

Annual PHA Plan <i>(Standard PHAs and Troubled PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 03/31/2024
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

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

Definitions.

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

A.	PHA Information.																				
A.1	<p>PHA Name: <u>Brockton Housing Authority</u> PHA Code: <u>MA024</u> PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>1/2023</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>1626</u> Number of Housing Choice Vouchers (HCVs) <u>1964</u> Total Combined Units/Vouchers <u>3590</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p>Availability of Information. PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p>The Brockton Housing Authority 2023 Annual Plan is available on the agencies website http://www.brocktonhousingauthority.com/, at our main office located at 45 Goddard Rd, Brockton MA 02301, at each Asset Managers offices and at our Admissions and Rental Assistance office located at 1090 Main Street Brockton MA 02301</p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 20%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 10%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:											
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Lead PHA:																					

B. Plan Elements

B.1 Revision of PHA Plan Elements.

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

Y N

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

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

Policies that govern eligibility, Selection and Admissions

In March of 2021 the Authority’s Administrative and Continued Occupancy plan was amended to allow for the opening of the Authority’s Federal Family housing list. The Amendment also allowed the list to be left open for applications.

The Section 8 Administrative plan was amended in June of 2020 to preferences related to HUD’s Main Steam Housing Voucher program.

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

On September 24, 2020 the Board of Commissioners approved a contract which authorized an Organizational Management review of our operations. The primary purpose of the review was to identify areas where the Authority could make improvements or add capacity to enable the Authority to access various funding, programs, and to improve and better maintain our housing stock.

The consultant spent hundreds of hours interviewing our staff and reviewing our policies and procedures and have produced a very detailed report. The report provided the Authority with information and recommendations that are being used to improve and enhance the capacity of our agency.

The report contains many areas where the Authority can consider making changes or adopting policies and/or procedures that will better position the Authority as we move to a new financial environment. Several of the recommendations can be done within our existing organization, but the major recommendations require the Authority to bring on or promote employees with additional capacities to provide the expertise and oversight for successful and efficient future operations. The Authority has appointed an Assistant Executive Director, Director of Asset Management and Director of Procurement as recommended in the plan

There were four major areas identified that require the creation of new positions.

- Administrative Efficiency
- Procurement
- Asset Management
- Regulatory Compliance

A summary of the recommendations made in the report that address these items is below.

Administrative Efficiency

The transition back to the use of an Assistant or Deputy Executive Director, who in turn would have direct oversight of the Directors and other departments without a Director. Consistent with best practices the consultant has seen at other housing authorities, they have proposed a revised organizational structure that would greatly reduce the number of direct reports to the Executive Director which will allow the

Executive Director to concentrate on planning, organizing, Board engagement, developing staff, future affordable housing development, new programs, and public relations.

Procurement

The creation of a new position, Director of Procurement reporting to the Chief Financial Officer. Previously, the procurement responsibility was dispersed between the Facilities Director, the Director of Capital Improvements, and the Purchasing Agent. A central location for procurement responsibility has now been established. Procurement is very regulated and requires someone with the knowledge of the various procurement regulations and requirements and the sole responsibility for the function should be clear. The Purchasing Agent reports to this person.

Asset Management

With the retirement of the Division Director of Asset Management, the Authority needed to restructure the position and rewrite the job description to match the direction of the organization. This position now provides direct oversight of Asset Managers, Security, Resident Services, and FSS. The job duties of the Director of Asset Management will continue to evolve as there will be different oversight and coordination responsibilities as the Authority begins to more aggressively reposition its public housing portfolio and change subsidy platforms to a voucher-based subsidy. If low income housing tax credits are utilized as funding for future redevelopment, the BHA should still have the ability to manage our properties, but would need initial assistance from a tax credit compliance consultant for initial admissions. The consultant also recommends having some BHA LIHTC-certified staff in the future.

Regulatory and Compliance

The creation of a new position reporting directly to the Executive Director, which is focused squarely on compliance, quality control, adherence to polices, standard operating procedures and other special projects. The duties of this position could include file reviews for the public housing and voucher programs, quality control file reviews for the procurement function to supplement reviews performed by the Procurement Director, implementation and oversight of written standard operating procedures, and review over other areas of concern as identified by either the E.D. or Board and would include the creation of risk assessments and an enhanced internal review, compliance and audit function over what now exists within BHA.

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

In June of 2010 The Brockton Housing Authority, along with the City of Brockton and Building a Better Brockton published an Analysis of Impediments to Fair Housing Choice. The Analysis confirmed the most significant barrier to fair housing continues to be the limited supply of affordable housing. The City, along with the Brockton Housing Authority had created and submitted an Affirmatively Furthering Fair Housing Plan in October of 2017. At that time we were informed that the AFFH plan process was being suspended by HUD. We have now re-engaged with the City to create and submit a voluntary AFFH plan. We will proceed with our annual plan using the local information that was collected during the AFFH process and any new information gathered through further analysis.

Furthermore, in Brockton, non-whites are more likely than white residents to be low-income, so the housing problems of low-income people are most prevalent in minority households. The limited funding for the development of new affordable housing serves to restrict fair housing choice for lower income, minority households as well as people with disabilities. The Authority continues to explore options for low income families in the Low Income Tax Credit area, the award of additional Housing Choice Vouchers and other section voucher programs along with using our existing portfolio as leverage for capital improvements and the development of additional units. The Authority has applied and been awarded additional mainstream vouchers and has been awarded 31 Emergency Vouchers of homeless or those about to become homeless.

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 becoming more and more 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 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 property owners 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 filled a new landlord outreach position in 2020 to assist voucher holders find and lease units. The Authority is now designated as a moving to work agency and is proposing two changes to our policies that we believe will assist our voucher holders in leasing more quickly and in better neighborhoods. Please see the MTW supplement for more information on these proposed changes.

The inventory of available and acceptable apartments has become very tight. Many voucher holders, especially one bedroom voucher holders have had difficulty finding appropriate units, although now, with a greater degree of difficulty. The primary issue facing residents of all low income

demographics is affordability and the availability of subsidized or affordable housing. These issues have been pivotal in the determination of the Authority's five year plan

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

Attached as file MA024a01

B.2 New Activities.

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

Y N

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

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

- **Hope VI or Choice Neighborhoods.** The Authority will consider applying for the Hope VI or Choice neighborhood grants if it is determined that we qualify for the programs and/or that it would be in the best interest of our residents. No application would be considered without first consulting with the Authorities Resident Advisory Board and obtaining their support for the application.
- **Mixed Finance Modernization or Development;** The Authority will use financing when available to supplement our modernization activities. The Authority continues to explore Energy Saving program that may increase utility savings that can be leveraged to supplement out capital plan.
- **Demolition and/or Disposition:**

On March 24, 2021 the Brockton Housing Authority submitted an application to the US Department of HUD's Special Application Center for the Disposition of the Campello High-rise (MA02400002) located at 1380 Main Street Brockton MA 20301. The Campello High-rise consist of 398 residential units. 377 of these units are 1 bedroom apartments, 29 are 1 bedroom apartments with special accessibility modifications for disabled families and 2 units are 2 bedroom apartments with special accessibility modifications for disabled families. As of the writing of this plan the application has not been approved. This application was approved in October of 2021..

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

Furthermore, it is the intent of the Brockton Housing Authority to explore the Section 18 Disposition program with regard to the obsolescence of several of other federal public housing units. It is the intent of the Authority to retain control of the units and seek Tenant Preservation Vouchers for any units that qualify for the Disposition program. The Authority will review its entire public housing portfolio including, 24-1 Hillside Village, 24-2 Belair heights, 24-3 Manning Tower, 24-4 Crescent Court, 24-7 Caffrey Towers, 24-8 Sullivan Tower, 24-9 Roosevelt Heights, 24-10 Belair High-rise. An application for Demolition/disposition will only be made if it will support financial opportunities to address the large backlog of capital needs within our current federal public housing program. This is consistent with the PHA's annual and five-year plan.

- **Designated Housing for Elderly and/or Disabled Families.** The Authority is required to resubmit an application for approval of its designated housing plan every two years. The Authority submitted the plan this year for approval for the 2021 and 2022 plan years in 2020 and will submit an updated request for the years 2023 and 2024.
- **Conversion of Public Housing to Project-Based Assistance under RAD:** The Brockton Housing Authority will explore the feasibility of used the RAD program to determine if the program will address the backlog of capital needs of its developments. If it is found that this program will provide the additional funds needed to address this backlog the Authority will submit an application to

	<p>HUD's Special Application Center. The Authority will review its entire public housing portfolio including, 24-1 Hillside Village, 24-2 Belair heights, 24-3 Manning Tower, 24-4 Crescent Court, 24-6 Campello High-rise, 24-7 Caffrey Towers, 24-8 Sullivan Tower, 24-9 Roosevelt Heights, 24-10 Belair High-rise. An application for the Rental Demonstration Program will only be made if it will support financial opportunities to address the large backlog of capital needs within our current federal public housing program. This is consistent with the PHA's annual and five-year plan</p> <ul style="list-style-type: none"> • The Authority does have one unit occupied by a Brockton Police Officer at Roosevelt Heights. There are no plans to expand this program at this time • Project-Based Vouchers; The Authority is regularly reviewing and considering the issuance of project based vouchers to address deconcentration of poverty and lack of suitable housing available to voucher holders. We have not committed to any specific development. The underlying motivation is to provide better quality housing stock and/or more diverse locations for our participants. It is anticipated that the Authority will have available vouchers for project basing inn 2023. • Units with Approved Vacancies for Modernization; The Authority will use hotel units when they are necessary to complete comprehensive modernization. The Authority is expecting d to do comprehensive modernization to forty plus units in the Caffrey Tower Elderly/disabled complex in 2022. This will require units to be held off line to be used hotel units. • Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants); The Authority will consider applying for any and all grants available to supplement the security activities at the agency.
<p>B.3</p>	<p>Progress Report.</p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.</p> <p>The Authority has continued its training regimen for all employees to ensure that our staff is prepared to meet the challenges of shrinking resources, increased regulatory demand and an ever increasing population with multiple service needs. We have also partnered with several service agencies to ensure that our residents continue to receive the services that they need and are entitled to.</p> <ol style="list-style-type: none"> 1. The Authority has submitted an application to the HUD special application center for the disposition of the Campello high-rise. This applications was approved in October of 2021. The Authority is now in the feasibility stage to identify the best way to improve the buildings and the quality of life of our residents. 2. The Authority was appointed to the Mayors homeless committee to provide recommendations and strategies to address the needs of homeless families and individuals. 3. The Authority engaged an organizational consultant 2020 to review the BHA's organizational capacities and make recommendations of changes necessary to successfully transition from our current financial infrastructure to new models available to address our future needs. This report has been received by the Board of Commissioners, who approved several of the organizations changes recommended. Most of the changes proposed in that review have been adopted as outline elsewhere in this plan. 4. We have refinanced our capital fund debt to fund the replacement of two aging elevators in Manning towers and to address envelope issues at Hillside village. We have completed a self-implementing energy performance contract to reduce our use of water, electricity and gas. This has allowed us to replace the aging elevators at the Campello high-rise, Caffrey Towers and Sullivan tower. A 5.6-Million-dollar Energy Service Agreement has been completed providing energy improvements throughout our federal portfolio. The Authority has entered into a net metering agreement with Sun Edison that is projected to save the Authority of \$14,000,000 over the next twenty years. 5. The Authority has submitted its Energy Performance plan to HUD, which was approved in June of 2022. This plan will allow the Authority to borrow \$3.2 Million dollars to make capital improvements at the Authority. 6. In 2022, it is anticipated that the Authority will graduate eight participants from the FSS program and two will become homeowners. 7. The Authority meets with the Resident Advisory Board on a monthly to discuss the needs and issues facing the residents. Through these meetings we have addressed issues around security, infestation, modernization, training and policy development. Our regular in person meetings have resumed since the reduction in COVID cases has occurred and the availability of vaccines has been abundant. 8. The Authority has joined the Statewide Section 8 waiting list to ensure resources are available to all applicants. The Authority is now participating in the State wide waiting list program for state aided housing assistance (CHAMPS). We have also continued with outreach to local churches and service agencies to ensure that the public is aware of resources available to them through the Authority. We have trained our maintenance and management staff on issues regarding Section 504 reasonable accommodation, limited English proficiency policies and many more. 9. It is the intent of the Brockton Housing Authority to explore the Section 18 Disposition and/or HUD's RAD program with regard to the obsolesce of several of our federal public housing units. It is the intent of the Authority to retain control of the units and seek Tenant Preservation Vouchers for any units that qualify for the Disposition program and RAD Vouchers for units that qualify for that program. The Authority will review its entire public housing portfolio including, 24-1 Hillside Village, 24-2 Belair heights, 24-3 Manning Tower, 24-4 Crescent Court, 24-6 Campello High-rise, 24-7 Caffrey Towers, 24-8 Sullivan Tower, 24-9 Roosevelt Heights, 24-10 Belair High-rise. An application for Demolition/disposition and or RAD will only be made if it will support financial opportunities to address the large backlog of capital needs within our current federal public housing program. This is consistent with the PHA's annual and five-year plan. 10. We continue to hire many residents to perform various jobs at the Authority. We have also worked with local agencies to bring educational opportunities to the Authority to address issue that prevent our residents from becoming self-sufficient.
<p>B.4</p>	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.</p> <p>See HUD form 50075.2 2021 Capital Fund program – Five-Year action plan approved by HUD on 5/12/2022</p>

B.5	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p>C. Other Document and/or Certification Requirements.</p>	
C.1	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
C.2	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.3	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p>Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.4	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>
C.5	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p>D. Affirmatively Furthering Fair Housing (AFFH).</p>	

D.1 Affirmatively Furthering Fair Housing (AFFH).

Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

Increase Section 8 Voucher lease up rate.

The current success rate of families who have been issued a voucher had declined due to the relatively tight rental market in our area. One step the Authority is taking is it is proposing to pay landlords vacancy payments if they are willing to keep the unit previously rented to a voucher holder available for another voucher holder

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

Decrease concentration of Poverty.

The Authority is proposing to increase the small area fair market rates up to 150% of the rate established by HUD. Many of the moderately priced apartments in our area have rent levels substantially above our current approvable levels causing most voucher holders to lease in only very low-income areas.

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

Collaborate with the City of Brockton to create and submit an Affirmatively Furthering Fair Housing plan for the City and the Authority. This process has begun and it is anticipated a plan will be submitted in 2022.

MA024901

DECONCENTRATION OF POVERTY POLICY

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

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

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

PHA Name : Brockton Housing Authority

PHA Code : MA024

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 1/1/2023

PHA Program Type: Combined

MTW Cohort Number: Landlord Incentives

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

The Brockton Housing Authority is seeking to expand housing choice for low-income families by seeking to implement, 2.a, 80-150% SAFMR in the Brockton Metro HUD FMR Area, so that families will have a greater choice of apartments and not be stuck in the poorer areas of the city.

Also, in order to increase housing choice, the Brockton Housing Authority is seeking to adopt, 4.a, the vacancy payment waiver in order to attract more landlords to the program. Currently, a landlord can tenant a cash tenant much quicker than a section 8 tenant due to the time for inspections, lease negotiations, rent reasonableness, etc. In order to incentivize landlords to hold the apartment for a section 8 tenant, we will pay a one moth vacancy payment.

In order to incentivize working and self sufficiency, the Brockton Housing Authority is seeking to adopt, 1.w, Income Exclusion. The proposed activity will exclude certain income from non disabled, non elderly families, that voluntarily leave TANF (welfare), while still eligible.

C. The policies that the MTW agency is using or has used (currently implement, plan to implement in the submission year, plan to discontinue, previously discontinued).

1. Tenant Rent Policies	
a. Tiered Rent (PH)	Not Currently Implemented
b. Tiered Rent (HCV)	Not Currently Implemented
c. Stepped Rent (PH)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
e. Minimum Rent (PH)	Not Currently Implemented
f. Minimum Rent (HCV)	Not Currently Implemented
g. Total Tenant Payment as a Percentage of Gross Income (PH)	Not Currently Implemented
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Not Currently Implemented
i. Alternative Utility Allowance (PH)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Not Currently Implemented
k. Fixed Rents (PH)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented
m. Utility Reimbursements (PH)	Not Currently Implemented
n. Utility Reimbursements (HCV)	Not Currently Implemented
o. Initial Rent Burden (HCV)	Not Currently Implemented
p. Imputed Income (PH)	Not Currently Implemented
q. Imputed Income (HCV)	Not Currently Implemented
r. Elimination of Deduction(s) (PH)	Not Currently Implemented
s. Elimination of Deduction(s) (HCV)	Not Currently Implemented
t. Standard Deductions (PH)	Not Currently Implemented
u. Standard Deductions (HCV)	Not Currently Implemented
v. Alternative Income Inclusions/Exclusions (PH)	Not Currently Implemented
w. Alternative Income Inclusions/Exclusions (HCV)	Plan to Implement in the Submission Year
2. Payment Standards and Rent Reasonableness	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Plan to Implement in the Submission Year
b. Payment Standards- Fair Market Rents (HCV)	Not Currently Implemented
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Not Currently Implemented
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Not Currently Implemented
b. Alternative Reexamination Schedule for Households (HCV)	Not Currently Implemented
c. Self-Certification of Assets (PH)	Not Currently Implemented
d. Self-Certification of Assets (HCV)	Not Currently Implemented
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Plan to Implement in the Submission Year
b. Damage Claims (HCV-Tenant-based Assistance)	Not Currently Implemented
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Not Currently Implemented
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Not Currently Implemented
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Not Currently Implemented
d. Alternative Inspection Schedule (HCV)	Not Currently Implemented
6. Short-Term Assistance	
a. Short-Term Assistance (PH)	Not Currently Implemented
b. Short-Term Assistance (HCV)	Not Currently Implemented
7. Term-Limited Assistance	
a. Term-Limited Assistance (PH)	Not Currently Implemented
b. Term-Limited Assistance (HCV)	Not Currently Implemented
8. Increase Elderly Age (PH & HCV)	

Increase Elderly Age (PH & HCV)	Not Currently Implemented
9. Project-Based Voucher Program Flexibilities	
a. Increase PBV Program Cap (HCV)	Not Currently Implemented
b. Increase PBV Project Cap (HCV)	Not Currently Implemented
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Not Currently Implemented
d. Alternative PBV Selection Process (HCV)	Not Currently Implemented
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Not Currently Implemented
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	Not Currently Implemented
10. Family Self-Sufficiency Program with MTW Flexibility	
a.PH Waive Operating a Required FSS Program (PH)	Not Currently Implemented
a.HCV Waive Operating a Required FSS Program (HCV)	Not Currently Implemented
b.PH Alternative Structure for Establishing Program Coordinating Committee (PH)	Not Currently Implemented
b. HCV Alternative Structure for Establishing Program Coordinating Committee (HCV)	Not Currently Implemented
c.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
c.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Not Currently Implemented
e.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
e.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
11. MTW Self-Sufficiency Program	
a.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
a.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
b.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
b.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
12. Work Requirement	
a. Work Requirement (PH)	Not Currently Implemented
b. Work Requirement (HCV)	Not Currently Implemented
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
Use of Public Housing as an Incentive for Economic Progress (PH)	Not Currently Implemented
14. Moving on Policy	
a. Waive Initial HQS Inspection Requirement (HCV)	Not Currently Implemented
b.PH Allow Income Calculations from Partner Agencies (PH)	Not Currently Implemented
b.HCV Allow Income Calculations from Partner Agencies (HCV)	Not Currently Implemented
c.PH Aligning Tenant Rents and Utility Payments Between Partner Agencies (PH)	Not Currently Implemented
c.HCV Aligning Tenant Rents and Utility Payments Between Partner Agencies (HCV)	Not Currently Implemented
15. Acquisition without Prior HUD Approval (PH)	
Acquisition without Prior HUD Approval (PH)	Not Currently Implemented
16. Deconcentration of Poverty in Public Housing Policy (PH)	
Deconcentration of Poverty in Public Housing Policy (PH)	Not Currently Implemented
17. Local, Non-Traditional Activities	
a. Rental Subsidy Programs	Not Currently Implemented
b. Service Provision	Not Currently Implemented
c. Housing Development Programs	Not Currently Implemented

C. MTW Activities Plan that Brockton Housing Authority Plans to Implement in the Submission Year or Is Currently Implementing

1.w. - Alternative Income Inclusions/Exclusions (HCV)
The Brockton Housing Authority plans to implement the following income exclusion. For families who voluntarily leave TANF (welfare), while still eligible, the Brockton Housing Authority will exclude the earned income from employment that is greater than the TANF payment, for one year. The goal is to incentivize families to leave TANF and become employed. This MTW activity is intended to meet the statutory requirement of establishing a reasonable rent policy designed to encourage employment and self-sufficiency. This MTW activity will not apply to the elderly or disabled.
This MTW activity serves the following statutory objectives: Self-sufficiency
This MTW activity serves the following statutory objectives: Increased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households
This MTW activity applies to: New admissions and currently assisted households
An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other). The MTW activity applies only to selected family types
The MTW activity applies to all tenant-based units
First year of implementation
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Brockton Housing Authority MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is/lare hardship requests pending.
Following inclusions or exclusions will be eliminated, modified, or added. The MTW activity is adding that certain income from non disabled, non elderly families, that voluntarily leave welfare, while still eligible, is excluded.

2.a. - Payment Standards- Small Area Fair Market Rents (HCV)
Brockton area voucher holders will have a greater choice of apartments. The Rental Assistance staff has recognized that voucher holders in Brockton are not able to rent in various developments because the rent exceeds the current payment standards. Currently, voucher holders are forced into less desirable sections of the city or move to adjacent towns that are in another FMR area and has a higher payment standard. Being forced to move to adjacent towns causes a disruption to the family being away from the supports of other family members, current schools, friends, and community support. Brockton has an excellent public transportation system and extensive shopping that are lacking in the surrounding towns. There are numerous reported cases of voucher holders taking an apartment in surrounding towns in order to not lose the voucher and looking to move back to Brockton at the end of the first year. In the past 12 months, we have had 11% of issued vouchers returned as the family could not find a place to rent.
This MTW activity serves the following statutory objectives: Housing choice
This MTW activity serves the following statutory objectives: Increased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households
This MTW activity applies to: New admissions and currently assisted households
An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other). The MTW activity applies to all family types

This MTW activity applies to the following housing choice voucher unit types: The MTW activity will only impact those units in the Brockton HUD Metro FMR Area.
This is a new implementation.
This MTW activity requires a Hardship Policy. The Hardship Policy is attached.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Brockton Housing Authority MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This MTW activity requires an Impact Analysis. The Impact Analysis is attached.
The following describes the payment standards by ZIP code or "grouped" ZIP codes: The Brockton Housing Authority will analyze and adopt a Payment Standard between 80% -150% for each of the zip codes in the Brockton HUD FMR Area

4.a. - Vacancy Loss (HCV-Tenant-based Assistance)
The Brockton Housing Authority proposes to pay a vacancy payment to a Section 8 landlord who tenants to another Section 8 tenant at the end of the tenancy of the first Section 8 tenant. There will be a cap of one month, the unit must have actually been vacant and will be paid upon signing the new HAP agreement.
This MTW activity serves the following statutory objectives: Housing choice
This MTW activity serves the following statutory objectives: Increased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
This is the first year.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Brockton Housing Authority MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This policy applies to To all units
The types of units policy applies to:
Maximum payment to the landlord is \$One months rent..
0 payments were issued under this policy y in the most recently completed PHA fiscal year.
\$0 issued under this policy in the most recently completed PHA fiscal year.

D.	Safe Harbor Waivers.
D.1	Safe Harbor Waivers seeking HUD Approval: No Safe Harbor Waivers are being requested.

E.	Agency-Specific Waiver(s).
E.1	<p>Agency-Specific Waiver(s) for HUD Approval:</p> <p>The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, Agency-Specific Waivers may be requested.</p> <p>No Agency-Specific Waivers are being requested.</p>
E.2	<p>Agency-Specific Waiver(s) for which HUD Approval has been Received:</p> <p>MTW Agency does not have approved Agency-Specific Waivers</p>

F.	Public Housing Operating Subsidy Grant Reporting.
F.1	Total Public Housing Operating subsidy amount authorized, disbursed by 9/30, remaining, and deadline for disbursement, by Federal Fiscal Year for each year the PHA is designated an MTW agency.

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
	\$0			
2022	\$9,537,532	\$0	\$0	

G.	MTW Statutory Requirements.	
G.1	75% Very Low Income – Local, Non-Traditional. HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
	Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
	80%-50% Area Median Income	
	49%-30% Area Median Income	
	Below 30% Area Median Income	
	Total Local, Non-Traditional Households	0

*Local, non-traditional income data must be provided in the MTW Supplement form until such time that it can be submitted in IMS-PIC or other HUD system.

G.2	Establishing Reasonable Rent Policy.
MTW agency did not established a rent reform policy to encourage employment and self-sufficiency The Brockton Housing Authority plans to implement MTW Activity 1.w as described previously, in 2023 ,to encourage self sufficiency.	

G.3	Substantially the Same (STS) – Local, Non-Traditional.	
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	0 # of unit months	
The total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	0 # of unit months	

Number of units developed under the local, non-traditional housing development activity that were available for occupancy during the prior full calendar year:

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if 'Population Type' is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
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G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.
To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix" of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying	

local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.

Family Size:	Occupied Number of Local, Non-Traditional units by Household Size
1 Person	
2 Person	
3 Person	
4 Person	
5 Person	
6+ Person	
Totals	0

H.	Public Comment
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Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.

No additional public hearing was held for an Agency-Specific Waiver and/or Safe Harbor waiver

I.	Evaluations.
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No known evaluations.

Hardship Policy for 2.a SAFMR

The Brockton Housing Authority will consider requests for a hardship exemption from participants.

The Brockton Housing Authority (BHA) has adopted this written policy for determining when a requirement or provision of an MTW activity constitutes a financial or other hardship for the family. The BHA will review its hardship policy(s) with HCV participants during initial briefing and during its recertification processes.

The BHA will consider if a voucher holder qualifies for a hardship exemption at the time of a potential termination of assistance that is due to this MTW activity.

Requesting a Hardship Exception

The family must formally request a hardship exception by submitting a completed Request for Hardship Exception in writing to the BHA.

When a voucher holder requests a hardship exemption from this MTW activity, the BHA will suspend the activity for the household, beginning the next month after the request, until the BHA has determined if the request is warranted. The BHA shall make the determination of whether a financial or other hardship exists within 10 days after the family's request. If BHA determines that a financial or other hardship exists, the BHA will continue to provide an exemption from the MTW activity at a reasonable level and duration, according to the BHA's written policy. If the BHA determines that the request did not meet its hardship standards, the MTW Activity will be enforced retroactively.

Appeals

Families who disagree with the hardship review decision may appeal in writing addressed to the Executive Director, within 10 days of receipt of the decision.

Payment Standards –Where a family believes that the payment standards cause a household hardship, the BHA will apply its review of the alleged hardship under this policy.

Hardship

If the following occur, they may constitute a hardship, if the circumstances are related to the MTW activity.

The family has lost eligibility for or is awaiting an eligibility determination for a federal, state, or local assistance program;

The family would be evicted as a result of the imposition of MTW activities;

The family has experienced a decrease in income because of changed circumstances, including loss or reduction of employment, death in the family, or reduction in or loss of earnings or other assistance;

The family has an increase in expenses because of changed circumstances, such as for medical costs, childcare, transportation, education, or similar items; and
Such other situations and factors determined by the agency to be appropriate.

Required Record Keeping

The BHA will preserve all records of hardship requests, determinations, and appeals for the duration of its MTW participation.

The BHA will maintain records to ensure traceability of activities and comply with all applicable regulations. When compliant and reasonable, documentation will be maintained in electronic format.

Records will be available for public review and inspection at the agency's principal office during normal business hours and supplied to HUD if requested.

Impacts of 80-150% SAFMR Brockton FMR Area

This analysis must consider the following factors, as applicable:

- 1. Impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution);**
The Brockton Housing Authority (BHA) anticipates that there will be a budgetary impact on the authority's section 8 program. An analysis of a random selection of 50 vouchers, indicates that raising the payment standard to 150% for all SAFMR in the Brockton FMR area, after rent reasonableness is factored in, would be an average increase of \$292 per voucher, per month. This is almost a 14% increase in per month cost. The authority must carefully analyze the payment standards in each SAFMR before setting it after the FMR is published.
- 2. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs);**
It appears that will not be an impact on the families as they will still be paying the same portion of their income.
- 3. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist);**
There should be no impact on the waitlist.
- 4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency);**
We do not anticipate a change in termination rate.
- 5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program;**
The proposed MTW activity does not impact public housing. The HCV utilization rate should increase, as families will be able to find a better unit that they can now afford and will not lose the voucher by not leasing up in time.
- 6. Impact on meeting the MTW statutory goals of cost effectiveness, self sufficiency, and/or housing choice;**
This MTW Activity is being implemented to increase housing choice and deconcentration of poverty. We believe that adjusting the Payment Standards to reflect local conditions will help families find better units. Brockton area voucher holders will have a greater choice of apartments. The Rental Assistance staff has recognized that voucher holders in Brockton are not able to rent in various developments because the rent exceeds the current payment standards. Currently, voucher holders are forced into less desirable sections of the city or move to adjacent towns that are in another FMR area and has a higher payment standard. Being forced to move to adjacent towns causes a disruption to the family, being away from the supports of other family members, current schools, friends, and community support. Brockton has an excellent public transportation system and extensive shopping that are lacking in the surrounding towns. There

are numerous reported cases of voucher holders taking an apartment in surrounding towns in order to not lose the voucher and looking to move back to Brockton at the end of the first year. In the past 12 months, we have had 11% of issued vouchers returned as the family could not find a place to rent.

- 7. Impact on the agency's ability to meet the MTW statutory requirements;** The BHA will ensure that the following statutory requirements are met.; 75% Very Low Income, reasonable rent policy that encourages self sufficiency, assist substantially same number of households, continue to assist the same type of households by family size and meet HQS.
- 8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity;**
This is the first year of this MTW Activity
- 9. Across the other factors above, the impact on protected classes (and any associated disparate impact).**
The BHA does not anticipate any disparate impact.

Capital Fund Program - Five-Year Action Plan

Status: Draft

Approval Date:

Approved By:

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 2577-0274
 02/28/2022

Part I: Summary

PHA Name : Brookton Housing Authority

Locality (City/County & State)
 Original 5-Year Plan

Revised 5-Year Plan (Revision No:)

PHA Number: MA024

A.	Development Number and Name	Work Statement for				
		Year 1 2023	Year 2 2024	Year 3 2025	Year 4 2026	Year 5 2027
	AUTHORITY-WIDE	\$1,056,983.50	\$1,045,256.00	\$1,047,423.50	\$1,048,368.50	\$1,043,236.00
	CRESCENT COURT (MA024000001)	\$412,676.00	\$450,000.00	\$208,949.50		\$1,900,000.00
	CAMPELLO HIGH RISE (MA024000002)	\$2,335,454.50	\$2,309,858.00	\$2,548,741.00	\$2,756,745.50	\$861,878.00

Capital Fund Program - Five-Year Action Plan

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 2577-0274
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Part II: Supporting Pages - Physical Needs Work Statements (s)

Work Statement for Year 1 2023

Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	AUTHORITY-WIDE (NAWASD)			\$1,056,983.50
ID0022	Bond Debt Obligation(Bond Debt Obligation (9001))	2017 Bond Repayment		\$666,472.50
ID0050	Administration - Salaries (Administration (1410)-Salaries)	Capital Improvements staff salaries through COCC.		\$380,511.00
ID0100	A/E Security Cameras (Contract Administration (1480)-Other Fees and Costs)	Design of complete new BHA Wide security camera system.		\$10,000.00
	CRESCENT COURT (MA024000001)			\$412,676.00
ID0041	Install Security Cameras/System(Non-Dwelling Interior (1480)-Security)	Installation of one hundred and ten (110) security cameras with system at BHA's AMP1 developments.		\$98,741.00
ID0081	Replacement of Floor & Stair Coverings(Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Flooring (non routine))	Removal and replacement of exiting floor coverings due to deterioration of floor coverings.		\$55,000.00

Capital Fund Program - Five-Year Action Plan

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Part II: Supporting Pages - Physical Needs Work Statements (s)

Work Statement for Year 1 2023

Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0082	A/E AMP 1 Fire Alarm Systems (Contract Administration (1480)-Other Fees and Costs)	Design to current codes and capacity for the replacement of the existing Fire Alarm Systems at 24-1 Hillside Village consisting of twenty (20) buildings.		\$60,000.00
ID0083	Install 24-1 Fire Alarm Systems(Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Interior (1480)-Community Building,Non-Dwelling Interior (1480)-Other,Non-Dwelling Interior (1480)-Security)	Removal and replacement of twenty (20) Fire Alarm Panels per recent codes.		\$58,935.00
ID0116	A/E VCT Floor Replacement (Contract Administration (1480)-Other Fees and Costs)	Design for the VCT replacement and sealing of the concrete slabs.		\$10,000.00
ID0117	Expansion Joint Caulking and Deck Replacement(Dwelling Unit-Exterior (1480)-Decks and Patios)	Remove and replace all expansion joint caulking and removal and replacement of 121 rear decks.		\$75,000.00
ID0118	A/E Expansion Joint Caulking and Deck Replacement(Contract Administration (1480)-Other Fees and Costs)	Design for the removal and replacement of all expansion joint caulking and removal and replacement of 121 rear decks.		\$15,000.00
ID0125	VCT Floor Replacement (Dwelling Unit-Interior (1480)-Flooring (non routine))	Removal of VCT flooring to seal concrete slab and install new vinyl flooring.		\$40,000.00
	CAMPELLO HIGH RISE (MA024000002)			\$2,335,454.50

Capital Fund Program - Five-Year Action Plan

Part II: Supporting Pages - Physical Needs Work Statements (s)

Work Statement for Year 1 2023

Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0045	24-7 Resume Comprehensive Modernization (Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Call-for-Aid Systems,Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Non-Dwelling Interior (1480)-Plumbing)	Resumption of Comp. Mod Standard unit work to include asbestos abatement, reconfiguration of kitchen, wallboard, painting, flooring, unit doors w/ hardware, kitchen cabinetry w/ counter tops, mill work, complete re-plumb (unit domestic, vent, waste, & all new fixtures), kitchen and bath electrical upgrade (panel w/ breakers), fixtures, devices, heating, phone, nurse call, appliances, sprinkler update, and HVAC modification. (unit cost \$42,000 to \$45,000) at 24-7 Caffrey Towers.		\$100,000.00
ID0064	M/E AMP 2 Backup Generator (Contract Administration (1480)-Other Fees and Costs)	Design to current codes and capacity for the replacement of the existing backup generators.		\$60,000.00
ID0066	Install Security Cameras System(Non-Dwelling Interior (1480)-Security)	Installation of twenty-one(21) security cameras with system at BHA's AMP2 developments.		\$150,000.00
ID0069	Install Backup Generators AMP 2 (Non-Dwelling Construction - Mechanical (1480)-Generator)	Removal and replacement of existing backup generators at AMP 2 Developments consisting of four (4) high-rise buildings, housing seven hundred and sixty-one (761) residential units.		\$240,000.00
ID0071	Install 24-3 Comprehensive Electrical Panel Replacement(Dwelling Unit-Interior (1480)-Electrical,Non-Dwelling Interior (1480)-Common Area Painting,Non-Dwelling Interior (1480)-Electrical)	Comprehensive replacement of Federal Pacific electrical panels in ninety-eight residential units and common areas of ten (10) story high-rise.		\$800,000.00
ID0073	24-10 Install Rubber Membrane Roofing(Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Tuck-Pointing)	24-10 Removal of ballast roofing system and replace with rubber membrane system, on one (1) eleven story high-rise, housing two hundred and sixty-seven (267) residential units.		\$1,000.00

Capital Fund Program - Five-Year Action Plan

U.S. Department of Housing and Urban Development
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Part II: Supporting Pages - Physical Needs Work Statements (s)

Work Statement for Year 1 2023

Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0080	BHA Replacement of Trash Compactors & Chutes(Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor)	Removal and replacement of existing trash compactors & chutes due to deterioration chutes and age of compactors at seven (7) high-rise buildings, housing over 1,200 residential units.		\$300,000.00
ID0099	AMP 2 Backup Generator (Non-Dwelling Construction - Mechanical (1480)-Generator)	Replacement of the existing backup generators.		\$128,236.00
ID0102	Install Bituminous Pavement (Non-Dwelling Site Work (1480)-Asphalt - Concrete - Paving, Non-Dwelling Site Work (1480)-Curb and Gutter,Non-Dwelling Site Work (1480)-Landscape,Non-Dwelling Site Work (1480)-Lighting,Non-Dwelling Site Work (1480)-Storm Drainage)	Complete removal and replacement of 11 thousand square feet of bituminous pavement parking areas and walkways, resetting of curbs, and storm drains at BHAs AMP2 developments.		\$198,741.00
ID0103	A/E 24-3 Comprehensive Electrical Panel Replacement(Contract Administration (1480)-Other Fees and Costs)	Design to current codes the comprehensive modernization replacement of the electrical panels in ninety-eight (98) residential units, and common areas.		\$60,454.50
ID0112	Gas to Electric Stove Conversion (Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Plumbing)	Convert 101 gas range over to electric.		\$100,000.00
ID0113	Ceiling Repair (Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Other)	Repair ceilings in high-rise buildings due to water infiltration.		\$50,000.00
ID0114	A/E Gas to Electric Stove Conversion (Contract Administration (1480)-Other Fees and Costs)	Engineer services for the gas to electric Stove conversion.		\$22,023.00

Capital Fund Program - Five-Year Action Plan

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Part II: Supporting Pages - Physical Needs Work Statements (s)

Work Statement for Year 1 2023

Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0127	Switchgear Replacement(Non-Dwelling Construction - Mechanical (1480)-Electric Distribution)	Replacement of original switchgear.		\$100,000.00
ID0128	A/E Switchgear Replacement(Contract Administration (1480)-Other Fees and Costs)	Design of switchgear replacement.		\$25,000.00
	Subtotal of Estimated Cost			\$3,805,114.00

Capital Fund Program - Five-Year Action Plan

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Part II: Supporting Pages - Physical Needs Work Statements (s)

Work Statement for Year 2 2024

Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0053	ME 24-2 Replace Hydronic Boiler Systems(Contract Administration (1480)-Other Fees and Costs) CAMPBELLO HIGH RISE (MA024000002)	A/E to design, bid, and construction over-site for the complete replacement of the existing Hydronic boilers, domestic hot water storage, venting and associated pumps at Belair Heights in twelve (12) buildings housing eighty-eight (88) units.		\$25,000.00
ID0065	24-8 Install Rubber Membrane Roofing(Dwelling Unit-Exterior (1480)-Tuck-Pointing)	24-8 Removal and replacement of rubber membrane system on an eight (8) story high-rise building housing 122 residential units.		\$400,000.00
ID0067	24-3 Install Rooftop Air Make-up Units (Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System)	24-3 Removal and replacement of two (2) air make-up unit serving 2 ten (10) story high-rise housing 96 residential units.		\$98,741.00
ID0084	Install 24-7 Comprehensive Modernization of Common Areas(Non-Dwelling Interior (1480)-Common Area Bathrooms;Non-Dwelling Interior (1480)-Common Area Finishes;Non-Dwelling Interior (1480)-Common Area Painting;Non-Dwelling Interior (1480)-Electrical;Non-Dwelling Interior (1480)-Mechanical)	Comprehensive Modernization of the common areas throughout two (2), eight (8) story high-rise buildings and connecting areas which house three hundred eighteen (318) residential units.		\$1,000,000.00
ID0087	BHA Replacement of Trash Compactors & Chutes(Non-Dwelling Construction - Mechanical (1480)-Other;Non-Dwelling Construction - Mechanical (1480)-Trash Compactor)	Removal and replacement of existing trash compactors & chutes due to deterioration chutes and age of compactors at seven (7) high-rise buildings, housing over 1,200 residential units.		\$436,117.00
ID0104	24-10 Install Rooftop Air Make-up Unit (Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System)	24-10 Removal and replacement of one (1) air make-up unit serving a ten (10) story high-rise housing 269 residential units.		\$350,000.00

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Work Statement for Year 2 2024

Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	AUTHORITY-WIDE (NAWASD)			\$1,045,256.00
ID0074	Bond Debt Obligation(Bond Debt Obligation (9001))	2017 Bond Repayment		\$664,745.00
ID0075	Administration - Salaries (Administration (1410)-Salaries)	Capital Improvements staff salaries through COCC.		\$380,511.00
	CRESCENT COURT (MAA024000001)			\$450,000.00
ID0088	Install 24-1 Fire Alarm Systems(Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Interior (1480)-Community Building,Non-Dwelling Interior (1480)-Other,Non-Dwelling Interior (1480)-Security)	Removal and replacement of twenty (20) Fire Alarm Panels per recent codes.		\$450,000.00
	Subtotal of Estimated Cost			\$3,805,114.00

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Work Statement for Year 3 2025

Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0072	CAMPELLO HIGH RISE (MA024000002)			
ID0072	A/E 24-7 Comprehensive Modernization of Common Areas(Contract Administration (1480)-Other Fees and Costs)	Design to current codes the comprehensive modernization of the common areas throughout two (2), eight (8) story high-rise buildings and connecting areas which house three hundred eighteen (318) residential units.		\$198,741.00
ID0091	Install Security Cameras/System(Non-Dwelling Interior (1480)-Security)	Installation of thirty (30) security cameras with system at BHA's AMP2 developments.		\$300,000.00
ID0095	Install Rubber Membrane Roofing(Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Roofs)	24-8 Removal and replacement of rubber membrane system on an eight (8) story high-rise building housing 122 residential units.		\$100,000.00
ID0096	A/E 24-7 Comprehensive Modernization of Common Areas(Contract Administration (1480)-Other Fees and Costs)	Design to current codes the comprehensive modernization of the common areas throughout two (2), eight (8) story high-rise buildings and connecting areas which house three hundred eighteen (318) residential units.		\$150,000.00
ID0097	Install 24-7 Comprehensive Modernization of Common Areas(Non-Dwelling Interior (1480)-Common Area Finishes,Non-Dwelling Interior (1480)-Common Area Bathrooms,Non-Dwelling Interior (1480)-Common Area Painting,Non-Dwelling Interior (1480)-Electrical)	Comprehensive Modernization of the common areas throughout two (2), eight (8) story high-rise buildings and connecting areas which house three hundred eighteen (318) residential units.		\$800,000.00
ID0098	Install 24-7 Comprehensive Modernization of Common Areas(Non-Dwelling Interior (1480)-Common Area Bathrooms, Non-Dwelling Interior (1480)-Common Area Finishes, Non-Dwelling Interior (1480)-Common Area Painting, Non-Dwelling Interior (1480)-Electrical, Non-Dwelling Interior (1480)-Mechanical)	Comprehensive Modernization of the common areas throughout two (2), eight (8) story high-rise buildings and connecting areas which house three hundred eighteen (318) residential units.		\$1,000,000.00

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Work Statement for Year 3 2025

Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	AUTHORITY-WIDE (NAWASD)			\$1,047,423.50
ID0089	Administration - Salaries(Administration (1410)-Salaries)	Capital Improvements staff salaries through COCC.		\$380,511.00
ID0090	Bond Debt Obligation(Bond Debt Obligation (9001))	2017 Bond Repayment.		\$666,912.50
	CRESCENT COURT (MAA024000001)			\$208,949.50
ID0092	Install Security Cameras/System(Non-Dwelling Interior (1480)-Security)	Installation of twenty-five(25) security cameras with system at BHA's AMP1 developments.		\$100,000.00
ID0093	Install 24-9 Window Replacement(Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Other,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Other)	Removal and replacement of fifty (50) defective window sash, and deteriorating exterior trim and install new energy efficient replacement windows, with new PVC trim/sill at 24-9 Roosevelt Heights.		\$108,949.50
	Subtotal of Estimated Cost			\$3,805,114.00

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Work Statement for Year 4 2026

Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	CAMPELLO HIGH RISE (MA024000002)			\$2,756,745.50
ID0101	Install Security Cameras/System(Non-Dwelling Interior (1480)-Security)	Installation of forty (40) security cameras with system at BHA's AMF2 developments.		\$355,486.50
ID0107	Install Bituminous Pavement (Non-Dwelling Site Work (1480)-Asphalt - Concrete - Paving, Non-Dwelling Site Work (1480)-Curb and Gutter, Non-Dwelling Site Work (1480)-Landscape, Non-Dwelling Site Work (1480)-Lighting, Non-Dwelling Site Work (1480)-Storm Drainage)	Complete removal and replacement of 20thousand square feet of bituminous pavement parking areas and walkways, resetting of curbs, and storm drains at BHA's AMF2 developments.		\$1,000,000.00
ID0108	Install 24-10 Comprehensive Electrical Panel Replacement(Dwelling Unit-Interior (1480)-Electrical,Non-Dwelling Interior (1480)-Common Area Painting,Non-Dwelling Interior (1480)-Electrical)	Comprehensive replacement of Zinsco electrical panels in two hundred and sixty-nine residential units, offices, and common areas of ten (10) story high-rise.		\$1,000,000.00
ID0109	A/E 24-3 Comprehensive Electrical Panel Replacement(Contract Administration (1480)-Other Fees and Costs)	Design to current codes the comprehensive modernization replacement of the electrical panels in two hundred and sixty-nine residential units, offices, and common areas.		\$1,259.00
ID0111	Install 24-7 Comprehensive Modernization of Common Areas(Non-Dwelling Interior (1480)-Common Area Bathrooms,Non-Dwelling Interior (1480)-Common Area Finishes,Non-Dwelling Interior (1480)-Common Area Painting,Non-Dwelling Interior (1480)-Electrical,Non-Dwelling Interior (1480)-Mechanical)	Comprehensive Modernization of the common areas throughout two (2), eight (8) story high-rise buildings and connecting areas which house three hundred eighteen (318) residential units.		\$400,000.00
	AUTHORITY-WIDE (NAWASD)			\$1,048,368.50

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Work Statement for Year 4 2026

Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0105	Administration - Salaries (Administration (1410)-Salaries)	Capital Improvements staff salaries through COCC.		\$380,511.00
ID0106	Bond Debt Obligation(Bond Debt Obligation (9001))	2017 Bond Repayment		\$667,857.50
	Subtotal of Estimated Cost			\$3,805,114.00

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Work Statement for Year 5 2027

Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	CRESCENT COURT (MA024000001)			\$1,900,000.00
ID0115	VCT Floor Replacement (Dwelling Unit-Interior (1480)-Flooring (non routine))	Removal of VCT flooring to seal concrete slab and install new vinyl flooring.		\$200,000.00
ID0124	Expansion Joint Caulking and Deck Replacement(Dwelling Unit-Exterior (1480)-Decks and Patios)	Remove and replace all expansion joint caulking and removal and replacement of 121 rear decks.		\$1,500,000.00
ID0126	Install 24-1 Fire Alarm Systems(Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Other;Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Interior (1480)-Community Building,Non-Dwelling Interior (1480)-Other;Non-Dwelling Interior (1480)-Security)	Removal and replacement of twenty (20) Fire Alarm Panels per recent codes.		\$100,000.00
ID0131	Copy of Install Security Cameras/System(Non-Dwelling Interior (1480)-Security)	Installation of one hundred and ten (110) security cameras with system at BHA's AMP1 developments.		\$100,000.00
	AUTHORITY-WIDE (NAWASD)			\$1,043,236.00
ID0119	Bond Debt Obligation(Bond Debt Obligation (9001))	2017 Bond Repayment		\$662,725.00

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Work Statement for Year 5 2027

Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0120	Administration - Salaries (Administration (1410)-Salaries)	Capital Improvements staff salaries through COCC.		\$380,511.00
	CAMPELLO HIGH RISE (MAA024000002)			\$861,878.00
ID0121	Ceiling Repair (Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Interior Painting (non routine))	Repair ceilings in high-rise buildings due to water infiltration.		\$100,000.00
ID0122	Gas to Electric Stove Conversion (Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Plumbing)	Convert 101 gas range over to electric.		\$100,000.00
ID0129	Switchgear Replacement(Non-Dwelling Construction - Mechanical (1480)-Electric Distribution)	Replacement of original switchgear.		\$500,000.00
ID0130	Copy of AMF 2 Backup Generator (Non-Dwelling Construction - Mechanical (1480)-Generator)	Replacement of the existing backup generators.		\$161,878.00
	Subtotal of Estimated Cost			\$3,805,114.00

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Development Number/Name General Description of Major Work Categories			Estimated Cost
Housing Authority Wide			
Bond Debt Obligation(Bond Debt Obligation (9001))			\$666,472.50
Administration - Salaries (Administration (1410)-Salaries)			\$380,511.00
A/E Security Cameras (Contract Administration (1480)-Other Fees and Costs)			\$10,000.00
Subtotal of Estimated Cost			\$1,056,983.50

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Work Statement for Year 2	2024
Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Bond Debt Obligation(Bond Debt Obligation (9001))	\$664,745.00
Administration - Salaries (Administration (1410)-Salaries)	\$380,511.00
Subtotal of Estimated Cost	\$1,045,256.00

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Work Statement for Year	2025
Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Administration - Salaries/Administration (1410)-Salaries)	\$380,511.00
Bond Debt Obligation(Bond Debt Obligation (9001))	\$666,912.50
Subtotal of Estimated Cost	\$1,047,423.50

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Work Statement for Year	2026
Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Administration - Salaries (Administration (1410)-Salaries)	\$380,511.00
Bond Debt Obligation(Bond Debt Obligation (9001))	\$667,857.50
Subtotal of Estimated Cost	\$1,048,368.50

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Work Statement for Year	2027	
Development Number/Name General Description of Major Work Categories		Estimated Cost
Housing Authority Wide		
	Bond Debt Obligation(Bond Debt Obligation (9001))	\$662,725.00
	Administration - Salaries (Administration (1410)-Salaries)	\$380,511.00
	Subtotal of Estimated Cost	\$1,043,236.00