

City of Brockton, Massachusetts

Substantial Amendment

Program Year 2021

Annual Action Plan

July 1, 2021 – June 30, 2022



HOME-ARP

Brockton Redevelopment Authority
Honorable Robert F. Sullivan, Mayor
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HOME-ARP Allocation Plan Template With Guidance

Guidance:

- 1) To receive its HOME-ARP allocation, a PJ must:
 - i) Engage in consultation with at least the required organizations.
 - ii) Provide for public participation including a 15-day public comment period and one public hearing, at a minimum; and,
 - iii) Develop a plan that meets the requirements in the HOME-ARP Notice.
- 2) To submit: a PJ must upload a Microsoft Word or PDF version of the plan in IDIS as an attachment next to the "HOME-ARP allocation plan" option on either the AD-26 screen (for PJs whose FY 2021 annual action plan is a Year 2-5 annual action plan) or the AD-25 screen (for PJs whose FY 2021 annual action plan is a Year 1 annual action plan that is part of the 2021 consolidated plan).
- 3) PJs must also submit an SF-424, SF-424B, and SF-424D, and the following certifications as an attachment on either the AD-26 or AD-25 screen, as applicable:
 - i) Affirmatively Further Fair Housing;
 - ii) Uniform Relocation Assistance and Real Property Acquisition Policies Act and Anti-displacement and Relocation Assistance Plan;
 - iii) Anti-Lobbying;
 - iv) Authority of Jurisdiction;
 - v) Section 3; and,
 - vi) HOME-ARP specific certification

Introduction

The American Rescue Plan (ARP) Act was created by the Biden Administration, so states, counties and local governments address the adverse economic impact of the Coronavirus pandemic. Through the law, the administration appropriated funds, known as HOME-ARP for the U.S. Department of Housing and Urban Development (HUD) to distribute under the HOME Investment Partnership Program (HOME). HOME-ARP funds can be used for the following eligible activities: rental housing development, tenant-based rental assistance, supportive housing services, non-congregate shelter development, operating and capacity building expenses for non-profits undertaking related activities, and administration expenses connected to implementing funded programs.

Eligible activities under this plan are to benefit the following qualifying populations: (1) homeless, as defined in 24 CFR 91.5; (2) at-risk of homelessness, as defined in 24 CFR 91.5; (3) fleeing or attempting to flee stalking, domestic violence, dating violence, sexual assault, or human trafficking, as defined by HUD; (4) other populations with the greatest risk of housing instability and veterans and families that include a veteran family member who meets the criteria for one of the qualifying populations. To allocate funds to specific projects, the city of Brockton must post a draft plan for public comment and then submit a finalized HOME-ARP allocation plan to HUD for review and approval.

The amount appropriated to the city by HUD for HOME-ARP expenditures is \$2,096,451. Brockton's HOME-ARP allocation plan abides by HUD Notice CPD-21-10 Requirements of the Use of Funds in the HOME-American Rescue Plan Program (the NOTICE or HUD Notice). This document's layout includes questions and tables listed because they are requirements for the HOME-ARP allocation plan, as described in the notice. Descriptions of the allocation plan requirements as well as instructions for submitting it, the SF-424, SF-424B, SF-424D, and the certifications are available in the notice, as well. Please also note that all **grey** text in this document are HUD instructions for completing the plan, retained to offer context to readers.

Participating Jurisdiction: City of Brockton, MA

Consultation

Before developing its plan, a PJ must consult with the CoC(s) serving the jurisdiction's geographic area, homeless and domestic violence service providers, veterans' groups, public housing agencies (PHAs), public agencies that address the needs of the qualifying populations and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities, at a minimum. State PJ's are not required to consult with every PHA or CoC within the state's boundaries; however, local PJ's must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

Describe the consultation process including methods used and dates of consultation:

To draft the HOME-ARP allocation plan, the city of Brockton and Brockton Redevelopment Authority (BRA) consulted with various community stakeholders. As the steward of Brockton's annual HUD allocations, the BRA used the consultations to provide an overview of the HOME-ARP program guidelines, timelines and Homeless Management Information System (HMIS) data. Over the course of fulfilling plan consultation requirements, the BRA hosted a series of virtual discussions whose purpose was to incorporate stakeholder input into the plan's development. It also disseminated a questionnaire/survey to participants, comprising of staff from agencies and service providers serving the qualified populations (QP's):

- Sheltered and unsheltered homeless populations
- Those at-risk of homelessness
- Those fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking
- "Other" populations - other families requiring services or housing assistance to prevent homelessness and those at greatest risk of housing instability
- Veterans and families that include a veteran family member that meet the criteria in one of the populations above

Conversations focused on one or more of the QP's. From their vantage points, the consulted stakeholder entity staff could identify unmet needs and gaps. Their feedback is recorded on the consultation table starting on page five. A consistent theme of the conversations by participants was that the city should create more affordable units with the goal of fostering housing stability for residents within the QP populations.

BRA also consulted with the Continuum of Care lead agency Father Bill’s and MainSpring; Neighborworks Housing Solutions, the local CHDO; and Edwina House, which focuses on rehabilitation and recovery; Family and Community Resource Center, whose core clientele are individuals coping with the effects of domestic violence; as well as other partners. The table below reflects summaries of the discussions and meetings with these key stakeholders. Once received, the feedback and input were considered and incorporated into the plan’s drafting.

Consultation invitees were also selected based on their affiliation with housing development and service delivery to residents. In addition, expanded efforts were made to reach additional stakeholders and partners with expertise in providing homelessness-targeted services and housing to HOME-ARP QP-beneficiary groups. Those stakeholders included local housing authority officials as well as shelter, domestic violence service, substance abuse service and veterans’ service providers.

The focus of the consultation with the stakeholder groups was to identify priorities and needs. It involved the following steps: a) providing information about existing programs that serve HOME-ARP populations and local funding sources available for expanded programming; b) inviting feedback on how the city could best support the expansion of some of these programs; c) compiling feedback and comments to highlight themes and recommendations for types of new or expanded areas of investments or programming.

Key stakeholders consulted are listed in the table below.

List the organizations consulted:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Father Bill’s & MainSpring	Homeless/Shelter	Virtual meeting and survey completion 6/12/23	FBMS provided feedback about the shortcomings in the current system. It said that the most critical resource needed to prevent and end homelessness is a variety of affordable housing options to meet each household’s needs. This includes permanent supportive housing, flexible prevention assistance to cover rent and utilities, and rapid rehousing programs. In addition, services to help increase income (access to unearned income and employment) and those that

		<p>provide wrap-around health, behavioral health, and legal services are most impactful. It also stated the following about unmet needs in the qualifying population: On any given night there are approximately 250 homeless individuals and 145 homeless families sheltered in FBMS programs. Many more are experiencing housing instability and receiving services in FBMS prevention programs. Unfortunately, there are lengthy waiting times for accessing permanent housing. One of the greatest challenges today is that folks who have received rental assistance vouchers are finding it very difficult to locate an available and affordable unit. The housing market is extremely tight, resulting in much longer lengths of stay in shelter than would otherwise be the case. One staffer said, "We estimate there is a need for about 20-50 additional units of permanent supportive housing annually. This would be in addition to expansion of rental assistance programs annually, likely in the range of 20-40 additional vouchers annually. Our CoC needs a range of housing options, from prevention and shelter to diversion, to rapid rehousing, and permanent supportive housing. A diverse continuum of housing opportunities is best to address the unique needs of the population and ensure that everyone is able to get the help they need."</p>
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<p>Family & Community Resources</p>	<p>Domestic Violence/Trauma</p>	<p>Virtual meeting and survey completion 01/12/2022</p>	<p>When the BRA met with Family Community Resources, it identified that Domestic Violence, High Rents, and Lack of affordable housing are 3 of the leading causes of housing instability and homelessness in the city of Brockton. It also believed that additional funding, rent control production of more affordable housing, hiring bi-lingual and bi-cultural staff would be ideal in combating the causes of housing instability and homelessness. Prior to COVID in the middle of the night, the supervisor was asked to go to the emergency room and meet with staff in the morning. The organization had spent a fortune on emergency hotel rooms. It was forced to be creative in how to provide the best possible services-keeping in mind what best for the kids and the staff.</p>
<p>Edwina Martin House</p>	<p>Drug Rehabilitation/Recovery</p>	<p>Virtual Meeting 6/30/2023</p>	<p>Edwina Martin House is one of the state’s first recovery homes, designed specifically for women. Clients include women in recovery needing housing, so homeless women or women at-risk of becoming homeless. It offers services to 21 women and can accommodate up to 2 infants at a time. The BRA reached out to its staff and these were some of their responses: Ninety-five percent of its client population are homeless. Participating staff explained that most residents require housing assistance. Staff also identified lack of housing, length of time for</p>

			<p>housing searches and lack of focus on affordability of sober housing for clients as exacerbating local homelessness. These participants also identified a lack of housing for residents completing treatment as a major obstacle for the QP in Brockton.</p>
<p>NeighborWorks Housing Solutions</p>	<p>Affordable Housing/Financial Assistance/Fair Housing Activities/Landlord and Homeowner Education Trainings</p>	<p>Virtual Meeting 6/12/2023 01/13/2022</p>	<p>BRA contacted Neighborworks Housing Solutions to discuss needs and gaps for the qualifying populations. Staff explained that loss of income, increased housing costs and lack of inventory are three leading causes of housing instability and homelessness in the city. To combat this instability, staff suggested that supportive services are needed for mental health and domestic violence. They also said that more developers are needed. The following are NHS' answers to the prepared survey with questions highlighted in bold and NHS answers in plain text.</p> <p>Describe the unmet housing and service needs of any and/or all qualifying populations?</p> <p>There are no emergency re-housing programs available, and shelters are at capacity. There are also very few that serve individuals as opposed to families,</p> <p>There are not enough housing voucher subsidies available for</p>

			<p>those in need- so waitlists are substantial.</p> <p>Are there any gaps within the current shelter and housing inventory as well as the service delivery system?</p> <p>Yes.</p> <p>What do you attribute as being 3 of the leading causes of housing instability and homelessness in the city of Brockton?</p> <ol style="list-style-type: none"> 1. Lack of inventory 2. Price Increases / Rent Increases 3. Drug Crisis / Displaced people experiencing homelessness <p>What are the most important/critical services needed in Brockton to address the needs of the QPs?</p> <ol style="list-style-type: none"> 1. Shelter WITH services on site. 2. Compassionate Rehabilitation Facilities / Mental Health Resources 3. Street Team 4. Rapid Re-Housing Services
<p>High Point Treatment Center</p>	<p>Drug Rehabilitation/Recovery</p>	<p>Virtual Meeting 01/12/2022</p>	<p>When the BRA met with High Point Treatment Center, its staff expressed that the following were the three leading causes of housing instability and</p>

			<p>homelessness: Substance use disorder (Section 8 loss and financial instability) Domestic Violence (fleeing relationship and without a place to go). Lack of natural support - Stay with family or friends during transitional periods. People in detox will often relapse on a recurring basis. Detox is only three to seven days. (Sober-living support has cut census in half due to COVID pandemic). HPTC believes that there are not enough developers and supportive services to address needs. There are always fewer female beds than male ones for recovery. As a result, some women live in a tent and move constantly due to lack of availability. MASH is a certified sober home in the state of Massachusetts. HPTC only has two certified sober homes, and both are male targeted. It also finds there are not enough regulations governing sober homes.</p>
<p>Health Imperatives</p>	<p>Domestic Violence Shelter</p>	<p>Virtual Meeting and Questionnaire Sent Out but No Response</p>	<p>During the first round of consultation, the BRA was not successful in meeting with Health Imperatives. This organization plays a major role in our city for the services it provides to victims of domestic violence. The BRA reached out to determine gaps and needs and strategize services that would address the priority needs and gaps of the qualifying populations. Ultimately, the attempts were unfruitful. See this email chain that concludes this summer as late as June 22, 2023.</p>

<p>David John Louiston Center</p>	<p>Homeless/Shelter</p>	<p>Virtual Meeting w Parent Organization Old Colony YMCA 7/5/2023</p>	<p>This organization serves families with infants and toddlers who were homeless or living in cars, abandoned buildings, and overcrowded apartments. It has been serving the Brockton Community since the 80's, doing an amazing job. It has been a recipient of CDBG public services funds for many years. Because the organization is now a subsidiary of the Old Colony YMCA, most of the Y's answers outlined below apply to this section. The Y's website describes the organization as "offering temporary shelter as well as educational opportunities for the personal, social, and economic growth of all members of homeless families." The center's board of directors voted to merge it with the Y in July 2006.</p>
<p>Brockton Housing Authority</p>	<p>Public Housing Authority/Fair Housing</p>	<p>Virtual Meeting 6/12/2023</p>	<p>The Brockton Housing Authority has been a crucial partner to the BRA under the HOME Program. We have completed projects together and much of BHA's rental portfolio are HOME-assisted units. The Authority serves all listed populations. It administers an emergency voucher program in partnership with Father Bills-MainSpring. It also has a mainstream program for disabled individuals and a VASH program. Many of its residents were negatively affected by the pandemic, losing income and many became ill and passed. Its tenants' accounts receivable increased substantially. Its director said that it finds that</p>

			<p>Brockton has a long list of service providers in almost every category needed. The problem is that the services providers do not have the capacity to address the scale of the problems. In the questionnaire, it responded that Housing First works if there are structured long-term services available to address the underlying issues that caused homelessness. There have not been services available on a scale that is needed to address the problem. Staff said there is a substantial shortage of affordable housing in every aspect. The system is overwhelmed.</p> <p>To the question, “What do you attribute as being 3 of the leading causes of housing instability and homelessness in the city of Brockton?” Staff responded by listing these factors:</p> <p>Increased cost of housing far outpacing income growth. substance abuse/mental health issues. Family disfunction</p> <p>· What are the most important/critical services needed in Brockton to address the needs of the QPs? Mental Health Substance Abuse Services</p>
CoC	Continuum of Care	Virtual Meeting 6/12/2023	FBMS takes the lead in coordinating the CoC even though HUD has City of Quincy listed as the Collaborative Applicant. It is

			<p>also the HMIS Administrator for the area. FBMS serves all the qualifying populations noted above. Its target populations include those at risk of or experiencing homelessness, and significant portions of the population include survivors of domestic violence, veterans, elders, youth, and others. It identified the most critical resource needed to prevent and end homelessness is a variety of affordable housing options to meet each household's needs. This includes permanent supportive housing, flexible prevention assistance to cover rent and utilities, and rapid rehousing programs. In addition, services to help increase income (access to unearned income and employment) and those that provide wrap-around health, behavioral health, and legal services are most impactful. It also provided the CoC's Housing Inventory Count report from 2022 for analysis. At the time of the consultation, it was still working on the 2023 version. It shared the data explaining that the HIC is the most complete accounting of homeless beds in the region, while being imprecise about location.</p>
<p>Old Colony YMCA</p>	<p>Charitable, non-profit association committed to the development of strong spirit, mind, and body, guided by Judeo-Christian principles, to enrich the quality of life</p>	<p>Virtual meeting and questionnaire responses on 7/5/2023</p>	<p>The Y serves 63 families daily and 200+ individuals in its shelters. It serves approximately 500 individuals in the Brockton community. It explained that the system is now flooded with hundreds of families in hotels. It also</p>

	<p>for everyone in the communities.</p>		<p>experienced challenges with finding landlords that will work with housing programs. These landlords have expressed disinterest in working with anything other than a Section 8 voucher, which are difficult to access.</p> <p>When asked the question: What do you attribute as being 3 of the leading causes of housing instability and homelessness in the city of Brockton? Staff stated the following:</p> <ul style="list-style-type: none"> o Cost of living (rent too high) o Availability of property o Mental health needs (causes stress and health problems) <p>Participants were also asked this question: What are the most important/critical services needed in Brockton to address the needs of the QPs?</p> <ul style="list-style-type: none"> o Increased support services to meet the needs of the population o Language capacity to meet the communication needs of the population o Increased job and skill training to support employment needs o Capital support for building needs, renovations, purchases, etc.
<p>Brockton Area Arc</p>	<p>Disability Services</p>	<p>Invited to Consult Without Response Please click on link for invitation thread.</p>	<p>The Brockton Area Arc is one of the CDBG Public Service funds recipient in the previous years. It provides direct services for children and adults with intellectual and developmental disabilities</p>

			(I/DD) and autism spectrum disorder. The BRA identified it as an additional organization to consult to better understand homelessness among children. Unfortunately, there was no response.
Dept. of Developmental Services	Disability Services	Invited to Consult Without Response Please click on link for invitation thread.	DDS is another agency within the city that the BRA contacted for a consultation. With the services it provides, and the clientele served, it could have played a crucial role in helping the BRA determine the unmet gaps and priority needs on the qualifying populations, particularly to understand the impact of homelessness and the other QP topics on individuals with developmental disabilities. Unfortunately, it did not respond.
Brockton Veterans' Services	Veterans Services	Virtual Meeting 5/17/2023	The BRA has identified this organization to be consulted in regards to QP4. It shared the following when contacted: Need has increased, but the income and asset limits have not increased with the cost of living. Almost all services are limited to veterans and families within 200% of the Federal Poverty Level. Costs have significantly increased, so families that are over income for programs now need benefits to continue living in the community. Many landlords sold rental properties to new owners who increased rent, leaving veterans and their families facing eviction or being forced to move to less expensive areas. The pandemic changed the operation of support services or stopped support services from operating

		<p>entirely. Most had significant staff turnover. The programs themselves are rebuilding, and the veterans' relationships with the new staff are also rebuilding. This disruption in service limits access. It will take a couple of years for the support and relationships to return to pre-pandemic levels. Isolation has always impacted the veteran community's mental health, and it increased significantly during the pandemic. Many veterans and their dependents are still recovering from the negative effects.</p> <p>To the following specific questions, she responded with these answers:</p> <ul style="list-style-type: none">• Describe the unmet housing and service needs of any and/or all qualifying populations? <p>Veterans and their families are being priced out of Brockton because most of the Vietnam Era veterans have a fixed income that can't meet the rising costs. Veterans who own their homes can't afford the cost of upkeep and maintenance. Veterans with health conditions that require case management are not able to live independently and there is a shortage of housing units that partner with social workers.</p> <ul style="list-style-type: none">• Are there any gaps within the current shelter and housing
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			<p>inventory as well as the service delivery system?</p> <p>Yes, most veterans we work with are not good candidates for congregate shelters and there aren't enough non-congregate units in the area.</p> <ul style="list-style-type: none"> • What do you attribute as being 3 of the leading causes of housing instability and homelessness in the city of Brockton? <p>-Landlords selling the property, and the new landlord dramatically increasing the rent</p> <p>-Serious mental illness (SMI)</p> <p>-Folks make too much money to get financial assistance, but not enough to live. The income cap on programs has not kept up with the market</p> <ul style="list-style-type: none"> • What are the most important/critical services needed in Brockton to address the needs of the QPs? <p>-Case management to assist folks in application process from start to finish</p> <p>-Relaxed income criteria for eligibility</p> <p>-Mental health treatment</p>
<p>Brockton Police Department</p>	<p>Police</p>	<p>Virtual Meeting 6/20/2023</p>	<p>The Police Department have been a recipient of CDBG Public Service funds for many years. The BRA identified it to be consulted regarding QP3. Data for QP3 in Brockton is not readily available. Thus, a qualitative interview would provide great context that quantitative data could not</p>

			offer. The BRA met with an officer who said that the police serve all populations in different instances depending on calls and contact by other means to law enforcement. He identified that QP populations remain unhoused throughout different parts of the city but especially in the downtown; at times turning to FBMS for temporary shelter. The officer also connected housing insecurity among the QP to substance abuse disorders; mental health; lifestyle choices and a lack of outreach workers and needed more beds in treatment facilities.
Plymouth County DA Office	Court System	To be consulted.	The BRA has also identified Plymouth County DA Office in hopes to locate data on victims of human trafficking and stalking. This attempt may be difficult to achieve but the BRA is committed to have a discussion with them on the priority needs and gaps of QP's.
NAACP	Civil Rights	Contacted but no response Please click on above hyperlink for invitation thread.	The NAACP has strong connections to the local community, aware of issues from a civil rights angle. Its perspective would cover how people of color cope among the QP populations cope with challenges of daily living.

Following is the list of targeted agencies compiled at the beginning of the process and the reasons for why they were deemed appropriate for consultations.

REQUIRED AGENCIES	AGENCIES CONSULTED
Continuum of Care (CoC)	CoC/FBMS
Homeless Service Providers	FBMS

Public Housing Authority	Brockton Housing Authority
Affordable Housing/Assistance	Neighborworks Housing Solutions*
Drug Rehab/Recovery	Edwina Martin House
DV, SA, Fleeing, Human Trafficking	Brockton Police Dept.
Drug Rehab/Recovery	High Point Treatment Center*
DV Service Provider	Family & Community Resources

Civil Rights/Fair Housing	NAACP of Brockton
Disabilities Service Providers	Brockton Area Arc
Veterans Services	Brockton Veterans Service

Domestic Violence Shelter	Health Imperatives
Homeless Service Providers	David Jon Louison Center

DV, SA, Fleeing, Human Trafficking	Plymouth County DA Office
Disabilities Service Providers	Dept. of Developmental Services.

Summarize feedback received and results of upfront consultation with these entities:

The city of Brockton initiated the consultation process in December 2021 and January 2022, and they continued through July 2023. The Brockton Redevelopment Authority reached out to the organizations via email and met with those who responded via Zoom (NHS, FCR, and High Point) to discuss and determine the needs in the community and ways to narrow gaps.

Consultation Survey

As stated earlier, the BRA also circulated a questionnaire/survey to stakeholders. The survey was included with every invitation to consultations to agencies that address the needs of the qualifying populations and public and private organizations that address civil rights and the needs of persons with disabilities. Some agencies opted for interviews to consultations through Zoom or to do both (answer the survey and participate in consultations) or opted to do neither.

Questions were about the identification of barriers for those who are experiencing homelessness or are at risk of homelessness, gaps between housing, shelter, and service delivery, anticipated resources to leverage with HOME-ARP funds, and how to prioritize the eligible activities based on level of need. Increasing the housing supply and offering more mental health support for QP's was labeled as the most urgent need. Others responded by speaking of the rising cost of housing and inflation as major concerns for QP's. Other high priorities identified by respondents included general wrap-around services and other support focusing on homelessness prevention as great needs.

During the consultation, the following questions were asked of respondents in person from the surveys/questionnaire:

- What do you attribute as being three of the leading causes of housing instability and homelessness in the city of Brockton?
- Do you believe that there are enough developers and/or supportive services in the city of Brockton to combat some of your identified causes of housing instability and homelessness?
- Do you believe funding in Brockton is equally distributed among developers and/or supportive service providers?
- Do you believe that a lack of funding for developers and/or supportive service providers contributes to some of the leading causes of housing instability and homelessness in the city of Brockton?
- How has (if at all) the operation of business at your organization been impacted by the COVID-19 Pandemic?
- Has (if at all) the Pandemic also caused disruptions in the services that your organization provides? How so?

Consultation involved two main activities: interview sessions and a provider survey. The stakeholders invited to consultations represented a variety of groups, including Continuum of Care staff from the CoC, homeless service providers, domestic violence service providers, veterans' groups, public housing authorities (PHAs), public agencies that address the needs of the qualifying populations, and public and private organizations.

While the BRA contacted several agencies/organizations, the response was not robust. Staff understands the importance of meeting with local organizations that provide services and are in constant contact with the target populations. Nevertheless, of the ones that responded, they had varying levels of direct experience with the qualifying populations under HOME-ARP, but some observations were nearly universal – namely, the increase in households struggling as costs of living rise dramatically, the lack of units in a very competitive rental market, and the need for supportive services.

Many highlighted the role of the COVID-19 pandemic, inflation and cost of living increases, and the affordable-housing crisis as reasons for the significant escalation in demand for assistance. Multiple attendees also noted that the demographic nature of people experiencing homelessness is also shifting. As the region's overall population both ages and diversifies, providers and stakeholders are seeing similar trends in the population experiencing homelessness. While responses during interviews varied and were reflective of the person's role or experience with qualifying populations, a few trends did emerge regarding the greatest needs and the best use of HOME-ARP funds. These trends are organized as themes appearing as titles directly below.

Shelter Programs:

- Question/Issue: Areas that should be prioritized for which we have gaps in our community –
- **Theme of Responses From Consultation Participants:**
 - (1) More affordable units with the goal of fostering housing stability for residents within the QP populations
 - (2) Year-round service-enhanced congregate shelter with on-site housing placement and services supports
 - (3) Wrap-around and housing placement supports in existing congregate, motel, semi-congregate, and alternative shelters
- Question/Issue: Population/Communities that should be prioritized for supportive housing –
- **Theme of Responses From Consultation Participants:**
 - People suffering from severe and persistent mental illness;
 - Individuals suffering from addiction disorders-low barrier;
 - Individuals seeking clean and sober environment;
 - People of Color who are overrepresented in the unsheltered population;
 - Families with Children; Domestic and Sexual Violence Survivors;
 - LGBTQIA+ and youths.
- **Recommendation From Participants:** To improve outcomes,
 - Increase the affordable-housing pool
 - Focus on addressing the barriers that prevent various sub-populations and demographic groups from coming into shelter
 - Provide genuine trauma-informed care training to shelter staff; establishing a minimum standard of care for all shelter programs;
 - Increase access to behavioral health services – both mental health and addiction services – in shelter programs
- **Question/Issue: Housing Placement and Retention** -- Areas that should be prioritized which there are gaps in the community
- **Theme of Consultation Participant Responses:**
 - Flexible client and rental assistance;
 - Mobile housing case management teams;
 - Place-based housing case management teams;
 - In-home housing stabilization services;
 - Behavioral health pre- and post-housing supports;
 - Access to education, training, and employment supports;
 - Peer support services
 - Legal assistance;

- Landlord recruitment and retention
- Benefits application assistance, especially SSI/SSDI
- **Recommendations From Consultation Participants** -- These communities should be prioritized for supportive housing:
 - People of Color from communities overrepresented in the homeless population;
 - Seniors;
 - Families with children;
 - LGBTQIA+;
 - Domestic and Sexual Violence Survivors; Youth;
 - Immigrant and refugee communities, including those who are undocumented.
- **Question/Issue: Substance Abuse** -- Areas that should be prioritized because there are gaps in the community:
- **Theme of Consultation Participant Responses:**
 - High acuity mental health-focused permanent supportive housing;
 - Long-term care/assisted living with behavioral health focus;
 - Substance use recovery housing;
 - Housing that is accessible to people with significant substance abuse and daily living challenges;
 - Culturally-specific case management services for persons of color and for those who have had long standing challenges with substance abuse;
 - Equitable access to sober homes and sober living facilities
- Recommendations From Participants
 - Increase participant choice;
 - Deepen partnerships with healthcare providers;
 - Expand culturally specific support services provider networks;

Public Participation

In accordance with Section V.B of the Notice (page 13), PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

PJs are required to make the following information available to the public:

- The amount of HOME-ARP the PJ will receive, and
- The range of activities the PJ may undertake.

Throughout the HOME-ARP allocation plan public participation process, the PJ must follow its applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for persons with disabilities and providing meaningful access to participation by limited English proficient (LEP) residents that are in its current citizen participation plan as required by 24 CFR 91.105 and 91.115.

Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:

The public participation process included public hearing on the Draft Plan that was introduced and concluded in the following ways:

- ***Date(s) of public notice: 4/15/2022***
- ***Public comment period: start date – 4/15/2022 end date – 5/15/2022***
- ***Date(s) of public hearing: 5/5/2022***

Describe the public participation process:

The Brockton Redevelopment Authority published a notice of the public hearing on its website and on its social media channels. This hearing was done in conjunction with the FY22 annual action plan public hearing. BRA took this approach to use time more effectively and drum up simultaneous interest in both projects. The process also adhered to the public participation processes outlined in the Citizen Participation Plan to provide for effective communication, accessibility, reasonable accommodation for persons with disabilities, and meaningful access to participation by limited English proficient (LEP) residents.

Translation languages included Spanish, Haitian-Creole, and Cape-Verdean Kriolo. The project's initial stakeholder and distribution list was built based on recommendations from BRA staff's understanding of municipal dynamics and the key players working with the QP populations. The public hearing was advertised in the *Brockton Enterprise*, the BRA webpage, on social media, and through email blasts to the agency distribution list. As for the meeting itself, it was hosted on Zoom. Participants did not request any special accommodation.

Describe efforts to broaden public participation:

As previously stated, information about the public hearing and request for public participation was added to the BRA website and through social media channels. In addition, outreach to agencies for participation continued well into 2023 in an attempt to engage as many stakeholders as possible.

Summarize the comments and recommendations received through the public participation process either in writing, or orally at a public hearing:

There was no public comments received.

Summarize any comments or recommendations not accepted and state the reasons why:

There were no comments and recommendations on the Substantial Amendment due to no attendance from public in the public hearing.

Needs Assessment and Gaps Analysis

In accordance with Section V.C.1 of the Notice (page 14), a PJ must evaluate the size and demographic composition of **all four** of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. If the PJ does not evaluate the needs of one of the qualifying populations, then the PJ has not completed their Needs Assessment and Gaps Analysis. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

