

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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Family & Community Resources	Domestic Violence/Trauma	Virtual meeting and survey completion 01/12/2022	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.
Edwina Martin House	Drug Rehabilitation/Recovery	Virtual Meeting 6/30/2023	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

			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.
NeighborWorks Housing Solutions	Affordable Housing/Financial Assistance/Fair Housing Activities/Landlord and Homeowner Education Trainings	Virtual Meeting 6/12/2023 01/13/2022	<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
High Point Treatment Center	Drug Rehabilitation/Recovery	Virtual Meeting 01/12/2022	<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>
Health Imperatives	Domestic Violence Shelter	Virtual Meeting and Questionnaire Sent Out but No Response	<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>

David John Louiston Center	Homeless/Shelter	Virtual Meeting w Parent Organization Old Colony YMCA 7/5/2023	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.
Brockton Housing Authority	Public Housing Authority/Fair Housing	Virtual Meeting 6/12/2023	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>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	<p>FBMS takes the lead in coordinating the CoC even though HUD has City of Quincy listed as the Collaborative Applicant. It is</p>

			<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>
Old Colony YMCA	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	Virtual meeting and questionnaire responses on 7/5/2023	<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>

	for everyone in the communities.		<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.
Brockton Area Arc	Disability Services	<u>Invited to Consult Without Response</u> Please click on link for invitation thread.	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

			(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.</p> <p>Veterans who own their homes can't afford the cost of upkeep and maintenance.</p> <p>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>
Brockton Police Department	Police	Virtual Meeting 6/20/2023	<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 were 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.

The city of Brockton is actively engaged in the MA-511 Quincy, Brockton, Weymouth, Plymouth City and County Continuum of Care (CoC). The CoC is the lead organizing body ensuring a diverse set of stakeholders is implementing a comprehensive regional agenda to prevent and end homelessness. City officials participate in the general and executive committees as voting members.

Additionally, the CoC and the city collaborate by sharing data and advising one another on priorities for funding streams made available to Brockton from local, state, and federal sources. Based on the region's recent results from HUD's Point in Time Count and Systems Performance Measures, the CoC has identified the following key priorities for the coming year: homelessness prevention, maximizing income and benefits and veteran homelessness among other goals. Brockton Public Schools is a core CoC partner and member of the CoC's General Committee and Youth Committee. Father Bill's and MainSpring (FBMS), the local CoC, shared its Change in Annual Counts survey with the BRA. Please see below for its findings.

	Submitted FY 2021	FY 2022	Difference
Universe: Unduplicated Total sheltered homeless persons	2148	2713	565
Emergency Shelter Total	2127	2697	570
Safe Haven Total	29	29	0
Transitional Housing Total	0	0	0

The data captured in the CoC provided table shows a nearly 600 persons increase in those seeking emergency shelter and safe haven services, which use a "Housing First" supportive housing model to provide an alternative to shelter placement. The program is designed to serve hard-to-reach individuals, who are chronically unhoused and often have disabling mental health and substance use conditions.

Many Safe Haven clients choose to engage (or re-engage) in behavioral health treatment, but this is not a requirement to receive Safe Haven housing. A successful transition to permanent housing - often with ongoing support services or directly into permanent supportive housing - is the most important goal and expected outcome for all clients.

As the CoC lead agency, FBMS also provided its inventory data for the entire county showing designated beds for domestic violence victims, among others. That data is below for review highlighting other key demographic information for Brockton and the CoC region.

Organization Name	Project Name	Geo Code	Inven tory Type	Bed Type	Target Pop.	Beds HH w/ Children	Units HH w/ Children	Beds HH w/o Childre n	Beds HH w/ only Children	McKin ney-Vento	Year-Round Beds	Total Seas onal Beds	Over flow Beds	Total Beds	Utiliza tion Rate	Last Update On
Brockton Housing Authority	Welcome Home	250354	C		NA	10	3	0	0	Yes	10			10	100%	4/27/2022 14:48
Developmental Disabilities, Inc	Carolina Shelter	259023	C	Facility-based beds	NA	41	16	0	0	No	41	0	0	41	100%	4/19/2022 17:07
DOVE	DOVE Shelter	251992	C	Facility-based beds	DV	10	3	3	0	No	13	0	0	13	131%	4/20/2022 15:16
Family and Community Resources Inc	Rapid Rehousing and Supports for DV Survivors	250354	C		DV	14	5	0	0	Yes	14			14	100%	8/10/2022 20:34
Father Bill's & MainSpring	Anderson House	259023	C		NA	0	0	6	0	No	6			6	83%	4/19/2022 17:12
Father Bill's & MainSpring	BCU Consolidated Project	251992	C		NA	87	35	81	0	Yes	168			168	117%	4/26/2022 16:00
Father Bill's & MainSpring	BSSHA	251962	C		HIV	3	1	5	0	No	8			8	50%	4/19/2022 17:21
Father Bill's & MainSpring	Charlotte's House	251992	C		NA	0	0	3	0	No	3			3	100%	4/19/2022 17:24
Father Bill's & MainSpring	Chronic Homeless Scattered Site-Home & Healthy for Good	251962	C		NA	0	0	7	0	No	7			7	100%	4/19/2022 17:26
Father Bill's & MainSpring	Conway House	259023	C	Facility-based beds	NA	24	12	0	0	No	24	0	0	24	129%	4/19/2022 17:27
Father Bill's & MainSpring	Erie Ave	250354	C		NA	9	3	0	0	No	9			9	144%	4/19/2022 17:32
Father Bill's & MainSpring	ESG COVID RRH Brockton	250354	C		NA	0	0	15	0	Yes	15			15	100%	4/19/2022 17:41
Father Bill's & MainSpring	ESG COVID RRH Quincy	250354	C		NA	0	0	11	0	Yes	11			11	100%	4/19/2022 17:43
Father Bill's & MainSpring	ESG-RRH: Emergency Solutions Grant	250354	C		NA	0	0	6	0	Yes	6			6	100%	4/19/2022 17:47
Father Bill's & MainSpring	Father Bill's Place	251992	C	Facility-based beds	NA	0	0	105	0	Yes	105	0	34	139	100%	4/26/2022 19:49
Father Bill's & MainSpring	Father Bill's Project	251962	C		NA	84	31	124	0	Yes	208			208	109%	4/26/2022 20:08
Father Bill's & MainSpring	Grove St	250354	C		NA	6	3	0	0	No	6			6	117%	4/20/2022 10:55
Father Bill's & MainSpring	Jack's Place	250354	C		NA	0	0	20	0	No	20			20	70%	4/26/2022 16:04
Father Bill's & MainSpring	Lexington St.	250354	C		NA	12	3	0	0	No	12			12	108%	4/20/2022 11:01
Father Bill's & MainSpring	MainSpring House	250354	C	Facility-based beds	NA	0	0	115	0	Yes	115	0	48	163	100%	4/26/2022 19:51
Father Bill's & MainSpring	Marshfield Veteran House	259023	C		NA			8		Yes	8			8	12%	4/21/2022 10:59
Father Bill's & MainSpring	MHSA-Pay for Success	250354	C		NA	0	0	30	0	No	30			30	93%	4/20/2022 11:10
Father Bill's & MainSpring	Montello II	250354	C		NA	0	0	23	0	No	23			23	87%	4/20/2022 13:28
Father Bill's & MainSpring	My Home Consolidated Project	250354	C		NA	9	3	42	0	Yes	51			51	122%	4/20/2022 13:45
Father Bill's & MainSpring	O'Neil House	251992	C		NA	0	0	3	0	No	3			3	100%	4/20/2022 11:30
Father Bill's & MainSpring	Patty's House	250354	C		NA	4	2	0	0	No	4			4	125%	4/20/2022 13:58
Father Bill's & MainSpring	Perkins St.	250354	C		NA	8	2	0	0	No	8			8	50%	4/20/2022 14:35
Father Bill's & MainSpring	Rodeway - Permanent Supportive Housing	250354	C		NA	0	0	69	0	No	69			69	19%	4/27/2022 18:32
Father Bill's & MainSpring	Scattered sites	250354	C	Other beds	NA	325	105	0	0	No	325	0	0	325	78%	4/20/2022 14:38
Father Bill's & MainSpring	Sheila McIntyre House	251992	C		NA	0	0	8	0	Yes	8			8	88%	4/26/2022 16:09
Father Bill's & MainSpring	Tom's House	252784	C		NA	0	0	3	0	No	3			3	100%	4/20/2022 14:42
Father Bill's & MainSpring	Tribou Street	250354	C		NA	6	3	0	0	No	6			6	100%	4/20/2022 14:43
Father Bill's & MainSpring	VA - GPD:Grant Per Diem Housing	250354	C		NA			15	0	No	15			15	93%	4/20/2022 14:45
Father Bill's & MainSpring	VA - Worth Program	250354	C	Facility-based beds	NA	4	2	11	0	No	15		0	15	73%	4/20/2022 14:48
Father Bill's & MainSpring	Wareham - Evergreen House	259023	C		NA			9		Yes	9			9	89%	4/28/2022 13:31
Father Bill's & MainSpring	Work Express Housing	250354	C		NA	0	0	16	0	Yes	16			16	94%	4/20/2022 14:50
Father Bill's & MainSpring	Y Initiative - Brockton	250354	C	Other beds	NA	0	0	5	0	No	5	0	0	5	80%	4/20/2022 14:53
Father Bill's & MainSpring	Y Initiative- Quincy	251992	C	Other beds	NA	0	0	8	0	No	8	0	0	8	88%	4/20/2022 14:54
Friends of the Homeless	Friends of the Homeless	252784	C	Facility-based beds	NA	60	23	0	0	No	60	0	0	60	70%	4/20/2022 11:28
Health Imperatives Inc.	Penelope's Place	250354	C	Facility-based beds	DV	12	6	0	0	No	12	0	0	12	83%	4/20/2022 12:34
NeighborWorks Housing Solutions	HomeBASE - RRH	250354	C		NA	186	64	0	0	No	186			186	100%	4/28/2022 13:32
NeighborWorks Housing Solutions	Housing Solutions-Family Shelter	259023	C	Facility-based beds	NA	33	12	0	0	No	33	0	0	33	70%	4/20/2022 12:33
NeighborWorks Housing Solutions	Weymouth Veterans House	252784	C		NA	0	0	6	0	No	6			6	83%	4/20/2022 11:44
Old Colony Y	Brockton Family Life Center	250354	C	Facility-based beds	NA	50	19	0	0	No	50	0	0	50	102%	4/20/2022 14:56
Old Colony Y	David Jon Louison Family Center	250354	C	Facility-based beds	NA	61	23	0	0	No	61	0	0	61	100%	4/20/2022 12:46
Old Colony Y	Old Colony Y-Congregate	250354	C	Facility-based beds	NA	44	18	0	0	No	44	0	0	44	91%	4/20/2022 14:57
Old Colony Y	Supportive Housing for Families Expansion Project	250354	C		NA	56	17	0	0	Yes	56			56	98%	4/20/2022 12:56
Peabody Properties	Howard House	250354	C		NA	0	0	14	0	No	14			14	100%	4/20/2022 14:59
Plymouth Area Coalition for the Homeless	Pilgrim's Hope	259023	C	Facility-based beds	NA	39	13	0	0	No	39	0	0	39	100%	4/20/2022 11:33
Plymouth Task Force to End Homelessness	Next Step House	251962	C		NA	0	0	5	0	No	5			5	80%	4/26/2022 12:49
Plymouth Task Force to End Homelessness	Overnights of Hospitality	251962	C	Other beds	NA	0	0	0	0	No	0	20	0	20	75%	4/20/2022 13:42
U.S. Department of Veterans Affairs	VASH	251992	C		NA	96	41	195	0	No	291			291	100%	8/10/2022 20:16
Volunteers of America MA	VOAMA-SSVF	251992	C		NA	0	0	12	0	No	12			12	100%	4/20/2022 15:04
						Sum : 1293	Sum : 468	Sum : 983	Sum : 0		Sum : 2276	Sum : 20	Sum : 82			

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	37,304		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	2,815		
Rental Units Affordable to HH at 50% AMI (Other Populations)	5,240		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		6,985	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		3,655	
Current Gaps			2,585 (HH at 30% & 30-50% AMI)

OPTIONAL Housing Needs Inventory and Gap Analysis Table

Suggested Data Sources: 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS)

[H1: OCCUPANCY STATUS - Census Bureau Table](#)

<https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:d929990b-8f51-34c8-a958-82d0db06f701>

Father Bill's and MainSpring provided data to help concretize need in the city of Brockton as a primary source of shelter service delivery in the area. Its data below on its individual shelter demographics represents anecdotal evidence of need within the QP population.

Father Bill's & MainSpring

Individual Shelter Demographics - FY22

(July 1, 2021-June 30, 2022)

FY22 Count of Individuals Served	Total Annual Count	Average Nightly Count
Father Bill's Place, Quincy	611	137
MainSpring House, Brockton	527	106
Plymouth Nights of Hospitality (<i>Seasonal Nov-Apr</i>)	54	10
Total Combined Unduplicated	1,177	

Long Term Stayers *	Total Count	% of Total
Father Bill's Place	192	31%
MainSpring House	172	33%
Plymouth Nights of Hospitality (<i>Seasonal Nov-Apr</i>)	NA	NA

Total Unduplicated	364	31%
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*A guest with 180 or more consecutive days in program during enrollment that fell within reporting period

Below is a continuation of demographic data of users of the Father Bill's and MainSpring data.

Gender	FBP Count	FBP%	MSH Count	MSH%	PNH Count	PNH%	Total Unduplicated	Total Unduplicated - %
Male	409	66.9%	372	70.6%	39	72.2%	810	68.8%
Female	196	32.1%	151	28.7%	15	27.8%	357	30.3%
Gender Non-Conforming (i.e. not exclusively male or female)	2	0.3%	1	0.2%	0	0.0%	3	0.3%
Transgender - Female to Male	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Transgender - Male to Female	2	0.3%	0	0.0%	0	0.0%	2	0.2%
Transgender - otherwise unspecified	2	0.3%	3	0.6%	0	0.0%	5	0.4%
Disability as reported at time of Unduplicated Count	FBP Count	FBP%	MSH Count	MSH%	PNH Count	PNH%	Total Unduplicated	Total Unduplicated - %
with any Disability	504	82.5%	337	63.9%	47	87.0%	879	74.7%
Substance Abuse	247	40.4%	154	29.2%	36	66.7%	432	36.7%
Mental Health	380	62.2%	249	47.2%	41	75.9%	665	56.5%
Physical Disability	263	43.0%	128	24.3%	13	24.1%	400	34.0%
Developmental Disability	140	22.9%	69	13.1%	9	16.7%	214	18.2%
HIV/AIDS	18	2.9%	14	2.7%	0	0.0%	32	2.7%
Other	FBP Count	FBP%	MSH Count	MSH%	PNH Count	PNH%	Total Unduplicated	Total Unduplicated - %
Survivor of Domestic Violence	190	31.1%	90	17.1%	9	16.7%	284	24.1%
Currently Fleeing Domestic Violence	57	9.3%	29	5.5%	6	11.1%	90	7.6%
at intake	195	31.9%	59	11.2%	30	55.6%	282	24.0%
Chronic Homeless - at intake	62	10.1%	32	6.1%	2	3.7%	95	8.1%
Veterans								
Age	FBP Count	FBP%	MSH Count	MSH%	PNH Count	PNH%	Total Unduplicated	Total Unduplicated - %
18-24	43	7.0%	56	10.6%	3	5.6%	102	8.7%
25-59	441	72.2%	369	70.0%	37	68.5%	836	71.0%
60+	127	20.8%	102	19.4%	14	25.9%	239	20.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Ethnicity	FBP Count	FBP%	MSH Count	MSH%	PNH Count	PNH%	Total Unduplicated	Total Unduplicated - %
Non-Hispanic/Latino	561	91.8%	437	82.9%	53	98.1%	1,037	88.1%
Hispanic/Latino	47	7.7%	87	16.5%	1	1.9%	134	11.4%
Unknown	3	0.5%	3	0.6%	0	0.0%	6	0.5%
Race	FBP Count		MSH Count		PNH Count		Total Count	% of Total
White	464	75.9%	303	57.5%	44	81.5%	798	67.8%
Black or African American	118	19.3%	189	35.9%	8	14.8%	313	26.6%
Multiple races reported	9	1.5%	12	2.3%	1	1.9%	22	1.9%
American-Indian or Alaska Native	4	0.7%	6	1.1%	1	1.9%	11	0.9%
Asian	6	1.0%	1	0.2%	0	0.0%	7	0.6%
Native Hawaiian or Pacific Islander	7	1.1%	5	0.9%	0	0.0%	12	1.0%
Unknown	3	0.5%	11	2.1%	0	0.0%	14	1.2%

Gender	FBP Count	FBP%	MSH Count	MSH%	PNH Count	PNH%	Total Unduplicated	Total Unduplicated - %
Male	409	66.9%	372	70.6%	39	72.2%	810	68.8%
Female	196	32.1%	151	28.7%	15	27.8%	357	30.3%
Gender Non-Conforming (i.e. not exclusively male or female)	2	0.3%	1	0.2%	0	0.0%	3	0.3%
Transgender - Female to Male	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Transgender - Male to Female	2	0.3%	0	0.0%	0	0.0%	2	0.2%
Transgender - otherwise unspecified	2	0.3%	3	0.6%	0	0.0%	5	0.4%
Disability, as reported at time of Unduplicated Count of Participants	FBP Count	FBP%	MSH Count	MSH%	PNH Count	PNH%	Total Unduplicated	Total Unduplicated - %
with any Disability	504	82.5%	337	63.9%	47	87.0%	879	74.7%
Substance Abuse	247	40.4%	154	29.2%	36	66.7%	432	36.7%
Mental Health	380	62.2%	249	47.2%	41	75.9%	665	56.5%
Physical Disability	263	43.0%	128	24.3%	13	24.1%	400	34.0%
Developmental Disability	140	22.9%	69	13.1%	9	16.7%	214	18.2%
HIV/AIDS	18	2.9%	14	2.7%	0	0.0%	32	2.7%
Survivor of Domestic Violence	FBP Count	FBP%	MSH Count	MSH%	PNH Count	PNH%	Total Unduplicated	Total Unduplicated - %
Currently Fleeing Domestic Violence intake	190	31.1%	90	17.1%	9	16.7%	284	24.1%
at intake	57	9.3%	29	5.5%	6	11.1%	90	7.6%
Chronic Homeless - at intake	195	31.9%	59	11.2%	30	55.6%	282	24.0%
Veterans	62	10.1%	32	6.1%	2	3.7%	95	8.1%
Age	FBP Count	FBP%	MSH Count	MSH%	PNH Count	PNH%	Total Unduplicated	Total Unduplicated - %
18-24	43	7.0%	56	10.6%	3	5.6%	102	8.7%
25-59	441	72.2%	369	70.0%	37	68.5%	836	71.0%
60+	127	20.8%	102	19.4%	14	25.9%	239	20.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Ethnicity	FBP Count	FBP%	MSH Count	MSH%	PNH Count	PNH%	Total Unduplicated	Total Unduplicated - %
Non-Hispanic/Latino	561	91.8%	437	82.9%	53	98.1%	1,037	88.1%
Hispanic/Latino	47	7.7%	87	16.5%	1	1.9%	134	11.4%
Unknown	3	0.5%	3	0.6%	0	0.0%	6	0.5%
Race	FBP Count		MSH Count		PNH Count		Total Count	% of Total
White	464	75.9%	303	57.5%	44	81.5%	798	67.8%
Black or African American	118	19.3%	189	35.9%	8	14.8%	313	26.6%
Multiple races reported	9	1.5%	12	2.3%	1	1.9%	22	1.9%
American-Indian or Alaska Native	4	0.7%	6	1.1%	1	1.9%	11	0.9%
Asian	6	1.0%	1	0.2%	0	0.0%	7	0.6%
Native Hawaiian or Pacific Islander	7	1.1%	5	0.9%	0	0.0%	12	1.0%
Unknown	3	0.5%	11	2.1%	0	0.0%	14	1.2%

Describe the size and demographic composition of qualifying populations within the PJ's boundaries:

The city of Brockton, located in Plymouth County, has a population of 105,446, as reported by the 2020 census Bureau.¹ The average household income in Brockton is \$58,469 and the rate of poverty is 14.80%,² with an unemployment rate of 8.3%. From 2010 until 2020, The city saw a -4.8% change in

¹ <https://www.census.gov/quickfacts/brocktoncitymassachusetts>

² <https://www.census.gov/quickfacts/brocktoncitymassachusetts>

the number of housing units in the area³. In addition, the city has an elderly rate (persons 65 and older) of 13.1%⁴.

Homeless as defined in 24 CFR 91.5

The population of homeless individuals according to the 2022 PIT was 2,246 and the count for homeless families was 291. It is important to clarify that these figures are for the entire CoC. Brockton's population overall is only about 20% of the total CoC population although the homeless population may be overrepresented in the city, especially as Boston clears the encampment at Melnea Cass Boulevard and Massachusetts Avenues frequently called Mass and Cass.

Below is the CoC's Point in Time Count data for 2022, provided by Faber Bills and MainSpring in May 2023.

Organization Name	Project Name	Geo Code	McKinney-Vento	PIT Count
Brockton Housing Authority	Welcome Home	250354	Yes	10
Developmental Disabilities, Inc	Carolina Shelter	259023	No	41
DOVE	DOVE Shelter	251992	No	17
Family and Community Resources Inc	Rapid Rehousing and Supports for DV Survivors	250354	Yes	14
Father Bill's & MainSpring	Anderson House	259023	No	5
Father Bill's & MainSpring	BCIJ Consolidated Project	251992	Yes	196
Father Bill's & MainSpring	BSSHA	251962	No	4
Father Bill's & MainSpring	Charlotte's House	251992	No	3
Father Bill's & MainSpring	Chronic Homeless Scattered Site-Home & Healthy for Good	251962	No	7
Father Bill's & MainSpring	Conway House	259023	No	31
Father Bill's & MainSpring	Erie Ave	250354	No	13
Father Bill's & MainSpring	ESG COVID RRH Brockton	250354	Yes	15
Father Bill's & MainSpring	ESG COVID RRH Quincy	250354	Yes	11
Father Bill's & MainSpring	ESG-RRH: Emergency Solutions Grant	250354	Yes	6
Father Bill's & MainSpring	Father Bill's Place	251992	Yes	139
Father Bill's & MainSpring	Father Bill's Project	251962	Yes	226
Father Bill's & MainSpring	Grove St	250354	No	7
Father Bill's & MainSpring	Jack's Place	250354	No	14
Father Bill's & MainSpring	Lexington St.	250354	No	13
Father Bill's & MainSpring	MainSpring House	250354	Yes	163
Father Bill's & MainSpring	Marshfield Veteran House	259023	Yes	1

³ <https://www.towncharts.com/Massachusetts/Housing/Brockton-city-MA-Housing-data.html>

⁴ <https://www.census.gov/quickfacts/brocktoncitymassachusetts>

Father Bill's & MainSpring	MHSA-Pay for Success	250354	No	28
Father Bill's & MainSpring	Montello II	250354	No	20
Father Bill's & MainSpring	My Home Consolidated Project	250354	Yes	62
Father Bill's & MainSpring	O'Neil House	251992	No	3
Father Bill's & MainSpring	Patty's House	250354	No	5
Father Bill's & MainSpring	Perkins St.	250354	No	4
Father Bill's & MainSpring	Rodeway - Permanent Supportive Housing	250354	No	13
Father Bill's & MainSpring	Scattered sites	250354	No	252
Father Bill's & MainSpring	Sheila McIntyre House	251992	Yes	7
Father Bill's & MainSpring	Tom's House	252784	No	3
Father Bill's & MainSpring	Tribou Street	250354	No	6
Father Bill's & MainSpring	VA - GPD: Grant Per Diem Housing	250354	No	14
Father Bill's & MainSpring	VA - Worth Program	250354	No	11
Father Bill's & MainSpring	Wareham - Evergreen House	259023	Yes	8
Father Bill's & MainSpring	Work Express Housing	250354	Yes	15
Father Bill's & MainSpring	Y Initiative - Brockton	250354	No	4
Father Bill's & MainSpring	Y Initiative- Quincy	251992	No	7
Friends of the Homeless	Friends of the Homeless	252784	No	42
Health Imperatives Inc.	Penelope's Place	250354	No	10
NeighborWorks Housing Solutions	HomeBASE - RRH	250354	No	186
NeighborWorks Housing Solutions	Housing Solutions-Family Shelter	259023	No	23
NeighborWorks Housing Solutions	Weymouth Veterans House	252784	No	5
Old Colony Y	Brockton Family Life Center	250354	No	51
Old Colony Y	David Jon Louison Family Center	250354	No	61
Old Colony Y	Old Colony Y-Congregate	250354	No	40
Old Colony Y	Supportive Housing for Families Expansion Project	250354	Yes	55
Peabody Properties	Howard House	250354	No	14
Plymouth Area Coalition for the Homeless	Pilgrim's Hope	259023	No	39
Plymouth Task Force to End Homelessness	Next Step House	251962	No	4
Plymouth Task Force to End Homelessness	Overnights of Hospitality	251962	No	15
U.S. Department of Veterans Affairs	VASH	251992	No	291
Volunteers of America MA	VOAMA-SSVF	251992	No	12
				Sum: 2246

Highlighted text represents sites located in Brockton

At Risk of Homelessness as defined in 24 CFR 91.5

The city of Brockton has three primary organizations that provide supportive housing opportunities for the homeless populations, and they are Father Bill's and Mainspring, Family and Community Resources and Old Colony YMCA Family Center. Together, these organizations provide various programs to help homeless individuals and their families when they are at-risk or become homeless.

Brockton Area Multi Services Inc. (BAMSI's) helpline program provides information and referrals to individuals and families housing insecure, at risk of homelessness, or homeless. In addition to information and referral services, helpline staff act as advocates to help callers navigate the various resources available, including calling shelters to find beds. When available, helpline also provides money to help pay rent, mortgage or utility bill, usually state RAFT funds.

The organization's COPE Center serves a sizable percentage of homeless and at-risk individuals, providing tents, sleeping bags, socks and warm clothes, and other basic needs but does not specifically target homeless individuals. BAMSI offers a variety of services that complement those targeted to the homeless. BAMSI Health and BAMSI Community especially offer behavioral health, peer support, recovery and employment assistance.

With the recent implementation of the coordinated entry system for people at risk of and experiencing homelessness, service gaps are becoming less significant. The CoC operates with a no-wrong door approach and utilizes common assessment tools to ensure any individual or family seeking homelessness assistance is screened in the same way and prioritized according to their needs. Our CoC also employs a regional network coordinator, which is a dedicated position responsible for ensuring resources are well synced and that the diverse stakeholders are working collaboratively.

Despite the high level of coordination within the service delivery system, the CoC has identified some gaps. For example, there are inadequate resources for youth experiencing homelessness, and our current effort to develop a plan to end youth homelessness will attempt to set clear goals for eliminating those service gaps. The region also continues to be challenged by extremely high housing costs, and significant gaps between skills/opportunities and jobs that pay family-sustaining wages.

While there are strong local partnerships that effectively connect those experiencing homelessness to services, there are always unmet needs. This is particularly true for behavioral health services. Detox has become more accessible in recent years, but accessing longer-term mental health and substance use treatment can still be challenging.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

According to the 15th Annual Domestic Violence Counts Survey (taken on 9/10/2020), there were 1,892 victims of domestic violence served in one day, and 434 unmet requests for services.⁵ In the city of Brockton, there are 3 domestic violence and abuse shelters and programs; 2 offer shelter services, and all three offer a domestic violence hotline. The profile of domestic violence victims is scant in Brockton because service delivery is confidential. Nevertheless, the issue exists in the city, as in any metropolitan area, evidenced by the presence of shelters offering services to victims and media accounts of tragedies providing anecdotal insight into the details of specific cases.

Family and Community Resources (FCR) focuses on finding safety for families fleeing domestic violence. It offers a variety of services to prepare for successful separation as it is one of the most common ways that women and families become homeless. Approximately five years ago, FCR introduced the Greater Brockton Area Task Force on Sexual Assault and Domestic Violence, which launched the Brockton Area High Risk Initiative to streamline services for those in danger of domestic violence. The initiative also began to place emphasis on a team approach transitioning from a focus on education and cross training.

With the shift, came a high-risk assessment team to help remove potential victims of domestic violence from volatile situations and provide services to keep them out of danger. The change also allowed for monitoring for groups that often fall through the cracks, including disabled women and members of the LGBT community. In addition to FCR, the Greater Brockton Domestic and Sexual Violence Task Force members includes Health Imperatives and South Shore Women's Resource Center, along with public agencies, such as the VA Boston Healthcare System in Brockton.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice

The overwhelming housing need for low-income Brockton residents is affordable housing. A great majority of all reported housing problems relate to housing cost burdens among residents, particularly among low- and moderate-income populations. In addition, the lack of maintenance, resulting in housing violations, and the lack of accessibility can and has resulted in many persons being faced with foreclosures or becoming at risk of homelessness.

This section uses language about individuals at-risk of homelessness to focus on housing instability and its connection to the topic. Persons at risk of homelessness are defined as individuals or families facing immediate eviction and cannot relocate to another residence or shelter. Definitions include the following: someone who has moved two or more times within 60 days because of economic reasons, is doubled up with another household, has been notified they must vacate their current housing within 21 days, is paying to live in a hotel/motel, is living in an overcrowded situation, or, otherwise, lives in housing that is unstable. An examination of the data on overcrowding and cost burdened households provides some insight into the extent of the problem. Households with extremely low incomes, ranging from 0 - 30% of median income, represent the most stressed and vulnerable group.

⁵ <https://nnedv.org/wp-content/uploads/2021/05/15th-Annual-DV-Counts-Report-Massachusetts-Summary.pdf>

Apartments that have Board of Health violations cause renter instability. If the apartment is condemned, the occupants must vacate even if they have nowhere to go. Such renters often live in less-than-ideal circumstances out of fear eviction will occur. Rodents, no heat, general disrepair are some of the challenges faced by renters living in poor housing conditions to name a few. Individuals who fall under the category of the operational definition of the at-risk group are linked with instability and an increased risk of homelessness. In addition, households are most at-risk when there is a mismatch between affordability and income.

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing (Optional):

As of the [2022](#) Continuum of Care Housing Inventory Count (HIC), there were a total of 1,293 beds for households with children, eg, families,, and 468 shelter units for families.⁶ For individuals, there were a total of 983 beds. Year-round, there were 2,276 beds, 20 total seasonal and 82 overflow beds. In 2020, there 247 were emergency shelter beds available for individuals. For veterans, there were 15 shelter beds available. Once again, this data for the entire CoC is used to illustrate anecdotal need in Brockton.

Describe the unmet housing and service needs of qualifying populations:

The city has a total of 33,861 housing units, of which, 15,237 are rental -- 45% of all units. 94% of all housing units in the city are currently occupied, with a 6% vacancy rate.

QP1: Homeless as defined in 24 CFR 91.5

As of the 2022 PIT count, there were 2,246 sheltered and unsheltered homeless individuals in the CoC and 2,276 shelter beds.

QP2: At-Risk of Homelessness as defined in 24 CFR 91.5

The rising FMR standards in Brockton continue to put the lowest-income households at risk and make it difficult for those who are experiencing homelessness to become rehoused. This means that costs put a return to living in a safe home out of the at-risk population's risk. Rental assistance and permanent supportive housing dedicated to homeless households are the most effective strategies to reduce continued housing insecurity. The Brockton Housing Authority has identified the following

⁶ https://files.hudexchange.info/reports/published/CoC_HIC_State_MA_2020.pdf and <https://docs.google.com/spreadsheets/d/1cBvrKI-VE0rZifCKxkjXLkVuCA5-37W7/edit?usp=sharing&ouid=109154336015908469586&rtpof=true&sd=true>

characteristics as key aspects of increases in homelessness: Increases in monthly rent and code violations – unclean and unsanitary units.

A key partner is Neighborworks Housing solutions due to its work in providing rental assistance to the most vulnerable during the COVID pandemic. The program is especially popular because it assists at-risk homeowners and renters, pay for the following:

- Rent arrears
- Mortgage arrears
- Moving-related expenses (first/last/security, moving trucks and furniture)
- Utility arrears

It has a benefit cap of \$7,000 per year with the income restrictions at or below 50% of Area Median Income (AMI), or 60% of AMI for households who are at risk of domestic violence.

QP3: Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

There were 22 beds designated for domestic violence victims within the CoC, 10 at one shelter within a CoC community and 12 at another within Brockton. There was a 131% utilization rate at the facility with 10 beds and 83% rate at the one with 12 in Brockton.

QP4: Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice

Severely cost-burdened ELI households are considered a Qualifying Population under “Other populations” defined in Notice CPD 21-10. Severe cost burden means that a household is paying more than half of its income toward select housing costs. The CHAS data outlines how prevalent this issue is for very-low income households, which are paying more than half of their income toward housing costs.

“Other Populations” receive supportive services or assistance that prevent the household’s homelessness or would serve those with the greatest risk of housing instability. This population is housed due to temporary or emergency assistance, and need additional assistance or supportive services to avoid homelessness;

- Have an annual income less than 30 percent AMI (Extremely Low Income, or ELI) and are severely cost burdened; or
- Have an annual income less than or equal to 50 percent AMI (Very Low Income, or VLI) and meets certain conditions that may include exiting a publicly funded institution, living in a hotel/motel, undergoing eviction, moving two or more times in the past 60 days, and more.

CHAS data is the primary source available to analyze qualifying populations in this category.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a Whole	3,530	2,585	365
White	1,025	950	140
Black / African American	1,395	995	160
Asian	115	0	0
American Indian, Alaska Native	40	0	0
Pacific Islander	0	0	0
Hispanic	590	405	60

**Table 22 – Severe Housing Problems 0 - 30%
AMI**

Data: 2013-2017

Source: CHAS

*The four severe housing problems are 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a Whole	1,895	2,985	0
White	765	1,210	0
Black / African American	810	1,150	0
Asian	25	25	0
American Indian, Alaska Native	0	35	0
Pacific Islander	0	0	0
Hispanic	200	315	0

The housing need is greater than the supply in the city of Brockton, and thus, the city is faced with the challenge of how it can support production programs or opportunities that can close the gap.

In addition, the dominant housing problem facing the city's residents is housing-cost burden. Over 80% of Brockton's households experience a housing cost burden as defined by Congress and the U. S. Department of Housing and Urban Development. Nearly 60% of households have severe cost burdens and 30% have a moderate cost burden. Regardless of ethnicity, housing cost burden proves to be the most significant housing problem in the city for low-income households whether owners or renters.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	18,210	7,495	6,120	375
White	9,180	2,765	2,065	140
Black / African American	5,765	3,035	2,455	170
Asian	285	85	130	0
American Indian, Alaska Native	40	35	60	0
Pacific Islander	0	0	0	0
Hispanic	1,390	840	840	60

Table 26 – Greater Need: Housing Cost Burdens AMI

Data Source: 2013-2017
CHAS

Cost Burden	Owner	Rental	Total
<=30%	11,995	6,985	18,980
30-50%	3,335	3,655	6,990
>50%	2,025	3,480	5,505

Table 27 - 2015-2019 CHAS: Housing Cost Burden Overview

Discussion:

It is imperative that the preservation of existing rental units that are subsidized, as well as those affordable rental units provided by private landlords is an important strategy for the city. Rehabilitation programs and other preservation approaches can help tremendously. For owners, approaches may include lowering utility costs through retrofitting of energy, and water improvements.

Identify any gaps within the current shelter and housing inventory as well as the service delivery system:

A chart posted above is the 2022 Point in Time Count Continuum of Care Housing Inventory Count from Father Bill's & MainSpring. In this data, veteran and DV beds are counted within the family and adult units. For reference, in the 2022 HIC, there were 12 DV beds in six units in Brockton and 10 beds in three units across the CoC. Numbers for beds are year-round figures. Father Bill's had 82 overflow beds available on the night of the 2022 PIT count (beds or floormats). Veteran and DV victims are counted within Adults and Family for the current gap calculation. During the 2022 PIT count, there were the following circumstances:

- 17 individuals currently fleeing DV in a DV shelter in the CoC
- 10 individuals in the DV shelter in Brockton

Based on the figure showing that there were 2,246 homeless individuals in the CoC and 2,276 beds on the day of the PIT count, there seems to be a surplus in the number of beds. However, numerous providers emphasized the PIT's data limitations: PIT counts only account for one night of the year, do not count those who are "doubling up" or living in a hotel/motel without assistance, and may undercount those living in their cars or in another uncaptured setting not fit for human habitation. While there is a demand in the region for housing at a range of income

levels, for HOME-ARP qualifying populations based on income, specifically the nearly 60% of households that have severe cost burden, the gap in affordable units is a great burden.

Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of “other populations” that are “At Greatest Risk of Housing Instability,” as established in the HOME-ARP Notice. If including these characteristics, identify them here:

This section will be added.

Identify priority needs for qualifying populations:

Information for the number of victims of domestic violence seeking emergency shelter in the city is limited. There are no designated shelter beds for elderly individuals, and though there are approximately 20 senior housing options, there are no low income/affordable senior housing options.

Rental assistance is highly needed for households at risk of homelessness to aid with high rent burdens. Supportive services are also needed for individuals with housing instability, and individuals fleeing or attempting to flee domestic violence, dating violence, stalking, sexual assault and human trafficking.

The challenge facing QPs is the need for various types of deeply affordable rental housing and supportive services. Moving homeless, at-risk, and other qualifying populations into suitable housing will provide these households with the stability necessary to focus on other needs they may be experiencing.

- Sheltered and Unsheltered Homeless Populations require rental housing development to alleviate their challenges.
- Those at-Risk of Homelessness need immediate assistance with rental assistance through Section 8 vouchers or tenant based rental assistance, eligible for funding by HOME-ARP funds.
- Those Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking would benefit from an increase of designated units for their use. Currently, there are only 22 such units throughout the entire CoC

region. Rental assistance funding could be used to sponsor more units for those fleeing DV.

- “Other” Populations - Other Families Requiring Services or Housing Assistance to Prevent Homelessness and Those at Greatest Risk of Housing Instability: Tenant-based rental assistance will assist those who are cost burdened. Another strategy would be to subsidize the development of supportive housing units that provide financial coaching and other education about managing budgets and avoiding financial instability.
- Veterans and families that include a veteran family member that meet the criteria in one of the populations above: Over the course of this research, there has been little mention of extensive support available to veterans. As a result, HOME-ARP funds could be used to support veterans through wrap-around services and rental vouchers to ensure housing security.

Explain how the PJ determined the level of need and gaps in the PJ’s shelter and housing inventory and service delivery systems based on the data presented in the plan:

The BRA determined the level of need and gaps in the shelter and housing inventory and service delivery systems based on the reviewed datasets from 2015-2019 CHAS data, 2022 PIT counts, 2022 Housing Inventory Counts (HIC), 2020-2022 McKinney-Vento data, 2017-2021 American Community Survey (ACS) estimates, Public Housing Authority data, and other miscellaneous datasets and reports from providers.

As a result, BRA found that gaps in the program delivery system are largely attributable to fiscal constraints. As program administrative requirements continue to grow and as annual entitlement amounts continue to shrink, it becomes increasingly difficult to engage adequate staff capacity to implement all elements of needed community services. Consequently, the BRA must sometimes seek out independent contractors or engage in interagency agreements to carry out certain program responsibilities and activities.

Case conferencing within the coordinated entry system allows the CoC to identify systemic gaps and raise those up to an executive committee for advocacy and strategy development. The executive committee meets quarterly to discuss strategies related to priority needs and then charges working groups with implementation. It reports on its work to the general committee of the CoC twice per year. That body consists of over 140 members who evaluate progress and provide additional insight into priority needs and potential strategies to address them.

Recent examples of such strategies to overcome gaps in institutional structure and the service delivery system include an initiative to create homeless preferences with local housing authorities and private owners in HUD's 202 program and a partnership with Brockton Hospital to pilot a respite bed project targeting high utilizers of emergency services. FBMS continues to work to develop partnerships with behavioral health and other service providers to ease access and establish priority for homeless households.

HOME-ARP Activities

Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:

Solicitation for applications for funding will be placed on the city's website, BRA website and social media outlets. The BRA will also do a legal notice posting on the *Brockton Enterprise*. Equal opportunity will be provided to all applicants through our RFP and procurement process.

When it issues requests for proposals for HOME-ARP funds, the BRA will do so in a manner that abides by HUD procurement standards, although there will be an effort to manage projects internally. For outsourced projects, accepted RFP's must show a capacity to best meet the needs of Brockton's qualifying populations, have demonstrated experience with one or more of the eligible activities, and align with the competitive criteria, HOME-ARP standards, budget requirements, and existing planning efforts (the Annual Action Plan, the Five-Year Consolidated Plan, etc.) will receive priority consideration.

The BRA will review all work produced for the HOME-ARP projects for compliance that fulfill HOME and all regulatory requirements. The final review of responses and award notice dates are to be determined. However, the BRA hopes to begin the process shortly following Plan approval. As with the regular HOME program, rental developments are subject to underwriting and must include the appropriate requirements in their agreements, including inspections during the affordability periods. All approved projects are subject to monitoring by the BRA.

Describe whether the PJ will administer eligible activities directly:

The city of Brockton acting by and through the Redevelopment Authority will, in some cases, through an RFP process seek and engage qualified agencies to carry out HOME-ARP activities. Outsourcing the programs could change, though, with enough staff capacity at the BRA. At this point, the BRA will be primarily responsible for the administration and planning of the HOME-ARP Plan and for enforcing compliance standards. Circumstances could change with additional staff that would allow for direct program administration.

If any portion of the PJ's HOME-ARP administrative funds are provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:

Not Applicable. The city of Brockton did not provide any portion of its administrative funds to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan.

In accordance with Section V.C.2. of the Notice (page 4), PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.

Template:

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 200,000.00		
Acquisition and Development of Non-Congregate Shelters	\$ #		
Tenant Based Rental Assistance (TBRA)	\$ 380,000.00		
Development of Affordable Rental Housing	\$ 1,201,983.35		
Non-Profit Operating	\$ #	# %	5%
Non-Profit Capacity Building	\$ #	# %	5%
Administration and Planning	\$ 314,467.65	# %	15%
Total HOME ARP Allocation	\$ 2,096,451.00		

Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:

The Brockton Redevelopment Authority (BRA) will allocate \$200,000 (9.54%) of the HOME-ARP Funds to supportive services. Supportive Services will include case management, mental health and substance abuse counseling, life skills, budgeting, job search and transportation. \$380,000 (18.13%) will be allocated for tenant based rental assistance for households at risk of becoming homeless among all qualifying populations. Fifteen percent (\$314,467.65) will be set-aside for administration and planning of the HOME-ARP Program.

BRA will allocate \$1,201,983.35 (57.24%) of the HOME-ARP Funds for development of affordable rental housing. These funds will be utilized to cover construction, soft costs and developer fee for each affordable housing project. The Brockton Redevelopment Authority will be responsible for the administration and planning of the HOME-ARP Funds in addition to managing the eligible activities directly when it is possible to do so.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

There is a need for the approach described in the plan due the realities of the local housing market cited in this *Brockton Enterprise* article: “According to the National Low Income

Housing Coalition's 2021 *Out of Reach* report, "...the average hourly wage of Brockton's renters, which make up nearly 30% of the population, is \$11.91. The fair market rate for a two-bedroom in the city is \$1,560 a month. So, to afford a two-bedroom in Brockton, the average renter must work two and a half full-time jobs." Thus, priority of the proposed projects are based on the community needs. As expressed in the housing analysis and charts above, there is a significant gap in the number of affordable rental housing units for all QP's. Due to this factor, we are prioritizing most of the funds to be allocated for acquisition and development of affordable rental units.

DV-focused housing has minimal affordable units within the city. The City's bed availability for victims fleeing or survivors of domestic violence is only 10, which rises to 22 with an additional 12 within the entire CoC region.

Connections between homelessness and addiction are prevalent, and investment into supportive services such as substance abuse counseling and rehabilitation can aid in reducing the percentage of homeless individuals and families in The City.

HOME-ARP Production Housing Goals

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

The city estimates six to 10 new affordable housing units will be created from the recommended allocation. The BRA is in early conversation with our PHA since it has a history of administering the HOME program, as well. It has carried out affordable rental projects with HOME funds. Strategies to use the funds to create 6-10 affordable rental units are being discussed. The BRA will seek to leverage additional funding with hopes of bringing this goal into fruition and provide more affordable units to the qualifying populations.

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how the production goal will address the PJ's priority needs:

The goal is six to 10 affordable housing units produced with the ARP funds based on section 220-Housing in Urban Renewal Areas as provided by the HOME limits.

Preferences

In accordance with Section V.C.4 of the Notice (page 15), the HOME-ARP allocation plan must identify whether the PJ intends to give a preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. **If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan.** For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ's HOME-ARP allocation plan. Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

Template:

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

The city intends to give no preferences to any group, as it works to serve the qualifying populations by using and deploying HOME-ARP funds.

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and

families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

No preference was identified.

Acquisition and Development of Affordable Rental Units: There will be no preferences.

Referral Methods

PJs are not required to describe referral methods in the plan. However, if a PJ intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the PJ must ensure compliance with Section IV.C.2 of the Notice (page10).

A PJ may use only the CE for direct referrals to HOME-ARP projects and activities (as opposed to CE and other referral agencies or a waitlist) if the CE expands to accept all HOME-ARP qualifying populations and implements the preferences and prioritization established by the PJ in its HOME-ARP allocation plan. A direct referral is where the CE provides the eligible applicant directly to the PJ, subrecipient, or owner to receive HOME-ARP TBRA, supportive services, admittance to a HOME-ARP rental unit, or occupancy of a NCS unit. In comparison, an indirect referral is where a CE (or other referral source) refers an eligible applicant for placement to a project or activity waitlist. Eligible applicants are then selected for a HOME-ARP project or activity from the waitlist.

The PJ must require a project or activity to use CE along with other referral methods (as provided in Section IV.C.2.ii) or to use only a project/activity waiting list (as provided in Section IV.C.2.iii) if:

1. the CE does not have a sufficient number of qualifying individuals and families to refer to the PJ for the project or activity;
2. the CE does not include all HOME-ARP qualifying populations; or,
3. the CE fails to provide access and implement uniform referral processes in situations where a project's geographic area(s) is broader than the geographic area(s) covered by the CE

If a PJ uses a CE that prioritizes one or more qualifying populations or segments of qualifying populations (e.g., prioritizing assistance or units for chronically homeless individuals first, then prioritizing homeless youth second, followed by any other individuals qualifying as homeless, etc.) then this constitutes the use of preferences and a method of prioritization. To implement a CE with these preferences and priorities, the PJ **must** include the preferences and method of prioritization that the CE will use in the preferences section of their HOME-ARP allocation plan. Use of a CE with embedded preferences or methods of prioritization that are not contained in the PJ's HOME-ARP allocation does not comply with Section IV.C.2 of the Notice (page10).

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):

The Brockton Redevelopment Authority did not set up a referral method to be used for the HOME-ARP projects and activities. However, when the plan is approved, possibly through an RFP process, the BRA will request for the applicant to specify their referral methods in carrying out the HOME-ARP activities.

If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered. (Optional):

Not applicable. The BRA does not intend to use the coordinated entry process established by the CoC.

If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional):

Not applicable

If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional):

Not applicable

Limitations in a HOME-ARP rental housing or NCS project

Limiting eligibility for a HOME-ARP rental housing or NCS project is only permitted under certain circumstances.

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance

with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.

- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.
- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:

The City of Brockton will not impose eligibility limitations for HOME-ARP rental housing, supportive services, and rental assistance to a particular qualifying population.

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

N/A

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):

N/A

HOME-ARP Refinancing Guidelines

The City does not intend to utilize HOME-ARP funds to refinance existing debt.

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with 24 CFR 92.206(b). The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project, including:

- *Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity*

N/A

- *Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.*

N/A

- *State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.*

N/A

- *Specify the required compliance period, whether it is the minimum 15 years or longer.*

N/A

- *State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.*

N/A

- *Other requirements in the PJ's guidelines, if applicable:*

N/A