

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

Brockton Housing Authority Plans

5-Year Plan for Fiscal Years 2005 - 2009

Streamlined Annual Plan for Fiscal Year 2005

**NOTE: THIS PHA PLANS TEMPLATE (HUD 50075) IS TO BE COMPLETED IN
ACCORDANCE WITH INSTRUCTIONS LOCATED IN APPLICABLE PIH NOTICES**

PHA Plan Agency Identification

PHA Name: Brockton Housing Authority

PHA Number: MA024

PHA Fiscal Year Beginning: (mm/yyyy) 01/2005

Public Access to Information

Information regarding any activities outlined in this plan can be obtained by contacting: (select all that apply)

- Main administrative office of the PHA
- PHA development management offices
- PHA local offices

Display Locations For PHA Plans and Supporting Documents

The PHA Plans (including attachments) are available for public inspection at: (select all that apply)

- Main administrative office of the PHA
- PHA development management offices
- PHA local offices
- Main administrative office of the local government
- Main administrative office of the County government
- Main administrative office of the State government
- Public library
- PHA website
- Other (list below)

PHA Plan Supporting Documents are available for inspection at: (select all that apply)

- Main business office of the PHA
- PHA development management offices
- Other (list below)

5-YEAR PLAN
PHA FISCAL YEARS 2005 - 2009
[24 CFR Part 903.5]

A. Mission

State the PHA's mission for serving the needs of low-income, very low income, and extremely low-income families in the PHA's jurisdiction. (select one of the choices below)

- The mission of the PHA is the same as that of the Department of Housing and Urban Development: To promote adequate and affordable housing, economic opportunity and a suitable living environment free from discrimination.
- The PHA's mission is: (state mission here) The Brockton Housing Authority mission is to provide decent, safe and affordable housing to low and moderate income residents and provide economic opportunities through self-sufficiency and home ownership programs.

B. Goals

The goals and objectives listed below are derived from HUD's strategic Goals and Objectives and those emphasized in recent legislation. PHAs may select any of these goals and objectives as their own, or identify other goals and/or objectives. Whether selecting the HUD-suggested objectives or their own, **PHAS ARE STRONGLY ENCOURAGED TO IDENTIFY QUANTIFIABLE MEASURES OF SUCCESS IN REACHING THEIR OBJECTIVES OVER THE COURSE OF THE 5 YEARS.** (Quantifiable measures would include targets such as: numbers of families served or PHAS scores achieved.) PHAs should identify these measures in the spaces to the right of or below the stated objectives.

HUD Strategic Goal: Increase the availability of decent, safe, and affordable housing.

- PHA Goal: Expand the supply of assisted housing
Objectives:
- Apply for additional rental vouchers:
 - Reduce public housing vacancies:
 - Leverage private or other public funds to create additional housing opportunities:
 - Acquire or build units or developments
 - Other (list below)
- PHA Goal: Improve the quality of assisted housing
Objectives:
- Improve public housing management: (PHAS score)
 - Improve voucher management: (SEMAP score)
 - Increase customer satisfaction:

- Concentrate on efforts to improve specific management functions:
(list; e.g., public housing finance; voucher unit inspections)
 - Renovate or modernize public housing units:
 - Demolish or dispose of obsolete public housing:
 - Provide replacement public housing:
 - Provide replacement vouchers:
 - Other: (list below)
-
- PHA Goal: Increase assisted housing choices
Objectives:
 - Provide voucher mobility counseling:
 - Conduct outreach efforts to potential voucher landlords
 - Increase voucher payment standards
 - Implement voucher homeownership program:
 - Implement public housing or other homeownership programs:
 - Implement public housing site-based waiting lists:
 - Convert public housing to vouchers:
 - Other: (list below)

HUD Strategic Goal: Improve community quality of life and economic vitality

- PHA Goal: Provide an improved living environment
Objectives:
 - Implement measures to deconcentrate poverty by bringing higher income public housing households into lower income developments:
 - Implement measures to promote income mixing in public housing by assuring access for lower income families into higher income developments:
 - Implement public housing security improvements:
 - Designate developments or buildings for particular resident groups (elderly, persons with disabilities)
 - Other: (list below)

HUD Strategic Goal: Promote self-sufficiency and asset development of families and individuals

- PHA Goal: Promote self-sufficiency and asset development of assisted households
Objectives:
 - Increase the number and percentage of employed persons in assisted families:
 - Provide or attract supportive services to improve assistance recipients'

- employability:
- Provide or attract supportive services to increase independence for the elderly or families with disabilities.
 - Other: (list below)

HUD Strategic Goal: Ensure Equal Opportunity in Housing for all Americans

- PHA Goal: Ensure equal opportunity and affirmatively further fair housing
Objectives:
 - Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion national origin, sex, familial status, and disability:
 - Undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion national origin, sex, familial status, and disability:
 - Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required:
 - Other: (list below)

Other PHA Goals and Objectives: (list below)

Annual PHA Plan PHA Fiscal Year 2005

[24 CFR Part 903.12]

i. Annual Plan Type:

Select which type of Annual Plan the PHA will submit.

Standard Plan

Streamlined Plan:

High Performing PHA

Small Agency (<250 Public Housing Units)

Troubled Agency Plan

ii. Executive Summary of the Annual PHA Plan (optional)

[24 CFR Part 903.12 (b), 24 CFR 903.7(r)]

Provide a brief overview of the information in the Annual Plan, including highlights of major initiatives and discretionary policies the PHA has included in the Annual Plan.

The Brockton Housing Authority has received the designation as a high performer due to its constant attention to the “nuts and bolts” of the management and operations of its over 2000 Public Housing units. 2004 has present many challenges to the Authority with multiple changes to the Section Eight Housing Choice Voucher Program. The uncertainty of the program and the lack of specific direction has caused the Authority to restrict the issuance of new Vouchers. While need remains at high levels the Authority is unsure if it would be able to support any new vouchers with the implementation of the new financial guidelines.

On In February of 2004 the Authority started a Section 8 Homeownership Program. In partnership with harbor One Credit Union 60 Section 8 voucher holders received home buying counseling. Two of the participant have found homes and financing has been arranged. Unfortunately due to the uncertainty of funding for the program the Authority has frozen the program.

The Family Self Sufficiency Program continues its success in the Home ownership area. 27 new homeowners have graduated from the program. 3 have started new businesses and 9 have graduated and no longer receive any government’s assistance since the inception of the program. The Family Self-Sufficiency Program was a 1999 recipient of a HUD “Best Practices” award, and in 2003 the program was awarded a National Award of Merit from the National Association of Housing and Redevelopment Officials for its “The More You Learn The More You Earn” program.

2004 also saw the end of the very successful Public Housing Drug Elimination Program (PHDEP). This program supported targeted community police details and after school and summer programs for children as alternatives to other non-productive

activities. Through collaborations with the local Boys & Girls Club, The Plymouth County D.A's office and the Brockton Public Schools these programs continue. Target police details have been severely curtailed due to the funding situation.

The implementation of a Maintenance Vacancy Reduction Team has substantially reduced the number of days that a unit remains vacant prior to be ready to rent. This team continued to work towards maximizing revenues while providing quality workmanship in the preparation of units.

The Authority continues to work with the Brockton Redevelopment Authority in many low-income projects. Replacement housing for units lost in the rehabilitation of The Roosevelt Height family housing development continues throughout the City. The Brockton Housing Authority is acting as agent for the Mayor's Homeownership program. This program calls for the development of vacant lots acquired by the City through the enforcement of tax laws to be made ready development by the Authority and then distributed to qualified developers through the request for proposal process. The developers will then develop homes for low and moderate-income first time homeowners.

iii. Annual Plan Table of Contents

[24 CFR Part 903.12(b)]

Provide a table of contents for the Annual Plan, including attachments, and a list of supporting documents available for public inspection.

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Attachments

Indicate which attachments are provided by selecting all that apply. Provide the attachment's name (A, B, etc.) in the space to the left of the name of the attachment. Note: If the attachment is provided as a **SEPARATE** file submission from the PHA Plans file, provide the file name in parentheses in the space to the right of the title.

Required Attachments:

- Admissions Policy for Deconcentration ma024a02
- FY 2005 Capital Fund Program Annual Statement ma024b02
- Most recent board-approved operating budget (Required Attachment for PHAs that are troubled or at risk of being designated troubled ONLY)

Optional Attachments:

- PHA Management Organizational Chart ma024d02
- FY 2005 Capital Fund Program 5-Year Action Plan
- Comments of Resident Advisory Board or Boards (must be attached if not included in PHA Plan text)
- Other (List below, providing each attachment name)
 - 2004 Annual and 5 year plan ma024c02
 - RAB Membership ma024e02
 - 2002 P & E & Rev 6-30-04 ma024f02
 - 2003 HUD bonus \$ 6-30-04 ma024f02
 - 2003 P&E 6-30-04 ma024h02

Fair Housing review

ma024i02

Supporting Documents Available for Review

Indicate which documents are available for public review by placing a mark in the “Applicable & On Display” column in the appropriate rows. All listed documents must be on display if applicable to the program activities conducted by the PHA.

List of Supporting Documents Available for Review

Applicable & On Display	Supporting Document	Applicable Plan Component Approval No: 2577-0226 exp (05/31/2006)
X	PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations	5 Year and Annual Plans
X	State/Local Government Certification of Consistency with the Consolidated Plan	5 Year and Annual Plans
X	Fair Housing Documentation: Records reflecting that the PHA has examined its programs or proposed programs, identified any impediments to fair housing choice in those programs, addressed or is addressing those impediments in a reasonable fashion in view of the resources available, and worked or is working with local jurisdictions to implement any of the jurisdictions' initiatives to affirmatively further fair housing that require the PHA's involvement.	5 Year and Annual Plans fair housing review attachment ma024i02
X	Housing Needs Statement of the Consolidated Plan for the jurisdiction(s) in which the PHA is located and any additional backup data to support statement of housing needs of families on the PHA's public housing and Section 8 tenant-based waiting lists.	Annual Plan: Housing Needs
X	Most recent board-approved operating budget for the public housing program	Annual Plan: Financial Resources;
X	Deconcentration Income Analysis	Annual Plan: Eligibility, Selection, and Admissions
X	Public Housing Admissions and (Continued) Occupancy Policy (A&O), which includes the Tenant Selection and Assignment Plan [TSAP]	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Section 8 Administrative Plan	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Public Housing Deconcentration and Income Mixing Documentation: 1. PHA board certifications of compliance with deconcentration requirements (section 16(a) of the US Housing Act of 1937, as implemented in the 2/18/99 <i>Quality Housing and Work Responsibility Act Initial Guidance; Notice</i> and any further HUD guidance) and 2. Documentation of the required deconcentration and income mixing analysis	Annual Plan: Eligibility, Selection, and Admissions Policies
N/A	Any policy governing occupancy of Police Officers in Public Housing <input type="checkbox"/> check here if included in the public housing A&O Policy	
X	Public housing rent determination policies, including the methodology for setting public housing flat rents <input checked="" type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Rent Determination
X	Schedule of flat rents offered at each public housing development <input checked="" type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Rent Determination
X	Section 8 rent determination (payment standard) policies (if included in plan, not necessary as a supporting document) and written analysis of Section 8 payment standard policies <input type="checkbox"/> check here if included in Section 8 Administrative Plan	Annual Plan: Rent Determination
X	The Capital Fund/Comprehensive Grant Program Annual Statement /Performance and Evaluation Report for any active grant year	Annual Plan: Capital Needs
N/A	Most recent CIAP Budget/Progress Report (HUD 52825) for any active CIAP grant	Annual Plan: Capital Needs
	Most recent, approved 5 Year Action Plan for the Capital Fund/Comprehensive Grant Program, if not included as an attachment (provided at PHA option)	Annual Plan: Capital Needs
	Approved HOPE VI applications or, if more recent, approved or	Annual Plan: Capital

1. Statement of Housing Needs

[24 CFR Part 903.12 (b), 903.7(a)]

A. Housing Needs of Families on the Public Housing and Section 8 Tenant- Based Assistance Waiting Lists

State the housing needs of the families on the PHA's waiting list/s. **Complete one table for each type of PHA-wide waiting list administered by the PHA.** PHAs may provide separate tables for site-based or sub-jurisdictional public housing waiting lists at their option.

Housing Needs of Families on the Waiting List			
Waiting list type: (select one)			
<input type="checkbox"/> Section 8 tenant-based assistance			
<input checked="" type="checkbox"/> Public Housing Elderly/Disabled			
<input type="checkbox"/> Combined Section 8 and Public Housing			
<input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional)			
If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	497		
Extremely low income <=30% AMI	458	92%	
Very low income (>30% but <=50% AMI)	34	1%	
Low income (>50% but <80% AMI)	5	1%	
Families with children	0	0%	
Elderly families	106	21%	
Families with Disabilities	331	67%	
White	304	61%	
Black	162	33%	
American Indian	4	1%	
Asian/Pacific	3	1%	
Characteristics by Bedroom Size (Public Housing			

Housing Needs of Families on the Waiting List			
Only)			
1BR	464	93%	
2 BR	33	7%	
3 BR			
4 BR			
5 BR			
5+ BR			
Is the waiting list closed (select one)? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes If yes: How long has it been closed (# of months)? Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input type="checkbox"/> Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input type="checkbox"/> Yes			

Housing Needs of Families on the Waiting List			
Waiting list type: (select one) <input checked="" type="checkbox"/> Section 8 tenant-based assistance <input type="checkbox"/> Public Housing <input type="checkbox"/> Combined Section 8 and Public Housing <input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional) If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	313		
Extremely low income <=30% AMI	259	83%	
Very low income (>30% but <=50% AMI)	48	15%	
Low income (>50% but <80% AMI)	6	1%	
Families with children	248	79%	
Elderly families	14	1%	
Families with Disabilities	30	1%	
White	100	32%	
Black	209	67%	

Housing Needs of Families on the Waiting List			
American Indian	1	1%	
Asian/Pacific	2	1%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	65	21%	
2 BR	128	41%	
3 BR	99	32%	
4 BR	18	1%	
5 BR	3	1%	
5+ BR			
Is the waiting list closed (select one)? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes			
If yes:			
How long has it been closed (# of months)? 64			
Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes			
Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			
It is anticipated that the Brockton Housing Authority will open this list in October of 2004			

Housing Needs of Families on the Waiting List			
Waiting list type: (select one)			
<input type="checkbox"/> Section 8 tenant-based assistance			
<input checked="" type="checkbox"/> Public Housing General Occupancy (Family) Housing			
<input type="checkbox"/> Combined Section 8 and Public Housing			
<input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional)			
If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	161		
Extremely low income <=30% AMI	141	88%	
Very low income (>30% but <=50% AMI)	18	11%	
Low income (>50% but <80%	2	1%	

Housing Needs of Families on the Waiting List			
AMI)			
Families with children	93	58%	
Elderly families	13	8%	
Families with Disabilities	28	17%	
White	61	38%	
Black	93	58%	
American Indian	2	1%	
Asian/Pacific	3	1%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	71	44%	
2 BR	56	35%	
3 BR	28	17%	
4 BR	6	1%	
5 BR	0	0%	
5+ BR			
Is the waiting list closed (select one)? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes If yes: How long has it been closed (# of months)? 64 Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes It is anticipated that the Brockton Housing Authority will open this list in October of 2004			

B. Strategy for Addressing Needs

Provide a brief description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list **IN THE UPCOMING YEAR**, and the Agency's reasons for choosing this strategy.

(1) Strategies

Need: Shortage of affordable housing for all eligible populations

Strategy 1. Maximize the number of affordable units available to the PHA within its current resources by:

Select all that apply

- Employ effective maintenance and management policies to minimize the number of public housing units off-line
- Reduce turnover time for vacated public housing units
- Reduce time to renovate public housing units
- Seek replacement of public housing units lost to the inventory through mixed finance development
- Seek replacement of public housing units lost to the inventory through section 8 replacement housing resources
- Maintain or increase section 8 lease-up rates by establishing payment standards that will enable families to rent throughout the jurisdiction
- Undertake measures to ensure access to affordable housing among families assisted by the PHA, regardless of unit size required
- Maintain or increase section 8 lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration
- Maintain or increase section 8 lease-up rates by effectively screening Section 8 applicants to increase owner acceptance of program
- Participate in the Consolidated Plan development process to ensure coordination with broader community strategies
- Other (list below)

Strategy 2: Increase the number of affordable housing units by:

Select all that apply

- Apply for additional section 8 units should they become available
- Leverage affordable housing resources in the community through the creation of mixed - finance housing
- Pursue housing resources other than public housing or Section 8 tenant-based assistance.
- Other: (list below)

Need: Specific Family Types: Families at or below 30% of median

Strategy 1: Target available assistance to families at or below 30 % of AMI

Select all that apply

- Exceed HUD federal targeting requirements for families at or below 30% of AMI in public housing
- Exceed HUD federal targeting requirements for families at or below 30% of AMI in tenant-based section 8 assistance
- Employ admissions preferences aimed at families with economic hardships
- Adopt rent policies to support and encourage work
- Other: (list below)

Need: Specific Family Types: Families at or below 50% of median

Strategy 1: Target available assistance to families at or below 50% of AMI

Select all that apply

- Employ admissions preferences aimed at families who are working
- Adopt rent policies to support and encourage work
- Other: (list below)

Need: Specific Family Types: The Elderly

Strategy 1: Target available assistance to the elderly:

Select all that apply

- Seek designation of public housing for the elderly
- Apply for special-purpose vouchers targeted to the elderly, should they become available
- Other: (list below)

Need: Specific Family Types: Families with Disabilities

Strategy 1: Target available assistance to Families with Disabilities:

Select all that apply

- Seek designation of public housing for families with disabilities
- Carry out the modifications needed in public housing based on the section 504 Needs Assessment for Public Housing
- Apply for special-purpose vouchers targeted to families with disabilities, should they become available
- Affirmatively market to local non-profit agencies that assist families with disabilities
- Other: (list below)

Need: Specific Family Types: Races or ethnicities with disproportionate housing needs

Strategy 1: Increase awareness of PHA resources among families of races and ethnicities with disproportionate needs:

Select if applicable

- Affirmatively market to races/ethnicities shown to have disproportionate housing needs
- Other: (list below)

Strategy 2: Conduct activities to affirmatively further fair housing

Select all that apply

- Counsel section 8 tenants as to location of units outside of areas of poverty or minority concentration and assist them to locate those units
- Market the section 8 program to owners outside of areas of poverty /minority concentrations
- Other: (list below)

Other Housing Needs & Strategies: (list needs and strategies below)

(2) Reasons for Selecting Strategies

Of the factors listed below, select all that influenced the PHA's selection of the strategies it will pursue:

- Funding constraints
- Staffing constraints Related to Funding constraints
- Limited availability of sites for assisted housing
- Extent to which particular housing needs are met by other organizations in the community
- Evidence of housing needs as demonstrated in the Consolidated Plan and other information available to the PHA
- Influence of the housing market on PHA programs
- Community priorities regarding housing assistance
- Results of consultation with local or state government
- Results of consultation with residents and the Resident Advisory Board
- Results of consultation with advocacy groups
- Other: (list below)

2. Statement of Financial Resources

[24 CFR Part 903.12 (b), 903.7 (c)]

List the financial resources that are anticipated to be available to the PHA for the support of Federal public housing and tenant-based Section 8 assistance programs administered by the PHA during the Plan year. Note: the table assumes that Federal public housing or tenant based Section 8 assistance grant funds are expended on eligible purposes; therefore, uses of these funds need not be stated. For other funds, indicate the use for those funds as one of the following categories: public housing operations, public housing capital improvements, public housing safety/security, public housing supportive services, Section 8 tenant-based assistance, Section 8 supportive services or other.

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FY 2005 grants)		
a) Public Housing Operating Fund	\$2,963,321	
b) Public Housing Capital Fund	\$2,335,338	
c) HOPE VI Revitalization	N/A	
d) HOPE VI Demolition	N/A	
e) Annual Contributions for Section 8 Tenant-Based Assistance	\$8,475,441	
f) Public Housing Drug Elimination Program (including any Technical Assistance funds)	N/A	
g) Resident Opportunity and Self-Sufficiency Grants	N/A	
h) Community Development Block Grant	N/A	
i) HOME	N/A	
Other Federal Grants (list below)		
2. Prior Year Federal Grants (unobligated funds only) (list below)		
3. Public Housing Dwelling Rental Income		
	\$3,830,421	Operating Budget
4. Other income (list below)		
Interest Income	\$25,980	Operating Budget
Excess Utility&Misc.	\$63,330	Operating Budget
4. Non-federal sources (list below)		

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
Total resources	\$17,693,831	

3. PHA Policies Governing Eligibility, Selection, and Admissions

[24 CFR Part 903.12 (b), 903.7 (b)]

A. Public Housing

Exemptions: PHAs that do not administer public housing are not required to complete subcomponent 3A.

(1) Eligibility

a. When does the PHA verify eligibility for admission to public housing? (select all that apply)

- When families are within a certain number of being offered a unit: (state number) Applicants eligibility is reviewed when they are number 10 or lower on the list.
- When families are within a certain time of being offered a unit: (state time)
- Other: (describe)

b. Which non-income (screening) factors does the PHA use to establish eligibility for admission to public housing (select all that apply)?

- Criminal or Drug-related activity
- Rental history
- Housekeeping
- Other (describe)

c. Yes No: Does the PHA request criminal records from local law enforcement agencies for screening purposes?

d. Yes No: Does the PHA request criminal records from State law enforcement agencies for screening purposes?

e. Yes No: Does the PHA access FBI criminal records from the FBI for screening purposes? (either directly or through an NCIC-authorized source) The Authority will access these records if there is a reason to believe the person has lived out of state.

(2)Waiting List Organization

a. Which methods does the PHA plan to use to organize its public housing waiting list (select all that apply)

- Community-wide list
- Sub-jurisdictional lists
- Site-based waiting lists
- Other (describe)

b. Where may interested persons apply for admission to public housing?

- PHA main administrative office
- PHA development site management office
- Other (list below)

c. If the PHA plans to operate one or more site-based waiting lists in the coming year, answer each of the following questions; if not, skip to subsection **(3) Assignment**

1. How many site-based waiting lists will the PHA operate in the coming year?

2. Yes No: Are any or all of the PHA's site-based waiting lists new for the upcoming year (that is, they are not part of a previously-HUD-approved site based waiting list plan)?
If yes, how many lists?

3. Yes No: May families be on more than one list simultaneously?
If yes, how many lists?

4. Where can interested persons obtain more information about and sign up to be on the site-based waiting lists (select all that apply)?

- PHA main administrative office
- All PHA development management offices
- Management offices at developments with site-based waiting lists
- At the development to which they would like to apply
- Other (list below)

(3) Assignment

a. How many vacant unit choices are applicants ordinarily given before they fall to the bottom of or are removed from the waiting list? (select one)

- One
- Two
- Three or More

b. Yes No: Is this policy consistent across all waiting list types?

- c. If answer to b is no, list variations for any other than the primary public housing waiting list/s for the PHA: all Federal Public Housing applicants are offered up to 3 offers.

(4) Admissions Preferences

a. Income targeting:

- Yes No: Does the PHA plan to exceed the federal targeting requirements by targeting more than 40% of all new admissions to public housing to families at or below 30% of median area income?

b. Transfer policies:

In what circumstances will transfers take precedence over new admissions? (list below)

- Emergencies
 Overhoused
 Underhoused
 Medical justification
 Administrative reasons determined by the PHA (e.g., to permit modernization work)
 Resident choice: (state circumstances below)
 Other: (list below) The Authority has established a transfer committee, which meets on a monthly basis to consider all transfer request. The purpose of the committee is to hear all request and make determinations on the most urgent without unduly affecting the applicants on each list.

c. Preferences

1. Yes No: Has the PHA established preferences for admission to public housing (other than date and time of application)? (If "no" is selected, skip to subsection **(5) Occupancy**)
2. Which of the following admission preferences does the PHA plan to employ in the coming year? (select all that apply from either former Federal preferences or other preferences)

Former Federal preferences:

- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
 Victims of domestic violence
 Substandard housing

- Homelessness
- High rent burden (rent is > 50 percent of income)

Other preferences: (select below)

- Working families and those unable to work because of age or disability
- Veterans and veterans' families
- Residents who live and/or work in the jurisdiction
- Those enrolled currently in educational, training, or upward mobility programs
- Households that contribute to meeting income goals (broad range of incomes)
- Households that contribute to meeting income requirements (targeting)
- Those previously enrolled in educational, training, or upward mobility programs
- Victims of reprisals or hate crimes
- Other preference(s) (list below)

3. If the PHA will employ admissions preferences, please prioritize by placing a "1" in the space that represents your first priority, a "2" in the box representing your second priority, and so on. If you give equal weight to one or more of these choices (either through an absolute hierarchy or through a point system), place the same number next to each. That means you can use "1" more than once, "2" more than once, etc.

1 Date and Time

Former Federal preferences:

- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- Victims of domestic violence
- Substandard housing
- Homelessness
- High rent burden

Other preferences (select all that apply)

- Working families and those unable to work because of age or disability
- Veterans and veterans' families
- Residents who live and/or work in the jurisdiction
- Those enrolled currently in educational, training, or upward mobility programs
- Households that contribute to meeting income goals (broad range of incomes)
- Households that contribute to meeting income requirements (targeting)
- Those previously enrolled in educational, training, or upward mobility programs
- Victims of reprisals or hate crimes
- Other preference(s) (list below)

The following is an excerpt from the Brockton Housing Authorities Admissions and Continued Occupancy Plan

B. APPLICANT PLACEMENT ON THE WAITING LISTS

When accepting applications for its elderly/disabled developments, the BHA places applicants on the waiting list based upon the time and date of receipt of the application within the weighted selection preferences noted below.

When accepting applications for its family developments, the BHA places applicants on the waiting list based upon the sequence drawn in the random lottery and within the weighted selection preferences noted below.

1. Preference Categories [24 CFR 960.206]

The BHA assigns a point value for each of the preference categories. An applicant may be eligible for points in one or more categories. The total number of points for which an applicant is eligible shall determine his/her placement on the waiting list.

Preference 1: Resident of Brockton, Massachusetts [24 CFR 960.206(b)(ii)]

This selection preference is available to an applicant, otherwise eligible and qualified, who is a resident of Brockton, MA or who has been hired to work in Brockton, MA. An applicant who proves this preference shall receive seven (7) points.

Preference 2: Working/Educational Program Preference

This selection preference is available to an applicant, otherwise eligible and qualified, who, at the time of application is employed a minimum of 30 hours per week, is 62 years of age or older, or is handicapped or disabled, and as a result of the handicap or disability is unable to work.

This selection preference is also available to an applicant, otherwise eligible and qualified, who, at the time of application is participating in an educational program or job training program, or has graduated from such a program during the one year period immediately prior to application to the federal public housing program.

An applicant who proves this preference shall receive five (5) points.

- Preference 4: Standard Applicant

4. Relationship of preferences to income targeting requirements:

- The PHA applies preferences within income tiers
 Not applicable: the pool of applicant families ensures that the PHA will meet income targeting requirements

(5) Occupancy

a. What reference materials can applicants and residents use to obtain information about the rules of occupancy of public housing (select all that apply)

- The PHA-resident lease
 The PHA's Admissions and (Continued) Occupancy policy
 PHA briefing seminars or written materials
 Other source (list)

b. How often must residents notify the PHA of changes in family composition? (select all that apply)

- At an annual reexamination and lease renewal
 Any time family composition changes
 At family request for revision
 Other (list)

(6) Deconcentration and Income Mixing

a. Yes No: Did the PHA's analysis of its family (general occupancy) developments to determine concentrations of poverty indicate the need for measures to promote deconcentration of poverty or income mixing?

b. Yes No: Did the PHA adopt any changes to its **admissions policies** based on the results of the required analysis of the need to promote deconcentration of poverty or to assure income mixing?

c. If the answer to b was yes, what changes were adopted? (select all that apply)

- Adoption of site based waiting lists
If selected, list targeted developments below:

- Employing waiting list “skipping” to achieve deconcentration of poverty or income mixing goals at targeted developments
If selected, list targeted developments below:
- Employing new admission preferences at targeted developments
If selected, list targeted developments below:
- Other (list policies and developments targeted below)
- d. Yes No: Did the PHA adopt any changes to **other** policies based on the results of the required analysis of the need for deconcentration of poverty and income mixing?
- e. If the answer to d was yes, how would you describe these changes? (select all that apply)
- Additional affirmative marketing
- Actions to improve the marketability of certain developments
- Adoption or adjustment of ceiling rents for certain developments
- Adoption of rent incentives to encourage deconcentration of poverty and income-mixing
- Other (list below)
- f. Based on the results of the required analysis, in which developments will the PHA make special efforts to attract or retain higher-income families? (select all that apply)
- Not applicable: results of analysis did not indicate a need for such efforts
- List (any applicable) developments below:
- g. Based on the results of the required analysis, in which developments will the PHA make special efforts to assure access for lower-income families? (select all that apply)
- Not applicable: results of analysis did not indicate a need for such efforts
- List (any applicable) developments below:

B. Section 8

Exemptions: PHAs that do not administer section 8 are not required to complete sub-component 3B. **Unless otherwise specified, all questions in this section apply only to the tenant-based section 8 assistance program (vouchers, and until completely merged into the voucher program, certificates).**

(1) Eligibility

- a. What is the extent of screening conducted by the PHA? (select all that apply)
- Criminal or drug-related activity only to the extent required by law or

- regulation
- Criminal and drug-related activity, more extensively than required by law or regulation
- More general screening than criminal and drug-related activity (list factors below)
- Other (list below) Has the applicant been a past participant in a housing subsidy program and did they leave in good standing.
- b. Yes No: Does the PHA request criminal records from local law enforcement agencies for screening purposes?
- c. Yes No: Does the PHA request criminal records from State law enforcement agencies for screening purposes?
- d. Yes No: Does the PHA access FBI criminal records from the FBI for screening purposes? (either directly or through an NCIC-authorized source) The Authority will access these records if there is a reason to believe the person has lived out of state.
- e. Indicate what kinds of information you share with prospective landlords? (select all that apply)
- Criminal or drug-related activity
- Other (describe below)
We inform prospective landlords that the participants have not been screened for tenancy. The issuance of a voucher simply means they met program qualifications.

(2) Waiting List Organization

- a. With which of the following program waiting lists is the section 8 tenant-based assistance waiting list merged? (select all that apply)
- None
- Federal public housing
- Federal moderate rehabilitation
- Federal project-based certificate program
- Other federal or local program (list below)
- b. Where may interested persons apply for admission to section 8 tenant-based assistance? (select all that apply)
- PHA main administrative office
- Other (list below)

(3) Search Time

- a. Yes No: Does the PHA give extensions on standard 60-day period to search for a unit?

If yes, state circumstances below: Applicants are informed that if they can show they have actively been searching for a unit they will be granted an extension of up to 60 days.

(4) Admissions Preferences

- a. Income targeting

- Yes No: Does the PHA plan to exceed the federal targeting requirements by targeting more than 75% of all new admissions to the section 8 program to families at or below 30% of median area income?

- b. Preferences

1. Yes No: Has the PHA established preferences for admission to section 8 tenant-based assistance? (other than date and time of application) (if no, skip to subcomponent **(5) Special purpose section 8 assistance programs**)
2. Which of the following admission preferences does the PHA plan to employ in the coming year? (select all that apply from either former Federal preferences or other preferences)

Former Federal preferences

- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- Victims of domestic violence
- Substandard housing
- Homelessness
- High rent burden (rent is > 50 percent of income)

Other preferences (select all that apply)

- Working families and those unable to work because of age or disability
- Veterans and veterans' families
- Residents who live and/or work in your jurisdiction
- Those enrolled currently in educational, training, or upward mobility programs
- Households that contribute to meeting income goals (broad range of incomes)
- Households that contribute to meeting income requirements (targeting)
- Those previously enrolled in educational, training, or upward mobility

- programs
- Victims of reprisals or hate crimes
- Other preference(s) (list below)

3. If the PHA will employ admissions preferences, please prioritize by placing a “1” in the space that represents your first priority, a “2” in the box representing your second priority, and so on. If you give equal weight to one or more of these choices (either through an absolute hierarchy or through a point system), place the same number next to each. That means you can use “1” more than once, “2” more than once, etc.

1 Date and Time

Former Federal preferences

- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- Victims of domestic violence
- Substandard housing
- Homelessness
- High rent burden

Other preferences (select all that apply)

- Working families and those unable to work because of age or disability
- Veterans and veterans’ families
- Residents who live and/or work in your jurisdiction
- Those enrolled currently in educational, training, or upward mobility programs
- Households that contribute to meeting income goals (broad range of incomes)
- Households that contribute to meeting income requirements (targeting)
- Those previously enrolled in educational, training, or upward mobility programs
- Victims of reprisals or hate crimes
- Other preference(s) (list below)

4. Among applicants on the waiting list with equal preference status, how are applicants selected? (select one)

- Date and time of application
- Drawing (lottery) or other random choice technique

5. If the PHA plans to employ preferences for “residents who live and/or work in the jurisdiction” (select one)

- This preference has previously been reviewed and approved by HUD
- The PHA requests approval for this preference through this PHA Plan

6. Relationship of preferences to income targeting requirements: (select one)

- The PHA applies preferences within income tiers
- Not applicable: the pool of applicant families ensures that the PHA will meet income targeting requirements

(5) Special Purpose Section 8 Assistance Programs

a. In which documents or other reference materials are the policies governing eligibility, selection, and admissions to any special-purpose section 8 program administered by the PHA contained? (select all that apply)

- The Section 8 Administrative Plan
- Briefing sessions and written materials
- Other (list below)

b. How does the PHA announce the availability of any special-purpose section 8 programs to the public?

- Through published notices
- Other (list below) Notices to the Resident Advisory Board, Resident Councils and to area agencies, social service and religious groups

4. PHA Rent Determination Policies

[24 CFR Part 903.7(d)]

A. Public Housing

Exemptions: PHAs that do not administer public housing are not required to complete sub-component 4A.

(1) Income Based Rent Policies

Describe the PHA's income based rent setting policy/ies for public housing using, including discretionary (that is, not required by statute or regulation) income disregards and exclusions, in the appropriate spaces below.

a. Use of discretionary policies: (select one)

- The PHA will not employ any discretionary rent-setting policies for income based rent in public housing. Income-based rents are set at the higher of 30% of adjusted monthly income, 10% of unadjusted monthly income, the welfare rent, or minimum rent (less HUD mandatory deductions and exclusions). (If selected, skip to sub-component (2))

---or---

- The PHA employs discretionary policies for determining income based rent (If selected, continue to question b.)

b. Minimum Rent

1. What amount best reflects the PHA's minimum rent? (select one)

- \$0
 \$1-\$25
 \$26-\$50

2. Yes No: Has the PHA adopted any discretionary minimum rent hardship exemption policies?

1. If yes to question 2, list these policies below:

The BHA has established a minimum rent of fifty dollars (\$50.00).

The BHA shall grant an exemption from the payment of the minimum rent if the family is unable to pay the minimum rent due to financial hardship. Financial hardship includes the following situations:

- The family or individual has lost eligibility or is waiting for an eligibility determination for a Federal, State, or Local assistance program;
- The family or individual would be evicted as a result of the imposition of the minimum rent requirement;
- The income of the family or individual has decreased because of a changed circumstance, including loss of employment; and/or
- A death in the family has occurred.

If a family requests a hardship exemption, the BHA shall suspend the minimum rent requirement beginning the month following the family's request for a hardship exemption, and continuing until the BHA determines whether there is a qualifying financial hardship and whether it is temporary or long term.

The BHA shall promptly determine whether a qualifying hardship exists and whether it is temporary or long term. The BHA may not evict the family for nonpayment of minimum rent during the 90-day period beginning the month following the family's request for a hardship exemption.

If the BHA determines that a qualifying financial hardship is temporary, the BHA shall reinstate the minimum rent from the beginning of the suspension of the minimum rent. The BHA shall offer the family a reasonable repayment agreement, on terms and conditions established by the BHA, for the amount of back minimum rent owed by the family.

If the BHA determines that a qualifying financial hardship is long-term, the BHA shall exempt the family from the minimum rent requirements so long as the hardship continues. The exemption shall apply from the beginning of the month following the family's request for a hardship exemption until the end of the qualifying financial hardship.

c. Rents set at less than 30% than adjusted income

1. Yes No: Does the PHA plan to charge rents at a fixed amount or percentage less than 30% of adjusted income?

2. If yes to above, list the amounts or percentages charged and the circumstances under which these will be used below:

Flat Rents

d. Which of the discretionary (optional) deductions and/or exclusions policies does the PHA plan to employ (select all that apply)

For the earned income of a previously unemployed household member

- For increases in earned income
- Fixed amount (other than general rent-setting policy)
If yes, state amount/s and circumstances below:
- Fixed percentage (other than general rent-setting policy)
If yes, state percentage/s and circumstances below:
- For household heads
- For other family members
- For transportation expenses
- For the non-reimbursed medical expenses of non-disabled or non-elderly families
- Other (describe below)

e. Ceiling rents

1. Do you have ceiling rents? (rents set at a level lower than 30% of adjusted income)
(select one)

- Yes for all developments
- Yes but only for some developments
- No

2. For which kinds of developments are ceiling rents in place? (select all that apply)

- For all developments
- For all general occupancy developments (not elderly or disabled or elderly only)
- For specified general occupancy developments
- For certain parts of developments; e.g., the high-rise portion
- For certain size units; e.g., larger bedroom sizes
- Other (list below)

3. Select the space or spaces that best describe how you arrive at ceiling rents (select all that apply)

- Market comparability study
- Fair market rents (FMR)
- 95th percentile rents
- 75 percent of operating costs
- 100 percent of operating costs for general occupancy (family) developments
- Operating costs plus debt service

- The "rental value" of the unit
 Other (list below)

f. Rent re-determinations:

1. Between income reexaminations, how often must tenants report changes in income or family composition to the PHA such that the changes result in an adjustment to rent? (select all that apply)
- Never
 At family option
 Any time the family experiences an income increase
 Any time a family experiences an income increase above a threshold amount or percentage: (if selected, specify threshold) _____
 Other (list below) The family is always required to report a change in family composition. Changes in income not related to a change in family composition are reported at family option.

- g. Yes No: Does the PHA plan to implement individual savings accounts for residents (ISAs) as an alternative to the required 12 month disallowance of earned income and phasing in of rent increases in the next year?

(2) Flat Rents

1. In setting the market-based flat rents, what sources of information did the PHA use to establish comparability? (select all that apply.)
- The section 8 rent reasonableness study of comparable housing
 Survey of rents listed in local newspaper
 Survey of similar unassisted units in the neighborhood
 Other (list/describe below)

B. Section 8 Tenant-Based Assistance

Exemptions: PHAs that do not administer Section 8 tenant-based assistance are not required to complete sub-component 4B. **Unless otherwise specified, all questions in this section apply only to the tenant-based section 8 assistance program (vouchers, and until completely merged into the voucher program, certificates).**

(1) Payment Standards

Describe the voucher payment standards and policies.

a. What is the PHA's payment standard? (select the category that best describes your standard)

- At or above 90% but below 100% of FMR
- 100% of FMR
- Above 100% but at or below 110% of FMR
- Above 110% of FMR (if HUD approved; describe circumstances below)

b. If the payment standard is lower than FMR, why has the PHA selected this standard? (select all that apply)

- FMRs are adequate to ensure success among assisted families in the PHA's segment of the FMR area
- The PHA has chosen to serve additional families by lowering the payment standard
- Reflects market or submarket
- Other (list below)

c. If the payment standard is higher than FMR, why has the PHA chosen this level? (select all that apply)

- FMRs are not adequate to ensure success among assisted families in the PHA's segment of the FMR area
- Reflects market or submarket
- To increase housing options for families
- Other (list below)

d. How often are payment standards reevaluated for adequacy? (select one)

- Annually
- Other (list below)

e. What factors will the PHA consider in its assessment of the adequacy of its payment standard? (select all that apply)

- Success rates of assisted families
- Rent burdens of assisted families
- Other (list below)

(2) Minimum Rent

a. What amount best reflects the PHA's minimum rent? (select one)

- \$0
- \$1-\$25
- \$26-\$50

- b. Yes No: Has the PHA adopted any discretionary minimum rent hardship exemption policies? (if yes, list below)

5. Capital Improvement Needs

[24 CFR Part 903.7 (g)]

Exemptions from Component 7: Section 8 only PHAs are not required to complete this component and may skip to Component 8.

A. Capital Fund Activities

Exemptions from sub-component 7A: PHAs that will not participate in the Capital Fund Program may skip to component 7B. All other PHAs must complete 7A as instructed.

Capital Fund Program

- A. Yes No: Is the PHA eligible to participate in the CFP in the fiscal year covered by this PHA Plan?

B. What is the amount of the PHA's estimated or actual (if known) Capital Fund Program grant for the upcoming year? **\$2,335,338**

C. Yes No Does the PHA plan to participate in the Capital Fund Program in the upcoming year? If yes, complete the rest of this component. If no, skip to next component.

D. Yes No: Does the PHA propose to use any portion of its CFP funds to repay debt incurred to finance capital improvements? If so, the PHA must identify in its annual and 5-year capital plans the development(s) where such improvements will be made and show both how the proceeds of the financing will be used and the amount of the annual payments required to service the debt. (Note that separate HUD approval is required for such financing activities.). The Brockton Housing Authority is in the process of applying for HUD approval. The approval has **NOT** been received as of the preparation of this plan.

E. Capital Fund Program Grant Submissions

(1) Capital Fund Program 5-Year Action Plan

The Capital Fund Program 5-Year Action Plan is provided as Attachment

(2) Capital Fund Program Annual Statement

The Capital Fund Program Annual Statement is provided as Attachment

B. HOPE VI and Public Housing Development and Replacement Activities (Non-Capital Fund)

Applicability of sub-component 7B: All PHAs administering public housing. Identify any approved HOPE VI and/or public housing development or replacement activities not described in the Capital Fund Program Annual Statement.

- Yes No: a) Has the PHA received a HOPE VI revitalization grant? (if no, skip to question c; if yes, provide responses to question b for each grant, copying and completing as many times as necessary)
b) Status of HOPE VI revitalization grant (complete one set of questions for each grant)

1. Development name:
2. Development (project) number:
3. Status of grant: (select the statement that best describes the current status)
 - Revitalization Plan under development
 - Revitalization Plan submitted, pending approval
 - Revitalization Plan approved
 - Activities pursuant to an approved Revitalization Plan underway

- Yes No: c) Does the PHA plan to apply for a HOPE VI Revitalization grant in the Plan year?
If yes, list development name/s below:

- Yes No: d) Will the PHA be engaging in any mixed-finance development activities for public housing in the Plan year?
If yes, list developments or activities below:

- Yes No: e) Will the PHA be conducting any other public housing development or replacement activities not discussed in the Capital Fund Program Annual Statement?
If yes, list developments or activities below:

6. Demolition and Disposition

[24 CFR Part 903.7 (h)]

Applicability of component 8: Section 8 only PHAs are not required to complete this section.

1. Yes No: Does the PHA plan to conduct any demolition or disposition activities (pursuant to section 18 of the U.S. Housing Act of 1937 (42 U.S.C. 1437p)) in the plan Fiscal Year? (If “No”, skip to component 9; if “yes”, complete one activity description for each development.)

2. Activity Description

- Yes No: Has the PHA provided the activities description information in the **optional** Public Housing Asset Management Table? (If “yes”, skip to component 9. If “No”, complete the Activity Description table below.)

Demolition/Disposition Activity Description	
1a. Development name:	
1b. Development (project) number:	
2. Activity type: Demolition <input type="checkbox"/> Disposition <input type="checkbox"/>	
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>	
4. Date application approved, submitted, or planned for submission: <u>(DD/MM/YY)</u>	
5. Number of units affected:	
6. Coverage of action (select one) <input type="checkbox"/> Part of the development <input type="checkbox"/> Total development	
7. Timeline for activity: a. Actual or projected start date of activity: b. Projected end date of activity:	

7. Homeownership Programs Administered by the PHA

[24 CFR Part 903.7 (k)]

A. Public Housing

Exemptions from Component 11A: Section 8 only PHAs are not required to complete 11A.

1. Yes No: Does the PHA administer any homeownership programs administered by the PHA under an approved section 5(h) homeownership program (42 U.S.C. 1437c(h)), or an approved HOPE I program (42 U.S.C. 1437aaa) or has the PHA applied or plan to apply to administer any homeownership programs under section 5(h), the HOPE I program, or section 32 of the U.S. Housing Act of 1937 (42 U.S.C. 1437z-4). (If “No”, skip to component 11B; if “yes”, complete one activity description for each applicable program/plan, unless eligible to complete a streamlined submission due to **small PHA** or **high performing PHA** status. PHAs completing streamlined submissions may skip to component 11B.)

2. Activity Description

Yes No: Has the PHA provided all required activity description information for this component in the **optional** Public Housing Asset Management Table? (If “yes”, skip to component 12. If “No”, complete the Activity Description table below.)

Public Housing Homeownership Activity Description (Complete one for each development affected)
1a. Development name: 1b. Development (project) number:
2. Federal Program authority: <input type="checkbox"/> HOPE I <input type="checkbox"/> 5(h) <input type="checkbox"/> Turnkey III <input type="checkbox"/> Section 32 of the USHA of 1937 (effective 10/1/99)
3. Application status: (select one) <input type="checkbox"/> Approved; included in the PHA’s Homeownership Plan/Program <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date Homeownership Plan/Program approved, submitted, or planned for submission: (DD/MM/YYYY)
5. Number of units affected:
6. Coverage of action: (select one)

<input type="checkbox"/> Part of the development
<input type="checkbox"/> Total development

B. Section 8 Tenant Based Assistance

1. Yes No: Does the PHA plan to administer a Section 8 Homeownership program pursuant to Section 8(y) of the U.S.H.A. of 1937, as implemented by 24 CFR part 982 ? (If “No”, skip to component 12; if “yes”, describe each program using the table below (copy and complete questions for each program identified), unless the PHA is eligible to complete a streamlined submission due to high performer status. **High performing PHAs** may skip to component 8.) The Brockton Housing Authority is a High Performing PHA

2. Program Description:

a. Size of Program

- Yes No: Will the PHA limit the number of families participating in the section 8 homeownership option?

If the answer to the question above was yes, which statement best describes the number of participants? (select one)

- 25 or fewer participants
 26 - 50 participants
 51 to 100 participants
 more than 100 participants

b. PHA-established eligibility criteria

- Yes No: Will the PHA’s program have eligibility criteria for participation in its Section 8 Homeownership Option program in addition to HUD criteria?

If yes, list criteria below:

The PHA will offer monthly homeownership assistance only to participating families who:

Are currently enrolled in the Family Self-Sufficiency (FSS) Program and in compliance with the FSS contract. Or

Are graduates of the PHA’s Family Self-Sufficiency FSS program or are current voucher holders in good standing with the Brockton Housing Authority.

Have a Section 8 Housing Choice Voucher Administered by the Brockton Housing Authority and who have completed a First Time Home Buyer

Counseling Educational Program offered by HUD recognized groups, including local Community Development Corporations (CDC).

The PHA will limit monthly homeownership assistance to a maximum of 100 families at any given time. The Authority reserves the right to further limit the program due to staff capacity.

8. Civil Rights Certifications

[24 CFR Part 903.12 (b), 903.7 (o)]

Civil rights certifications are included in the PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations.

9. Additional Information

[24 CFR Part 903.12 (b), 903.7 (r)]

A. PHA Progress in Meeting the Mission and Goals Described in the 5-Year Plan

The Brockton Housing Authority continues to apply for additional Section 8 Vouchers. As of this date we have not been awarded a new allotment. We will continue to apply if units are made available.

The Authority has created a vacancy reduction team that has substantially reduced vacancy turnaround time.

The Authority has partnered with the Brockton Housing Partnership, which consists of a group of local banks, working together to create housing opportunities. We have completed 4 new homes which have been sold to Family self-sufficiency participants and have completed six new units that been added to our state public housing inventory.

The Authority continues to work towards improving its PHAS scores. In the most recent review the Authority was rated as a high performer. The Authorities SEMAP score has improved. The current rating is standard performer.

The Authority is working with the Resident Advisory Board (RAB) to identify issues that the residents have and increase their satisfaction. Over the last five years the RAB has worked with the Authority to rewrite its Administrative and Continued Occupancy Policy, worked to create recognized crime watch groups in our various complexes and

bring in activities that are appropriate for the individual neighborhoods.

The Authorities Maintenance and Housing Management operations have been reorganized to bring the staff closer to the residents, six offices have been created throughout the Authority and most services have been decentralized. The maintenance department has been organized into three different units, Work order team, Preventative Maintenance Team and Vacancy Preparation. These specialized units have improved response time and the delivery of maintenance services.

The Authority continues its aggressive modernization program. The Authority is completing this work with the long-term health of the complexes in mind. Units are to be durable and attractive to the resident and the community.

The Authority has worked with Father Bill's homeless coalition to provide housing search assistance for our voucher holders. The Authority is also a member of the Metro South Landlords Association. The Authority participates in the education of this group and works with them to make sure that an ongoing supply of appropriate units are available to our participants.

The Authority has continued to increase its investment in the security infrastructure. We have also partnered with the City of Brockton who has supplied two full time Police Officers who have exclusive responsibility for Authority properties. A full time Security Supervisor has been hired to work 7PM to 3AM with our contract security guards to ensure the most efficient use of their services. The Brockton Police have also partnered with our residents to create many Crime Watch groups.

The Brockton Housing Authority has a very successful Family Self Sufficiency program. We have fostered relationships with many agencies that regularly assist our residents on their way to meeting their goals. The Family Self Sufficiency Program continues its success in the Home ownership area. 27 new homeowners have graduated from the program. 3 have started new businesses and 9 have graduated and no longer receive any government's assistance. The Family Self-Sufficiency Program was a 1999 recipient of a HUD "Best Practices" award, and in 2003 the program was awarded a National Award of Merit from the National Association of Housing and Redevelopment Officials for its "The More You Learn The More You Earn" program.

The Authorities Service coordinator Program ensures that local agencies and groups are available to assist our Elderly/Disabled population. The Authority has signed an agreement with the Dorne-Davies senior center, which is now housed at our Campello High-rise. All programs and services of the center are available to all Authority residents.

Offering quality housing to all qualified applicants and residents regardless of race, color, religion, national origin, sex familial status and disability is an overriding goal of the Authority. The Authority does not tolerate actions contrary to this goal and feels

it is an intrinsic part of our mission. We have developed important relationships with the minority organizations within the area and have made them part of our outreach protocol.

B. Criteria for Substantial Deviations and Significant Amendments

The Brockton Housing Authority defines substantial deviations and significant amendment as a policy change that is not consistent with the goals stated in the approved one or five year plans.

C. Other Information

[24 CFR Part 903.13]

A. Resident Advisory Board Recommendations

1. Yes No: Did the PHA receive any comments on the PHA Plan from the Resident Advisory Board/s?
Each month Brockton Housing Authority staff members meet with the Resident Advisory Board to discuss policy and procedures. The RAB has been instrumental in the Development of a revised ACOP and is currently reviewing a new Maintenance Plan. Although the Authority received no formal comment the plan does reflect the participation of the residents throughout the year.

2. If yes, the comments are: (if comments were received, the PHA **MUST** select one)
 Attached at Attachment (File name)
 Provided below:

3. In what manner did the PHA address those comments? (select all that apply)
 Considered comments, but determined that no changes to the PHA Plan were necessary.
 The PHA changed portions of the PHA Plan in response to comments
List changes below:
 Other: (list below)

B. Description of Election Process for Residents on the PHA Board

1. Yes No: Does the PHA meet the exemption criteria provided in section 2(b)(2) of the U.S. Housing Act of 1937? (If no, continue to question 2; if yes, skip to sub-component C.)

2. Yes No: Was the resident who serves on the PHA Board elected by the residents? (If yes, continue to question 3; if no, skip to sub-

component C.)

3. Description of Resident Election Process

a. Nomination of candidates for place on the ballot: (select all that apply)

- Candidates were nominated by resident and assisted family organizations
- Candidates could be nominated by any adult recipient of PHA assistance
- Self-nomination: Candidates registered with the PHA and requested a place on ballot
- Other: (describe)

b. Eligible candidates: (select one)

- Any recipient of PHA assistance
- Any head of household receiving PHA assistance
- Any adult recipient of PHA assistance
- Any adult member of a resident or assisted family organization
- Other (list)

c. Eligible voters: (select all that apply)

- All adult recipients of PHA assistance (public housing and section 8 tenant-based assistance)
- Representatives of all PHA resident and assisted family organizations
- Other (list)

C. Statement of Consistency with the Consolidated Plan

[24 CFR Part 903.15]

For each applicable Consolidated Plan, make the following statement (copy questions as many times as necessary).

1. Consolidated Plan jurisdiction: (Brockton Massachusetts)

2. The PHA has taken the following steps to ensure consistency of this PHA Plan with the Consolidated Plan for the jurisdiction: (select all that apply)

- The PHA has based its statement of needs of families in the jurisdiction on the needs expressed in the Consolidated Plan/s.
- The PHA has participated in any consultation process organized and offered by the Consolidated Plan agency in the development of the Consolidated Plan.
- The PHA has consulted with the Consolidated Plan agency during the development of this PHA Plan.
- Activities to be undertaken by the PHA in the coming year are consistent with the initiatives contained in the Consolidated Plan. (list below)

Other: (list below)

2. The Consolidated Plan of the jurisdiction supports the PHA Plan with the following actions and commitments: (describe below)The following actions and commitments are contained in the City of Brockton's FY 2003-2007 Consolidated Plan,

- Demolition of Vacant Properties- Utilizing CDGB funds, an abandoned and dilapidated city-owned school building, the former Edgar School will be demolished. The building, which is located in a low and moderate-income neighborhood, will be razed for public safety reasons. Upon demolition of the building and clearance of the land, the property will be made available for the development of new affordable housing.
- Senior Programs – BAMSII operates the Dorn Davies Senior Center in the Brockton Housing Authority's Campello High Rise elderly/disabled residence. Programs focus on senior citizens health and nutritional needs as well as recreation and socialization among other things. CDGB funds will provide roughly 5% of the center's operating budget.
- HOME funds will be utilized by the Brockton Housing Authority (BHA) to construct a two family rental duplex. The property will be constructed on a site to be determined and will be owned, operated and maintained by the BHA. Tenant s will be eligible low and moderate-income families.

The Consolidated Annual Performance and Evaluation Report (CAPER) details the accomplishments of the Brockton Housing Authority working with the City to accomplish the goals and meet the needs established in the Consolidated Plan.

10. Project-Based Voucher Program (if applicable)

If the PHA plans to use the project-based voucher program, provide a statement of the projected number of project-based units and general locations, and how project basing would be consistent with its PHA Plan.

The Brockton housing Authority has utilized the Project Based Section 8 program to secure apartments in non-poverty areas to meet Deconcentration goals. We have also used the program to secure one-bedroom units, which are difficult for our applicants to find. We currently have 31 units and a waiting list from existing landlords who would like to participate in the program. Each application is reviewed with the above factors considered. Additional units will be added if the Authority feels comfortable with the funding source for the section 8 program.

Attachments

Use this section to provide any additional attachments referenced in the Plans.

Annual Statement/Performance and Evaluation Report
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part I: Summary

PHA Name:	Grant Type and Number Capital Fund Program Grant No: Replacement Housing Factor Grant No:	Federal FY 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 No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost	
		Original	Revised	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations				
3	1408 Management Improvements				
4	1410 Administration				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Nondwelling Structures				
13	1475 Nondwelling Equipment				
14	1485 Demolition				
15	1490 Replacement Reserve				
16	1492 Moving to Work Demonstration				
17	1495.1 Relocation Costs				
18	1499 Development Activities				
19	1501 Collateralization or Debt Service				
20	1502 Contingency				
21	Amount of Annual Grant: (sum of lines 2 – 20)				
22	Amount of line 21 Related to LBP Activities				
23	Amount of line 21 Related to Section 504 compliance				
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				

Capital Fund Program Five-Year Action Plan					
Part I: Summary					
PHA Name				<input type="checkbox"/> Original 5-Year Plan <input type="checkbox"/> Revision No:	
Development Number/Name/HA-Wide	Year 1	Work Statement for Year 2 FFY Grant: PHA FY:	Work Statement for Year 3 FFY Grant: PHA FY:	Work Statement for Year 4 FFY Grant: PHA FY:	Work Statement for Year 5 FFY Grant: PHA FY:
	Annual Statement				
CFP Funds Listed for 5-year planning					
Replacement Housing Factor Funds					

Capital Fund Program Five-Year Action Plan						
Part II: Supporting Pages—Work Activities						
Activities for Year 1	Activities for Year : ____ FFY Grant: PHA FY:			Activities for Year: ____ FFY Grant: PHA FY:		
	Development Name/Number	Major Work Categories	Estimated Cost	Development Name/Number	Major Work Categories	Estimated Cost
See						
Annua						
I						
Statement						
Total CFP Estimated Cost			\$			\$

***Brockton Housing Authority
Deconcentration of Poverty Policy***

The Brockton Housing Authority Board of Commissioners hereby adopts that the admissions policy of the Brockton Housing Authority in relation to its federally funded housing programs will consist of the following:

1. The Brockton Housing Authority may not concentrate very low families (or other families with relatively low incomes) in public housing dwelling units in certain public housing projects or certain buildings within projects;
2. The Authority shall annually determine and compare the relative tenant incomes of each development, as well as household incomes of census tracts in which the developments are located;
3. If it appears that one or more development(s) has a higher concentration of lower income families than another or other development(s), the Authority shall attempt to equalize the concentrations through admissions policies designed to achieve such equalization, including the placement of a higher income family in a development which has a high concentration of lower income families or the placement of a lower income family in a development which has a high concentration of higher income families, when such placement is consistent with other applicable law relating to tenant selection and assignment.
4. The Authority shall, when developing its Agency Plan, include an admissions policy designed to provide for deconcentration of poverty and income mixing by bringing its higher income tenants into lower income projects and lower income tenants into higher income projects, consistent with other applicable law. (This may not be construed to require any specific income or racial quota for any project or projects).

CAPITAL FUND PROGRAM TABLES START HERE

Annual Statement/Performance and Evaluation Report					
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part 1: Summary					
PHA Name: Brockton Housing Authority		Grant Type and Number Capital Fund Program Grant No: MA06P02450105 Replacement Housing Factor Grant No:			Federal FY of Grant: 2005
<input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/ Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report					
Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost	
		Original	Revised	Obligated	Expended
1	Total non-CFP Funds – BOND PROCEEDS **	**8,414,362			
2	1406 Operations				
3	1408 Management Improvements Soft Costs	2,000			
	Management Improvements Hard Costs				
4	1410 Administration	233,533			
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	800,000			
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures	1,300,887			
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1490 Replacement Reserve				
16	1492 Moving to Work Demonstration				
17	1495.1 Relocation Costs	30,005			
18	1499 Development Activities				

Annual Statement/Performance and Evaluation Report					
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part 1: Summary					
PHA Name: Brockton Housing Authority		Grant Type and Number Capital Fund Program Grant No: MA06P02450105 Replacement Housing Factor Grant No:		Federal FY of Grant: 2005	
<input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/ Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report					
Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost	
19	1502 Contingency				
	Amount of Annual Grant: (sum of lines 2-17)	2,366,425			
	Amount of line XX Related to LBP Activities				
	Amount of line 16 Related to Section 504 compliance				
	Amount of line XX Related to Security –Soft Costs				
	Amount of Line XX related to Security-- Hard Costs				
	Amount of line XX Related to Energy Conservation Measures				
	Collateralization Expenses or Debt Service	800,000			

** BLI # 1 – Bond Proceeds from Pooled Bond Issue through MassHousing Agency – pending HUD approval of application submitted 2004/5

Annual Statement/Performance and Evaluation Report
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)
Part II: Supporting Pages

PHA Name: Brockton Housing Authority		Grant Type and Number Capital Fund Program Grant No: MA06P02450105 Replacement Housing Factor Grant No:				Federal FY of Grant: 2005		
Development Number Name/HA-Wide Activities	General Description of Major Work Categories		Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost	Status of Work
BHA Wide	Resident & Staff Training		1408		2,000			
BHA Wide	Modernization Administrative Salaries							
	Director of Modernization				100,000			
	Technical Assistant				78,000			
	Administrative Aide				55,538			
	Sub Total A/C 1408				233,538			
BHA Wide	Bond Debt Service – 24-4 Crescent Court		1430		800,000			
MA24-7 Caffrey Towers	Comprehensive Modernization - Continued							
	Phase 3 – Apartment Interiors							
	Replace plumbing risers & distribution system		1460	100	480,000			
	Replace & reconfigure kitchen cabinets		1460	100	270,000			
	Electrical upgrades		1460	100	181,087			
	Retile floors		1460	100	145,000			
	Replace bathroom fixtures		1460	100	100,800			
	Repaint apartments			100	124,000			
	Subtotal A/C 1460				1,300,887			

Annual Statement/Performance and Evaluation Report
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)
Part II: Supporting Pages

PHA Name: Brockton Housing Authority		Grant Type and Number Capital Fund Program Grant No: MA06P02450105 Replacement Housing Factor Grant No:				Federal FY of Grant: 2005		
Development Number Name/HA-Wide Activities	General Description of Major Work Categories		Dev. Acct No.	Quantity	Total Estimated Cost	Total Actual Cost		Status of Work
MA 24-7 Caffrey Towers	Temporary Relocation		1495.1	100	30,005			
MA 24-4 Crescent Court	Comprehensive Modernization from BOND PROCEEDS		NON-CFP FUNDS					
	Landscaping: New lawns & plantings, pavement repairs				500,000			
	Building Exterior & Envelope: Replace roofs, install new insulation, new front porches, new siding facade		NON-CFP FUNDS		4,750,000			
	Interior Apartments: Install new 2 nd floor radiation, new kitchen cabinet doors & countertops, new flooring, install new bathroom venting, paint		NON-CFP FUNDS		3,164,362			

Annual Statement/Performance and Evaluation Report
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)
Part II: Supporting Pages

PHA Name: Brockton Housing Authority		Grant Type and Number Capital Fund Program Grant No: MA06P02450105 Replacement Housing Factor Grant No:				Federal FY of Grant: 2005			
Development Number Name/HA-Wide Activities	General Description of Major Work Categories		Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work

**Annual Statement/Performance and Evaluation Report
 Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)
 Part III: Implementation Schedule**

PHA Name: Brockton Housing Authority		Grant Type and Number Capital Fund Program No: MA06P02450105 Replacement Housing Factor No:					Federal FY of Grant: 2005
Development Number Name/HA-Wide Activities	All Fund Obligated (Quarter Ending Date)			All Funds Expended (Quarter Ending Date)			Reasons for Revised Target Dates
	Original	Revised	Actual	Original	Revised	Actual	
MA 24-4 Crescent Court	8/30/07			8/30/09			
MA24-7 Caffrey Towers	8/30/07			8/30/09			

CAPITAL FUND PROGRAM TABLES START HERE

Annual Statement/Performance and Evaluation Report					
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part 1: Summary					
PHA Name: Brockton Housing Authority		Grant Type and Number Capital Fund Program Grant No: MA06P02450104 Replacement Housing Factor Grant No:		Federal FY of Grant: 2004	
<input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/ Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report					
Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost	
		Original	Revised	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations				
3	1408 Management Improvements Soft Costs	5,000			
	Management Improvements Hard Costs				
4	1410 Administration	233,533			
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	500,000			
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures	1,546,805			
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Nondwelling Structures				
13	1475 Nondwelling Equipment				
14	1485 Demolition				
15	1490 Replacement Reserve				
16	1492 Moving to Work Demonstration				
17	1495.1 Relocation Costs	50,000			
18	1499 Development Activities				
19	1502 Contingency				

Annual Statement/Performance and Evaluation Report Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part 1: Summary					
PHA Name: Brockton Housing Authority		Grant Type and Number Capital Fund Program Grant No: MA06P02450104 Replacement Housing Factor Grant No:		Federal FY of Grant: 2004	
<input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/ Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report					
Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost	
	Amount of Annual Grant: (sum of lines 2-18)				
	Amount of line XX Related to LBP Activities	2,335,338			
	Amount of line XX Related to Section 504 compliance				
	Amount of line XX Related to Security –Soft Costs				
	Amount of Line XX related to Security-- Hard Costs				
	Amount of line XX Related to Energy Conservation Measures				
	Collateralization Expenses or Debt Service				

Annual Statement/Performance and Evaluation Report									
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)									
Part II: Supporting Pages									
PHA Name: Brockton Housing Authority			Grant Type and Number Capital Fund Program Grant No: MA06P02450104 Replacement Housing Factor Grant No:				Federal FY of Grant: 2004		
Development Number Name/HA-Wide Activities	General Description of Major Work Categories		Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
BHA Wide	Management Improvements Resident Initiatives & Training & Staff Training		1408		5,000				
BHA Wide	Modernization Administrative Salaries								
	Director of Modernization		1410		100,000				
	Technical Assistant		1410		78,000				
	Administrative Aide		1410		55,533				
24-4 Crescent Court	Advance A/E for Mod Study – Bond Sale		1430		500,000				
24-7 Caffrey Towers	Phase 2 Comp Mod Continued – Apartments – Forced A/C Labor								
	Replace plumbing risers & water distribution system		1460	120	599,045				
	Replace & Reconfigure kitchen cabinets		1460	120	324,000				
	Electrical Upgrades		1460	120	180,000				
	Retile Floors		1460	120	174,000				
	Replace Bathroom fixtures		1460	120	120,960				
	Repaint apartments		1460	120	148,800				

Annual Statement/Performance and Evaluation Report Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part II: Supporting Pages									
PHA Name: Brockton Housing Authority			Grant Type and Number Capital Fund Program Grant No: MA06P02450104 Replacement Housing Factor Grant No:				Federal FY of Grant: 2004		
Development Number Name/HA-Wide Activities	General Description of Major Work Categories		Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
24-7 Caffrey Towers	Tenant Relocation		1495.1		50,000				

Capital Fund Program Five-Year Action Plan

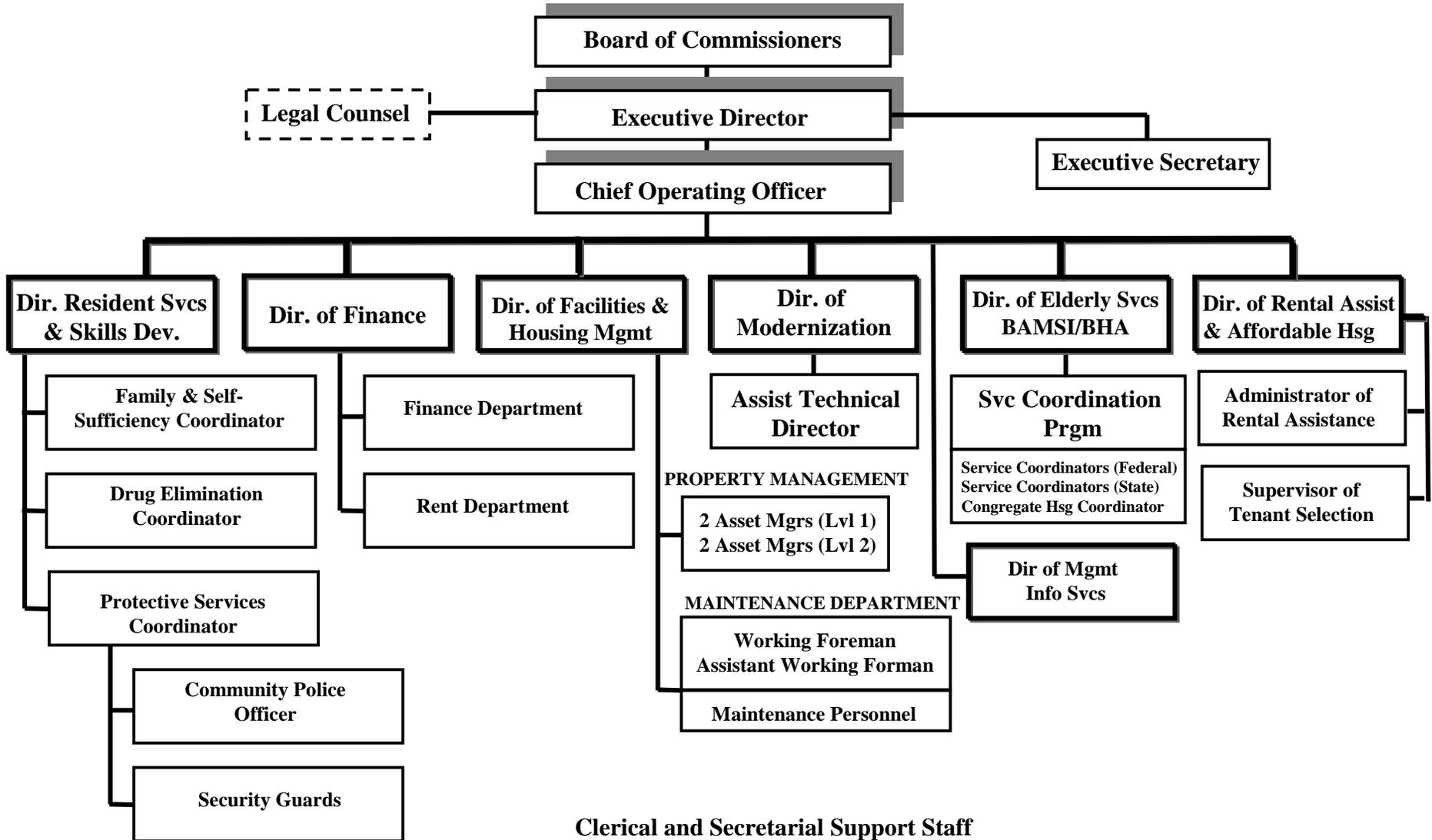
Part I: Summary

PHA Name Brockton Housing Authority		<input checked="" type="checkbox"/> Original 5-Year Plan <input type="checkbox"/> Revision No:			
Development Number/Name/HA-Wide	Year 1 04	Work Statement for Year 2 FFY Grant: 05 PHA FY: 05	Work Statement for Year 3 FFY Grant: 06 PHA FY: 06	Work Statement for Year 4 FFY Grant: 07 PHA FY: 07	Work Statement for Year 5 FFY Grant: 08 PHA FY: 08
24-4 Crescent Court	Annual Statement	800,000	800,000	800,000	800,000
24-7 Caffrey Towers		1,535,338	1,535,338	1,535,338	
24-6 Campello High Rise					1,535,338
Total CFP Funds (Est.)		2,335,338	2,335,338	2,335,338	2,335,338
Total Replacement Housing Factor Funds		N/A	N/A	N/A	N/A

Capital Fund Program Five-Year Action Plan
Part II: Supporting Pages—Work Activities

Activities for Year 1 04	Activities for Year : <u>2</u> FFY Grant: 05 PHA FY: 05			Activities for Year: <u>3</u> FFY Grant: 06 PHA FY: 06		
	24-7 Caffrey Towers	Phase 2 & 3 Comp Mod Continued – Common Areas & Exterior Site	1,535,335	24-7 Caffrey Towers	Phase 3 Continued – Apartment Modernization	1,535,338
		Lobbies, corridors, common rooms, lighting, railings				
	24-4 Crescent Court Interior & Exterior Mod	Apartment heating elements, update kitchen cabinets, new flooring, paint & complete exterior modernization – debt service – bond	800,000 Debt Service on Bond	24-4 Crescent Court Interior & Exterior Mod	Apartment heating elements, update kitchen cabinets, new flooring, paint & complete exterior modernization – debt service – bond	800,000 Debt Service on Bond
	24-7 Caffrey Tower	Phase 4 Common areas & exterior site	1,535,338			
	24-6 Campello High Rise	Phase I Comprehensive Modernization – Building Envelope		24-6 Campello High Rise	Phase I Comprehensive Modernization – Building Envelope & Apartments	1,535,338
	24-4 Crescent Court	Completion of Comprehensive Modernization	800,000 Debt Service on Bond	24-4 Crescent Court	Debt Service – Bond	800,000 Debt Service on Bond

Brockton Housing Authority Organizational Structure



Clerical and Secretarial Support Staff

CURRENT R.A.B. MEMBERSHIP AS OF August, 2004

ACTIVE MEMBERS

Madeline Greenlaw, 31 Plymouth St., Brockton, MA 02302
Marcia Uzzell, 51A Kennedy Drive, Brockton, MA 02301
Carmen Garcia, 58 Hill Street, Brockton, MA 02302
Rosemary Rittenberg, 68 Hill Street, Brockton, MA 02302
Joseph Sterling, 66A Kennedy Drive, Brockton, MA 02301
Bruce Valade, 1380 Main Street, #304B, Brockton, MA 02301
Kelly Bystrom, 1380 Main Street, #909B, Brockton, MA 02301
Susan Sweeney, 1380 Main Street, #205B, Brockton, MA 02301
Rosemary Foster, 1380 Main Street, #801A, Brockton, MA 02031
Beverly Effner, 25 North Avenue, #220, Brockton, MA 02302
Viola Smith, 25 North Avenue, #207, Brockton, MA 02302
Rose Gabriele, 89C Earle Street, Brockton, MA 02301
Mary Hall, 45 Goddard Road, #301, Brockton, MA 02301
Theresa Dimond, 45 Goddard Road, #506, Brockton, MA 02301

INACTIVE MEMBERS

Norman Gray, 755 Crescent Street, #841A, Brockton, MA 02302
Myrtle (Ellie) Williams, 16 Golden Circle, Brockton, MA 02301
Wally Gagnon, 105 Belair Street, #626, Brockton, MA 02301
Margaret Lane, 140 Colonel Bell Drive, #508, Brockton, MA 02301

CAPITAL FUND PROGRAM TABLES START HERE

Annual Statement/Performance and Evaluation Report					
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part 1: Summary					
PHA Name: Brockton Housing Authority		Grant Type and Number Capital Fund Program Grant No: MA06P02450102 Replacement Housing Factor Grant No:			Federal FY of Grant: 2002
<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/ Emergencies <input checked="" type="checkbox"/> Revised Annual Statement (revision no: 2) 6/30/04 P&E AND BUDGET REVISION # 2 <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report					
Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost	
		Original	Revised	Obligated	Expended
		Original	Revised	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations	100,000		100,000	100,000
3	1408 Management Improvements Soft Costs	50,000	18,098.81	18,098.81	18,098.81
	Management Improvements Hard Costs				
4	1410 Administration	248,345		248,345	2,227.70
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	500,000	484,723.71	484,723.71	76,333.71
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures	1,555,110	1,630,126.59	1,630,126.59	809,124.35
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Nondwelling Structures				
13	1475 Nondwelling Equipment	10,000	2,160.89	2,160.89	2,160.89
14	1485 Demolition				
15	1490 Replacement Reserve				
16	1492 Moving to Work Demonstration				
17	1495.1 Relocation Costs	20,000	-0-		
18	1499 Development Activities				

Annual Statement/Performance and Evaluation Report
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part 1: Summary

PHA Name: Brockton Housing Authority	Grant Type and Number Capital Fund Program Grant No: MA06P02450102 Replacement Housing Factor Grant No:	Federal FY of Grant: 2002
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Original Annual Statement Reserve for Disasters/ Emergencies Revised Annual Statement (revision no: 2) 6/30/04 P&E AND BUDGET REVISION # 2
 Performance and Evaluation Report for Period Ending: Final Performance and Evaluation Report

Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost	
		Original	Revised	Obligated	Expended
19	1502 Contingency				
	Amount of Annual Grant: (sum of lines 2-17)	2,483,455		2,483,455	1,007,945.46
	Amount of line XX Related to LBP Activities	0			
	Amount of line 16 Related to Section 504 compliance	500,000			
	Amount of line XX Related to Security –Soft Costs	0			
	Amount of Line XX related to Security-- Hard Costs	0			
	Amount of line XX Related to Energy Conservation Measures	100,000			
	Collateralization Expenses or Debt Service				

Annual Statement/Performance and Evaluation Report
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)
Part II: Supporting Pages

PHA Name: Brockton Housing Authority		Grant Type and Number Capital Fund Program Grant No: MA06P02450102 Replacement Housing Factor Grant No:				Federal FY of Grant: 2002 P&E 6/30/04			
Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work	
				Original	Revised	Obligated	Expended		
BHA Wide	Operations	1406		100,000		100,000	100,000	Complete	
BHA Wide	Staff Training-NAHRO Asset Management Training	1408		35,000	15,135.81	15,135.81	15,135.81	Complete	
BHA Wide	Resident Initiatives & Training	1408		15,000	2,963	2,963	2,963	Complete	
BHA Wide	Modernization Admin. Salaries								
	Director of Modernization	1410		98,345		98,345	2,227.70		
	Technical Assistant	1410		85,000		85,000			
	Administrative Aide	1410		65,000		65,000			
24-7 Caffrey	Advance A/E for Multi-Phase Comprehensive Modernization	1430		425,000	427,050.34	427,050.34	18,660.34	Construction	
24-8 Sullivan	Phase 3 A/E Services & Reimbursable	1430		55,000	57,673.37	57,673.37	57,673.37	Complete	
24-6 Campello	A/E Services – Amendment – Phases	1430		20,000	-0-				
24-7 Caffrey	Phase 1 – Comp Mod / Barrier Free Unit Conversions – Includes replacement of Plumbing riser & electrical upgrade , window replacement	1460	9	383,935	181,896.77	181,896.77		Start-up	

Annual Statement/Performance and Evaluation Report
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)
Part II: Supporting Pages

PHA Name: Brockton Housing Authority		Grant Type and Number Capital Fund Program Grant No: MA06P02450102 Replacement Housing Factor Grant No:				Federal FY of Grant: 2002 P&E 6/30/04			
Development Number Name/HA-Wide Activities	General Description of Major Work Categories		Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
					Original	Revised	Obligated	Expended	
24-7 Caffrey	Phase 1 – Comp Mod – Roof & Make Up Air Replacement		1460	2 +2	267,110	597,425	597,425	459,889.75	77% Complete
24-6 Campello	Balcony Repairs		1460		829,065	673,169.02	673,169.02	171,688.80	26% Complete
24-8 Sullivan	Phase 3 – Comp Mod – Finish Common Areas		1460		75,000	177,635.80	177,635.80	177,635.80	Complete
BHA Wide	Computers & Equipment – Mod Dept		1475		10,000	2,160.89	2,160.89	2,160.89	Complete
24-7 Caffrey	Relocation Expenses – Phase 1		1495.1		20,000	-0-			

CAPITAL FUND PROGRAM TABLES START HERE

Annual Statement/Performance and Evaluation Report					
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part 1: Summary					
PHA Name: Brockton Housing Authority		Grant Type and Number Capital Fund Program Grant No: MA06P02450203 Replacement Housing Factor Grant No:			Federal FY of Grant: 2003
<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/ Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report 6/30/04					
Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost	
		Original	Revised	Obligated	Expended
		Original	Revised	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations				
3	1408 Management Improvements Soft Costs				
	Management Improvements Hard Costs				
4	1410 Administration				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures	407,234		407,234	
11	1465.1 Dwelling Equipment— Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				

Annual Statement/Performance and Evaluation Report					
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part 1: Summary					
PHA Name: Brockton Housing Authority		Grant Type and Number Capital Fund Program Grant No: MA06P02450203 Replacement Housing Factor Grant No:		Federal FY of Grant: 2003	
<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/ Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report 6/30/04					
Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost	
		Original	Revised	Obligated	Expended
14	1485 Demolition				
15	1490 Replacement Reserve				
16	1492 Moving to Work Demonstration				
17	1495.1 Relocation Costs				
18	1499 Development Activities				
19	1502 Contingency				
	Amount of Annual Grant: (sum of lines 2-17)	407,234		407,234	
	Amount of line XX Related to LBP Activities				
	Amount of line 16 Related to Section 504 compliance				
	Amount of line XX Related to Security –Soft Costs				
	Amount of Line XX related to Security-- Hard Costs				
	Amount of line XX Related to Energy Conservation Measures				
	Collateralization Expenses or Debt Service				

Annual Statement/Performance and Evaluation Report
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)
Part II: Supporting Pages

PHA Name: Brockton Housing Authority		Grant Type and Number Capital Fund Program Grant No: MA06P02450203 Replacement Housing Factor Grant No:				Federal FY of Grant: P&E 6/30/04 2003			
Development Number Name/HA- Wide Activities	General Description of Major Work Categories		Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
					Original	Revised	Obligated	Expended	
24-7 Caffrey Towers	Phase 2 Comp. Mod. Apartments, Kitchens, Baths, Electrical, Plumbing, Window Replacement		1460	100	407,234		407,234		

**Annual Statement/Performance and Evaluation Report
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)
Part II: Supporting Pages**

PHA Name: Brockton Housing Authority		Grant Type and Number Capital Fund Program Grant No: MA06P02450203 Replacement Housing Factor Grant No:				Federal FY of Grant: P&E 6/30/04 2003			
Development Number Name/HA- Wide Activities	General Description of Major Work Categories		Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
					Original	Revised	Obligated	Expended	

CAPITAL FUND PROGRAM TABLES START HERE

Annual Statement/Performance and Evaluation Report						
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part 1: Summary						
PHA Name: Brockton Housing Authority		Grant Type and Number Capital Fund Program Grant No: MA06P02450103 Replacement Housing Factor Grant No:			Federal FY of Grant: 2003	
<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/ Emergencies <input checked="" type="checkbox"/> Revised Annual Statement (revision no: 1) P&E a/o 6/30/04 <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report BUDGET REV. # 1						
Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost		
		Original	Revised	Obligated	Expended	
		Original	Revised	Obligated	Expended	
1	Total non-CFP Funds					
2	1406 Operations	175,110	-0-			
3	1408 Management Improvements Soft Costs					
	Management Improvements Hard Costs					
4	1410 Administration	148,345		1,178.30	1,178.30	
5	1411 Audit					
6	1415 Liquidated Damages					
7	1430 Fees and Costs	50,000	5,000			
8	1440 Site Acquisition					
9	1450 Site Improvement					
10	1460 Dwelling Structures	1,544,649	1,774,759	1,728,492.18		
11	1465.1 Dwelling Equipment— Nonexpendable					
12	1470 Non-dwelling Structures					
13	1475 Non-dwelling Equipment					

**Annual Statement/Performance and Evaluation Report
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part 1: Summary**

PHA Name: Brockton Housing Authority	Grant Type and Number Capital Fund Program Grant No: MA06P02450103 Replacement Housing Factor Grant No:	Federal FY of Grant: 2003
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Original Annual Statement Reserve for Disasters/ Emergencies Revised Annual Statement (revision no: 1) P&E a/o 6/30/04
 Performance and Evaluation Report for Period Ending: Final Performance and Evaluation Report **BUDGET REV. # 1**

Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost	
		Original	Revised	Obligated	Expended
14	1485 Demolition				
15	1490 Replacement Reserve				
16	1492 Moving to Work Demonstration				
17	1495.1 Relocation Costs	10,000	-0-		
18	1499 Development Activities				
19	1502 Contingency				
	Amount of Annual Grant: (sum of lines 2-17)	1,928,104		1,728,492.18	1,178.30
	Amount of line XX Related to LBP Activities				
	Amount of line 16 Related to Section 504 compliance				
	Amount of line XX Related to Security –Soft Costs				
	Amount of Line XX related to Security-- Hard Costs				
	Amount of line XX Related to Energy Conservation Measures				
	Collateralization Expenses or Debt Service				

Annual Statement/Performance and Evaluation Report
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)
Part II: Supporting Pages

PHA Name: Brockton Housing Authority		Grant Type and Number Capital Fund Program Grant No: MA06P02450103 Replacement Housing Factor Grant No:				Federal FY of Grant: P&E 6/30/04 2003		
Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised	Obligated	Expended	
BHA Wide	Operations	1406		175,110	-0-			
BHA Wide	Modernization Administrative Salaries	1410						
	Director of Modernization	1410	1	58,345		1,178.30	1,178.30	
	Technical Assistant	1410	1	50,000				
	Administrative Aide	1410	1	40,000				
24-7 Caffrey Tower	Supplemental A/E Funds	1430		50,000	-0-			
24-6 Campello High Rise	Balcony Repairs	1460		100,000	5,000			
24-7 Caffrey Towers	Phase 2 Comp. Mod. Apartments, Kitchens, Baths, Electrical, Plumbing	1460	100	1,543,649	1,774,759	1,728,492.18		
24-7 Caffrey Towers	Tenant Relocation	1495.1		10,000	-0-			

Fair Housing Review

In response to the Department of Housing And Urban Developments Office of Fair Housing and Equal Opportunity's request for additional information regarding the steps that the Brockton Housing Authority (BHA) has taken to review its programs for impediments to fair housing and addressed them in a reasonable fashion the BHA presents the following;

1. The BHA hired MAPPLAN Associates to conduct a Section 504 needs assessment, a self-evaluation and transition plan. The BHA has been using this plan in its 1 and 5 year Capital Fund planning and performance reports. The plans calls for up to date specially designed units adapted for disabled residents in a manner that provides the most integrated setting appropriate for their needs. The plan will be completed with the modernization of Crescent Court currently in the planning process. The Authority's waiting list data shows that the supply of these units surpasses demand. In past years the Authority has requested exemptions on vacancy days due to units being hard to tenant due to lack of disabled applicants. The Authority does work with the surrounding Housing Authorities who share their list. We have also worked with Catholic Charities, The Brockton Area Multi Service Corporation, Brockton Family and Community Resources, The Massachusetts Rehabilitation Commission and the Department of Mental Health to recruit disabled applicants to fill the units.
2. On January 22, 2004 the Brockton Housing Authority adopted a revised Administrative and Continued Occupancy Plan (ACOP) for its Federal Public Housing Program. While compiling this plan, the BHA hired McCright and Associates to review our existing programs to ensure compliance with current regulations including the Fair Housing regulations. The ACOP was created to comply with including, but not limited to, 24 CFR Part 5, 24 CFR 960, the Privacy Act, the Rehabilitation Act of 1973, the Americans with Disabilities Act ("ADA"), and Title VI of the Civil Rights Act of 1964. The ACOP was developed with the input and review of the Resident Advisory Board (RAB). Input was solicited from the Cape Verdean Association, The Latino Health Center, Southeastern Massachusetts Legal Assistance and Massachusetts Law Reform. Furthermore the ACOP states "The BHA shall affirmatively further fair housing in the administration of its public housing programs [24 CFR 960, 103, 24 CFR 5.105(a)].

No person shall, on the grounds of race, color, sex, religion, national or ethnic origin, familial status, handicap or disability, be excluded from participation in, be denied the benefits of, or be otherwise subjected to, discrimination under the BHA's programs.

To further its commitment to full compliance with applicable civil rights laws, the BHA will provide federal/state/local information to applicants/tenants of the public housing programs regarding discrimination and any recourse available to them if they believe they may be victims of discrimination. Such information will be available at the BHA's Tenant Selection Department and all BHA management offices throughout the City. In addition, all BHA written information and advertisements will contain the appropriate Equal Opportunity language and logo.

The BHA will assist any family that believes it has suffered illegal discrimination by providing copies of the appropriate housing discrimination forms. The BHA will also assist in completing the forms, if requested, and will provide the address of the nearest HUD Office of Fair Housing and Equal Opportunity.

3. To ensure that residents and applicants are afforded every opportunity to access the BHA's programs the Authority has adopted the following Reasonable Accommodation Policy.

REASONABLE ACCOMMODATION

The BHA shall make reasonable accommodations as required by law for handicapped/disabled persons to promote the objective of providing equal access to and participation in the public housing programs. Except as otherwise provided in 24 CFR 8.21(c) (1), 8.24(a), 8.25 and 8.31, no individual with disabilities shall be denied the benefits of, be excluded from participation in, or otherwise be subjected to discrimination because the BHA's facilities are inaccessible to or unusable by persons with disabilities.

The following procedures set out the means by which applicants and tenants may request accommodations and the guidelines that the BHA will follow in determining whether it is reasonable to provide a requested accommodation. Because disabilities are not always apparent, the BHA will ensure that all applicants/tenants are aware of the opportunity to request reasonable accommodations.

1. Communication

The BHA will advise in writing the method to follow in order to request an accommodation on the following documents: application forms, written notifications at reexamination, inspections, appointments and/or evictions and any notifications requesting action by the tenant. The BHA will appoint a staff member who will be responsible for reviewing all requests for accommodations and for responding in writing to the requestors.

2. Questions to ask in granting the accommodation

The appointed staff members will conduct the following analysis:

a. *Is the requestor a person with disabilities?*

For the purpose of the Americans with Disabilities Act (“ADA”) the definition of a person with disabilities is:

A person with a physical or mental impairment that substantially limits one or more major life activities, has a record of such impairment, or is regarded as having such impairment.

If the disability, for which the accommodation is being requested, is apparent or has already been documented, the answer to this question is yes. If the disability is not apparent or documented, the BHA will obtain verification that the person is a person with a disability within the meaning of the ADA.

b. *Is the requested accommodation related to the disability?*

If it is apparent that the request is related to the apparent or documented disability, the answer to this question is yes. If it is not apparent, the requestor must provide documentation that the requested accommodation is needed due to the disability. The BHA will not inquire as to the nature of the disability.

c. *Is the requested accommodation reasonable?* In order to be determined reasonable, the accommodation must meet two criteria:

1. *Would the accommodation constitute a fundamental alteration?*

The BHA's business is housing. If the request would alter the fundamental business that the BHA conducts, it would not be considered reasonable. For instance, the BHA would deny a request to have the BHA do grocery shopping for a person with disabilities.

2. *Would the requested accommodation create an undue financial hardship or administrative burden?*

Frequently, the requested accommodation costs little or nothing. If the cost would be an undue burden, the BHA may request a meeting with the individual to investigate and consider equally effective alternatives.

If more than one accommodation is equally effective in providing access to the BHA's housing programs and services, the BHA retains the right to select the most efficient or economic choice.

The cost necessary to carry out approved requests, including requests for physical modifications, will be borne by the BHA if there is no one else willing to pay for the modifications. If another party pays for the modifications, the BHA will seek to have the same entity pay for any restoration costs.

The BHA will consider a tenant's request to make physical modifications to a unit at his/her own expense. In making its decision, the BHA will consider whether the proposed modifications comply with local code and/or affect the structural integrity of the building.

Any request for an accommodation that will enable a tenant to materially violate essential lease terms will not be approved, (i.e. allowing nonpayment of rent, destruction of property, disturbing the peaceful enjoyment of others, etc.).

OTHER SERVICES TO PROMOTE ACCESSIBILITY TO PROGRAMS

Any notice to a tenant or applicant, who is known not to speak English, shall bear a notice in commonly spoken foreign languages of the importance that the notice be translated.

When given at least 24 hours notice of a need for an interpreter, the BHA will endeavor to have bilingual staff available or access to people who can translate languages other than English. When provided with adequate notice, the BHA will endeavor to have sign language interpreters available for the hearing impaired.

The BHA's offices are accessible to persons with disabilities. TTD of Verizon provides accessibility for the hearing impaired.

4. One of the concerns expressed by the Office of Fair Housing and Equal Opportunity was that the BHA reported no Hispanics on its waiting list in the Annual Plan. The omission of Hispanics was due to the categories requested by HUD in the Annual plan. On all HUD forms race is defined as,

1 = White

2 = Black

3 = American Indian/ Alaska Native

4 = Asian/Pacific Islands

The above categories are what the Brockton Housing Authority has reported in the past. HUD does ask that Authorities report ethnicity as Hispanic or Non Hispanic. Using this information the Authority's Section 8 waiting list has 15.9% Hispanic applicants, the Federal Elderly/Disabled list has 8.9% Hispanic applicants and the Federal Family list has 13.9% Hispanic applicants as of March 30th 2005. According to the year 2000 Census the City of Brockton's population consist of 8% Hispanics. The BHA includes the Latino Health Institute, The Spanish Center and all Churches, including those whose parishioners are primarily minority, in its outreach efforts.

5. In the year 2002 the Brockton Redevelopment Agency (BRA) conducted an analysis of the impediments to fair housing choice. In the course of that effort a number of other agencies and organizations were contacted. The BHA played a major role in this analysis. At that time the BRA, with an eye to the preparation of the City's Consolidated Plan, sought the input of these agencies not only in terms of fair housing choice issues, but also in terms of the larger housing and community development needs picture. Among the agencies that participated in this efforts were:

1. Brockton Housing Authority
2. Greater Brockton Board of Realtors
3. Brockton Area Help Line
4. Mainspring House
5. David Jon Lousison Child Center
6. Brockton Interfaith Community

An analysis of the City has found that all 21 census tracts contain minority residents, yet concentrations are apparent in certain census tracts. Census tracts 5108 and 5116 are home to the largest concentrations of African Americans; Census tracts 5105 and 5107 house the largest Asian populations, while the greatest number of Hispanic residents can be found in Census tracts 5104, 5108 and 5116. To address these concentrations, the BHA has started a Section 8 Project Based Program. In the program the BHA issued a Request for Proposals. Part of the Selection Criteria required the proposed units to be in Census tracts that did not contain high concentrations of poverty. This program secures apartments for participants of our Section 8 program outside of areas normally considered by minority populations. Furthermore the BHA has been a longstanding member of the South Shore Landlord Association. Annually the BHA presents our programs to area landlords, counseling them on their obligations in tenant selection and quality housing.

The most recent Analysis of Impediments to Fair Housing Choice completed by the BRA list the General impediments at;

- Overall housing inventory insufficient to meet housing needs

- Loss of 600 dwelling units between 1990 and 2000, displacing low income residents
- Increase in median rental cost
- Decrease of multiple housing units and increase in single family development

The Brockton Housing Authority is working to address these impediments through the following actions;

- Worked closely with the Department of Housing and Community Development, the City of Brockton and the Brockton Redevelopment Authority to bring back on-line a 102 unit subsidized family development that was vacant for five years,
- Secured funding to de-lead 25 units of subsidized family housing that was vacant for three years
- Worked with the City of Brockton and the Brockton Redevelopment Authority to create 12 new subsidized family units on vacant lots owned by the City scattered through out the City boundaries.
- Worked closely with the City and the BRA to build eleven units of affordable housing in the Pleasant-Prospect neighborhood.
- Build three affordable homes on a former vacant lot at the corner of Newbury and Highland St.
- Planning to build five affordable units on the vacant lot at Snow and Baxendale Ave.
- Working closely with the Old Colony YMCA to build five Youth Build homes. These home have been sold at substantial discounts to participants of the BHA's Family Self-Sufficiency program.

Rental Barriers

- Cost of rental acquisition; security deposit
- Rental Process; credit check; poor credit, poor references, criminal records, past evictions.

These impediments are solely the result of the functioning of the local private real estate market and are best dealt with through education and dialogue, particularly among owners of small and mid sized residential properties. The BHA addresses these issues through the South Shore Landlords association. The Association exists to educate and advise landlords. The BHA is an active source of information for the Association. Furthermore the BHA's tenant selection policies are structured to investigate the origins of poor screening results and to identify any mitigating circumstances that may qualify the applicant for residency. The lack of credit or the existence of poor credit in itself will not disqualify an applicant. It is recognized that applicants are applying for assistance due to their financial situation and therefore to hold their financial background against them would only present unnecessary impediments to their finding appropriate housing.

Cultural Barriers

- Language Barriers

- Distrust
- Speech accents

The Brockton Housing Authority reaches out to the minority community to find bilingual applicants when filling vacancies. Currently we have employees who speak Spanish, Portuguese Creole and Haitian. Furthermore we offer in our correspondence to obtain translations services for the applicants and residents when dealing with the BHA. The City of Brockton, through the BRA continues to use CDBG funds to support local social service agencies that provide advocacy services, ESL education and translation services to non-English speaking persons in need of housing. The BRA has held a Fair Housing Forum to discuss and move beyond these fair housing impediments. Local real estate brokers, attorneys, property owners, and public service agencies involved in housing matters are invited.

Local Legal/Zoning Barriers

- Local lead-based paint issues related to older, affordable housing stock has made many of the available units not suitable for families with children.

The Brockton Housing Authority has adopted the lead based parameters of the Department of Housing and Urban Development. Our inspectors have been trained in detection of unsuitable conditions and we have worked with state agencies to identify funding sources for small and medium size landlords to de-lead their units. The BRA continues to utilize substantial portions of its CDBG and HOME funds to effectuate removal of lead-based paint hazards in smaller residential properties. These funds are often used to supplement Mass Housing's "Get the Lead Out" program.

Local Legal/Zoning Barriers

- Private owners refusal to rent to families with children.
- Small property owners extending inquiries in improper, and sometimes, illegal areas
- Illegal discrimination against heads of households

The Brockton Housing Authority has partnered with the Brockton Area Multiservice Corporations Help Line to provide housing search assistance and counseling to participants to help identify discrimination in the Housing search process. Participants are provided information on what their rights are and what a potential landlord can and cannot ask you. Landlords are advised through the South Shore Landlords Association in person and in writing of their obligations when renting a unit. Applicants and participants are informed that the Brockton Housing Authority will assist them in filing fair housing complaints.

6. A review of the demographics contained within the Housing Authority developments reveals no undue concentrations of minorities or poverty given the Annual Plan definition. The general occupancy complexes do have a higher rate of minorities than the Elderly/Disabled complexes, which is reflective of the changing demographic within the City. The relatively small number of federal family units (221) in two complexes does not lend itself to creating large

concentrations of one race. The Authority does monitor the changing demographics; this information is part of the supporting documentation for the annual plan.

While no specific information has been assembled regarding the needs of specific Minorities with respect to housing a review of the economic standings of the populations by race does provide information that would suggest that economic factors are a major barrier to affordable housing. Based on per capita income, African Americans earn 71% of the average white family, Hispanics are experiencing even more financial hardship with their average income being equal to 54% of the average white family. In general, the average non-white family's income is equal to 62% of the average white family. The Brockton Housing Authority assists a disproportionate number of minorities when compared to the demographics of the city due to the financial disparity. The Brockton Housing Authority will continue to work towards creating affordable housing opportunities. This will be done as noted in the aforementioned programs. We will also continue to apply for whatever Section 8 assistance that becomes available as stated in the Annual Plan. Information regarding the income or housing needs of the disabled was unavailable.