

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
--	---	--

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	PHA Name: <u>Brockton Housing Authority</u> PHA Code: <u>MA024</u> PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>01/01/2024</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>1941</u> Total Combined Units/Vouchers <u>3567</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission					
<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 2024 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>						
<input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)						
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:						

B. PHA Elements

B.1 Revision of PHA Plan Elements.

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

- | | | |
|-------------------------------------|-------------------------------------|--|
| Y | N | |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Statement of Housing Needs and Strategy for Addressing Housing Needs |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Financial Resources. See Attachment (MA024b01) |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Rent Determination. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Operation and Management. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Grievance Procedures. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Homeownership Programs. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Community Service and Self-Sufficiency Programs. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Safety and Crime Prevention. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Pet Policy. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Asset Management. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Substantial Deviation. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | 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. It is anticipated that major modifications will be approved by the Authority's Board in September of 2023 to bring the Authority into compliance with the anticipated 1-1-2024 requirements of the Housing Opportunities Through Modernization Act (HOTMA).

The Section 8 Administrative plan was amended in February 2023 to include policies with regard to the Moving to Work waivers adopted by the Authority.

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

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 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 were 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, the Purchasing Agent and other administrative personnel. 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 policies, 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.

The Authority has implemented the majority of the recommendations. The implementation has been slower than originally anticipated due to the unexpected departure of personnel and the tight labor market. It is expected that the new structure will be fully staffed in 2024

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 for and been awarded additional mainstream vouchers and has been awarded 31 Emergency Vouchers for homeless or those about to become homeless.

In April of 2022 the Authority started its 20-year term as a Moving to Work Agency (MTW). The Authority was named an MTW agency under the Housing Choice Voucher Cohort by the US Department of Housing and Urban Development. The Authority will use the flexibilities afforded it by this designation to implement policies and procedures that will address the dearth of affordable housing opportunities through actions that will incentivize landlords to participate in the program, to deconcentrate poverty and to allow the Authority to develop additional units when feasible. It is the intention of the Authority to use its financial flexibility to fund these initiatives to address the local need.

The City of Brockton has published its draft FY2023 to FY 2027 Annual Consolidated Plan. This document lists the following as the City's Housing Objectives.

- Maintain, support, and preserve the existing housing stock, prevent housing deterioration and vacancies; prevent neighborhood deterioration due to foreclosures.
- Increase the overall availability of affordable permanent housing through the creation of new units and rehabilitation of vacant deteriorated properties to return to habitable condition.
- Preserve the quality of life in existing neighborhoods while accommodating smart growth, supporting balance between housing development, transportation, open space and recreational facilities, and appropriate commercial development opportunities. • Increasing access to homeownership through down payment assistance for first time homebuyers Outcomes for these objectives will be measured against:
- The number of housing units rehabilitated, de-leaded or prevented from becoming deteriorated and/or vacant. • The number of affordable units developed through new construction or the restoration and re-occupancy of vacant and deteriorated units.
- Determining if new neighborhoods have been created or existing neighborhoods have been created or existing neighborhoods have been enhanced through smart growth practices.
- The number of people provided with financial assistance for down payment.

Consistent with the City's consolidated plan, the Brockton Housing Authority will prioritize the preservation of our existing housing stock. The Authority has complexes with a substantial backlog of capital needs. The Authority will use its financial flexibilities granted by our status as a MTW agency to address these needs in combination with other financial mechanisms, including but not limited to Low Income Tax Credit Financing, Tradition financing, CDBG and HOME funding, philanthropy grants and other financial programs that may be available for these purposes

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 and other proposed and implemented 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 | |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Hope VI or Choice Neighborhoods. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Mixed Finance Modernization or Development. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Demolition and/or Disposition. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Designated Housing for Elderly and/or Disabled Families. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Conversion of Public Housing to Tenant-Based Assistance. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Conversion of Public Housing to Project-Based Assistance under RAD. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Occupancy by Over-Income Families. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Occupancy by Police Officers. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Non-Smoking Policies. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Project-Based Vouchers. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Units with Approved Vacancies for Modernization. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 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 our 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 (MA024000002) located at 1380 Main Street Brockton MA 02301. The Campello High-rise consists of 398 residential units. 377 of these units are 1 bedroom apartments, 19 are 1 bedroom apartments with special accessibility modifications for disabled families and 2 units are 2 bedroom apartments with special accessibility modifications for disabled families. This application was approved in October of 2021..

It is the intent of the Authority to transfer the ownership of Campello from the BHA to a Limited Liability Company (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 and the City's Consolidated 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 for approval for the 2023 and 2024 plan years
- **Conversion of Public Housing to Tenant-Based Assistance.** The authority will consider converting any and all of its public housing to Tenant Based Assistance if it is determined that the conversation will allow the Authority to address the backlog of capital need in our public housing portfolio and/or improve the living conditions of the residents.
- **Conversion of Public Housing to Project-Based Assistance under RAD:** The Brockton Housing Authority will explore the feasibility of used the RAD program to determine if the program will address the backlog of capital needs of its developments. If it is found that this program will provide the additional funds needed to address this backlog the Authority will submit an application to HUD's Special Application Center. The Authority will review its entire public housing portfolio including, 24-1 Hillside Village, 24-2 Belair heights, 24-3 Manning Tower, 24-4 Crescent Court, 24-6 Campello High-rise, 24-7 Caffrey Towers, 24-8 Sullivan Tower, 24-9 Roosevelt Heights, 24-10 Belair High-rise. An application for the Rental Demonstration Program will only be made if it will support financial opportunities to address the large backlog of capital needs within our current federal public housing program. This is consistent with the PHA's annual and five-year plan
- **The Authority does have one unit occupied by a Brockton Police Officer at Roosevelt Heights.** There are no plans to 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 in 2024.
- **Units with Approved Vacancies for Modernization;** The Authority will use hotel units when they are necessary to complete comprehensive modernization. The Authority is expecting to do comprehensive modernization to units in the Caffrey Tower Elderly/disabled complex in 2024. This will require units to be held offline to be used as 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.
- **Federalization;** It is the intent of the Authority to use its Faircloth authority to federalize its State Public Housing program. The Authority will consider federalization for any and all of its 374 state public housing units when deemed appropriate and feasible.
- **Moving to Work.** The Authority will use its administrative and financial flexibility to implement and fund the activities listed above when it is determined in the best interest of the program and participants.

<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 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 design stage to identify the best way to improve the buildings and the quality of life of our residents. It is anticipated that the financial closing will occur late 2024 or early 2025. 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 continues its implementation of the recommendations made by an organizational consultant. The recommendations were based upon a review of the BHA's organizational capacities to successfully transition from our current financial infrastructure to new models available to address our future needs. This report was 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 outlined 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. This work will be completed by 12/31/2023. 6. In 2023, it is anticipated that the Authority will graduate nine participants from the FSS program and two will start small businesses, two will have self-sufficient incomes and five will become homeowners. The Authority will make a post COVID push to expand the program in 2024. 7. The Authority meets with the Resident Advisory Board on a monthly basis 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 Statewide 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 and the City's Consolidated 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 issues that prevent our residents from becoming self-sufficient. 11. Moving to Work. The Authority will continue to use it Financial and Administrative flexibilities to address the needs of the Section 18 approved project at the Campello site, for future RAD projects, projects to enhance the ability of our participants to become self-sufficient and to use the flexibility to develop and maintain affordable housing.
<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 5/31/2023</p>
<p>B.5</p>	<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>

	(b) If yes, please describe:
C. Other Document and/or Certification Requirements.	
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>
D. Affirmatively Furthering Fair Housing (AFFH)	
D.1	<p>Affirmatively Furthering Fair Housing (AFFH).</p> <p>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</p>

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 has 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 been delayed due to staff changes at the Brockton Redevelopment Authority and some ambiguity in the nature of the plan required by our funding agencies. The most recent Statement by HUD on the issue is On February 9, 2023, HUD published in the Federal Register a Notice of Proposed Rulemaking (NPRM) entitled "Affirmatively Furthering Fair Housing". The proposed rule would faithfully implement the Fair Housing Act's statutory mandate to affirmatively further fair housing (AFFH), which directs HUD to ensure that the agency and its program participants proactively take meaningful actions to overcome patterns of segregation, promote fair housing choice, eliminate disparities in opportunities, and foster inclusive communities free from discrimination. The public comment period ended on April 24, 2023. HUD will take the upcoming months to review public comments before making revisions and finalizing the rule.

Upon issuance of the final rule the Authority will continue its effort to develop this plan

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

A. PHA Information. All PHAs must complete this section. (24 CFR §903.4)

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

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

B. Plan Elements. All PHAs must complete this section.

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

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

Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR §903.7(a)).

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(2)(i)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA's reasons for choosing its strategy. (24 CFR §903.7(a)(2)(ii))

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

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

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

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

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

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

Community Service and Self-Sufficiency Programs. Describe how the PHA will comply with the requirements of (24 CFR §903.7(l)). Provide a description of: 1) Any programs relating to services and amenities provided or offered to assisted families; and 2) Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs subject to Section 3 of the Housing and Urban Development Act of 1968 (24 CFR Part 135) and FSS. (24 CFR §903.7(l))

Safety and Crime Prevention (VAWA). Describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the

coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. (24 CFR §903.7(m)) A description of: 1) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; 2) Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and 3) Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5))

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

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

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

Significant Amendment/Modification. PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the 'Sample PHA Plan Amendment' found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices.

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

PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b))

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

HOPE VI or Choice Neighborhoods. 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI or Choice Neighborhoods is a separate process. See guidance on HUD's website at:

https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6. (Notice PIH 2011-47)

Mixed Finance Modernization or Development. 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at:

https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4

Demolition and/or Disposition. With respect to public housing only, describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (including project number and unit numbers (or addresses)), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA's last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm. (24 CFR §903.7(h))

Designated Housing for Elderly and Disabled Families. Describe any public housing projects owned, assisted or operated by the PHA (or portions thereof), in the upcoming fiscal year, that the PHA has continually operated as, has designated, or will apply for designation for occupancy by elderly and/or disabled families only. Include the following information: 1) development name and number; 2) designation type; 3) application status; 4) date the designation was approved, submitted, or planned for submission, 5) the number of units affected and; 6) expiration date of the designation of any HUD approved plan. Note: The application and approval process for such designations is separate from the PHA Plan process, and PHA Plan approval does not constitute HUD approval of any designation. (24 CFR §903.7(i)(C))

Conversion of Public Housing under the Voluntary or Mandatory Conversion programs. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at:

<http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>. (24 CFR §903.7(i))

Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Rental Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD's website at: [Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices.](#)

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

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

Non-Smoking Policies. The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects. See additional guidance on HUD's website at: [Notice PIH 2009-21 and Notice PIH-2017-03. \(24 CFR §903.7\(e\)\)](#)

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

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

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

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

B.3 Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.7(r)(1))

B.4 Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section (24 CFR §903.7(g)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: "See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX."

B.5 Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. (24 CFR §903.7(p))

C. Other Document and/or Certification Requirements.

C.1 Resident Advisory Board (RAB) comments. If the RAB had comments on the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)

C.2 Certification by State or Local Officials. Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154 or 24 CFR 5.160(a)(3) as applicable; (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations, impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o)).

C.4 Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

C.5 Troubled PHA. If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark "yes," and describe that plan. Include dates in the description and most recent revisions of these documents as attachments. If the PHA is troubled, but does not have any of these items, mark "no." If the PHA is not troubled, mark "N/A." (24 CFR §903.9)

D. Affirmatively Furthering Fair Housing (AFFH).

D.1 Affirmatively Furthering Fair Housing. The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: "To implement goals and priorities in an AFH, strategies and actions shall be included in program participants' ... PHA Plans (including any plans incorporated therein) Strategies and actions must affirmatively further fair housing" Use the chart provided to specify each fair housing goal from the PHA's AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless, the PHA will address its obligation to affirmatively further fair housing in part by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

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

Public reporting burden for this information collection is estimated to average 7.52 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

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

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.

ATTACHMENT MA024b01

FINANCIAL RESOURCES
BROCKTON HOUSING AUTHORITY

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FYB 2022 grants)		
a) Public Housing Operating Fund	10,036,228	
b) Public Housing Capital Fund 2022	4,625,079	
c) HOPE VI Revitalization		
d) HOPE VI Demolition		
e) Annual Contributions for Section 8 Tenant-Based Assistance	28,475,635	
f) Resident Opportunity for Self- Sufficiency Grant FSS21MA2813	152,955.00	
g) Mainstream Vouchers	1,341,986	
h) Emergency Housing Vouchers	378,037	
i)		
Other Federal Grants (list below)		
2. Prior Year Federal Grants (unobligated funds only) (list below)		
Capital Fund 2021	2,374,212	
Capital Fund 2020	699,918	
Capital Fund 2019	342,585	
3. Public Housing Dwelling Rental Income	5,230,021	PH Operations
4. Other income (list below)		
Excess Utility	13,020	PH Operations
Miscellaneous Laundry & Ins Receipts	126,825	PH Operations
Miscellaneous Antenna Receipts	396,097	PH Operations
Investment	7,541	PH Operations
Miscellaneous		PH Operations
4. Non-federal sources (list below)		
Total Resources	54,200,139	

Sources: FYE 12/31/2022 FDS, Eloccs as of 12/31/2022

PHA Name : Brockton Housing Authority

PHA Code : MA024

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 1/1/2024

PHA Program Type: Combined

MTW Cohort Number: Landlord Incentives

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

The Brockton Housing Authority will continue to implement the waivers obtained for FY2023 to increase housing opportunity. For FY 2024 the Brockton Housing Authority plans to use its financial flexibility to develop/redevelop affordable housing. The Brockton Housing Authority plans to use waiver 17.c to use financial flexibility to help redevelop some obsolete public housing for which it has Section 18 approval at the Campello High Rise. These 398 deeply affordable units are greatly needed in the Brockton area. Currently there is a dearth of housing of any kind in the Brockton area. We also plan to implement PBV waivers 9. c, & d to project base the TPV vouchers awarded with the Section 18 approval to the new development. All of our plans so far are to help our participants and residents find clean, safe, sanitary, and affordable housing by either increasing or maintaining the supply of affordable housing and by implementing waivers that make it easier for voucher holders to find a suitable unit.. We also plan to implement 4.c Other Landlord Incentives by implementing a security deposit program for new voucher holders for their first lease up. Many of our new voucher holders have no credit history or are coming from homelessness and are unable to compete with a private pay tenant who can afford a security deposit. We expect that this plan will increase our success rate a by encouraging landlords to rent to our voucher holders.

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
r. Elimination of Deduction(s) (PH)	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)	Not Currently Implemented
2. Payment Standards and Rent Reasonableness	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Currently Implementing
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)	Currently Implementing
b. Damage Claims (HCV-Tenant-based Assistance)	Not Currently Implemented
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Plan to Implement in the Submission Year
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)	Plan to Implement in the Submission Year
b. Increase PBV Project Cap (HCV)	Plan to Implement in the Submission Year
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.PH Modify or Eliminate the Contract of Participation (PH)	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	Plan to Implement in the Submission Year

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

4.1 - Payment Standards - Small Area Fair Market Rents (HCV)
<p>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</p> <p>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.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Self-sufficiency</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Increased expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p> <p>New admissions and currently assisted households</p>
<p>Does the MTW activity apply to all family types or only to selected family types?</p> <p>The MTW activity applies to all family types</p>
<p>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p> <p>The MTW activity applies to all tenant-based units</p>
<p>Does this MTW activity require a hardship policy?</p> <p>No</p> <p>No document is attached.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>Does the MTW activity require an impact analysis?</p> <p>No</p> <p>No document is attached.</p>
<p>Please explain the payment standards by ZIP code or "grouped" ZIP codes:</p> <p>Brockton HUD Metro FMR area</p>

4.a. Vacancy Loss (HCV Tenant-based Assistance)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

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.

Which of the MTW statutory objectives does this MTW activity serve?

Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Increased expenditures

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

there have been no requests for vacancy payments to date.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program)?

To all units

What is the maximum payment that can be made to a landlord under this policy?

\$one months rent

How many payments were issued under this policy in the most recently completed PHA fiscal year?

0

What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?

\$0

4.b. Other Landlord Incentives (HCV Tenant-based Assistance)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

The PHA plans to pay the security deposit for new voucher holders who need a security deposit. The goal is to allow voucher holders to compete with private pay renters and thereby increase our success rate. This activity will fit into the larger initiative of giving our voucher holders more choice by opening up units that require a security deposit.

Which of the MTW statutory objectives does this MTW activity serve?

Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Increased expenditures
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households? The MTW activity applies only to a subset or subsets of assisted households
Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? New admissions (i.e., applicants) only
Does the MTW activity apply to all family types or only to selected family types? The MTW activity applies to all family types
Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers? The MTW activity applies to all tenant-based units
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. Being implemented this year
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No
Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program)? To all units
What is the maximum payment that can be made to a landlord under this policy? \$one month
How many payments were issued under this policy in the most recently completed PHA fiscal year? 0
What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year? \$0

3.a. Increase PBV Program Cap/HCV
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative This activity will increase the PHA's PBV cap and allow the PHA to project base the TPV's received with its Section 18 Demo/Dispo approval in order to help secure financing for the reconstruction of 398 deeply affordable units.
Which of the MTW statutory objectives does this MTW activity serve? Housing choice
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households
Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? New admissions and currently assisted households
Does the MTW activity apply to all family types or only to selected family types? The MTW activity applies to all family types
Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers? The MTW activity applies to all properties with project-based vouchers
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. To be implemented
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No
What percentage of total authorized HCV units will be authorized for project-basing? 40.00%

10. Increase REV/Project Cap (HCV)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative This activity will allow the PHA to project base all of the units being reconstructed in its Campello High rise Section 18 redevelopment
Which of the MTW statutory objectives does this MTW activity serve? Housing choice
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today. Neutral (no cost implications)
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households? The MTW activity applies to all assisted households
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. Not implemented yet
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No

17.C - Housing Development Programs

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

This activity is to is redevelop the Brockton Housing Authority's Campello High Rise. There are currently two 10-story high-rise buildings occupied by federally-assisted elderly and disabled residents that Brockton Housing Authority operates and manages. The existing buildings were designed for the southwest of the United States and have been plagued from the beginning by water infiltration and inadequate insulation from the cold. One of the high-rise buildings sits in the flood plain of the Salisbury River, leading to flooding onsite. These original design flaws, combined with the age of the buildings, have led to wide scale system failures. An in-depth physical needs analysis has determined the buildings are obsolete and are not economically feasible to rehabilitate.

The Residences uses Project-Based Vouchers acquired through HUD's Section 18 disposition program to assist with funding the site's redevelopment allowing the preservation of deeply subsidized and affordable units for elderly and disabled residents for the long term. The Residences is designed to be climate resilient and sustainable thus reducing the project's carbon footprint. The Residences is financeable using project based operating subsidies, 4% Low-Income Housing Tax Credits (LIHTC), tax-exempt bond financing, and various other grants and loans. To satisfy LIHTC requirements, the BHA will ground lease the property to a limited liability company which will be 99.99% owned by a tax credit investor.

The redevelopment project will replace all existing units and create at least 396 new one-bedroom and 2 two-bedroom apartments. Many of the residents are aging in place and the existing facilities pose hazards and inefficiencies to the residents given the building's poor condition, structural deficiencies, undersized units, and failing building systems including non-existent ventilation. The site will be completely redesigned to transform the imposing high rises into a functional and livable campus, and to remove the residential units from the flood zone. The work will include new drives, parking areas, site lighting, walkways, fencing, landscaping and open spaces.

The redevelopment will be completed in multiple phases. There will be construction of three new mid-rise buildings and demolition of the existing buildings. Our plan is to construct the new buildings while leaving the residents in place, move the residents, and then demolish the existing buildings.

The redevelopment contributes to the City of Brockton's master plan and aligns with efforts to promote economic development in the Campello Neighborhood. The redevelopment will spur job growth as the demand for labor will be consistent throughout this multi-phased project. The project will be the catalyst for redevelopment in the Campello Neighborhood, which will set the precedent for developing high quality low-income and affordable housing in the City of Brockton and surrounding area. The physical improvements of the Campello Neighborhood will integrate affordable housing and increased pedestrian access to and from public transportation within the community. This project will catalyze

activity in the local economy through construction and local spending.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Elderly families; Disabled families (to the extent those families are not exempt via a reasonable accommodation)

Does the MTW activity apply to all public housing developments?

The MTW activity applies to specific developments

Which developments participate in the MTW activity?
Campello High Rise

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?
The MTW activity applies to all tenant-based units

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.
New implementation

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?
No

Table 17.c.1 - Housing Development Programs that the MTW Agency plans to commit Funds to in Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit, Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
Campello High Rise	New construction	GAP Financing, Tax Credit partner	398.00	398.00	0.00	0.00	398.00	0.00

Housing Development Programs that the MTW Agency plans to spend funds on in the Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit, Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
Campello High Rise	New Construction	Pre construction	398.00	0.00	0.00	0.00	398.00	0.00

Table 17.c.2 - Housing Development Programs that the MTW Agency committed funds to in prior Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit, Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
Campello High Rise	New Construction	Pre Construction Costs	398.00	398.00	0.00	0.00	398.00	0.00

Housing Development Programs that the MTW Agency spent funds on in prior Fiscal Year

Name of Development and Address	MTW Role Acquisition, Rehabilitation, New Construction	Type of MTW Agency Financing Subsidy Gap Financing, Tac Credit, Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
	New Construction	Gap Financing, Tac Credit Partner	398.00	398.00	0.00	0.00	398.00	0.00

D	Safe Harbor Waivers
D.1	<p>Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?</p> <p>No Safe Harbor Waivers are being requested.</p>

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, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, or waive a statutory and/or regulatory requirement not included in Appendix I.</p> <p>In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable.</p> <p>For each Agency-Specific Waiver(s) request, please upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the initiative, and h) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.</p> <p>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</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>Does the MTW agency have any approved Agency-Specific Waivers?</p> <p>MTW Agency does not have approved Agency-Specific Waivers</p>

F	Public Housing Operating Subsidy Grant Reporting
F.1	<p>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.</p>

Federal Fiscal Year	Total Operating Subsidy Authorized (YTD)	Total Amount Disbursed by 9/30 Reporting Period	Remaining Available Disbursed	Deadline
2022				
2023	\$8,106,517	\$6,732,267	\$1,374,250	

G. MTW Statutory Requirements	
G.1	<p>75% Very Low Income – Local, Non-Traditional.</p> <p>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.</p>
Income Level	Number of Local Non-Traditional Households Admitted in the Fiscal Year
80%-50% Area Median Income	0
49%-30% Area Median Income	0
Below 30% Area Median Income	0
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
<p>Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency?</p> <p>Yes</p>

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 AND ADDRESS	1	2	3	4	5	TOTAL UNITS	COOPERATION TYPE	If Positioning Unit is Own	If Section 504 Accessible (Mobility)	If Section 504 Accessible (Hearing/Vision)	Was the Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the total amount of new and low-student of Property?

G.4. Comparable Mix by Family Size – Local, Non-Traditional
<p>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.</p>

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

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.

I Evaluations

No known evaluations.

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

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

Part I: Summary

PHA Name: Brockton Housing Authority	Grant Type and Number Capital Fund Program Grant No. MA01P02450124 Replacement Housing Factor Grant No. _____ Date of CFFP: _____	FY of Grant: 2024 FY of Grant Approval: 2024
--	---	---

Type of Grant Reserve for Disasters/Emergencies Revised Annual Statement (Revision No:)

Original Annual Statement Performance and Evaluation Report for Period Ending: Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost (4)	
		Original	Revised (2)	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations				
3	1408 Management Improvement				
4	1410 Administration				
5	1480 General Capital Activity				
6	1492 Moving To Work Demonstration	\$3,973,123.00			
7	1501 Collater Exp / Debt Srvc				
8	1503 RAD-CFP				
9	1504 Rad Investment Activity				
10	1505 RAD-CPT				
11	1509 Preparing for, Preventing and Responding to Coronavirus (1509)				

(1) To be completed for the Performance and Evaluation Report
 (2) To be completed for the Performance and Evaluation Report or a Revised Annual Statement
 (3) PHAs with under 250 units in management may use 100% of CFP Grants for operations
 (4) RHF funds shall be include here

Part I: Summary

PHA Name: Brockton Housing Authority	Grant Type and Number Capital Fund Program Grant No. MA01P02450124 Replacement Housing Factor Grant No. Date of CRFP:	FFY of Grant: FFY of Grant Approval: 2024
--	---	---

Type of Grant

Original Annual Statement
 Reserve for Disasters/Emergencies
 Revised Annual Statement (Revision No:)
 Performance and Evaluation Report for Period Ending:
 Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ⁽¹⁾	
		Original	Revised ⁽²⁾	Obligated	Expended
12	9000 Debt Reserves				
13	9001 Bond Debt Obligation	\$664,745.00			
14	9002 Loan Debt Obligation				
15	RESERVED				
16	RESERVED				
17	RESERVED				
18a	RESERVED				
18ba	RESERVED				
19	RESERVED				
20	RESERVED				
21	Amount of Annual Grant (sum of lines 2-20)	\$4,637,868.00			

(1) To be completed for the Performance and Evaluation Report
 (2) To be completed for the Performance and Evaluation Report or a Revised Annual Statement
 (3) PHAs with under 250 units in management may use 100% of CRFP Grants for operations
 (4) RHF funds shall be include here

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

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	Grant Type and Number Capital Fund Program Grant No. MA01P02450123 Replacement Housing Factor Grant No. Date of CFFP:	FY of Grant: FFY of Grant Approval: 2024
--	---	--

Type of Grant

Original Annual Statement Reserve for Disasters/Emergencies

Performance and Evaluation Report for Period Ending: Revised Annual Statement (Revision No:)

Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ⁽¹⁾	
		Original	Revised ⁽²⁾	Obligated	Expended
22	Amount of line 21 Related to LBP Activities				
23	Amount of line 21 Related to Section 504 Activities				
24	Amount of line 21 Related to Security - Soft Costs				
25	Amount of line 21 Related to Security - Hard Costs				
26	Amount of line 21 Related to Energy Conservation Measures				

Signature of Executive Director	Date	Signature of Public Housing Director	Date
--	-------------	---	-------------

(1) To be completed for the Performance and Evaluation Report
 (2) To be completed for the Performance and Evaluation Report or a Revised Annual Statement
 (3) PHAs with under 250 units in management may use 100% of CFP Grants for operations
 (4) RHF funds shall be include here

Part II: Supporting Pages

Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost (2)		Status of Work
				Original	Revised (1)	Funds Obligated	Funds Expended	
Not associated with any specific development	Bond Debt Obligation (Bond Debt Obligation (9001)) Description : 2017 Bond Repayment	9001		\$664,745.00				
Not associated with any specific development	MTW Activities	1492		\$3,973,123.00				

Grant Type and Number MA01P02450124
PHA Name: Brockton Housing Authority
Capital Fund Program Grant No. MA01P02450124
Replacement Housing Factor Grant No. CFFP(Yes/No):

Federal FFY of Grant: 2024

(1) To be completed for the Performance and Evaluation Report or a Revised Annual Statement
 (2) To be completed for the Performance and Evaluation Report

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

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

Part III: Implementation Schedule for Capital Fund Financing Program

PHA Name:
 Brockton Housing Authority

Federal FFY of Grant: 2024

Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates ⁽¹⁾
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	

(1) Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

Brockton Housing Authority
Capital Improvement Schedule

Discription	2024	2025	2026	2027	2028	Total
CFP Award	\$4,637,868.00	\$4,637,868.00	\$4,637,868.00	\$4,637,868.00	\$4,637,868.00	\$23,189,340.00
Admin Costs	\$463,786.00	\$463,786.00	\$463,786.00	\$463,786.00	\$463,786.00	
Bond Debt	\$664,745.00	\$669,912.50	\$667,857.50	\$662,725.00	\$666,505.00	
Acquisition of 1362 Main Street with the use of MTW Funds & for the Revitalization of Campello High-Rise	\$1,500,000.00	\$1,500,000.00	\$1,500,000.00	\$1,500,000.00	\$1,500,000.00	\$7,500,000.00
A/E Design & Contract Admin. Surveillance Systems Throughout the BHAWide	\$25,000.00					\$25,000.00
A/E Design & Contract Admin. for Comp Mod to Identified Units BHA Wide		\$348,741.00				\$348,741.00
A/E Design & Contract Admin. for Electrical Upgrades to Identified Units BHA Wide	\$15,000.00		\$1,295.00			\$16,295.00
A/E Design & Contract Admin. for Electrical Switchgear Replacement BHA Wide				\$25,000.00		\$25,000.00
A/E Design & Contract Admin. for Deck Replacement at Identified Units BHA Wide				\$50,000.00		\$50,000.00
A/E Design & Contract Admin. Fire Alarm Systems Replacement at identified Developments.	\$24,741.00					\$24,741.00
A/E Design & Contract Admin. for Roof Replacement at Identified Developments.	\$24,000.00					\$24,000.00
A/E Design & Contract Admin. for Emergency Generators at Identified Developments BHA Wide.				\$25,000.00		\$25,000.00
A/E Design & Contract Admin. for Trash Compactors & Chutes as Required BHA Wide.	\$35,000.00					\$35,000.00

Brockton Housing Authority Capital Improvement Schedule

Continuation of Surveillance Camera Systems throughout the BHA Portfolio		\$400,000.00	\$350,000.00	\$0.00		\$750,000.00
BHA Wide Unit/Common Area Modernization to Identified Developments.	\$240,000.00	\$1,040,000.00	\$400,000.00		\$250,000.00	\$1,930,000.00
Replacement and/or installation of Generator for Life Safety and Backup Power BHA Wide	\$180,000.00			\$160,000.00	\$250,000.00	\$590,000.00
Replacement and/or Upgrade to Eelectrical Panels as Required BHA Wide.	\$200,000.00		\$750,000.00			\$950,000.00
Replacement of Trash Compactors & Chutes as Required BHA Wide.	\$400,000.00					\$400,000.00
Replacement of Flooring & Stair Coverings BHA Wide				\$200,000.00	\$300,000.00	\$500,000.00
Replacement of Unit Decks at Identified Developments.				\$590,000.00	\$600,000.00	\$1,190,000.00
Replacement of Expansion Joints at identified Developments.				\$250,000.00		\$250,000.00
Replacement of Gas Piping Development Wide if, BHA is Identified as a Master Meter Operator.				\$100,000.00	\$100,000.00	\$200,000.00
Switchgear Replacement at Identified Developments.				\$500,000.00		\$500,000.00
Roof Replacement at Identified Developments BHA Wide.	\$400,000.00	\$200,000.00				\$600,000.00
Fire Alarm Systems Replacement at identified Developments.	\$450,000.00			\$100,000.00		\$550,000.00
Install Bituminous Pavement BHA Wide.			\$490,000.00		\$500,000.00	\$990,000.00
Office Reconfiguration and Renovations BHA Wide	\$15,596.00	\$15,428.50	\$14,929.50	\$11,357.00	\$7,577.00	\$64,888.00
Annual Grant Award:	\$4,637,868.00	\$4,637,868.00	\$4,637,868.00	\$4,637,868.00	\$4,637,868.00	\$23,189,340.00
	\$4,637,868.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

