

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

During the Consolidated Plan's first program year, 2018, the Brockton Redevelopment Authority and the City of Brockton Planning and Economic Development Department believe we have met our objectives and responsibilities under the 2018 Annual Plan. As this is year one, there is still much work to be done in accomplishing our major goals, but this year we have made many strides in the right direction. Major HOME funded projects are completed or well underway. The rescue of foreclosed homes initiative has expanded making concrete results and continues in such a manner as to better leverage other resources enlisted for this cause; facade improvement projects have been completed with matching funds; homeowner rehabilitation assistance has grown to provide more low income families with much needed repairs to their homes; financial assistance were provided to low-mod income persons for down payment and closing costs; and all public service projects have been completed to the benefit of many low and moderate income residents.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Homeless and At-Risk of Homelessness Services	Homeless	CDBG: \$	Homelessness Prevention	Persons Assisted	500	50	10.00%	100	50	50.00%

Homeless Prevention	Homeless	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5000	5986	119.72%	1000	5986	598.60%
Increase Access for Homeownership	Affordable Housing	HOME: \$	Direct Financial Assistance to Homebuyers	Households Assisted	40	9	22.50%	10	9	90.00%
Increase Supply of Affordable Housing	Affordable Housing	HOME: \$	Rental units constructed	Household Housing Unit	25	0	0.00%	5	0	0.00%
Increase Supply of Affordable Housing	Affordable Housing	HOME: \$	Rental units rehabilitated	Household Housing Unit	25	12	48.00%	5	12	240.00%
Preserve Existing Housing Stock	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	75	10	13.33%	15	10	66.67%
Promote Economic Development	Non-Housing Community Development	CDBG: \$	Facade treatment/business building rehabilitation	Business	10	2	20.00%	2	2	100.00%
Promote Economic Development	Non-Housing Community Development	CDBG: \$	Jobs created/retained	Jobs	25	0	0.00%	5	0	0.00%
Promote Services that Promotes Self Sufficiency	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	250	112	44.80%	50	112	224.00%

Revitalize Target Neighborhoods	Affordable Housing	CDBG: \$	Homeowner Housing Added	Household Housing Unit	0	2		2	2	100.00%
Revitalize Target Neighborhoods	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	75	2	2.67%			
Special Needs Housing	Non-Homeless Special Needs	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	500	5986	1,197.20%	1000	5986	598.60%
Stabilize and Improve At-Risk Neighborhoods	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	10000	5986	59.86%	10000	5986	59.86%

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

Our use of CDBG and HOME funds focused primarily on the city's vacant and abandoned housing stock, and creation of new housing through Southeastern Massachusetts Affordable Housing Corporation. Over the past year, we have rehabilitated 5 vacant and/or abandoned properties through our Receivership Program activity using CDBG funds. The Brockton Redevelopment authority expects to rehabilitate an additional 2 vacant properties in the coming year. These vacant properties will then be sold to first time homebuyers upon completion of the rehabilitation process. Additionally, we have been working more closely with the South Shore CoC on homeless solutions, more funding will be directed to supporting these efforts in the coming 4 years as we strengthen the partnership. The majority of our public service funded programs, assist in preventing homelessness through supportive services of low-moderate income populations. As well as the dedicated crime unit, working in and

with the population in target census tracts to build relationships with the community and provide all necessary support.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	CDBG	HOME
White	3,064	12
Black or African American	2,071	38
Asian	46	0
American Indian or American Native	2	0
Native Hawaiian or Other Pacific Islander	2	0
Total	5,185	50
Hispanic	987	0
Not Hispanic	4,198	50

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

Families of ethnic and racial compositions were greatly impacted by our public service activities.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	2,637,610	1,581,907
HOME	public - federal	577,068	820,817

Table 3 - Resources Made Available

Narrative

CDBG- Funds were utilized for public services, homeowner rehab, receivership acquisition rehab, commercial rehabilitation, and business facade improvement. The amount expended in this program year was \$1,581,907.39.

HOME- Funds were utilized for First Time Homebuyer down payment assistance, new construction of two-family dwelling and substantial rehabilitation at Chatham West. The amount expended was \$820,817.34.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Census tract 5104, 5108, 5109, 5114			
City Wide	75	75	
Downtown - Main Street	12	5	
Downtown Corridor/Business District			
Low and Moderate Census Tracts	13	20	

Table 4 – Identify the geographic distribution and location of investments

Narrative

Geographic Distribution is generally allocated by low and moderate-income areas within the city that have the most need. The crime rate was reduced due to unit patrols within the low and moderate-income census tracts throughout the city. The YMCA Cosgrove Pool is located in an area of the city that is surrounded by mostly children living in project-based housing. The program is geared toward providing a place for the city's youth to enjoy leisure time during the warm summer months. Other programs include The Facade Program which focus on low income business districts of the city in attempts to revitalize and attract business to these areas, down payment assistance and homeowner housing rehabilitation which increases access to homeownership and preserving housing livestock for low to

moderate income families.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

The BRA uses private financing (local bank) to leverage funds when doing housing developments. These developments consist of federal funds (CDBG and/or HOME) and a mortgage from a local bank. This also helped meet HOME's matching requirement.

The Mayor's Housing and Neighborhood Stabilization Advisory Group noted that the City (and its various agencies) was experiencing difficulties contacting banks to ensure that their vacant distressed properties were scheduled to be listed MLS (Multiple Listing Service). As part of the Mayor's Advisory Group the Plymouth County Registrar of Deeds shared our concerns with other communities and the AGO.

HOME - The Brockton Housing Authority's Massachusetts Rental Voucher Program fulfilled the City's HOME Match obligation during the reporting period, as shown in the HOME Match table below. In addition, the difference between a property's sale price and appraised value is another strategy to meet HOME's matching requirement.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	2,650,078
2. Match contributed during current Federal fiscal year	0
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	2,650,078
4. Match liability for current Federal fiscal year	110,175
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	2,539,903

Table 5 – Fiscal Year Summary - HOME Match Report

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match

Table 6 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at beginning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
0	613,775	0	0	0

Table 7 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period

	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Dollar Amount	0	0	0	0	0	0
Number	0	0	0	0	0	0
Sub-Contracts						
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0
	Total	Women Business Enterprises	Male			
Contracts						
Dollar Amount	0	0	0			
Number	0	0	0			
Sub-Contracts						
Number	0	0	0			
Dollar Amount	0	0	0			

Table 8 - Minority Business and Women Business Enterprises

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted

	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

Table 9 – Minority Owners of Rental Property

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition

Parcels Acquired		0	0			
Businesses Displaced		0	0			
Nonprofit Organizations Displaced		0	0			
Households Temporarily Relocated, not Displaced		0	0			
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

Table 10 – Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	2	1
Number of Non-Homeless households to be provided affordable housing units	0	0
Number of Special-Needs households to be provided affordable housing units	1	0
Total	3	1

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	11	3
Number of households supported through Rehab of Existing Units	11	23
Number of households supported through Acquisition of Existing Units	2	9
Total	24	35

Table 12 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

Our housing goals and objectives are a continued progress and we have made significant strides. The rising cost of rehabilitation (specifically material and labor cost) continues to be significant. There is also the fact that the many of the housing units we accept into the rehabilitation programs have some level of lead paint which needs to be dealt with at an additional cost. Families were provided with financial assistance through the City's down payment assistance program to acquire existing units; there were 3 new units constructed; and Chatham West requested HOME funds to rehab 300 of their units in which

11 were assisted with HOME Funds. HOME funds were committed to SMAHC for the rehabilitation of the two units and an ADA accessible unit. Accomplishments from this project will be include in the next reporting year since project was colpleted after end of FY18 and other projects will be reported as well.

The 277 households supported through rental assistance represent State vouchers issued through the Brockton Housing Authority and includes: 40 Alternative Housing Vouchers, 129 Massachusetts Rental Vouchers and 108 Department of Mental Health Vouchers. The BHA supported an additional 1563 households with Federal vouchers which includes 1018 Section 8 Vouchers and 545 Project Based Vouchers.

Discuss how these outcomes will impact future annual action plans.

There are two rental housing developments that are scheduled for groundbreaking. One project will be a new construction of 48 affordable housing units in which 11 are HOME-assisted; and 39 rental units for senior citizens in which 3 will be HOME-assisted. In addition, the jurisdiction is proposing to develop a new construction of two-family dwelling in which one unit will be HOME-assisted. The jurisdiction will also provide funding (if available) to developers for production/development of new housing units or substantial rehab of existing unit(s). The down payment assistance program will also aid households in acquiring existing units

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	3	1
Low-income	1	3
Moderate-income	1	29
Total	5	33

Table 13 – Number of Households Served

Narrative Information

In FY18, nine households were assisted in acquiring existing units through down payment assistance program. Two of these households were also supported in production of new units and rehab of existing units (note difference in total households supported on box #2 vs box #3). The production of new units were from the PJ's new constructon project of a two-family dwelling (two HOME-assisted units) and funding to a developer for a new construction projects for homeless veterans (1 HOME-assisted unit). At last, twenty-one households were assisted through rehab of existing units from the homeowner rehab project, recervership property (two units rehabbed), and substantial rehabilitation of 11 HOME-assisted units at Chatham West.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

Outreach is conducted to homeless unaccompanied adults in Brockton to assess their needs and provide assistance. Father Bill's & MainSpring (FBMS) operates MainSpring House, a low-barrier emergency shelter for homeless adults. Any homeless adult is provided shelter so long as the individual does not pose a safety risk. FBMS street outreach staff also conducts outreach and engagement of unsheltered individuals to encourage them to enter shelter and/or access housing directly.

In 2016, the Continuum of Care (CoC) adopted a written plan and began implementation of a coordinated entry system as required by the HEARTH Act. The CoC uses an evidence-based assessment tool, the Vulnerability Index & Service Prioritization Decision Assessment Tool (VI-SPDAT), with every homeless individual and family. Households are assessed for service needs and assisted with action plans for successful exits to housing or treatment. They are prioritized for HUD CoC permanent supportive housing and rapid rehousing assistance based on this assessment.

Any family in the CoC experiencing homelessness is directed to the local welfare office to be assessed for eligibility for diversion, rapid re-housing, or shelter placement in compliance with the Commonwealth of Massachusetts Emergency Assistance (EA) system. EA mandates that all eligible homeless families with dependent children are to be sheltered or otherwise kept out of homelessness. Family shelter providers must, by state contract, assess and engage the families they assist to develop and implement action plans for services and rehousing. There are no unsheltered families in Brockton due to the state EA mandate and to an extensive homeless family shelter and service network.

The CoC has been improving its assessment of homeless young adults in recent years. For the past five years it has conducted a homeless youth count and survey in concert with the annual homeless point-in-time count. These surveys capture data on youth both in shelters and no longer residing with their families but doubled-up or otherwise unstably housed. The survey and the quantitative count combined have greatly improved Brockton's response to unaccompanied homeless youth.

Addressing the emergency shelter and transitional housing needs of homeless persons

More than ten years ago, Brockton shifted its homeless shelter response to reduce barriers to entry and to engage, assess, and shelter nearly all homeless adults. No one is denied shelter unless they are a safety risk. As a result, on the night of the annual Point In Time Count in January 2019, there were only two unsheltered homeless individuals in Brockton. There were 349 households sheltered in Brockton that night, including 181 individuals and 168 families. Of all persons counted at the PIT, 299 were under

age 18.

As noted above, every eligible homeless family in Brockton who cannot be kept in housing is provided by the state with emergency shelter. FBMS and Old Colony YMCA are the family shelter providers for the Brockton area. There is also an emergency shelter for families experiencing domestic violence operated by Health Imperatives.

The CoC operates with a Housing First approach: whenever possible homeless persons are moved directly from the streets or shelter to housing, rather than requiring their placement in transitional housing as an interim step. The CoC however, does offer a 15-unit transitional housing program in Brockton for homeless veterans funded by the Veterans Administration. This program has a high success rate of placement into housing.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

In 2013, the Brockton Leadership Council recalibrated the Ten-Year Plan to End Chronic Homelessness with a goal of moving 50 chronically homeless individuals to housing in five years. Since then, FBMS was selected as the South Shore region's provider for the statewide Social Innovation Fund (SIF) initiative to house chronically homeless individuals. FBMS is providing 35 units, 20 of which are funded with new state rental subsidies; several of these are being targeted to chronically homeless individuals in Brockton. FBMS also opened two permanent supportive housing projects with a total of 45 units targeting chronically homeless individuals and homeless veterans. The CoC also continues to prioritize chronically homeless individuals and families for any HUD CoC-funded permanent supportive housing units that become available upon turnover. Old Colony YMCA added 5 housing units for chronically homeless families in Brockton in 2019 through CoC resources. Homeless individuals and families are assisted to access any affordable housing resource, but such resources remain extremely scarce given limited federal and state funding for affordable housing, especially long-term deep subsidies so households exiting homelessness do not experience homelessness again.

In FY18, according to FBMS data, the average length of stay in emergency shelter was 274 days for individuals and 373 days for families. Stays for homeless veterans are shorter, and approximately 50% exit rapidly to housing or to other appropriate next steps. FBMS has developed an array of programs and services for veterans which are funded by the VA, HUD, and others. Program staff engage veterans regardless of where they first enter our system, moving them to housing as rapidly as possible to shorten the time they experience homelessness, and connecting them to additional services as needed.

Homeless families are assisted to transition to permanent housing. Lengths of stay in shelter are longer

for families than for individuals, given the high cost of housing in this region and scarcity of long-term rental subsidies. The CoC has added workforce development resources to assist families to gain jobs and increase their incomes to afford and sustain housing. FBMS staff who assist homeless families with workforce development are co-located at the Brockton One Stop Career Center. Family shelter providers also provide rapid rehousing assistance using the state's HomeBASE program.

A priority for the CoC is to add housing resources for homeless unaccompanied youth given their rising numbers and the scarcity of housing targeted to their needs. The CoC's Unaccompanied Homeless Youth Committee was relaunched in 2015 with this housing goal. In 2018 the FBMS and Old Colony Y were awarded funding from the state for a new homelessness prevention and rapid rehousing project that will serve 100 unaccompanied homeless youth annually.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

Low-income families on the brink of becoming homeless are directed to the MA Department of Transitional Assistance (welfare office) in Brockton where they are assessed for eligibility for shelter under the state EA mandate. Both FBMS and NeighborWorks Housing Solutions have staff co-located at the Brockton welfare office to assess and assist families to avoid homelessness. Families that are deemed homeless, but who might be diverted from shelter to housing, are assisted by FBMS using state HomeBASE funds. Families that are not homeless, but at-risk, are assisted by FBMS and NeighborWorks Housing Solutions and may receive state prevention funds. Brockton Area Multi Services (BAMSI) Helpline also provides information, referral and prevention assistance to both families and individuals in the Brockton area using funds from the Emergency Food & Shelter Program (EFSP) and from private resources. South Coast Legal Services, Inc. provides free legal representation to low-income residents of Brockton who are in danger of losing their housing. FBMS operates the Tenancy Preservation Program (TPP) in this region, staffing an office at the Brockton Housing Court. TPP aids tenants who are at-risk of eviction due to their disability to remain housed.

Finally, the CoC tracks discharges from publicly funded institutions through its assessment of every homeless individual entering MainSpring House shelter, tracking where they stayed in the last seven days. Data on discharges from other systems of care is analyzed by the CoC and used to advocate with publicly funded institutions and policy makers to address inappropriate discharges to homelessness.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

Actions taken to encourage public housing residents to become more involved in management and participate in homeownership

The Residents Services Department, in collaboration with the Resident Advisory Board, continues to work together to provide leadership to the residents of the Brockton Housing Authority. Leadership training for tenant leaders continues. The purpose is to give voice to BHA resident leaders and assist them to take a contributing position in the organization and management of its 2000 residents. The organization of Tenant Councils continues to grow stronger and residents are taking more responsibility for the activities and direction of its residents. A strong leadership team has created a variety of programs that are able to reach out to as many residents as possible to teach, enrich and to brighten their lives. It is an excellent example of self-determination based on a beneficial collaboration. Many initiatives have been instituted, connecting with the local Council on Aging which sponsors many interesting programs and opportunities.

Twice a month Resident Advisory Board meetings are held. They meet at different locations in order to include more residents in the discussion. All Policies are reviewed by the Resident Advisory Board Before they are presented to the Board of Commissioners for consideration. The Family Self Sufficiency Program works diligently to sign up more residents, refer them to educational opportunities, help them with financial literacy, open up the possibilities of home ownership and raise their feelings of self-worth. 55 homeowners, six small business owners, and countless students are participating and making the most of learning and growing intellectually since the inception of the program.

Actions taken to provide assistance to troubled PHAs

The Public Housing Authority is not troubled.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

The City continues to take steps to create zoning which will promote affordable housing development such as Chapter 40R. The City of Brockton has designated five “Smart Growth” development districts which provide incentives for the development of affordable housing adjacent to transportation centers.

The City has also made changes to the following areas in an attempt to remove or ameliorate the negative effects of public policies serving as barriers to affordable housing.

- **Zoning Relief and Other Bonuses**
- **Inclusionary Housing**
- **Availability of Financing**
- **Accessory Apartments**
- **Gap Financing and Fee Reductions**
- **Permit Processing**

Compounding the need for affordable housing has been the loss of many units due to foreclosure. While these were not necessarily owned or occupied by households below 80% of median, it is reasonable to assume that a number of them were.

When regional housing costs recover and at some point, it is expected that there will continue to be insufficient funding for affordable rental and homeownership development, for rental assistance, for rehabilitation assistance, for foreclosure prevention funding and services, and first-time home-buyer financing assistance programs to meet the demands of low- and moderate-income residents and would-be residents of Brockton. Nevertheless, CDBG and HOME funds in conjunction with other resources have assisted or are assisting in the creation or restoration of affordable housing units. Programs have also now been established to assist First Time Homebuyers to receive ownership training, down payments and closing costs assistance.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

Major historic barriers to increased availability of high-quality, affordable housing continue to be extremely limited public funding and more limited private sector interest in developing affordable housing in Brockton. Brockton continues to work to create incentives to increase the supply of housing, including the adoption of zoning that will facilitate new development. Barriers to affordable housing in Brockton result from the market forces that affect the larger Eastern Massachusetts region and large sections of Southern New England. Since 2009 though, the supply of affordable housing continued to

contract sharply as the mortgage foreclosure in the City of Brockton remained unabated. This year, Brockton dedicated a substantial share of its CDBG funds to fight the negative impacts of vacant and blighted foreclosed properties on otherwise stable or potentially stable low and moderate-income neighborhoods. During this program year, the City worked to acquire and prepare to rehabilitate a certain number of those foreclosed and vacant properties, to rehabilitate them and then to sell some to trained and financially assisted income-eligible first-time homebuyers. The City also worked with Neighbor Works of Southern Mass to facilitate the first-time buyer assistance program. These actions were conducted in synchronization to help preserve the mid-level housing supply while increasing the affordable housing supply for those for who both price and supply constituted barriers to attaining affordable housing.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

The BRA's Homeowner Rehabilitation Program had assisted several homeowners in full lead abatement for their homes. Due to the lack of match funding and the high cost of lead removal, a full lead abatement is only approved when emergency repairs for the homes would disturb the lead paint surface, or if there are children under 6 years of age in the home. Any other interested citizens would be referred to the Mass Housing's "Get the Lead Out" program.

The City of Brockton, through the Brockton Redevelopment Authority, are working in cooperation with two (2) Community Based Organizations (Self-Help Inc./Neighborworks of Southern MA) and the Childhood Lead Poisoning Prevention Program (CLPPP) to continue operating the Lead Based Paint Hazard Control Program (LBPHCP). Based upon these existing relationships the LBPHCP will continue to provide all technical and financial assistance necessary to reduce lead hazards in approximately 144 low to very low-income households targeting pre-1978 rental units with EBL children.

Additionally, the Brockton Redevelopment Authority will notify of funding availability to the waiting list of applicants who have already applied for lead abatement assistance as a result of program marketing for previous grants and referrals from other agencies. To achieve these goals, we will employ additional program marketing tactics, which may include:

- Notification of funding availability to community-based organizations.
- Notification of funding availability to recipients of CDBG and HOME housing rehabilitation funds.
- Inserts in water bill mailings/Program information door hangers to Brockton Property owners.
- Public service announcements on Brockton Community Access (BCA)
- Informational handouts/brochures to families of children in the Self-Help Head start Program
- Lead staff will be seeking out opportunities to educate the community about the Lead Program, attend and present at community gatherings, and neighborhood group meetings.
- Develop public education and information materials, presentations and displays –
- Marketing in BRA'S Lead Program newsletters, media/new media outreach and website content.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

The Brockton Housing Authority's Family Self Sufficiency Program (FSS) gives residents the opportunity to learn, to earn and to save through an escrow program that potentially leads to homeownership. Residents become self-sufficient through hard work, saving, attendance at education and training programs, and their desire for success. BHA staff provides counsel and support to enable residents to improve their financial security and to build a better life for themselves, their families and future generations. The FSS program developed the *Raising Champions* program in 2012, which teaches FSS participants to teach their pre-school children literacy skills. During their five-year FSS term, people often use their FSS funds to gain employment or further their employment. FSS graduates leave their FSS five-year term with knowledge and understandings of the three steps required to project oneself into the next income bracket.

- Education that enables an individual to qualify for full employment,
- A job that allows the family to support itself without government assistance,
- Basic understanding of financial literacy concepts, money management and credit management.

Brockton has an extensive network of social service providers who work together even while singularly focused on a variety of specific socio-economic problems. As a group they approach trending problems from multiple perspectives and a depth of very particular experiences yet they all dedicate their efforts to reducing the numbers of persons living in poverty in Brockton and/or counteracting the negative social consequences of poverty. Economic development efforts in Brockton are focused on attracting businesses and developments that will create sustainable job opportunities for unemployed and underemployed lower income residents. Brockton consistently records higher unemployment rates than the Boston metropolitan area. Brockton, a city that thrived on the shoe industry has suffered acute effects of the loss of manufacturing jobs that has plagued the region over the past half-century. Now too, Brockton is forced to deal with the fallout of the housing crisis coupled with severe national unemployment that is even more acutely manifest in the City of Brockton. The City of Brockton has continued to be sought to improve the quality of life for its residents by reducing the number of families living at or below the poverty level and by trying to deal as best its resources permit, with the socio-economic factors contributing to – and caused by the housing foreclosure crisis. Many agencies and social service providers are working to alleviate the effects and eliminate the causes of poverty in Brockton. Several of them were provided CDBG funding for programmatic support over the program year.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

During the program year, a collaborative effort took place among local government, community-based organizations, and private concerns to assemble and integrate all available federal, state, local and private resources to have the greatest possible impact in staving off the most threatening consequences of rising foreclosures and declining economic circumstances. There was broad agreement that those resources are insufficient to address the growing scale of the problem but there has also been great determination to do the utmost to alleviate these conditions in Brockton to preserve and protect the substantial community development progress that has been achieved in recent years. During the

program year, the BRA under the direction of the Mayor worked closely with the Brockton Housing Partnership to craft responses to quickly changing housing, economic development, and public service needs and circumstances.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

The South Shore Regional Network Continuum of Care formed to bring together community agencies, government entities, faith-based organizations, and businesses to design and implement regional strategies to prevent, reduce, and end homelessness in the communities covered by the Network including Brockton. The South Shore Regional Network CoC was originally organized as two distinct CoC communities: the Brockton/Plymouth City and Couth CoC and the Quincy/Weymouth CoC. Since April 2009, with the support of the Commonwealth of Massachusetts to create ten regional network across the Commonwealth, the organizations operating in these two CoCs formed one Regional Network to build opportunities to merge their efforts into one formal CoC for the purposes of HUD CoC Planning resources; HUD CoC Program funds, including both Continuum of Care (CoC) and Emergency Solutions Grant (ESG) resources; and overall coordination and system planning on the regional basis. This network also includes other Norfolk county towns, currently in the Balance of State CoC. It is the intent of the Regional Network eventually to add those communities as well to this South Shore Regional Network CoC for the purposes of seamless planning and programming around homeless prevention, services and housing. The Executive Committee of the South Shore Regional Network CoC will work with HUD and representatives of the Balance of State CoC to identify how best to achieve this goal.

Throughout 2018, The “Mayor’s Housing & Neighborhood Stabilization Advisory Group” continues to be the forum for all stakeholders, housing advocates, social service agencies, public and private housing agencies would meet to discuss critical issues regarding the City of Brockton housing concerns. From the City’s Registration of Vacant, Foreclosed and Abandoned Property ordinance, the City of Brockton Receivership Program, or the review of the City’s Homeowner Rehabilitation program and its “Neighborhood Stabilization Strategies. Mayor Carpenter has designated this group to enhance the discussion and coordination of housing activities and programs in the City of Brockton, and has since continued with Mayor Rodriguez. He has made every effort to augment group members and City Departments (Code Enforcement, Building Department, Board of Health and City Council Representation) into this advisory group to continue our strategy efforts, provide a forum to discuss programs and critical housing challenges.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

The BRA drafted its Affirmatively Furthering Fair Housing Plan (“AFFH”) which was due to HUD on 10/4/2017 prior to the suspension of the AFFH tool. The BRA, in conjunction with the BHA and other local non-profit affordable housing agencies, continued its monthly "AFFH" stakeholder's meeting to collaborate on ways the City can continue to make efforts to eliminate discrimination and increase

access to housing within Brockton and surrounding communities. We recently created a Fair Housing Survey to collect feedback from local residents and people who work locally, about their perspective on fair housing issues.

As a community the City of Brockton continues to educate and provide programs that assist residents of Brockton of the many housing programs and resources that are available.

Brockton will also continue to use CDBG, HOME, and other funds as available, to develop affordable housing and affordable housing that is adaptable or accessible to people with mobility impairments.

During the past year, the City of Brockton has funded Southeastern Massachusetts Affordable Housing Corporation and the Brockton Housing Authority with HOME funds to acquire and rehabilitate vacant foreclosed housing and to create affordable housing units.

The Brockton Redevelopment Authority continues its work in coordination with the Mayor's Housing & Neighborhood Stabilization Advisory Group to identify vacant and abandoned buildings which are suitable for acquisition through the City's Receivership Program for the purpose of rehabilitation and resale to qualified first time homebuyers.

The City of Brockton, the Brockton Redevelopment Authority and the Brockton Housing Authority are members of the Brockton Housing Partnership which is a collaboration of local lenders and Fannie Mae and Massachusetts Housing Partnership, a collaboration of local financial institutions. We have worked with this group to establish lending programs such as "Buy Brockton" Mortgage Program.

Over the past several years we have published several brochures detailing the available housing programs and resources. At least twice a year we appear on the local cable community access station to discuss our various programs. The BRA have been using social media in this past year to promote housing programs and resources available to residents of Brockton.

Some actions that were taken to overcome the impediments identified in the PJ's analysis of impediments to fair housing choices were increasing access to appropriate housing for people with disability by adding a ramp that is ADA accessible to a disabled under the Homeowner Rehabilitation program. Also, HOME and CHDO funds were used on a developmental projects of 2 units and 1 ADA accessible unit. In addition, promoting financial empowerment for low-income households through expansion of homeownership opportunities by increasing access to homeownership through the Down Payment Assistance Program. Attracting new mixed use/mixed income development to R/ECAP areas by using tax foreclosed properties to incentivize private investment in the R/ECAP areas. Promoting equitable growth that spurs development to create diverse, affordable housing choices throughout the City. Brockton is adopting a Mandatory Housing Affordability (MHA) program that will require new development in all neighborhoods in the city to contribute to affordable housing and will create additional development capacity to accommodate more growth.

CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

HOME: Homeownership- To ensure long term affordability requirements of the HOME Program mortgages or restrictions of sale are filed with the Plymouth County Registry of Deeds on all rental, homebuyer and homeowner rehabilitation agreements. Recapture provisions are included in all homebuyer agreements calling for repayment if the property is sold within varying time periods keyed to the amount of assistance. Subordinations and/or discharges are prepared on a case by case basis. Each year when the City accepts proposals for HOME funds, applicants are required to supply specific information on primary beneficiaries of the intended project, number of minority persons served, target populations and service needs, along with development budgets. Monitoring is used to evaluate performance about meeting goals and objectives; compliance with HUD rules, regulations and administrative requirements; timely use of funds; and prevention of fraud and abuse of funds. There is also a system of performance measurement in place. Each recipient is required to relay information on anticipated goals of the project and identify actual measurable accomplishments including timeliness of expenditures, which are outlined in written agreements.

CDBG: Public Services as described in the 2018 plan, The BRA required, and subsequently received and reviewed as to accuracy, quarterly performance and fiscal reports from all social service providers funded with CDBG resources; additionally, the BRA staff made mid-year site visits to select entities to observe operations and review source files first-hand. With respect to other CDBG activities, the City of Brockton has used municipal (Inspectional Services) personnel and consultant engineers to oversee construction work. The BRA staff has made periodic inspections and has verified payment requests and supporting documentation, including HUD forms 11 and weekly payroll forms. Contract bid documents stipulated participation by Minority Business Enterprises (MBE) and Women Business Enterprises (WBE) and Section 3 to the greatest extent possible.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

In addition to the publicly advertised Citizen Participation process which included notification of proposed program amendments, the BRA continued to encourage input from public agencies, the business community, community-based organizations and other groups. Again, this year, under the auspices of the office of the Mayor, the BRA has made great efforts to outreach to community partners in terms of program performance and the identification of neighborhood needs and in formulating community development objectives, priorities and specific resource allocations. This included significant aspects of the process employed to develop the Annual Action Plans. The BRA has actively sought public input at advertised public hearings and invited written comments. The BRA has been active participants in forums on housing and community development issues and have taken part in collaborative dialogues centered on social issues particularly as relates to the housing foreclosure crisis. The BRA specifically outreached to a range of public entities focused on the areas of housing, public work, public services, planning and economic development. The BRA relied heavily on these consultations in implementing programs and projects, on monitoring and evaluating performance and on developing the Annual Plans.

The BRA conducted a Public Hearing for the CAPER of July 31, 2019 to inform the public about the CAPER and to also receive public comments on the report. The 15 day comment period was from August 1, 2019 through August 15, 2019.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

Not applicable.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

CR-50 - HOME 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

All scattered units of rental housing owned by the Brockton Housing Authority, Southeastern Massachusetts Affordable Housing Corporation and Montello Affordable Housing Corporation were inspected during the reporting year. The Brockton Housing Authority conducts annual inspections of all its rental units to ensure compliance with housing quality standards. The Brockton Redevelopment Authority (BRA) conducted its own independent inspection every three years since the sites are 1-5 units and only minor violations were discovered and quickly rectified upon inspection determination. Beacon Properties received HOME funding for five locations. Pines Homes, located at 73 Reservoir Street; Pine Gardens, located at 469 Pine Grove Drive; Pine Commons, located at 755 Oak Street; Chatham West, located at 202 Chatham West Dr. and Walkover Commons, located at 100 Perkins Ave. The property manager schedules annual inspections and the BRA also conducted its inspections annually since these properties consist of more than 25 units. No major violations were discovered, and all minor violations found were repaired promptly. Station Loft, Father Bill's MainSpring, and Howard House LLC received HOME funding for their housing development. The properties are inspected annually, and the BRA conducts its own inspections. Only minor violations were found and resolved promptly. Inspection reports for all HOME-assisted units note any repairs made during inspections or if there was a need for further repairs. Copies of work orders for repairs are submitted with the inspection reports. An Annual Inspection form is filled out at the time of inspection. Company policy is that Annual Inspection work orders are completed within thirty business days unless it is a health and safety item which will be done within 24 hours. Each week, reports are generated that show any open work orders in case follow up is needed. These reports are reviewed by all Senior Management Staff.

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units.

92.351(b)

Residents and/or property owners with questions, issues or complaints associated with applicable Fair Housing laws and requirements may access the technical services of agencies such as the Brockton Housing Authority. The City is charged with ensuring that education about fair housing is conducted and to manage complaints which might be received. The City of Brockton has established an Affirmative Fair Housing Marketing Plan for fair housing and equal opportunity, which was updated in June 2012, and submitted to HUD. As a result of the City of Brockton's Analysis of Impediments to Fair Housing Choice, the Mayor's Advisory Committee continues to provide recommendations and strategies to implement the City's fair housing goals that are contained in the Analysis. The City was working on preparing its

Affirmatively Furthering Fair Housing Plan which that due to HUD 10/20/2020 but the plan was suspended by the Dept. of Housing and Urban Development. The advisory committee continues to meet monthly to discuss issues raised in the Analysis and is continuing to meet in order to gather enough data to update the City's Analysis of Impediments to Fair Housing Choice and make additional recommendations to the Mayor. The BHA, through the Mayor's office, also provides access to a language line to assist those speaking limited English.

The City of Brockton reserved/committed HOME Funds for two developmental projects during the reporting year. These projects are the rehabilitation/conversion of the Lincoln School (70 Highland Street) into 39 senior rental housing units; and a new construction of a mixed-used development entailing commercial space for retail and 48 affordable housing units. The rehabilitation/conversion project will give the City of Brockton the opportunity to provide 3-HOME assisted units to low-mod income persons and the new construction 11-HOME assisted units.

The City of Brockton acting by and through the Brockton Redevelopment Authority conducts affirmative marketing procedures through local radio stations, the Brockton Community Access, Public Service Agencies, City Departments, and social media to inform residents about available programs and resources.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

During this reporting year, \$613,774.54 were received as program income. \$170,195.27 was from the sale of 130 Laureston Street which was a HOME new construction project and \$443,579.27 came from the refinance of one of HOME's funded rental property development.

Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)

Brockton's limited supply of affordable housing is one of the community's most significant barriers to fair housing choice. Lower income households experience a higher rate of housing problems than other households in Brockton, and this impacts minority households and people with disabilities in the community disparately because they are most likely to be low income households. The City of Brockton will continue to work with local and regional nonprofits and others to pursue opportunities to develop new affordable housing. Networks like the Massachusetts Smart Growth Alliance can provide resources and organizing support to promote equitable growth, including increased housing opportunities.

