work with non-elderly disabled individuals to assist in the apartment search and lease up. The position will also have a caseload of primarily disabled individuals with NED, Mainstream, and EHV vouchers. We have also sent out mailers requesting postings of one- bedroom units and keep current lists of available apartments submitted by landlords in the lobby. We have also worked with the Brockton Area Multi-Services and Father Bills Mainspring to house those needing Mainstream vouchers. The Authority has directed our Elderly/Disabled Service Coordinators to work with any current resident who apply for the program to assist the resident in their housing search through outreach and referral. The Authority has also worked with the Massachusetts Department of Mental Health, Massachusetts Rehabilitation Commission, and BAMSI to ensure proper placement for the program's participants. Additionally at briefing, participants receive resources to assist in finding suitable units. Included but not limited to, are websites that provide apartment listings in our area including gosection8.com., craigslist.com, Zillow.com, etc. A list of apartment complexes in our area along with local maps outlining the surrounding towns is provided.

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

As a condition for approval, the Authority was required to apply for and receive 100 Section 8 Rental Certificates or Rental Vouchers targeted for persons with disabilities under HUD's Notice of Funding availability for Fiscal Year 1997. Previous to this condition, the Authority had applied for 162 Vouchers and Certificates. As instructed, the Authority amended the request and applied for and received 100 Section 8 Rental Assistance Vouchers. The Authority has consistently labeled these vouchers as 'DHP' vouchers and only issued these vouchers to non-elderly disabled families. The Authority has also used the Project Based Program, and the Mainstream 5 Section 8 Program to continue to build an inventory of assistance to mitigate any negative impact on the non-elderly population

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

In 2014, the Authority was awarded 14 Project Based VASH vouchers for homeless veterans, many of which are disabled.

In 2019 & 2020, the Authority was awarded 51 Mainstream vouchers and 5 mobile VASH vouchers.

In 2021, the Authority was awarded 31 Emergency Housing Vouchers.

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

At the onset of the plan the Authority had a very short waiting list due to the negative perception growing within the community with regard to the undue concentration of young disabled persons in Elderly/Disabled housing. In January of 1998 the Federal Elderly/Disabled waiting list had 93 applicants. Of these applicants 31 were transfer requests. The wait time for any new applicant was determined by the ability of the Authority to obtain Criminal Offender records. If the person met the selection criteria they would be offered a unit immediately, regardless of age. Today the list consists of 1864 applicants. On average, approximately 125 units become available in any given year. The list

for an elder is estimated to be over two years long. Young disabled, who do not qualify as near elderly are most likely to be assisted through the Section 8 program and other voucher programs. This list is also over five years long. The amended tenant selection plan makes available approximately 50 public housing units in the designated complex's each year for non-elderly until the ratio of 75% to 25% is achieved.

With the original addition of Section 8 units in support of the plan, we have been able to assist more young disabled residents than we would have if the designated housing plan had not been approved. The Authority also administers Mainstream, NED, VASH, and EHV, and a State program known as the Alternative Housing Voucher Program (AHVP). This program assists young disabled applicants who are not eligible for the conventional elderly/disabled complexes. The Authority is administering 63 AHVP Vouchers at this time. These vouchers have been issued to applicants who have applied to the State and Federal elderly/disabled housing programs.

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

The single most significant effect the Designated Housing Plan has had on the composition and tenancing of our complexes has been the slowing of the rate that non-elder disabled applicants have come into the Authority's complexes over the last twenty plus years and now the accomplishment of the plans goals. The Authority's complexes would become primarily non-elderly disabled residents within a matter of months without this plan creating an undue concentration of non-elders in the BHA developments. This result is not consistent with our original application, which stated we would gradually work toward the 75% elderly, 25% persons with disabilities ratio. Many non-elder disabled residents are presented with significant need for services that are not available within the community and that the Authority is unprepared to meet. The following chart details the near elderly tenancing from 2012 to present.

Near Elderly Tenancing Statistics																				
Develop ment	Year 2003	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	Total
Belair Heights Non elevator 24-2	2	0	1	2	1	0	0	0	0	0	6	3	6	0	3	0	0	4	3	31
Manning Tower 24-3	6	1	5	7	6	7	0	11	1	3	1	4	4	2	2	3	1	0	6	70

Campello High-rise 24-6	12	10	28	11	24	6	18	12	4	4	8	16	17	15	11	7	11	6	14	234
Caffrey Towers 24-7	8	0	15	32	14	8	7	3	2	4	15	8	16	13	9	8	6	7	13	188
Sullivan Tower 24-8	5	0	4	3	9	4	2	2	1	3	4	4	2	5	4	0	5	0	1	58
Belair Tower 24-10												11	9	13	7	4	9	6	11	70
Totals	33	11	53	55	54	25	27	28	8	14	34	46	54	48	36	22	32			651

Although the current waiting list may indicate that there are more non-elderly and near-elderly than elderly waiting for assistance a number of factors have been considered in making this application for an update to (continuation of) our plan.

First, many of the non-elderly applicants have been assisted with vouchers. It is the policy of the Authority to keep the name of a non-elderly applicant on the waiting list for conventional elderly/disabled housing even after they have received assistance through the voucher program. Over the last 2 years, 112 federal vouchers were issued to non-elderly disabled. Second, the Authority is assisting substantially more non-elderly disabled individuals than when the plan was first approved in 1997. Many of these residents have complex service needs that the Authority is struggling to meet. In fact, due to aging in place, the make-up of current tenants of the non SDU units is 55% non-disabled to 45% disabled. If the amended plan is not approved, the Authority would be overwhelmed with an unhealthy concentration non-elderly disabled tenants with the prospect of unmet service needs preventing the Authority from meeting its basic mandate of providing decent, safe and sanitary housing. Third, the Authority has taken extensive steps to assist disabled non-elderly applicants that include but are not limited to obtaining more vouchers, both Federal and State to assist the non-elderly disabled, created a new position to help this population successfully lease up with vouchers, partnering with the Brockton Coalition for the Homeless, the Massachusetts Department of Mental Health and the BAMS I Help Line to provide housing search assistance for non-elders with vouchers. The Authority has also worked with the Cape Verdean Association, The Spanish Center, The Latino Health Institute, and many of the local churches that provide housing search assistance. The Authority continues to work with local landlords explaining the program and to develop listings of available apartments for non-elders. The Authority has partnered with BAMS I and obtained additional vouchers in support of the plan and with other local agencies on a successful McKinney Vento grant for disabled homeless. We continue to work with DHCD to obtain additional resources that will be made available to the non-elder applicants. Fourth, the amended plan maintains the

objectives of the original approved plan, avoids an undue concentration of unmet service needs and makes available 25% of designated units to non-elder disabled applicants.

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

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