

Executive Summary

ES-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

Brockton's continuing housing and community development strategy is a logical response to the social service needs of a predominately low- and moderate-income population, high unemployment and crime rates, the overall age of the housing stock, an inadequate supply of affordable housing and mounting foreclosures and abandonment of properties rendering Brockton among the most negatively municipalities in the state. Pressing needs include the improvement or replacement of older public facilities, enhancement of public safety, housing rehabilitation assistance to low- and moderate-income households, facilitation of housing counseling and mechanisms to prevent foreclosures and further destabilization of marginal neighborhoods. In addition, support is needed for public/social services in the aid of lower income families and individuals, enhanced crime prevention and job creating economic development.

Brockton's Consolidated Plan and Annual Action Plans will be crafted to address these identified local needs to the greatest extent possible within budgetary constraints of the communities Community Development Block Grant (CDBG) and HOME funding. Brockton will seek to leverage these limited resources by better connecting with other public and private resources dedicated to addressing community needs. Brockton will develop stronger cooperative working relationships with other public and private institutions, both nonprofit and for profit, which are engaged in a variety of community projects and services.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

Objectives and Outcomes (FY2022-FY2027)

Housing Objectives:

- Maintain, support, and preserve the existing housing stock, prevent housing deterioration and vacancies; prevent neighborhood deterioration due to foreclosures.
- Increase the overall availability of affordable permanent housing through the creation of new units and rehabilitation of vacant deteriorated properties to return to habitable condition.

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- Preserve the quality of life in existing neighborhoods while accommodating smart growth, supporting balance between housing development, transportation, open space and recreational facilities, and appropriate commercial development opportunities.
- Increasing access to homeownership through down payment assistance for first time homebuyers

Outcomes for these objectives will be measured against:

- The number of housing units rehabilitated, de-leaded or prevented from becoming deteriorated and/or vacant.
- The number of affordable units developed through new construction or the restoration and re-occupancy of vacant and deteriorated units.
- Determining if new neighborhoods have been created or existing neighborhoods have been created or existing neighborhoods have been enhanced through smart growth practices.
- The number of people provided with financial assistance for down payment.

Non-Housing Community Development Objectives:

- Assist in reduction of crime.
- Enhance the quality of life through the provision of better public facilities, through neighborhood stabilization efforts, and through infrastructure improvements aimed at economic development.
- Assist in the reduction of poverty and improve the quality of life for low- and moderate-income residents of the City by expanding economic opportunities and through support for vital social/public service providers and facilities that help create and/or retain jobs.

Outcomes for these objectives will be measured against:

- Increase or decrease of crime statistics.
- Improvements or additions of public facilities and infrastructure.
- Determination of the numbers of low- and moderate-income individuals and families aided by public service providers who are supported in part by CDBG funds.
- Evaluation of changes in quality of life status as a result of the provision of services, evaluation of actions that serve to expand economic opportunities including verification of numbers or jobs created and/or retained.

3. Evaluation of past performance

On an annual basis, the City of Brockton has historically allocated a significant portion of its Community Development Block Grant entitlement and HOME grant to rehabilitate the homes of low- and moderate-income homeowners and to assist low and moderate income individuals and families to become homeowners. During the past few years, Brockton has made some significant progress in meeting its

housing goals, although real estate costs and the cost of deleading of certain properties have contributed to a somewhat lengthy process. The FY2023-FY2027 Consolidated and Annual Action Plan's aim to better achieve these goals through closer cooperative actions with other housing providers and a more focused leveraging of CDBG and HOME funds. Brockton has consistently provided financial resources for the development of new units and rehabilitation of existing units to benefit low- and moderate-income residents. During this five-year period, Brockton has continued to do so as circumstances permit and will also seek to return vacant/foreclosed properties to habitable condition for the benefit of low and moderate income home buyers and renters.

Brockton's previous Consolidated Plan strategy has played a significant supporting role in the expansion of economic opportunity and the provision of needed services to low-income persons. CDBG assistance at the maximum level of fifteen percent (15%) of Brockton's annual entitlement amount has been extended to a diverse network of public service providers in support of programs, many of which involved job training skills development and homeless prevention. This will continue under the new five-year plan. The Brockton Redevelopment Authority has been an active member of the mayor's economic advisors and has supported efforts to create economic opportunity through public facility improvements that result in the creation and retention of jobs. Additionally, through efforts with agencies such as the Brockton Housing Authority, programs have been established to empower low-income public housing tenants through self-sufficiency training. Under the new Consolidated Plan, these efforts will expand to support agencies that provide counseling services aimed at preventing foreclosures through training in household management and budgeting.

4. Summary of citizen participation process and consultation process

Residents of lower income neighborhoods and other citizens likely to be affected by the CDBG Program and the HOME Program are to be provided adequate information and the opportunity to express their views on community development and the needs, proposed activities, and projected use of funds. Low- and moderate-income residents are encouraged to participate in the development of the Consolidated Plan.

Citizens, public agencies and other interested parties can request, in writing, information and records concerning Brockton's Consolidated Plan and its use of assistance under the CDBG and HOME programs during the five-year period. The city will make available within 10 days, any information which does not violate the privacy of any person or involve personnel matters. In accordance with federal regulations, the City will make the Citizens Participation Plan available through the office of the Mayor, the Brockton Redevelopment Authority, Brockton Housing Authority, Brockton Main Public Library, and the branch libraries as well as the City of Brockton's web site and the Brockton Redevelopment Authority web site. Interested citizens may also call the Brockton Redevelopment Authority at 508-586-3887 for a copy or may be obtained at the office of the Brockton Redevelopment Authority, 50 School Street, Brockton, MA 02301.

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Citizen participation at all stages of the CDBG program is encouraged, particularly by persons of low and moderate income. All written comments relative to the CDBG and HOME programs are to be answered within 15 days.

The Brockton Redevelopment Authority will hold two (2) public hearings to:

- Provide citizens the opportunity to comment on the prior year's performance on the CDBG and HOME program funds expended, and the status of funds being expended. There will be a thirty (30) day comment period after the public hearing to receive comments.
- To obtain the views of citizens on community development and housing needs and to obtain proposals and comments on the activities to be undertaken and the development of the proposed Consolidated Plan for both the CDBG and HOME Programs. Also, to include a thirty (30) day comment period.
- To gather feedback on the draft Consolidation Plan for both the CDBG and HOME Programs. With a thirty (30) day comment period.

All notices of public hearings are published at least ten (10) days prior to the hearing date in the legal section of the Brockton Enterprise. Public Hearings are held in the downstairs conference room at the Chamber of Commerce building, 60 School Street, Brockton, MA 02301, or at a location that is handicap accessible. Translation assistance will be made available upon request for non-English speaking persons.

The first public meeting was held on December 14, 2022.

Citizens in attendance:

- Meredith Keene – Resident; Cynthia Pendergast – Neighborworks Housing Solutions; Pat Kelleher – Family Community Resources; Jessica Roberts – Resident; David Marcos – Resident; Carol Griffin – Resident; David Vincent – Resident; Marvens Francois – Resident; Jackie Joseph – Resident; Chris Cooney – Metro South Chamber of Commerce; Diane Winghall – Resident; Susan Nicastro – Ward 4 City Councilor; Lynda Blake – GC/Developer and Katya H. – Investor/Developer.

The second Public Meeting was held on March 8, 2023.

5. Summary of public comments

See attached meeting minutes from all Public Hearings mentioned.

6. Summary of comments or views not accepted and the reasons for not accepting them

None.

7. Summary

Having assessed needs thoroughly, Brockton's Annual Plan and Consolidated Plan are crafted to carry out all the activities aimed at addressing the local needs to the greatest extent possible within budgetary constraints of the Community Development Block Grant funds (CDBG) and Home Investment Partnership Program (HOME). Brockton seeks to leverage these limited resources to the greatest extent possible by better connecting with other public and private resources dedicated to addressing the community needs.

A survey was provided to various agencies, city employees and residents of the City of Brockton. The survey provided questions relative to what was most important to them as residents or employers or employees of Brockton. The results of the survey are attached in two parts.

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The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	BROCKTON	Brockton Redevelopment Authority
HOPWA Administrator		Brockton does not receive HOPWA funds
HOME Administrator	BROCKTON	Brockton Redevelopment Authority
HOPWA-C Administrator		Brockton does not receive ESG funds

Table 1 – Responsible Agencies

Narrative

The City of Brockton has designated the Brockton Redevelopment Authority (BRA) as the lead agency with respect to the Community Development Block Grant (CDBG) program and the Home Investment Partnership Program (HOME). It is the responsibility of the Brockton Redevelopment Authority, under the direction of the Mayor, to prepare and submit the City of Brockton's FY2023-FY2027 Consolidated Plan. The Brockton Redevelopment has been the lead agency for the past several years. The Brockton Redevelopment Authority has been assigned responsibility for the preparation and submission of the previous Consolidated Plan and plays a critical role in the planning of activities.

The Process: In addition to the publicly advertised Citizen Participation process, the BRA has sought out and encouraged input and involvement of public agencies, the business community, community-based organizations and other groups in the determination of community development objectives, priorities and resource allocations. The significant aspects of the process employed to develop the Consolidated Plan and consequently the Action Plan included:

- An in-depth review of data, annual reports, newsletters, special reports and plans having regional and local significance
- Seeking public input at advertised public hearings and inviting written comments
- Participation in forums on housing and social services issues
- Outreach to public instrumentalities involved in housing, public works, and public services as well as planning and community development

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- One-on-one outreach by way of personal and telephone interviews to a wide range of public and private community-based organizations similarly involved in activities reflecting CDBG and HOME goals

Consolidated Plan Public Contact Information

Zaias Andrade, Director of Development or Charaliz Isaac, CDBG Program Manager

50 School Street, Floor 2

Brockton, MA 02301

508-586-3887

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PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)

1. Introduction

In the long course of public hearings, forums, inter-agency meetings and social service providers over the past several months, the City of Brockton acting through the Brockton Redevelopment Authority have continuously sought input as to the most pressing needs facing the City of Brockton and, its low and moderate income and minority populations. The city has relied heavily on these consultations in the development of this Consolidated Five Year Plan. The City will continue to encourage and maintain open lines of communication with all citizens, organizations and agencies throughout the life of the Consolidated Plan and in the preparation and implementation of Annual Action Plans.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I)).

The City of Brockton is the largest municipality in Plymouth County with a population of over 100,000. Working with and providing financial assistance to nine public service agencies. Our activities are geared to enhance coordination between public and assisted housing providers and private and governmental health, mental health and other services agencies which include the following activities: 1. With the limited funding we have, we have provided more affordable housing units. In the last ten years, 42 permanent housing units were added for chronically homeless individuals. In July of 2022, 69 chronic-dedicated units were made available by FBMS for homeless households. 2. Due to the coordination between mental health and service agencies 269 unduplicated individuals were served in one of our region's street outreach programs. The outreach services provided basic needs, triage, and rehousing services. 3. Working and synchronizing with providers for better outcomes for sheltered individuals. Since 2009, several providers have applied a new approach of immediate assessment and triage of guests at their facilities. 4. Moving toward "Zero Tolerance" of Discharges to shelter by other systems: For the past four years, with assistance from our partners, we have tracked discharges of people to local housing providers from jails, hospitals, substance abuse treatment and other state systems of care. In FY22, 172 individuals that entered one of our local shelter/outreach programs in FY22 came from another institution 5. One of the City's most promising activities is employment and housing for the Work Express Program being run by Father Bill's and Mainspring. There were 22 people who completed WorkExpress in FY22, many who had once been chronically homeless.

Within the Brockton Housing Authority, the Service Coordination staff works to identify tenants who are having difficulty meeting the requirements of their tenancy. In addition, staff works to assess the service requirements of each tenant. To address these needs the Service Coordination Program utilizes a multi-disciplinary approach. This involves working closely with all service providers in the area. These providers include the Department of Mental Health, Department of Children and Family Services, Old

Colony Elderly Services, Brockton Visiting Nurses Association, numerous agencies who provide home health care and housekeeping services. The BHA currently has a Memorandum of Understanding with the Department of Mental Health, Old Colony Elderly Services, Brockton Visiting Nurse Association and Brockton Area Multi Services Inc. Representatives of these agencies meet at least monthly to evaluate applicants to the Ann Ward Congregate House. Meetings with the Department of Mental Health occur monthly or more often if needed, to coordinate the mental health needs of our tenants.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

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 Committee and Executive Committee 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 regional'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, youth homelessness, elder homelessness, and veteran homelessness. Brockton Public Schools is a core CoC partner and member of the CoC's General Committee and Youth Committee.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

The City of Brockton does not receive ESG funding.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	BROCKTON NEIGHBORHOOD HEALTH CENTER
	Agency/Group/Organization Type	Services-Health Health Agency
	What section of the Plan was addressed by Consultation?	Lead-based Paint Strategy Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The BRA met with Brockton Neighborhood Health Center organization, a survey and consultation questions was provided via e-mail in which many of the questions relating to most common housing issues and community needs in the City of Brockton. Many of the issues relating to individuals and families and their numerous problems were discussed and suggestions were made on the issues facing the low- and moderate-income persons residing in the city.
2	Agency/Group/Organization	Father Bills MainSpring CoC
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The BRA met with Father Bill and MainSpring organization, a survey and consultation questions was provided via e-mail in which many of the questions relating to most common housing issues and community needs in the City of Brockton. Many of the issues relating to individuals and families and their numerous problems were discussed and suggestions were made on the issues facing the low- and moderate-income persons residing in the city.
3	Agency/Group/Organization	BAMSI
	Agency/Group/Organization Type	Services-Children Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence

	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The BRA met with Brockton Area Multi Services Inc. organization, a survey and consultation questions was provided via e-mail in which many of the questions relating to most common housing issues and community needs in the City of Brockton. Many of the issues relating to individuals and families and their numerous problems were discussed and suggestions were made on the issues facing the low- and moderate-income persons residing in the city.
4	Agency/Group/Organization	Family and Community Resources, Inc
	Agency/Group/Organization Type	Services-Victims of Domestic Violence Services - Victims
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The BRA met with Family Community Resources, Inc. organization, a survey and consultation questions was provided via e-mail in which many of the questions relating to most common housing issues and community needs in the City of Brockton. Many of the issues relating to individuals and families and their numerous problems were discussed and suggestions were made on the issues facing the low and moderate income persons residing in the city.
5	Agency/Group/Organization	Brockton Housing Authority
	Agency/Group/Organization Type	Housing PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The BRA met with Brockton Housing Authority organization, a survey and consultation questions was provided via e-mail in which many of the questions relating to most common housing issues in the City of Brockton. Many of the issues relating to individuals and families and their numerous problems were discussed and suggestions were made on the issues facing the low- and moderate-income persons residing in the city.
6	Agency/Group/Organization	Brockton Department of Planning and Economic Development
	Agency/Group/Organization Type	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Other government - Local Planning organization
	What section of the Plan was addressed by Consultation?	Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The BRA met with Brockton Planning and Economic Development organization, a survey and consultation questions was provided via e-mail in which many of the questions relating to most common housing issues and community needs in the City of Brockton. Many of the issues relating to individuals and families and their numerous problems were discussed and suggestions were made on the issues facing the low- and moderate-income persons residing in the city.
7	Agency/Group/Organization	Brockton Area Arc Inc
	Agency/Group/Organization Type	Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The BRA met with Brockton Area Arc, Inc. organization, a survey and consultation questions was provided via e-mail in which many of the questions relating to most common housing issues and community needs in the City of Brockton. Many of the issues relating to individuals and families and their numerous problems were discussed and suggestions were made on the issues facing the low- and moderate-income persons residing in the city.
8	Agency/Group/Organization	MassHire Greater Brockton Workforce Board
	Agency/Group/Organization Type	Services-Employment
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The BRA met with Masshire organization, a survey and consultation questions was provided via e-mail in which many of the questions relating to most common housing issues and community needs in the City of Brockton. Many of the issues relating to individuals and families and their numerous problems were discussed and suggestions were made on the issues facing the low- and moderate-income persons residing in the city.
9	Agency/Group/Organization	Neighborworks Southern Mass
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The BRA met with Neighborworks Housing Solutions organization, a survey and consultation questions were provided via e-mail in which many of the questions relating to most common housing issues and community needs in the City of Brockton. Many of the issues relating to individuals and families and their numerous problems were discussed and suggestions were made on the issues facing the low- and moderate-income persons residing in the city.
10	Agency/Group/Organization	Self Help Inc.
	Agency/Group/Organization Type	Services-homeless Services-Education

	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The BRA met with Self Help Inc. organization, a survey and consultation questions was provided via e-mail in which many of the questions relating to most common housing issues and community needs in the City of Brockton. Many of the issues relating to individuals and families and their numerous problems were discussed and suggestions were made on the issues facing the low- and moderate-income persons residing in the city.
11	Agency/Group/Organization	Conservation Commission
	Agency/Group/Organization Type	Agency - Managing Flood Prone Areas
	What section of the Plan was addressed by Consultation?	Hazard Mitigation
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The BRA met with Brockton Conservation Commission, a survey and consultation questions was provided via e-mail in which many of the questions relating to hazard mitigation in the City of Brockton.
12	Agency/Group/Organization	BROCKTON BOYS AND GIRLS CLUB
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The BRA met with Boys & Girls Club, a survey and consultation questions was provided via e-mail in which many of the questions relating to most common housing issues and community needs in the City of Brockton. Many of the issues relating to individuals and families and their numerous problems were discussed and suggestions were made on the issues facing the low- and moderate-income persons residing in the city.
13	Agency/Group/Organization	Associacao Caboverdiana de Brockton
	Agency/Group/Organization Type	Services-Children Services-Education Services-Employment

	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The BRA met with Associacao Caboverdeana de Brockton, a survey and consultation questions was provided via e-mail in which many of the questions relating to most common housing issues and community needs in the City of Brockton. Many of the issues relating to individuals and families and their numerous problems were discussed and suggestions were made on the issues facing the low- and moderate-income persons residing in the city.

Identify any Agency Types not consulted and provide rationale for not consulting

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	City of Brockton/Father Bill's and MainSpring	The City of Brockton has established a 10 Year Plan to end chronic homelessness. Although this plan has had much success over the past years, the Mayor of Brockton has requested that this plan be assertive and that the members of this committee to end homelessness be more aggressive in moving forward the plan. The plan will include a Housing First approach by creating permanent supportive housing for chronically homeless persons. The plan also includes energizing local businesses, the Brockton Housing Authority and housing developers to create 100 affordable housing units for low-income households and last, but not least, to prevent foreclosures and create more affordable housing for low-income families in order to prevent their homelessness.

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Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Downtown Urban Renewal District	City of Brockton/Planning Department/BRA	As the commercial and residential revival of Brocktons historic downtown continues, the Urban Renewal District is one of the economic developments tools the City has made available to investors. A part of the Brockton Downtown Action Strategy, created with support from MassDevelopment, the district includes incentives and financing options for new construction and renovation of existing sites.
Trout Brook Urban Renewal District	City of Brockton/Planning Department/BRA	The City of Brockton is in the planning stages for a new industrial park that hosts the terminal to a 100 gigabyte fiber optic cable. With its on-ramp to the ultra-high-capacity line, the 66-acre site on Mass. Rte. 28 is ideally situated for a data center or back-office operations for regional corporations. It is also served by Brockton best-in-class public water and sewer utilities, and its electrical supply is double-fed by National Grid. The site, which is part of an Urban Renewal District, will be the first purpose-built industrial park in the City.
Federal Opportunity Zones	City of Brockton/Planning Department	There are four federal Opportunity Zones in Brockton, each of which is designed to maximize investment opportunities. Two are located at the former CSX site, and in the Transit-Oriented Development (TOD) area that encompasses all area within one-quarter mile of the Campello and Montello Commuter Rail stations and within one-half mile of downtown; one is the 65-acre Brockton Fairgrounds on Mass. 123, the largest undeveloped site in the city; and one around Good Samaritan Medical Center, part of the Route 24 life sciences cluster. Special federal tax benefits are available to qualifying developments in these zones.
Brockton Investor Prospectus	Planning Department/BRA	Whether one is looking to take advantage of the Federal Opportunity Zones, our abundant water and sewer capacity, or our location just 20 miles south of Boston and Logan International Airport, the Brockton Investor Prospectus lays out a compelling argument for choosing Brockton for one's business start-up, expansion or relocation.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Digital Access Master Plan	City of Brockton Planning Department	The City of Brockton believes that every resident should have affordable, reliable, high-speed internet, as well as access to the devices and skills to fully utilize it. Initial action will be to provide fiber in downtown and SHI properties which include Brockton Housing Authority.

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

The Service Coordination staff of the Brockton Housing Authority work with tenants who are having difficulty meeting the requirements of their tenancy. In addition, staff work to assess the service requirements of each tenant. To address these needs, the Service Coordination Program utilizes a multi-disciplinary approach. This involves working closely with all service providers in the area.

The providers include The Department of Mental Health, Department of Children and Family Services, Old Colony Elder Services, Brockton Visiting Nurses Association, numerous agencies who provide home health care and housekeeping services.

The Brockton Housing Authority currently a Memorandum of Understanding with The Department of Mental Health, Old Colony Elder Services, Brockton Visiting Nurses Association and Brockton Area Multi Services Inc. Representatives of these agencies meet at least monthly to evaluate applicants to the Ann Ward Congregate House. Meetings with The Department of Mental Health may occur more frequently if needed to evaluate and coordinate the mental health needs of tenants residing in Brockton Housing Authority properties.

Narrative (optional):

According to the Massachusetts Department of Public Health Childhood Lead Poisoning Prevention Program screening and prevalence statistics (2017-2021 Calendar Year Data), 81% of housing units in Brockton were built prior to 1978. Amongst Brockton’s population of children ages 9-47 months 63% were screened for lead (3rd highest). Brockton presented with 87 cases in the abovementioned calendar year with a high-risk score of 12.1 (7th in the state)

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

The City of Brockton held one public hearing and one public meeting: The public hearing was held on December 14, 2022, and the public meeting was on March 8, 2023. Attendees had the opportunity to voice their opinions relative to how and where funding should be distributed.

The City will consider the view of citizens, public agencies, and other interested parties in the preparing the final consolidated submission and in the case of any substantial amendments (defined as the addition or deletion of an activity, source of income or objective in the Annual Action Plan). All comments will be publicly noticed and shall provide a 30 day review and comment period before the amendment is implemented. Regarding the Consolidated Annual Performance and Evaluation Report (CAPER), citizens will be provided reasonable notice and an opportunity to comment by means of an advertised 30 day comment period and provision that the City will consider all comments or views received in writing, as well as orally at public hearings, that the Consolidated Plan, any substantial amendments, all Action Plans and CAPERS shall be made available to the public both in public buildings including the BRA office, Mayor's office, three public libraries and two websites. At any time, technical assistance may include special interpretation and communication assistance provided to persons with disabilities and English speaking residents. The City of Brockton, through the Brockton Redevelopment Authority, will provide reasonable and timely access to records for citizens, public agencies, and other interested parties with respect to the Consolidated Plan.

Prior to the development of the Consolidated Plan, the City advertised in the Brockton Enterprise, that a public hearing would be held to obtain views of interested citizens, organizations, and parties as to the City's housing and community development needs. It was also advertised on the BRA's website and social media pages, City of Brockton's website and Chamber of Commerce website. The public hearing was held on Wednesday, December 14, 2022, at 6:00pm at the Shaws Center, 1 Feinberg Way, Brockton, MA 02301. In addition, the public meeting was also duly advertised in the Brockton Enterprise, City of Brockton's website, BRA's website, Chamber of Commerce website, Public Service agencies and was held on March 8, 2023 at 12:00pm at the Thorny Lea Golf Course, 159 Torrey Street, Brockton, MA 02301. Goals were established based upon meetings with individuals and organizations. Many of the topics discussed in these meetings have been made a part of the Consolidated Plan and Annual Plan. Streetscapes, housing rehabilitation, homeless care, and economic development to name a few.

Citizen Participation Outreach

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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
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1	Newspaper Ad	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish, Cape Verdean Creole, Haitian</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>The public hearing was advertised on The Enterprise Newspaper legal notice. It was advised if special accommodations were required, a request must be made to the BRA at a reasonable time prior to hearing. Notices were sent to public service agencies and organizations the BRA partnered with over the years.</p>	<p>No accommodation request was made to the BRA.</p>	<p>None.</p>	<p>file:///C:/Users/ZaiasAndrade/City%20of%20Brockton%20COMY%20DVLMT/Team%20Site%20-%20Grants/HUD%20Reporting/Consolidated%20Plan/2023-2025%20Consolidate</p>
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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
			<p>Flyers were posted at Mayor's Office, City's website, BRA office and website, Metro South Chamber of Commerce's office and website, and other agencies' website.</p>			

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Hearing	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Attendance was minimal. However, those who attended were concerned about the issues mentioned below as well as public services aimed at low- and moderate-income residents.	No accommodation request was made to the BRA. Comments are included in the public hearing minutes.	None.	

Demo

3	Community Survey	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish, Portuguese, Cape Verdean Creole</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>We received a total of 884 responses. 450 (58.90%) respondents were female, 313 (40.97%) were male and 1 (0.13%) specified as other.</p> <p>Regarding demographics: Whites (58.5%), Black/African American (21%), American Indian/Alaskan Native (15.9%), Asian (7.5%), Native Hawaiian/Other Pacific Islander (2.3%) and</p>		None.	https://brocktonredevelopmentauthority.com/2022-brockton-community-survey/
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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
			<p>Others (3.5%). 361 (47.2%) respondents were of Hispanic or Latino descent whereas 403 (52.8%) were not of Hispanic and Latino descent.</p>			

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Public Meeting	Minorities Non-English Speaking - Specify other language: Spanish, Portuguese, French Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing				

Table 4 – Citizen Participation Outreach

DRAFT

Needs Assessment

NA-05 Overview

Needs Assessment Overview

In considering funding priorities for the period of this Consolidated Plan, the City of Brockton is attempting to address emerging critical needs, especially the stabilization of foreclosed properties and neighborhoods experiencing significant numbers of foreclosures; deteriorating rental and owner housing stock and the ongoing need for more low income rental housing and home ownership; accessibility to public facilities to enable people with mobility impairments to enjoy public access and services; improving the vitality of the city's downtown and increasing the appeal of local businesses for the benefit of residents and business owners and to expand local employment opportunities; supporting and providing a broad range of public services needs for lower income residents and supporting other specific needs including housing and support services for Brockton residents.

In assigning priority to projects and need categories the City considers a variety of factors including community input, the communities emerging and critical needs such as the devastating foreclosure trend, the service needs of residents, the number of low and moderate income people served and the number and relative percentage of people in need.

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

The U. S. Department of Housing and Urban Development has identified four housing problems, which are 1) overcrowding, 2) lacks complete kitchen, 3) lacks complete plumbing, or 4) cost burden. Overcrowding means that there is more than one person per room living in that housing unit. The lack of complete kitchen or plumbing is obvious. When households spend too much of their incomes on housing, they are "cost burdened" or "severely cost burdened". HUD has determined that households should spend no more than 30% of their incomes on housing. Using definitions established by HUD, cost burden is calculated as gross income costs, including utility costs, as a percentage of gross earnings. Households that pay more than 30% of their income on housing are considered "cost burdened". Households that spend more than 50% of their income on housing are considered "severely cost burdened". Cost burdened households are finding it very difficult to meet all household needs; severely cost burdened households could be in danger of homelessness

The City of Brockton, acting through the Brockton Redevelopment Authority (BRA), will utilize its CDBG and HOME funds to address the following housing needs, to the extent that available funding allows:

1. Maintain, support, and preserve the existing housing stock, prevent housing deterioration and vacancies, prevent displacement due to foreclosures.
2. Increase the overall availability of affordable permanent housing through the creation of new units and the return of habitable status of vacant/deteriorated units.
3. Preserve the quality of life in existing neighborhoods while accommodating and promoting smart growth, supporting a well-conceived balance between housing development, transportation, open space and recreational facilities, as well as appropriate commercial development opportunities.

Demographics	Base Year: 2009	Most Recent Year: 2017	% Change
Population	93,217	95,160	2%
Households	32,063	32,200	0%
Median Income	\$50,197.00	\$52,393.00	4%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2013-2017 ACS (Most Recent Year)

LABEL	ESTIMATE	MARGIN OR ERROR	PERCENT	PERCENT MARGIN OF ERROR
Total population	105,455	+/- 45	105,455	(X)
Male	50,254	+/- 1,857	47.7%	+/- 1.8
Female	55,201	+/- 1,853	52.3%	+/- 1.8

Table 6 - ACS Brockton Population: 2021

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	6,475	4,880	6,100	3,305	11,445
Small Family Households	2,205	2,200	2,770	1,490	5,940
Large Family Households	520	460	740	570	1,735
Household contains at least one person 62-74 years of age	1,440	1,040	1,550	585	2,820
Household contains at least one person age 75 or older	765	815	685	320	790
Households with one or more children 6 years old or younger	1,360	1,334	1,450	770	1,150

Table 7 - Total Households Table

Data 2013-2017 CHAS
Source:

DRAFT

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	60	30	30	0	120	0	20	10	0	30
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	90	0	4	25	119	0	0	75	0	75
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	110	70	115	60	355	15	95	35	60	205
Housing cost burden greater than 50% of income (and none of the above problems)	2,310	1,010	90	0	3,410	945	665	645	90	2,345

Demo

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	895	1,345	1,280	165	3,685	90	530	1,180	775	2,575
Zero/negative Income (and none of the above problems)	175	0	0	0	175	190	0	0	0	190

Table 8 – Housing Problems Table

Data 2013-2017 CHAS
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	2,570	1,115	240	85	4,010	960	780	770	150	2,660
Having none of four housing problems	2,425	2,225	2,650	1,125	8,425	160	760	2,440	1,945	5,305
Household has negative income, but none of the other housing problems	175	0	0	0	175	190	0	0	0	190

Table 9 – Housing Problems 2

Data 2013-2017 CHAS
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,275	1,290	865	3,430	450	520	795	1,765
Large Related	320	205	115	640	65	160	275	500
Elderly	790	445	170	1,405	465	550	580	1,595
Other	1,030	490	310	1,830	75	64	245	384
Total need by income	3,415	2,430	1,460	7,305	1,055	1,294	1,895	4,244

Table 10 – Cost Burden > 30%

Data 2013-2017 CHAS
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,110	560	80	1,750	450	345	290	1,085
Large Related	305	45	0	350	65	100	45	210
Elderly	395	250	10	655	375	215	230	820
Other	695	220	0	915	75	60	80	215
Total need by income	2,505	1,075	90	3,670	965	720	645	2,330

Table 11 – Cost Burden > 50%

Data 2013-2017 CHAS
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	145	70	109	40	364	15	90	25	30	160
Multiple, unrelated family households	40	0	15	15	70	0	4	85	30	119

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Other, non-family households	15	0	0	25	40	0	0	0	0	0
Total need by income	200	70	124	80	474	15	94	110	60	279

Table 12 – Crowding Information – 1/2

Data Source: 2013-2017 CHAS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

Table 13 – Crowding Information – 2/2

Data Source
Comments:

Describe the number and type of single person households in need of housing assistance.

The American Community Survey 2021 1-year estimate provided an estimate data of individuals from the City of Brockton with and without disability, both males and females ages ranging from 5 and under to 74 and over. It was estimated that the total population in Brockton is 105,455 and about 12,492 (13.7% of the population) has a disability whereas 927 individuals are under 18 years old, 6,088 are 18 to 64 years old and 5,477 are 65 years old and over. This estimate shows that about 14% of the population are with disability and 86% without. In addition, the estimate number for total households is 37,554 which about 58% are single family households and 42% married-couple households.

The single family households are composed of 8,045 male householder with no spouse/partner present and 13,551 female householder with no spouse/partner present. About 822 of male householder lives with children under 18 years of age; 5,101 lives alone and 1,524 are 65 years and over. On the other hand, 4,487 female householder lives with children under the age of 18, 4,983 lives alone and 2,488 are 65 years old and over. Therefore, we can estimate that approximately 20-30% of individuals with disability; single-family households that are 64 years of age and older and living with children under the age of 18; and small family households under 0-50% AMI need housing assistance.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

The 2021 American Community Survey 1-year estimate provided an estimate data of individuals from the City of Brockton with and without disability, both males and females ages ranging from 5 and under to 74 and over. It was estimated that males of said ages with disability are approximately 5,610 of the overall male population estimate (49,393) which about 11.4% are with disability and 88.6% without. In addition, the estimate number for females with disability are 6,882 of the overall female population estimates (54,557) which is about 12.6% of females with disability and 87.4% without. Therefore, we can estimate that approximately 20-30% of individuals with disability need housing assistance.

What are the most common housing problems?

The most common housing problems the City of Brockton faces are lack of available rental housing that is affordable to those with the lowest incomes; lack of support services to assist those with barriers to maintain housing with the assistance of support services. Additionally, high rental units, late rental payments and eviction due to nonpayment of rent, high utility bills and shut off notices, lease compliance, late mortgage payment and life skills are all very common housing problems facing many of Brockton's low and moderate income citizens. The rental housing market has tightened considerably in the past few years since the start of the pandemic with the fair market rents increasing significantly. Extremely low-income households (i.e., limited to TANF or SSI/SSDI) are effectively priced out of the market unless they have deep rental assistance. We are seeing now that even when households have rental assistance vouchers, the affordable rental market is so limited that they continue to struggle to find an available unit and remain homeless longer than is necessary. Brockton also has an aging housing stock that needs repair due to a lack of upkeep. Many of these older homes also have lead-based paint which need to be addressed.

In addition, according to our reporting information, , the average cost of rent in FY'20 was \$978 compared to FY'22 \$1,200, an increase of 81.5%. It is typically known that rent cost should be around 30% of monthly income, but within Helpline we have seen trends average from FY20 to present of almost 40% and increasing each year.

For programs that directly serve the elderly, primarily in BHA properties, the most common issues with the housing concern insects and rodents and the age of their units.

BAMSI's HIV and Harm Reduction programs report lack of affordable housing as the most common housing problem. Even if someone has a Housing Voucher it is difficult to find affordable housing. That problem is followed by lack of access to rental assistance (First, last, security deposit), lack of housing for difficult to house individuals (those with SUD, MI etc..), and the prevalence of substandard housing.

Brockton Housing Authority states that the most common housing problems that they and the people they serve face are lack of affordable unites; there is a limited number of units for low income households.

Are any populations/household types more affected than others by these problems?

Populations and households who are generally more affected than others are individuals with disabilities who very often have lower incomes and cannot sustain housing often becoming chronically homeless sheltered and unsheltered. Those with limited ability to work, and racial and ethnic minority communities who continue to experience systemic racism in the housing market and are over-represented in the homeless population. The disabled population often falls into homelessness due to lack of income and need for support while housed. Additionally, those most affected are as follows; households whose head has a lack of education and/or employment, single parent head of households, non-English speaking households, unemployed and under-employed whose unemployment benefits have run out, and elderly persons who are on a fixed income can also be more affected than the general population.

Brockton Housing Authority states they noticed a correlation with populations/households being low income and having one or a combination of lack of education, mental health issues, drug abuse issues, domestic violence, living in shelters, or undocumented individuals.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Households who lack education (GED's and High School diplomas) and are functionally illiterate, are amongst some of the lowest income population. These persons are generally low-income wage earners who do not have childcare vouchers nor transportation. Many of these individuals' hours have been cut back at their respective jobs and therefore do not earn enough to cover the basic household expenses including qualification for health insurance. Persons with disabilities are often the extremely low-income population due to lack of work history and resources, and often falls into homelessness due to lack of income and need for support while housed.

Those most at-risk for homelessness and who are served through our prevention and shelter diversion programs have the lowest incomes (i.e., below 30% AMI or below 115% FPL), have disabilities, have young children, and have limited ability to increase their income. This often includes recent migrants, households with limited English proficiency, parents who are unable to secure affordable childcare, and individuals with severe and persistent disabilities. Prevention and diversion programs strive to support these households in housing but are often inadequate to fully resolve the risk of homelessness. Deeper, more intensive housing and supports are often needed to stabilize these households for the longer-term.

Households who have received rapid rehousing (RRH) assistance and are nearing the end of their assistance may or may not require additional support. RRH is a successful intervention for many folks

who are able to use that time to secure additional income or find alternate, lower-cost housing. However, there are some RRH participants who will require longer-term help with housing or other wrap-around services. Some RRH programs allow for additional flexible supports to be allocated as needed. However, for some households, RRH is insufficient or their trajectory toward stabilization is longer. In those cases, FBMS programs work to identify longer-term subsidies or additional services that are individualized to each household. FBMS works with several housing providers (in addition to our own portfolio) to help households secure longer-term opportunities as needed. This includes private landlord partners, Brockton Housing Authority, and NeighborWorks Housing Solutions.

In addition, the Brockton Housing Authority has identified the following characteristics and needs of low-income individuals and families with children who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered:

- Recently Unemployed
- Substance Abuse Issues
- Lack of Education
- Issues with child care
- Mental Health Issues
- Money Management Issues
- May not have knowledge of programs that may assist with rent issues
- Domestic Violence issues
- Depression
- Lack of Employment
- Inability to obtain and maintain long term employment
- Chronic Health Issues

The following are characteristics and needs identified for formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance:

- The Brockton Housing Authority was granted 31 emergency vouchers to be issued to homeless families in 2022. They have all been successfully leased with the assistance of Father Bill's Main Spring staff. None of these vouchers are in danger of termination.
- The issuance of homebase assistance without addressing the often-long term causes of the original housing issue defers homelessness. Additionally, long-term voucher assistance is often needed to address these issues.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

Persons at risk of homelessness are defined as individuals or families facing immediate eviction and cannot relocate to another residence or shelter, someone who has moved 2 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. Particular attention is accorded to those households with extremely low incomes, ranging from 0 - 30% of median income, as this represents the most stressed and vulnerable group.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

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. 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. Rental assistance and PSH dedicated to homeless households are the most effective strategies to reduce risk.

The Brockton Housing Authority has identified the following characteristics:

- Increase in monthly rent
- Code Violations – Unclean; Unsanitary

Discussion

The overwhelming housing need for low-income Brockton residents is for affordable housing. A great majority of all reported housing problems relate to housing cost burden 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.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

This document presents an overall assessment of the housing and community development needs in the City of Brockton based upon CHAS (2013-2017 & 2015-2019) data collected. Please refer to the data on the added table. The housing needs assessment provides the foundation for establishing priorities and allocating resources to address the identified needs. In the City of Brockton, about 57% of households are low income, earning less than 80% median income. Data from the CHAS indicates that 64% of these low-income households have housing problems. Of this low-income group, 28% are very low income earning less than 50% of median income and 48% are extremely low income earning less than 30% of median income. Renters in the City outnumber owners in the Extremely low-income group, very low income and low income groups.

A disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial/ethnic group is at least 10% points higher than the percentage of persons in the category.

0%-30% of Area Median Income

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	4,515	1,600	365
White	1,335	640	140
Black / African American	1,770	615	160
Asian	115	0	0
American Indian, Alaska Native	40	0	0
Pacific Islander	0	0	0
Hispanic	820	170	60

Table 14 - Disproportionally Greater Need 0 - 30% AMI

Data 2013-2017 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

INCOME	1 OF 4 HOUSING PROBLEMS	NO HOUSING PROBLEMS	TOTAL
<=30%	5225	1940	7160

Table 15 - 2015-2019: Income By housing Problems (<=30%)

30%-50% of Area Median Income

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	3,770	1,110	0
White	1,450	525	0
Black / African American	1,610	350	0
Asian	40	10	0
American Indian, Alaska Native	35	0	0
Pacific Islander	0	0	0
Hispanic	385	135	0

Table 16 - Disproportionally Greater Need 30 - 50% AMI

Data 2013-2017 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

INCOME	1 OF 4 HOUSING PROBLEMS	NO HOUSING PROBLEMS	TOTAL
30-50%	3315	1585	4900

Table 17 - 2015-2019: Income By housing Problems (30%-50%)

50%-80% of Area Median Income

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	3,470	2,630	0
White	1,285	1,290	0
Black / African American	1,470	720	0
Asian	45	15	0
American Indian, Alaska Native	0	20	0
Pacific Islander	0	0	0
Hispanic	225	330	0

Table 18 - Disproportionally Greater Need 50 - 80% AMI

Demo

Data 2013-2017 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

INCOME	1 OF 4 HOUSING PROBLEMS	NO HOUSING PROBLEMS	TOTAL
50-80%	3135	2945	6080

Table 19 - 2015-2019: Income By housing Problems (50-80%)

80%-100% of Area Median Income

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	1,170	2,130	0
White	480	1,080	0
Black / African American	395	660	0
Asian	10	55	0
American Indian, Alaska Native	20	0	0
Pacific Islander	0	0	0
Hispanic	210	200	0

Table 20 - Disproportionally Greater Need 80 - 100% AMI

Data 2013-2017 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

INCOME	1 OF 4 HOUSING PROBLEMS	NO HOUSING PROBLEMS	TOTAL
80-100%	980	2500	3480

Table 21 - 2015-2019: Income By housing Problems (80-100%)

Discussion

Comparing the number of housing problems in owner occupied households, a vast majority of the reported problems are reported as severe. In the case of severe owner housing problems, the extremely low income households report the most problems, and the numbers decline as income rises. Whites and Black/African Americans still report the greatest number of problems.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

As a whole, white home owners and renters and low income black owners and renters have comparable housing problems. A concern of the U.S. Department of Housing and Urban Development (HUD) is when there is a disproportionate need for any ethnic group. The impact of severe housing problems is including substandard housing, severe overcrowding and severe cost burden affect all ethnicities in the City of Brockton. When examined more closely by race and ethnic group, the distribution of severe housing problems by race and ethnic group does not vary from that overall population. Housing cost burden appears to be the most significant housing problem in the city for low income households. White, black and Hispanic renters and owners all experienced housing cost burden. However, no one group experienced a disproportionate share of housing cost burden compared with their proportion in the population generally.

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 Source: 2013-2017 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

Table 23 – Severe Housing Problems 30 - 50% AMI

Data 2013-2017 CHAS
Source:

*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%

50%-80% 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	1,010	5,090	0
White	350	2,225	0
Black / African American	425	1,770	0
Asian	19	40	0
American Indian, Alaska Native	0	20	0
Pacific Islander	0	0	0
Hispanic	60	495	0

Table 24 – Severe Housing Problems 50 - 80% AMI

Data 2013-2017 CHAS
Source:

*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%

80%-100% 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	235	3,070	0
White	90	1,470	0
Black / African American	80	975	0
Asian	0	65	0
American Indian, Alaska Native	20	0	0
Pacific Islander	0	0	0
Hispanic	25	380	0

Table 25 – Severe Housing Problems 80 - 100% AMI

Data 2013-2017 CHAS
Source:

*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%

Discussion

Clearly, the housing need is greater than the supply in the City of Brockton and thus the City is faced with of how it can support production programs that can close the gap. Black/African American and Whites have a greater disproportionately need than other races/ethnicities in the city.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

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 affecting predominately whites and Black/African American owners and renters combined.

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:

Since the housing needs of both renters and owners is the risk of moderate and severe cost burden of housing, 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,

Demo

approaches may include lowering utility costs through retrofitting of energy and water improvements may assist low-income owners. Assistance with repairs to properties, especially for the low-income elderly, can also be effective.

DRAFT

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

For the past five years Father Bill's & MainSpring conducted an analysis of racial disparities among the homeless population living in the region. Like national findings, it was noted that racial and ethnic minorities, particularly Black/African American and Hispanic/Latino households, are more likely to become homeless and experience disparities in rehousing. Data is evaluated from the region's Homeless Management Information System (HMIS) and compared to census data on the general population living in extreme poverty. The data show that income alone cannot explain the disparities for these populations. As such, Black and Hispanic households are more likely to need housing assistance, including prevention, rapid rehousing, and/or PSH.

Non-native English-speaking families struggle to access many of the support services available across Brockton. Working to provide translation services or translated materials for these families is critical to increasing reach of resources. From a racial/ethnic standpoint, data from the Department of Education continues to evidence that BIPOC youth lag counterparts in educational achievement as measured by standardized testing as well as graduation rates. We also see increased rates of unsupported mental and behavioral health needs among BIPOC individuals, both adults and youth.

Current census information indicates that low-income families are disproportionately people of color. This information does not indicate that these families have greater needs than other low income families.

If they have needs not identified above, what are those needs?

The needs of low-income households are spread across racial and ethnic groups in Brockton.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

Minority residents live in all of Brockton's 21 census tracts, yet the census shows us that racial concentrations are apparent in certain census tracts. Census Tracts 5104, 5105, 5108, and 5113 are home to the largest numbers of Black residents. Census tracts 5105 and 5117 contain the largest population of Asians in both numbers and concentrations. The largest numbers of Hispanic residents live in Census tracts 5102, 5109, 5110 and 5113. In general, the concentration of minority households is highest in Brockton's center, where population is generally concentrated. This distribution loosely correlates with low-income households as well. Finally, due to the age and type of the housing in these census tracts, the more acute housing needs and housing problems are likely to fall disproportionately on minority groups.

Demo

Brockton is a minority Majority City, therefore, many middleclass and working-class neighborhoods have the same racial make up of lower income neighborhoods.

DRAFT

NA-35 Public Housing – 91.205(b)

Introduction

The Brockton Housing Authority works with residents of low rent public housing and with participants in the HCV and MRVP voucher programs. It has established successful Family Self Sufficiency (FSS) programs for all clients of the Brockton Housing Authority. FSS programs develop self sufficiency and provide financial incentives for households seeking to become homeowners and/or providing educational tuition assistance. This program helps residents become free from all forms of government assistance, and although homeownership tends to be the end result of the program, much happens while residents are working towards this goal. Families enter this program under-employed and living beyond their means, with personal finances in disarray. Under the tutelage of the program, residents learn that education is the key to full employment, and the attend credit repair and financial education workshops to help them prepare for a better future. The Brockton Housing Authority has always focused on educating its participants regarding the skills they will need to develop and become self sufficient. The Housing Authority is reaching out to their broader resident population, since all residents should have access to this type of information.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *

Table 28 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	13,734	15,901	0	15,914	0	0
Average length of stay	0	0	6	5	0	5	0	0
Average Household size	0	0	1	2	0	2	0	0
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	994	182	0	182	0	0
# of Disabled Families	0	0	350	641	0	635	0	0
# of Families requesting accessibility features	0	0	1,583	1,711	0	1,704	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 29 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	956	896	0	892	0	0	3
Black/African American	0	0	610	778	0	775	0	0	3
Asian	0	0	8	16	0	16	0	0	0
American Indian/Alaska Native	0	0	8	17	0	17	0	0	0
Pacific Islander	0	0	1	4	0	4	0	0	0
Other	0	0	0	0	0	0	0	0	0

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 30 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	147	398	0	395	0	0	2
Not Hispanic	0	0	1,436	1,313	0	1,309	0	0	4

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 31 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

DRAFT

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

- Units that will allow them to move around without difficulty
- First Floor Units
- Roll-In Showers
- Assistance from outside agencies
- Separate Bedrooms for Live-In Aid

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

- Section 8 – Centralized List – 241,029
- State CHAMP – Centralized List – 29,756
- Federal Public Family/Elderly – 2,537
- The lists consists of Families,
- Elderly Applicants
- Disable Applicants
- Families in need of affordable housing
- Families in need of emergency housing
- Families who are employed
- Families receiving public assistance
- Families living shelters
- Families who are homeless but not living in shelters (live with family members, friends etc.)

How do these needs compare to the housing needs of the population at large

Discussion

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

The MA-511 CoC is comprised of 34 cities and towns in southeastern Massachusetts, including all of Plymouth County and much of Norfolk County. Communities include urban areas, such as Quincy, Brockton, and Plymouth, as well as many suburban towns. The CoC created a Racial Equity Committee in spring 2019 to conduct annual analyses about racial disparities and develop strategies for addressing any disparities over time. The HMIS Administrator provided data for the analysis using HMIS and Stella P data. The HMIS Administrator determined these were the most useful data sources and opted not to incorporate HUD's Racial Equity Tool this year. In October 2021, the CoC engaged with C4 Innovations and Massachusetts Housing & Shelter Alliance to evaluate the coordinated entry system with a focus on achieving more racially equitable outcomes for those who are most impacted by homelessness. While the technical assistance is ongoing, initial analysis was completed in February 2022 and presented to the full CoC membership. The evaluation included analysis of Stella P data and May 2022 Analysis of MA-511 Racial Disparities 2 surveys of coordinated entry staff, consumers, and other stakeholders.

Similarly, pending new projects are concentrated on permanent supported housing. In each case, the housing is provided through leasing of existing units. Historically, the City of Brockton CDBG funds have been used to assist in the funding of the service components of programs designed to prevent homelessness and move homeless persons into permanent housing. CDBG funds are also being provided to assist in work programs and shelter for the homeless. Through State funding, assistance is provided locally through DTA (Department of Transitional Assistance) and the Division of Housing Stabilization within the Department of Housing and Community Development.

The MA-511 CoC continues to emphasize the need to provide permanent supported housing for those who are homeless, in emergency shelters or in transitional housing in Brockton. Except for the Spring Street Housing, all permanent housing opportunities specifically for the homeless have been provided through leased units.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	48	946	0	0	0	0
Persons in Households with Only Children	0	349	0	0	0	0
Persons in Households with Only Adults	48	597	0	0	0	0
Chronically Homeless Individuals	24	198	0	0	0	0
Chronically Homeless Families	0	0	0	0	0	0
Veterans	14	16	0	0	0	0
Unaccompanied Child	1	19	0	0	0	0
Persons with HIV	0	11	0	0	0	0

Table 32 - Homeless Needs Assessment

Data Source Comments:

Indicate if the homeless population is: Has No Rural Homeless

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

DRAFT

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	415	39
Black or African American	498	7
Asian	10	0
American Indian or Alaska Native	7	0
Pacific Islander	2	2
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	768	45
Not Hispanic	192	3

Data Source
Comments:

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

In FY22 FBMS served 223 households with children their family shelter program. This is very similar year-to-year. They also serve over 200 at-risk families each year with prevention programming. Neighborworks Housing Solutions through their programs provide services/assistance to families struggling with rental payments and foreclosures. Between 2017-2018, FBMS completed a project aimed for veterans and disable individuals. A new construction of 23 supportive housing units with educational services prioritized for 12 U.S. veterans and 11 other disabled individuals.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

Homelessness in Brockton is a problem that affects all races (Blacks, Whites & Hispanics mostly) in the City and generally reflects the population breakdown of the City. Asians, Native Americans, and Pacific Islander tends to be the least affected when it comes to homelessness.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

From the Point-In-Time count of April 28, 2022, in the Brockton Shelter Programs and Street Homeless Count.

Families: 620 were single parent households, 59 families were headed by parenting youth (18-24) and were also single parents, there were a total of 1008 family members in the 620 households, 349 children and 659 adults, and a total of 226 persons served were chronically homeless.

Veterans: 30 households were provided with shelter. 16 were emergency and 14 safe havens. 13 were chronically homeless.

Youth: 20 total unaccompanied youth aged 18 to 24 in which 5 were chronically homeless.

Other Subpopulations: 208 adults with a serious mental illness, 83 adults with a substance use disorder, 11 adults with HIV/AIDS and 79 total domestic violence survivors.

Discussion:

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

Throughout the City of Brockton, there are households in various subpopulations who are not homeless but have specific housing needs and may also require special attention due to their current or prospective service needs. These subpopulations include elderly, frail elderly, persons with severe mental illness, victims of domestic violence, developmentally disabled, physically disabled, substance abusers and persons with HIV/AIDS. The City is aware of the needs of special populations and is committed to supporting initiatives which target these populations, whenever possible, given the financial constraints of available funds at its disposal. As part of its strategy, the City of Brockton has committed to use CDBG funds to assist a variety of service organizations who work with a number of these special needs populations.

Describe the characteristics of special needs populations in your community:

Regardless of which subpopulation of special needs individuals, characteristics are similar in many ways. Each of them requires a basic set of care including nutritional needs, health programs, legal assistance, recreational activities, training and self-sufficiency assistance. Many of these populations are simply in need of stabilization from foreclosure, rental assistance, providing access to public facilities and locating suitable rental housing.

BAMSI has been one of our public service recipient for many years and they serve special needs populations through several programs. BAMSI Home provides 24 hour supported housing for individuals with Developmental or Intellectual Disabilities, individuals with Traumatic Brain Injuries, and individuals with severe mental health issues. Although BAMSI operates several group homes for these individuals, there remains a substantial wait list of people needing community-based housing. Supported housing is limited for a variety of factors including the workforce shortage and a shortage of suitable land to develop/convert into supported homes. BAMSI also serves a large population of individuals living independently in the community with intellectual/developmental disabilities, substance use disorders, and mental health issues. This community is dependent on public transportation and needs access to more supportive social services.

While there are subpopulation group needs consisting of people with developmental disability issues, severe mental illness, and those with substance abuse addictions, given the specialized care required, these are best dealt with through the network of human service providers and state funded programs. Those with severe mental illness and/or alcohol and drug addictions are largely the focus of state programs and other local service providers. These areas will be assisted through public service grants.

What are the housing and supportive service needs of these populations and how are these needs determined?

The housing needs are lack of affordable housing, rental and fuel assistance, protection for families at risk of eviction because of increasing rents, crack down on substandard housing, hold landlords accountable. Brockton needs a greater supply of affordable housing. There are reports of an abundance of sub-standard housing units that are barely fit for habitation yet still expensive. Identifying and replacing these units with safe and affordable housing is a top priority. There are several special needs of non-homeless groups that can be targeted for assistance by Brockton and its instrumentalities or by private housing providers. The housing needs mirror the general population needs in finding affordable and available housing, however this population is usually facing more financial hardships and require more of a selective process in homes to meet their needs. Persons who are elderly or physically disabled who may require housing in the form of independent living units or specialized supportive units, may be able to continue living independently with the provision of necessary supportive services from specialized human service providers.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

As of January 1, 2022, data from Massachusetts HIV Epidemiologic Profile showed that from 2018-2020 83 individuals in the city of Brockton were diagnosed with HIV/AIDS. Of the 83 individuals, 41 (49%) were male assigned at birth and 42 (51%) were female assigned at birth whereas 56% were Black/African American (non-hispanic), 17% Whites (non-hispanic) and 8% Hispanic/Latinos. Less than 5 individuals were between 13-19 years of age; 13 between 20-29 years of age; 23 between 30-39 years of age; 15 between 40-49 years of age; 16 between 50-59 years of age; 12 between 60-69 years of age and less than 5 were between 70 or more years of age.

In FY22, BAMSII served 85 individuals diagnosed with with HIV/AIDS in which 51% were female, 47% male and 2% transgender. Of the 85 individuals, 40% were white and 55% were Black/African American. BAMSII Health is more than just a network of programs. It provides caring, individualized, comprehensive care to individuals and families struggling with health related challenges including mental illness, substance use disorders, HIV/AIDS, and other complex diagnoses.

Discussion:

The City of Brockton does not receive HOPWA funding. However, the Brockton Area Multi Services Inc. (BAMSII) currently provides services with HIV/AIDS. BAMSII's primary source of funding is the Massachusetts State Department of Public Health. BAMSII provides case management services by connecting the individuals served with proper medical care and maintaining them, they provide housing advocacy helping the individuals searching for a home and rental assistance. Also, BAMSII has access to small amounts of money for emergency situations. Clients can access this funding once a year for an

amount up to \$300.00 and it can be used for rent or utilities. Many of these individuals are low income and would greatly benefit from State and Federal rental subsidies as they become available.

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction’s need for Public Facilities:

How were these needs determined?

Describe the jurisdiction’s need for Public Improvements:

How were these needs determined?

Describe the jurisdiction’s need for Public Services:

How were these needs determined?

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

As of the 2020 Census, there were 105,643 people, 37,554 households, and 26,441 families in the city. The population density was 4,952 people per square mile. There were 38,391 housing units in which 98% are occupied and about 2% are vacant. The racial makeup of the city is divided in two categories: population of one race (79%) and population of two or more races (21%). Of the overall population, 35% are Black, 29% White, 0.5% Native American, 2.2% Asian, 0.03% Pacific Islander, 12.3% from other races, and 21% from 2 or more races. Hispanics or Latinos of any race was 12%. Brockton has experienced dramatic demographic change in the past 5 years as the minority population grows, like the rest of Southeastern Massachusetts.

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

The basic premise of all housing markets is that there should exist a variety of housing choices and opportunity for residents. This establishes that housing choices and needs differ in most communities due to a variety of factors including employment mix, household income, population age, proximity of employment and preference. Local housing and labor markets are linked to one another, and industries are served by local housing markets that provide choices and opportunities for both current and future workers.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	16,310	47%
1-unit, attached structure	835	2%
2-4 units	9,825	28%
5-19 units	4,505	13%
20 or more units	3,310	9%
Mobile Home, boat, RV, van, etc	79	0%
Total	34,864	100%

Table 33 – Residential Properties by Unit Number

Data Source: 2013-2017 ACS

TYPE	NUMBER	%
1-UNIT, DETACHED	20,541	54
1-UNIT, ATTACHED	1,244	3.2
2-4 UNITS	7,963	21
5-19 UNITS	5,501	14
20 OR MORE	3,142	8.2
MOBILE/BOAT/RV/VAN/ETC	0	0
TOTAL	38,391	100

Table 34 - UNITS IN STRUCTURE

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	30	0%	480	3%
1 bedroom	440	3%	4,190	28%
2 bedrooms	3,160	18%	5,520	37%
3 or more bedrooms	13,775	79%	4,610	31%
Total	17,405	100%	14,800	99%

Table 35 – Unit Size by Tenure

Data Source: 2013-2017 ACS

UNIT SIZE	NUMBER	%
NO BR	826	2.2
1 BR	4,785	12.5
2 BRS	11,041	28.8
3 OR MORE BRS	21,739	56.6
TOTAL	38,391	100

Table 36 - Unit Size by Tenure

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

Based on the needs of the community and local family sizes, we focus on single- and double-unit sized homes for homeowner rehab and down payment assistance. Most three-family plus homes turn into a revenue stream online for owners, rather than a place for their family’s occupancy. We find in those cases that is when the properties and neighborhoods are less taken care of as the owner does not live there and take as much stock or care. We work in partnership with other local projects for larger housing in apartment buildings and Brockton Housing Authority living updates and repairs, following the 40R plan for the City.

The Brockton Housing Authority has 1983 state and federal public housing units all available to low-income families. The majority of the families tenanted are below 30% of the AMI.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

This information is not known to the Brockton housing Authority.

Does the availability of housing units meet the needs of the population?

No, at this time there is a need for more affordable housing, based on the number of families waiting for assistance. In some instances, the families or individuals may wait a few years for housing. At this time emergency applicants can also face a number of years before they receive assistance based on the programs they have applied for.

The Brockton Housing Authority has lists that are more than 10 years long for families and over two years long for elderly residents, Many of those on our list will never receive assistance due to the lack of inventory.

Describe the need for specific types of housing:

There is a large need for multi-family housing, ADA compliant housing, scattered-site housing, SRO, elderly housing, veteran housing, and Section 8 vouchers/MRVP Vouchers/DHP vouchers/AHVP vouchers.

The Brockton Housing Authority addresses primarily housing needs for those requiring subsidies. There is a substantial need for family and elderly/disabled low-income housing based upon our waiting lists.

Discussion

The City of Brockton has a substantial problem with foreclosed properties. The City is currently using a plan that uses municipal governments eminent domain to take possession of foreclosed residential mortgage notes, selling them back to residents meeting income requirements, “for the purpose of removing blight and restoring family home-ownership within the city.” Bringing these vacant single and multifamily units back to livable conditions will go a long way in addressing the needs of moderate-income families within the City.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

Brockton is a very diverse community that offers residents many different perspectives and experiences. It's becoming expensive to live in Brockton due to rise of home prices, rent payments and other living costs factors. Brockton's housing expenses are 24% higher than the national average and the utility prices are 24% higher than the national average. Transportation expenses like bus fares and gas prices are 26% higher than the national average. Brockton has grocery prices that are 14% higher than the national average.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2017	% Change
Median Home Value	281,900	237,000	(16%)
Median Contract Rent	819	913	11%

Table 37 – Cost of Housing

Data Source: 2000 Census (Base Year), 2013-2017 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	4,030	27.2%
\$500-999	4,525	30.6%
\$1,000-1,499	5,115	34.6%
\$1,500-1,999	1,100	7.4%
\$2,000 or more	24	0.2%
Total	14,794	100.0%

Table 38 - Rent Paid

Data Source: 2013-2017 ACS

RENT PAID	NUMBER	%
<\$500	2,171	14
\$500-999	2,356	15
\$1,000-1,999	8,485	56
\$2,000 or more	2,222	15
TOTAL	15,234	100

Table 39 - 2021 ACS: Gross Rent

	2017	2021	% Change
Medium Home Value	237,000	367,500	55
Median Contract	913	2009	120

Table 40 - 2021 ACS: Cost of Housing

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	2,815	No Data
50% HAMFI	5,240	405
80% HAMFI	11,230	3,720
100% HAMFI	No Data	6,685
Total	19,285	10,810

Table 41 – Housing Affordability

Data Source: 2013-2017 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	1,145	1,309	1,723	2,181	2,505
High HOME Rent	1,145	1,309	1,612	1,854	2,049
Low HOME Rent	977	1,047	1,257	1,452	1,620

Table 42 – Monthly Rent

Data Source Comments:

Is there sufficient housing for households at all income levels?

No, currently there are more market rent units than affordable housing units. Brockton is currently experiencing a shortage of sufficient housing, and the lower income populations are having trouble in locating decent, safe affordable units. This is primarily being caused by the number of foreclosed homes that are being held in inventory by banks. Coupled with the currently booming housing market in Massachusetts, the prices of homes being sold outside of BRA and City control leave little homes affordable for the population earning below 80% median area income.

The Brockton Housing Authority can only speak to those who are participating in their programs. At this time, there is not sufficient housing for these families.

How is affordability of housing likely to change considering changes to home values and/or rents?

Affordability of housing is likely to continue to decrease as the housing market continues to do well and the demand continues to rise in the area. With rent prices rising, it is more reasonable for the community to purchase homes but there are not enough homes at the price in which they can be afforded.

housing is rapidly becoming more and more unaffordable for families of all incomes.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

The current HOME/ FMR are lagging in relationship to AMR. As noted above, rents in the City of Brockton are on the rise and subsidy holders getting shut out of the rental market in a great number of cases. Fair Market Rent prices in Brockton are very high compared to the national average. This FMR area is more expensive than 97% of other FMR areas. Compared to the rest of Massachusetts, the Brockton FMR area is more expensive than 70% of the state. The current default data is slightly lower the effective HOME rents established by HUD. The effective rent limits are as follow:

Market Rent	Low/High HOME Rent	Area Median Rent (Source: Rentdata.org)
1BR \$1,309	\$1,047/\$1,309	\$1,270
2BR \$1,723	\$1,257/\$1,612	\$1,674
3BR \$2,181	\$1,452/\$1,854	\$2,115

Home and Fair Market rents are not keeping up with the market. The Brockton Housing Authority has applied for and been approved to permit voucher rents to be up to 150% of fair market rents in appropriate circumstances.

Discussion

The median home value in Brockton is \$367,500 (2021 ACS). Brockton home values have gone up 55% from 2017 to 2021 and it's predicted that they will rise within the next year. In November 2022, the median listing home price in Brockton, MA was \$430K, trending up 7.5% year-over-year. The median listing home price per square foot was \$289. The median home sold price was \$445K. A stable housing market will support overall housing production and rehabilitation to meet the needs of low- and moderate-income families.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

The City of Brockton works to stabilize, improve, and increase access to affordable owner-occupied housing for low and moderate-income residents, including addressing the community’s significant needs related to the foreclosure crisis. Most of the units in the city were built before 1980 and the City has had a high level of units continuing lead-based paint. Significant progress has been made on this issue through previous and current programs.

To the extent permitted with limited financial and manpower resources, the City of Brockton undertakes systematic code enforcement inspections and when lead paint is detected, directs property owners toward programs created to assist in de-leading. These include the lead remediation program administered by Self Help, Inc. The various initiatives funded through state and federal NSP grants also included the remediation of lead-based paint hazards encountered in any targeted properties. The city of Brockton will continue its efforts in providing financial assistance to homeowners for lead remediation under the Lead Based Paint Hazard Control Program.

Additionally, one of the largest issues with the condition of housing comes from the residents aging in place and being unable/unaware of the updates and maintenance of the homes. This is one of the biggest needs seen through the Homeowner Rehabilitation program

Definitions

Substandard Condition - Housing with one or more substantial safety, code or health issues including, but not limited to structural, electrical, plumbing or mold issues. The home is unsafe to live in and is a detriment to the neighborhood. The condition of the home along with the high cost of rehab, far out way the benefit to the community of rehabbing the home, and it needs to be demolished.

Substandard Condition but Suitable for Rehabilitation - Housing with one or more safety, code or health issues including, but not limited to structural, electrical, plumbing or mold issues. The home is unsafe to live in and is a detriment to the neighborhood in its current condition. Despite the home’s condition and the cost to rehab it, doing so will benefit the neighborhood and provide a safe, healthy, and comfortable home for a family.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	6,190	36%	7,485	51%
With two selected Conditions	240	1%	370	3%
With three selected Conditions	0	0%	40	0%
With four selected Conditions	0	0%	0	0%

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
No selected Conditions	10,970	63%	6,900	47%
Total	17,400	100%	14,795	101%

Table 43 - Condition of Units

Data Source: 2013-2017 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	925	5%	730	5%
1980-1999	1,565	9%	1,830	12%
1950-1979	8,685	50%	5,325	36%
Before 1950	6,220	36%	6,915	47%
Total	17,395	100%	14,800	100%

Table 44 – Year Unit Built

Data Source: 2013-2017 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	14,905	86%	12,240	83%
Housing Units build before 1980 with children present	1,199	7%	494	3%

Table 45 – Risk of Lead-Based Paint

Data Source: 2013-2017 ACS (Total Units) 2013-2017 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 46 - Vacant Units

Data Source: 2005-2009 CHAS

Occupancy	Estimate	Margin of Error	Percent	% Margin of Error
Total Housing Units	38,391	+/- 1,817	38,391	(X)
Occupied Housing Units	37,554	+/- 1,753	97.8%	+/- 1.5
Vacant Housing Units	837	+/- 592	2.2%	+/- 1.5
Homeowner Vacancy Rate	0.6	+/- 1.0	(X)	(X)

Rental Vacancy Rate	0.7	+/- 1.1	(X)	(X)
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Table 47 - ACS 2021: Housing Characteristics - Vacancy

Need for Owner and Rental Rehabilitation

In Brockton the need for rehabilitation of the housing stock is a large and wide. Lead paint is an issue in many homes, as well as general maintenance and upkeep issues. The Homeowner Rehab Program is widely prescribed to and there is currently a long waiting list. The community survey also reveals that the community perceives the need for rehab of homes in the city.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

Lead was widely used in interior and exterior paint prior to 1978 when its use was banned by the Environmental Protection Agency. No reliable calculation exists as to the exact number of Brockton housing units containing lead paint, although it can be assumed that many older properties have been delead through various State and Federal programs to encourage deleading, in which the number of properties with lead paint is slowly diminishing. The City will continue utilizing the lead remediation program to clear units of lead paint in its effort to provide safe, decent and sanitary living conditions to residents. The key strategies for addressing the problem during the next five years are as follows:

1. The City of Brockton's systematic code enforcement inspections.
2. The Lead-Based paint Hazard Control Program administered by the Brockton Redevelopment Authority.
3. The BRA's CDBG funded property rehabilitation programs and property rescue efforts.
4. Mass Housing's "Get the Lead Out" Program.
5. The BRA's Homeowner Rehabilitation Program with requires testing for lead paint in any unit to be rehabilitated with children under the age of 6 residing at that property.
6. Working with HUD's Office of Lead Hazard Control and Healthy Homes, the State Department of Public Health, the Local Board of Health and Building Departments to make information booklets and outreach programs to make residents aware of lead paint hazards and to generate referrals for lead-based paint identification and abatement.
7. Partner with organizations that receive lead abatement funds

Discussion

The City has used HOME and CDBG funds to address some of the negative conditions which exist within the City's housing stock. Regulatory issues related to the HOME program significantly deterred homeowners from using this program for improvement. The CDBG program continues today. The Commonwealth of Massachusetts Department of Public Health operates a Childhood Lead Poisoning Prevention Program and publishes an annual "Childhood Lead Poisoning Screening and Incidence Statistics by Community" which is used as a guide for future programs.

The Brockton Redevelopment Authority (BRA) carried out housing rehabilitation activities for many years, routinely testing for lead paint in any unit to be rehabilitated with children under the age of 8 in residence. To the extent that housing rehabilitation was undertaken, mainly in conjunction with coordinated NSP and CDBG Receivership Program efforts, and within the budgetary constraints of the City's CDBG and HOME annual allocations, this practice continued under the auspices of the BRA and their sub-recipients respectively. Since the pandemic, the Receivership program came to a halt and the BRA is invested in bringing this program back to its rolling basis to begin recusing foreclosed and abandoned properties.

According to American Community Survey 2021 one-year estimates, there was a total of 38,391 housing units in the city of Brockton. Of the total units, 97.8% (37,554) were occupied and 2.2.% (837) were vacant. The homeowner vacancy rate is 0.6 and the rental vacancy rate is 0.7. However, Brockton may be higher or lower since there is not a fixed or accurate list of vacant units in the city.

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available			1,625	1,149			0	0	157
# of accessible units									

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 48 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

The Brockton Housing Authority owns and/or Manages 323 Family units and 1303 Handicapped/ Elderly units of Federal Assisted Housing Units, and 93 Family units and 375 Handicapped/ Elderly units of State Assisted Housing Units.

Although BHA has been receiving \$3+ million in capital funding over the last few years for Federal Public Housing, it still remains substantially in good to fair condition with the exception of the Campello Highrise, which is in poor condition. Capital needs are increasing due to the ageing portfolio and the escalating costs to bring these units up to current codes. Whereas the State Public Housing is in fair to poor condition due to the lack of capital funding over the years

Public Housing Condition

Public Housing Development	Average Inspection Score

Table 49 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

As stated above, with the lack of sufficient funding for capital improvements to the BHA's developments it has become apparent that the Authority must seek alternative funding and/or means to rehabilitate their Portfolio.

In 2020 the BHA commissioned a comprehensive Capital Needs Assessment (CAN) at the BHA's largest development (398 units) Campello High-Rise. With the completion of the CAN in 2021 it has been determined that the essential structural repairs necessary at Campello High-Rise cannot be performed due to existing conditions and the original construction. Therefore, a comprehensive revitalization and code compliance to the current high-rises is cost prohibitive.

The BHA has determined that a Section 18 Disposition is in order and has contracted with an Architectural Firm whom also determined that in fact a revitalization of the current high-rises was cost prohibitive. Therefore, the Authority has begun the Section 18 Disposition process of designing and securing funding for the building and demolition of 398 new units on the current site while the residents remain in their current apartments.

It is the Authority's intention that with the completion of the Section 18 Disposition at Campello High-Rise and the now 398 Faircloth units available, the Authority will begin the process of Federalization all of the Authority's State subsidized public housing portfolio. The Federalization of these units will allow the Authority to eventually bring these units up to current code compliance.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

It is the Authority's intention that with the completion of the Section 18 Disposition at Campello High-Rise and the now 398 Faircloth units available, the Authority will begin the process of Federalization all of the Authority's State subsidized public housing portfolio. The Federalization of these units will allow the Authority to eventually bring these units up to current code compliance.

Discussion:

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

The City of Brockton has three primary organizations that provide supportive housing opportunities for the homeless populations such as, Father Bill's and Mainspring, Family and Community Resources and Old Colony YMCA Family Center. Together these organizations provide a wide variety of programs to assist homeless individuals and their families get back on their feet and on the path to self-sufficiency. Additionally, the City of Brockton also has the Brockton Area Multi Services Inc. (BAMSI) Helpline program that provides services to individuals and families that are at risk of becoming homeless.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	0	0	0	0	0
Households with Only Adults	0	0	0	0	0
Chronically Homeless Households	0	0	0	0	0
Veterans	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0

Table 50 - Facilities and Housing Targeted to Homeless Households

Data Source Comments:

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

There are a variety of wrap-around services available to the population, including health, behavioral health, and employment services. FBMS manages programs in each of these areas with mainstream partners. There is always a need for more programming that is individualized and easy to access.

Father Bill's and MainSpring has a relationship with the Brockton Neighborhood Health Center, who provides limited nursing services at the individual shelters and Father Bill's and MainSpring is currently looking to expand these services. Father Bill's and MainSpring also hosts a full-time social worker on site at individual shelters from Eliot Community Services. Father Bill's and MainSpring is a partner and provides Work Ready Services to homeless families at the Career Works office in Brockton. Father Bill's and MainSpring provides a veteran's employment and training program (Homeless Veterans Reintegration Program-HVRP).

BAMSI has no programs at this time that are specifically targeted to homeless persons. BAMSI's Helpline program provides information and referrals to individuals and families who are housing insecure, at risk of homelessness, or homeless, however the program is designed to help anyone seeking assistance. In addition to information and referral services, Helpline staff act as an advocate to assist callers navigate the various resources available including calling shelters to find beds. When available, Helpline also provide money to help pay a rent, mortgage, or utility bill.

BAMSI's COPE Center serves a large percentage of homeless 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 services targeted to the homeless. BAMSI Health and BAMSI Community especially offer behavioral health, peer support, recovery, and employment assistance.

Family and Community Resources focuses on domestic violence and finding safety for families fleeing domestic violence. They offer a variety of services to prepare for successful separation as it is one of the most common ways for women and families to become homeless.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

FBMS operates Brockton's emergency shelter for individuals and is in the process of redeveloping a property on Manley St. to become the new site for that and 32 units of PSH. The shelter provides a safe overnight shelter, nutritious meals, case management and rehousing services, and an on-site medical clinic operated by Brockton Neighborhood Health Center. A variety of Brockton community partners also offer day services and programs targeting specific subpopulations. Old Colony YMCA is a strong partner of FBMS in serving unaccompanied homeless youth. The VA and Volunteers of America offer significant

programming for homeless veterans. FBMS also offers over 130 units of family shelter in and around Brockton. There are several other family shelter providers working in the region, as well, including Old Colony YMCA. Each provides shelter, meals, case management, and rehousing. FBMS also operates Secure Jobs, an employment program serving homeless families in the region

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

It has not been identified at this time that Brockton is in a strong need for special needs facilities. While there is a need for some housing accommodations and special needs access to all encompassing public facilities, these are assisted and rehabilitated through the CDBG public facilities, homeowner rehabilitation, and HOME funds. The services needed for the special needs' population is assisted through public service funding.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

Housing needs for persons with mental or physical disabilities, drug and alcohol abuse problems, frail elderly persons, and other special needs persons could use the following:

- Case management and wrap around services to ensure housing can be maintained that includes meeting based on the needs which could be several times weekly to monthly-progressive engagement and disengagement
- Co-location of community resources so there can be “one stop shopping” for those who are disabled to locate resources in one place
- Support services to assist them with the activities of daily life to keep them housed
- Additional funding for direct care professionals who provide support services during the ongoing staffing crisis
- Benefits navigation, information and referral, and advocacy services to help these individuals take advantage of local, state, and federal benefits intended to help them

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

Father Bill's and MainSpring and BAMSI has set aside a number of units/beds for those with serious mental illness and those serviced by the Department of Mental Health. Both, FBMS and BAMSI are funded through the City of Brockton CDBG Public Service Funding Program.

BAMSI operates a closed referral Respite program for DMH. DMH primarily refers individuals just released from “mental health institutions” for placement in a Respite home. The program supports guests with obtaining housing as part of discharge planning and collaborates with the guests support team, which often consists of staff from BAMSI's ACCS program, PACT, and DMH).

BAMSI's ACCS program has 54 beds across 9 Group Living Environments (GLE). Residents are typically referred from "Mental Health Institutions (closed referral from DMH). DMH provides Rental Subsidy (DMHRSP) to fund movement of residents out of BAMSI's GLE into apartments that BAMSI leases. Brockton Housing Authority and the person served share the rent, and BAMSI provides ongoing clinical interventions and support

BAMSI also assists 60 individuals living in the community with maintaining housing, obtaining housing of choice, applying for subsidies (BHA, Section 8, Mainstream Vouchers). BAMSI supports housing-related costs with contingency funds (DMH provides funding) on a case-by-case basis

BAMSI's ACCS has a full time Housing Specialist who assists persons served with tenancy preservation, subsidy and housing applications, obtaining IDs, and needed documents to secure housing, lease management, fuel assistance, referrals, obtaining furnishings, cleaners, movers, etc.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

Father Bill's and MainSpring, BAMSI and the Old Colony YMCA David Louison Center continues to provide services to those families and individuals once they are housed, connecting to community resources, providing crisis intervention, and developing housing within the community. The City is invested to continue providing financial assistance to these public service agencies to carry out their activities that will benefit our special needs population.

BAMSI received a federal grant to establish a Certified Community Behavioral Health Clinic. The clinic will serve people who use drugs and veterans and will provide crisis mental health services; screening, assessment, and diagnosis; patient-centered treatment planning; outpatient mental health and substance use services; outpatient clinic primary care screening and monitoring; targeted case management; psychiatric rehabilitation services; peer support, counseling, and family support; and intensive mental health care for those in the military and veterans. BAMSI's COPE Center, Adult Day Treatment program, and Young Adult Access Center will act as satellite locations within Brockton.

BAMSI is also planning to open additional group homes for individuals living with traumatic brain injuries and individuals with developmental and/or intellectual disabilities.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

The Brockton Housing Authority has a robust Resident Service Coordinator Program to help our residents in our Federal Elderly Disabled buildings access needed services. The Brockton Housing Authority also partners with the City of Brockton on vaccination clinics, the DornDavies Center on food distribution, and Old Colony Elder Services on a meals program for our residents.

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

The creation of significant large scale housing development which contains many affordable units is politically hard to support locally. The City already contains more than the State mandated permanently restricted affordable housing.

The City of Brockton's current Zoning Ordinances are one of the greatest impediments to the creation of affordable housing and private investment in residential projects. The city's zoning map has not seen a major update in several decades. Large areas of the City are zoned for single family residential homes. Many of the other areas which are zoned for multifamily are fully developed. Most of the parcels in the R-2 and R-3 zones are built out. Vacant parcels are usually small undersized parcels and those which are buildable are affected by current market conditions which do not support the development of new housing. Other areas of the city where it would be appropriate to change zoning to allow for multifamily development and mixed-use developments are currently zoned for commercial use only. The city's planning capacity is severely limited which creates limitations on the ability to write and pass zoning amendments. Major zoning amendments of the type necessary to allow for the creation of significant new multifamily housing developments usually need to be supported by a comprehensive planning study to receive political support for passage.

As the City does not have control to determine what is affordable and what is not for existing properties, that is a negative effect on what is able to be done and how things are helped. Additionally, our past affordable properties are grouped together creating gentrification, whereas the City should be looking at mixed-income properties such as with 40R, requiring the 20/80 split in properties developed.

There are no structural public policies known to the Authority in the City of Brockton that prevent the construction or operation of affordable housing.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

This section of the Consolidated Plan discusses the non-housing community development needs in Brockton. The City of Brockton, under the leadership of its mayor, works to encourage economic activity, eliminate slums and blight in targeted areas and improve conditions in areas that meet the low and moderate income threshold. Community development priorities were based on the ongoing evaluation of public infrastructure and programmatic needs among low- and moderate-income households, slums and blight in targeted areas and key initiatives designed to improve quality of life and economic opportunities.

The city continues to support expanded recreational opportunities and necessary public facilities which meet the diverse needs of the population, especially children, youth, elders and households with low and moderate incomes. The city places a high priority on continued support of public service agencies and organizations which provides essential services.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	59	5	0	0	0
Arts, Entertainment, Accommodations	5,228	2,859	12	9	-3
Construction	2,114	1,169	5	4	-1
Education and Health Care Services	14,194	12,666	32	40	8
Finance, Insurance, and Real Estate	2,563	953	6	3	-3
Information	789	250	2	1	-1
Manufacturing	3,483	2,162	8	7	-1
Other Services	2,141	2,402	5	8	3
Professional, Scientific, Management Services	3,415	1,712	8	5	-3
Public Administration	0	0	0	0	0
Retail Trade	6,278	4,991	14	16	2

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Transportation and Warehousing	2,152	1,198	5	4	-1
Wholesale Trade	1,896	1,275	4	4	0
Total	44,312	31,642	--	--	--

Table 51 - Business Activity

Data Source: 2013-2017 ACS (Workers), 2017 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	50,110
Civilian Employed Population 16 years and over	45,230
Unemployment Rate	9.72
Unemployment Rate for Ages 16-24	37.01
Unemployment Rate for Ages 25-65	5.74

Table 52 - Labor Force

Data Source: 2013-2017 ACS

Occupations by Sector	Number of People
Management, business and financial	6,685
Farming, fisheries and forestry occupations	2,040
Service	8,230
Sales and office	11,370
Construction, extraction, maintenance and repair	2,995
Production, transportation and material moving	2,760

Table 53 – Occupations by Sector

Data Source: 2013-2017 ACS

Occupation	Estimate	Margin of Error
Civilian employed 16 years and over	51288	+/- 2928
Management/Business/Financial	7075	+/- 1727
Farming, fisheries, and forestry	0	+/- 218
Service	13237	+/- 1861
Sales and office	9546	+/- 1719
Construction, extraction, maintenance and repair	4536	+/-1782
Production, transportation and material mowing	7236	+/- 1465

Table 54 - 2021 ACS: Occupation By Sector

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	23,978	56%
30-59 Minutes	13,649	32%
60 or More Minutes	4,918	12%
Total	42,545	100%

Table 55 - Travel Time

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	6,577	0	5,153
High school graduate (includes equivalency)	14,877	0	7,731
Some college or Associate's degree	11,763	0	5,429
Bachelor's degree or higher	14,091	0	2,989

Table 56 - Educational Attainment by Employment Status

Data Source Comments: <https://data.census.gov/table?q=Educational+Attainment+By+Employment+Status+BROCKTON+MA>

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	140	400	695	2,475	1,950
9th to 12th grade, no diploma	1,115	1,130	1,080	2,405	1,430
High school graduate, GED, or alternative	2,995	4,185	3,520	8,650	4,610
Some college, no degree	3,430	3,900	2,895	4,830	1,655
Associate's degree	505	1,020	1,485	1,855	720
Bachelor's degree	605	1,930	1,780	2,935	1,020
Graduate or professional degree	125	730	680	1,140	655

Table 57 - Educational Attainment by Age

Data Source: 2013-2017 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	25,150
High school graduate (includes equivalency)	30,865
Some college or Associate's degree	37,160
Bachelor's degree	50,870
Graduate or professional degree	63,380

Table 58 – Median Earnings in the Past 12 Months

Data Source: 2013-2017 ACS

Educational attainment	Median Earnins in the past 12 months	Margin of error
Less than high school graduate	30337	+/- 7148
High school graduate	40459	+/- 4583
Some college or associate degree	46541	+/- 8923
Bachelor's degree	61197	+/- 13551
Graduate or professional degree	65495	+/- 7846

Table 59 - ACS 2021: Median Earnings

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

The largest super sector of employment in the Southeast region are Education and Health Services (32%), Retail Trade (14%) and Arts/Entertainment (12%). These three sectors accounts for over 50% of employment in Brockton. On the other hand, Public Administration (0%), Agriculture/Mining/Oil & Gas (0.1%) and Information (1.8%) are the sectors least sought for employment accounting for less than 5 percent of the jobs in the region.

While the number of workers in the region with a bachelor’s degree or higher increased over the past decade, many of the areas industries still had large shares of employees with High School degrees or less. Additionally, while there are plentiful of jobs in the Health Services field in Brockton, there is extremely limited training for sustainable positions in Brockton.

Describe the workforce and infrastructure needs of the business community:

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

Much of the expected job growth in the city is anticipated to be in the areas of manufacturing and health care services. Traditionally manufacturing does not require a high level of education and specialized education. However, by taking the time to train, educate and invest in the employees the industry can create better sustainability for itself and the community. Health care does require a higher level of education and training, but a majority of health care workers do not need advanced degrees or need to attend medical school. Most work as nurses, technicians, receptionists, or billing clerks. Although Brockton has two nursing programs, they are both very limited in class size for each year and the next closest training options are Boston or nearly Rhode Island. CNAs, HHAs, and PCAs are widely and quickly trained here in Brockton, however the income that comes from this role is usually not one of something to sustain solely from as a family provider working full time.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

Yes

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

Discussion

MA-50 Needs and Market Analysis Discussion

**Are there areas where households with multiple housing problems are concentrated?
(include a definition of "concentration")**

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

What are the characteristics of the market in these areas/neighborhoods?

Are there any community assets in these areas/neighborhoods?

Are there other strategic opportunities in any of these areas?

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

The City of Brockton believes that every resident should have affordable, reliable, high-speed internet, as well as access to the devices and skills to fully utilize it. Universal broadband connectivity will provide widespread benefits to residents and businesses alike, in the realms of economic empowerment, public safety, health, and education. The City is dedicated to investigating options to establish a downtown district or citywide service area for broadband service to maximize economic, social, and community benefits to the City's residents and businesses.

The Brockton Broadband Committee has worked with EntryPoint Networks, Connect Humanity, and Biarri Networks to develop a Digital Access Master Plan to help City leaders determine whether it is feasible and advisable to deploy and operate a municipally owned fiber network for the residents, businesses, and anchor institutions in the City of Brockton.

Between January 1 and March 31, 2022, the City of Brockton conducted a survey of residents and business operators to assess the sentiment regarding existing internet services and the level of support for a municipal fiber network. Key findings from the survey include the following: 93% of survey respondents in Brockton have a wired connection, of these 94% are cable connection from Xfinity/Comcast. 40% of respondents rate the Reliability of their internet connection as Poor or Fair. 43% of respondents rate the Speed of their internet connection as Poor or Fair. 86% of respondents rate the Affordability of their internet connection as Poor or Fair. 99% of respondents in Brockton indicated Yes/Possibly when asked if they would support a City Sponsored Fiber Network.

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

The current providers in Brockton are Bel Air Internet, Cogent Communications, Comcast Communications, Light Tower Fiber Networks (Crown Castle) and Verizon Business. In Brockton, most residents and businesses subscribe to wireline internet services from the cable operator (Xfinity/Comcast) and telephone incumbent (Verizon). Some businesses in Brockton are connected to fiber optics. Through EntryPoint's research, it was learned that Light Tower was acquired by Crown Castle and the Crown Castle maps identify four points of presence in Brockton: Good Samaritan Hospital, Eastern Bank, W.B. Mason / FDA Office in Brockton, and the Verizon Building. No commercial customers were identified for Bel Air Internet or Cogent.

According to mLABS data, the average speed delivered by Xfinity/Comcast in Brockton is 71.72 Mbps download / 8.52 Mbps upload. Verizon's average speed in Brockton is 2.51 Mbps download / 0.65 Mbps

upload. A community survey was conducted to assess key broadband insights from residents and commercial entities in Brockton. More than 1,300 residents responded to the survey. Of those respondents: 94.21% subscribe to Xfinity/Comcast for ISP services and 3.46% subscriber to Verizon for ISP services.

The City of Brockton conducted a survey of residents and business operators to assess the sentiment regarding existing internet services and the level of support for a municipal fiber network. Of the total 1,342 respondents, 39.84% reported that their current internet reliability is poor/fair. The city of Brockton is considering building a municipal fiber network to improve affordability, treat fiber optic infrastructure as a public utility, create competition through an open access model, unbundle infrastructure and services, create alignment with subscribers, establish local control, spur economic development by controlling strategic infrastructure, and address the gaps driving the digital divide.

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

The Brockton Conservation Commission is the official municipal agency responsible for overseeing the protection and preservation of Brockton's natural resources. The Conservation Commission is responsible for administering the Commonwealth's Wetland Protection Act, the Rivers Protection Act, and the MA Department of Environmental Protection Stormwater Management Standards. The Conservation Agent and Planning Department are responsible for the administrative support of the Conservation Commission, as well as the development of green space plans and initiatives, such as the Open Space & Recreation Plan and the Urban Agriculture Plan.

The City of Brockton evaluated natural hazard risks associated with climate change as part of its Municipal Vulnerability Preparedness (MVP) Community Building Workshop in 2019. During the Community Resilience Building workshop, participants were asked to reflect on the potential impacts of the top four natural hazards of concern for the City of Brockton. Discussion of the top hazards built on earlier conversations that took place at the MVP Core Team Meeting, as well as the City's existing Hazard Mitigation Plan. Flooding and the collective impacts of heavy precipitation and stormwater were identified as one of the City's top hazards. Severe storms bringing high winds and heavy, sometimes mixed precipitation, were identified as a second hazard. Extreme cold and hot temperatures, especially the increase in days over 90 degrees Fahrenheit, was seen as a third major hazard. Finally, drought was identified as a fourth hazard. These four hazards have already had demonstrated impacts on the City, and as climate change progresses, these hazards are expected to have ever greater consequences for infrastructure and environment, as well as for various societal elements.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

While many impacts are expected to be felt City-wide, certain elements, locations, or community groups present concerns. Neighborhoods/Communities: Downtown, Ward 2, Belmont Avenue, Caffrey Towers Apartments, Campello Neighborhood. Buildings and Facilities: Kmart Plaza, Westgate Shopping Mall, Massasoit Community College, Brockton High School, North Middle School, Brockton Housing Authority properties, D.W. Field Park. Ecosystems: Searle's Brook, Malfardar Brook, Westgate River, Salisbury Brook, Salisbury Plain River, Ellis Brett Pond, Silver Lake (southeast of the City), Trout Pond, Hunt's Pond, Gerry's Farm, Brockton Reservoir (north of the City, in Avon), D.W. Field Park. Infrastructure: Electric infrastructure, natural gas lines, Campello rail line, Wastewater Treatment Plant, water supply transmission lines, the "T" Commuter rail line. Dams: Brockton Reservoir Dam, Trout Pond Dam, Hunt's Pond Dam, dams in D.W. Fields Park.

Flooding is a severe hazard that frequently affects Brockton. Intense storms occurring throughout the year are producing very high volumes of rain, causing rivers and streams to overflow their banks, putting

significant pressure on dams, culverts, and other drainage infrastructure, and overwhelming the stormwater infrastructure system. Flooding frequently has City-wide impacts, including road closures at susceptible locations. In recent memory, rescuers have had to pull residents out of flooded homes from a boat, and certain neighborhoods are susceptible to flooding and related power outages. Four homes in one neighborhood have even been removed after suffering repetitive losses from flooding, including damage from sewage that would accumulate to a depth of six feet inside the buildings.

Winter storms are a high frequency hazard for the City. Brockton receives an average 38 to 48 inches of snowfall annually. High winds and accumulating precipitation threaten public safety, restrict economic activity, and disrupt transportation as streets become impassable. The weight of ice and snow can pull down trees and powerlines and over-burden flat roofed buildings with excessive snow loads, causing them to collapse. Brockton residents have also observed extreme temperature changes during each change in season. Summer, for instance, brings its own challenges, as the City is increasingly dealing with extreme heat conditions. In 2018, cooling centers were opened, and City pools made the decision to extend their hours and the season by 7 days to provide essential cooling services to residents. Climate change is bringing new types of winter storms, where ice, snow, and rain may arrive in a single event, complicating the already challenging task of maintaining roads and keeping residents safe. In extreme cases, residents may be unable to leave their homes or receive assistance for many days at a time.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The needs of the City of Brockton and its low- and moderate-income population are great. Financial resources are needed in the areas of housing, economic development, public facilities, parks, public safety, and public services. However, with the limited funding the city has continued to prioritize its spending to meet the current needs of the City. The primary goal of this strategic plan is to improve neighborhoods and the facilities which affect the lives of residents. In the past five years a significant number of federal resources (CDBG and HOME) were spent in the direct rehabilitation of vacant and foreclosed properties in several neighborhoods in the City. This effort has been successful as it has now spurred renewed private investment in housing several of these neighborhoods. In many neighborhoods multifamily buildings are being purchased and rehabilitated by investors and residents alike. However, there are many other needs which affect the lives of residents in these neighborhoods.

Programs providing homeowner rehabilitation loans and upgrades to neighborhood parks have a direct effect on the fabric of neighborhoods and people's lives. Targeted public infrastructure projects in these areas also directly improve the quality of people's lives. Assisting homeowners with interest free loans for emergency repairs to their homes allows many residents to remain in their neighborhoods, thus providing stability in the area rather than another vacant building. Increasing access to homeownership by providing down-payment assistance to first time homebuyers. Providing financial assistance to business owners for exterior modification of their storefronts. Assisting homeowners with grants for lead remediation of their units to minimize chances of individuals having extremely high blood levels. The City has also begun making improvements to long neglected parks throughout the City. This plan envisions continued funding for parks and homeowner rehabilitation throughout the five years of this plan. This coordinated multi-faceted approach to directed spending in low- and moderate-income neighborhoods should result in a safer more vibrant and healthy community.

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

Table 60 - Geographic Priority Areas

1	Area Name:	Census tract 5104, 5108, 5109, 5114
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Other
	Other Revital Description:	Public Safety
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	
2	Area Name:	City Wide
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Housing
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
Identify the needs in this target area.		

	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	
3	Area Name:	Downtown - Main Street
	Area Type:	CDFI area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	93.47
	Revital Type:	Commercial
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	
4	Area Name:	Downtown Corridor/Business District
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Commercial
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	

	Are there barriers to improvement in this target area?	
5	Area Name:	Low and Moderate Census Tracts
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
Are there barriers to improvement in this target area?		

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

The City of Brockton is not allocating percentages of funds for specific geographic locations within the City except for the Main Street Art program and the Brockton Police Mobile Anticrime Patrols which are specifically for the downtown corridor and surrounding neighborhoods. The City of Brockton has 21 Census Tracts that divide up the City of Brockton. Of the 21 census tracts, ten of them are low- and moderate-income areas according to ACS estimates for 2010. The target neighborhoods indicated above are all within low- and moderate-income census tracts.

Downtown Core Neighborhoods – Census Tract 5109 had 79% of the households listed in the ACS as low and moderate income. This neighborhood is in the very core of the city. This area is a high crime area and is patrolled by the specially equipped Brockton Police Anti-Crime Unit.

Highland, Newbury, and Green Street Neighborhoods – Census Tract 5108 has 61% of the households listed in the 2010 Census as low and moderate income. The City has made great strides in this area relative to home acquisitions and renovations. Although there is still much to do, the City has committed

to completing projects by way of renovations to vacant or abandoned properties to bring them to habitable condition and demolitions of properties that are beyond repair.

Montello Neighborhood – There are two low- and moderate-income census tracts with this neighborhood, census tract 5105-02 and 5103. The City of Brockton and the Brockton Redevelopment Authority will assist homeowners in these census tracts with repairs to their homes and will concentrate on vacant or abandoned properties within these areas.

The Village – Census Tract 5110 is within this neighborhood and is made up of 65% low- and moderate-income residents.

Campello Neighborhood – Census tract 5114 and 5116 are within the Campello Neighborhood and has 52% of its residents low and moderate income in tract 5114 and 51% in Census Tract 5116.

East Side Neighborhood – Census Tract 5112 has 52% of the residents listed as low and moderate income.

Pleasant/Prospect Neighborhood is within census tract 5104 and has over 52% of its residents listed as low- and moderate-income households.

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

Table 61 – Priority Needs Summary

Narrative (Optional)

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	Age, accessibility, location, market trends, high market rents. We typically focus more on production of affordable housing units. However, in the next five years depending on availability of funds, the BRA will attempt to create a TBRA program. If not successful we'll look to provide funds to a subrecipient (with a match requirement) to carry out a rental assistance program.
TBRA for Non-Homeless Special Needs	Same as above.
New Unit Production	Market trends, slowing of foreclosures, high market rents. The City is committed to increase the supply of affordable housing units through production of new units construction and substantial rehabilitation of affordable housing units.
Rehabilitation	Market trends. The city plans to focus on homeowner rehabilitation activities in low-income target neighborhoods that require bringing property up to code and emergency repairs. Both, HOME & CDBG funds, will be committed for the rehabilitation of housing units through Receivership program (CDBG), Homeowner rehab program (CDBG), and substantial rehabilitation (HOME).
Acquisition, including preservation	Housing market. The City of Brockton will acquire housing units under the Receivership program, rehab the units and make it available and affordable to low-mod income persons/families while preserving the housing stock in the city.

Table 62 – Influence of Market Conditions

LABEL	ESTIMATE	MARGIN OR ERROR	PERCENT	PERCENT MARGIN OF ERROR
Total population	105,455	+/- 45	105,455	(X)
Male	50,254	+/- 1,857	47.7%	+/- 1.8
Female	55,201	+/- 1,853	52.3%	+/- 1.8

Table 63 - ACS Brockton Population: 2021

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

The Mayor has directed the Brockton Redevelopment Authority to work closely and collaboratively with public and private housing agencies, other municipal instrumentalities as directed, the Commonwealth’s Department of Housing and Community Development and with several non-profit organizations working in the areas of affordable housing, homelessness, social services, and anti-poverty programs. The Brockton Redevelopment Authority will maintain solid working ties and relationships with the extended network of housing and social service providers operating in Brockton and within the region including the Old Colony Planning Council and the Plymouth County Housing Alliance. Lastly, the BRA will remain active and engaged members and participants of the Mayor’s Economic Advisors which acts as a focal point and clearing house for municipal entities, non-profit organizations and private industry interests pursuing a common economic development agenda.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,270,793	300,000	0	1,570,793	0	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	684,097	0	0	684,097	0	

Table 64 - Anticipated Resources

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

Wherever possible and to the greatest extent feasible, Brockton will utilize CDBG and HOME funds to leverage additional state, local and private investments in support of affordable housing, public services, and economic development initiatives. Currently, CDBG has been used to match park grants, fund public services, along with other local developments.

In recent years the HOME funds have leveraged NSP funds from the Massachusetts Department of Housing and Community Development and private financing from area banks to acquire and rehabilitate vacant, foreclosed, bank owned two and three family homes for the purpose of neighborhood revitalization. Renovated properties have proven to be the catalyst in stabilizing neighborhoods and attracting private investment. Recent projects have also utilized State Chapter 40R Smart Growth Zoning and Housing Production funds. Developers are also using local HOME funds to leverage both state and historic tax credits along with DHCD State Affordable Housing Trust Funds, state HOME funds and Brownfield funds. Continued bridge building with stakeholders in the neighborhoods is important to ensure long term vitality. The Brockton Housing Authority's Massachusetts Rental Voucher Program will fulfill the City's HOME Match Program.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

Discussion

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served

Table 65 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The BRA’s strengths in terms of its delivery system for the Consolidated Plan and Subsequent Action Plans rest in its track record and institutional memory as the entity responsible for administrating Brockton’s CDBG program for more than 30 years and the HOME program for more than past 20 years. The BRA has had the responsibility for preparing, submitting, and implementing all previous Consolidated Community Development Plans and Action Plans as well as for managing the Consultation and Citizen Participation processes, preparing annual CAPER(s) and interacting with HUD representatives. The BRA has always played a central and critical role in the planning, implementation and coordination of Brockton’s multi-faceted and interrelated community and economic development efforts. As the BRA partners with other public agencies and with community based and/or private organizations to carry out projects and programs covered by the Consolidated Plan, the BRA nonetheless remains the agency ultimately responsible for administering those programs. Gaps in the program delivery system is largely and perhaps solely 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 the Consolidated Plan and Action Plans. Consequently, the BRA must sometimes seek out independent contractors or engage in interagency agreements to carry out certain program responsibilities and activities.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X		
Mortgage Assistance	X		
Rental Assistance	X		
Utilities Assistance	X		
Street Outreach Services			
Law Enforcement	X	X	
Mobile Clinics			

Street Outreach Services			
Other Street Outreach Services	X	X	X
Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X		
Education	X	X	X
Employment and Employment Training	X	X	
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	
Mental Health Counseling	X	X	
Transportation	X		
Other			

Table 66 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

(FBMS) creates and provides affordable, safe housing with supportive services for individuals and families who had once been homeless. Providing a special niche supportive housing for those whose disabilities or special circumstances are not met by the traditional housing market. Most of this housing is subsidized through HUD Continuum of Care (CoC) resources, with other federal, state, and private resources. FBMS has a Permanent Supportive Housing Program comprised of staff that engage hard-to-serve individuals, move them to permanent housing and provide supports to stabilize them in housing. FBMS serves individuals and families in Norfolk and Plymouth Counties.

FBMS facilitates connections to other services for homeless households. They operate licensed health clinics inside both their emergency shelters for individuals and maintain strong relationships with the mainstream behavioral health service continuum. This includes, but is not limited to, partnerships with Eliot Community Human Services, DMH, Bay State Community Services, Brockton Neighborhood Health, Signature- Brockton Hospital, Steward Healthcare, Champion Plan, etc. They connect homeless families to insurance and health/behavioral health as needed. FBMS is also a HOPWA and Ryan White recipient, providing housing support services to people living with HIV/AIDS.

The goal of supportive services is to help participants achieve housing stability, self-sufficiency, and employment and/or income maximization. Case managers serve as intermediaries with landlords, addressing any tenancy issues that may arise and ensure eligibility on an annual basis. Case managers provide ongoing, continual support via home visits based on participant need. They assist participants with financial management, tenancy issues, access to employment programs, food, medical and mental healthcare, and other support programs.

FBMS also assists with community outreach efforts. A clinician from Eliot Community Human Services is based at the MainSpring House shelter and conducts outreach on the streets with the assistance of a shelter triage worker on a weekly basis. The goal is to assist the hardest to serve individuals in accessing resources; and often starts with a bagged lunch, some clean socks and relationship building. The Table, a community lunch program, is located at the Mainspring House and is open to the community six days per week. This provides homeless and low-income individuals and families with at least one hot meal daily. It is also an opportunity to engage and build relationships with folks who may not otherwise access services.

As part of the services provided in shelter and housing, FBMS works with individuals who indicate their HIV status to ensure connections to targeted HIV services as well as mainstream benefits and services. FBMS currently operates two programs targeted to people experiencing homelessness who are living with HIV/AIDS. These programs are funded by the Ryan White Care Act and the Housing Opportunities for Persons With AIDS. These provide critical housing search, counseling, and stabilization services for the population.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

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 coordinated and 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 the mainstream services they need, 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 for our population.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

Case conferencing within the Coordinated Entry system allows the CoC to identify systemic gaps and raise those up to the 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. The Executive Committee 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 in their ACO program. FBMS continues to work to develop partnerships with behavioral health and other service providers to ease access and establish priority for homeless households.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Preserve Existing Housing Stock	2023	2027	Affordable Housing	City Wide			Homeowner Housing Rehabilitated: 70 Household Housing Unit
2	Homeless Prevention	2023	2027	Homeless	City Wide			Public service activities other than Low/Moderate Income Housing Benefit: 500 Persons Assisted
3	Increase Supply of Affordable Housing	2023	2027	Affordable Housing	City Wide			Rental units rehabilitated: 20 Household Housing Unit Homeowner Housing Added: 20 Household Housing Unit
4	Stabilize and Improve At-Risk Neighborhoods	2023	2027	Non-Housing Community Development	Census tract 5104, 5108, 5109, 5114			Public service activities other than Low/Moderate Income Housing Benefit: 1000 Persons Assisted
5	Promote Economic Development	2023	2027	Non-Housing Community Development	Downtown - Main Street Downtown Corridor/Business District City Wide			Facade treatment/business building rehabilitation: 10 Business Jobs created/retained: 20 Jobs

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Homeless and At-Risk of Homelessness Services	2023	2027	Homeless	City Wide			Homelessness Prevention: 500 Persons Assisted
7	Special Needs housing	2023	2027	Non-Homeless Special Needs	City Wide			Public service activities other than Low/Moderate Income Housing Benefit: 500 Persons Assisted
8	Revitalize target neighborhoods	2023	2027	Affordable Housing	City Wide Low and Moderate Census Tracts			Homeowner Housing Rehabilitated: 70 Household Housing Unit
9	Promote Services that Promotes Self Sufficiency	2023	2027	Non-Housing Community Development	City Wide			Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 500 Persons Assisted
10	Increase Access for Homeownership	2023	2027	Affordable Housing	City Wide			Direct Financial Assistance to Homebuyers: 30 Households Assisted

Table 67 – Goals Summary

Goal Descriptions

1	Goal Name	Preserve Existing Housing Stock
	Goal Description	Maintain, support and preserve existing housing stock in the City of Brockton by preventing deterioration of housing and by assisting low and moderate-income homeowners with needed repairs that they could otherwise not afford to pay for themselves.
2	Goal Name	Homeless Prevention
	Goal Description	The Brockton Redevelopment Authority is working with various agencies throughout the City toward the goal of ending chronic homelessness. Although the City has made great strides over the past five years, there is still much work to be done in meeting the goal of assisting and ending homelessness in the City of Brockton.
3	Goal Name	Increase Supply of Affordable Housing
	Goal Description	Produce affordable restricted housing with time restrictions that meets or exceeds the required affordability periods. Increase overall availability of affordable permanent housing through new units and the rehabilitation of existing vacant and deterioration units. Preserve the quality of life in existing neighborhoods while accommodating smart growth, supporting a well-conceived balance between housing development, transportation, open space and recreational facilities and commercial development.
4	Goal Name	Stabilize and Improve At-Risk Neighborhoods
	Goal Description	The City of Brockton is continuing to support the stabilization of foreclosed properties and/or assist low and moderate-income households that are at risk of losing their homes. In addition, to stabilize at risk neighborhoods, the City considers safety of its residents by reducing crime in neighborhoods known for high criminal activity, thus stabilizing the neighborhood while at the same time protecting the citizens of Brockton.
5	Goal Name	Promote Economic Development
	Goal Description	Enhance the income of low and moderate-income residents and provide jobs for the unemployed. Strategies: 1) develop neighborhood businesses 2) redevelopment of underutilized buildings especially downtown 3) support business and encourage efforts to retained and create jobs 4) improve parking and traffic patterns in core business areas 5) attract people to the downtown core.

6	Goal Name	Homeless and At-Risk of Homelessness Services
	Goal Description	Intervene in situations which can lead to homelessness such as foreclosures and to develop permanent housing in place of temporary shelters. Strategies: 1) info and referral services to connect people at risk w/appropriate resources 2) provide training and services to enable the homeless to become self-sufficient.
7	Goal Name	Special Needs housing
	Goal Description	Focus is on populations that have special needs which are rarely served by the private market. Strategies: 1) develop services 2) support housing programs 3) provide funding for adaptive rehabilitation of owner occupied single and 2 family homes.
8	Goal Name	Revitalize target neighborhoods
	Goal Description	Under the Receivership program, the City of Brockton plans to acquire, rehabilitate and/or demolish properties in low and moderate-income areas of the City. The City's efforts are to prevent neighborhoods from continued deterioration. The Brockton Redevelopment Authority, working with a variety of agencies throughout the City will work to rescue some of these properties and return them to productive use and occupancy. CDBG funds will be used to purchase and rehabilitate foreclosed single-family homes which will be sold to low and moderate-income families under existing First Time Homebuyer Programs. In the event a property is unable to be rehabilitated, the City will demolish the property to eliminate the concern for the health and safety of the residents that reside in those neighborhoods.
9	Goal Name	Promote Services that Promotes Self Sufficiency
	Goal Description	Help to maintain good health and preserve independence. Strategies include: 1) enable success in school through supportive a learning environment 2) enable independence through social service agencies.
10	Goal Name	Increase Access for Homeownership
	Goal Description	Down payment assistance and closing cost assistance for 1st time home buyers. Purchase and rehab program. Housing counseling courses. Fair housing programs including affirmative fair marketing, outreach efforts and transition of vital documents.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

During the next five years the City of Brockton expects to provide affordable housing to low-mod income persons under the First Time Homebuyer's Down Payment Assistance Program (FTHB-DPA). We estimate to be able to assist about 30 families of the community through this program and other projects and partnerships. During the FY2017, The City of Brockton developed a new construction of two units in which the property was sold to an income eligible person under the FTHB-DPA program. We are expecting to develop a similar new construction of two units to be sold to a first-time homebuyer that is income eligible. The City expects to provide more affordable housing to extremely low-income, low-income, and moderate-income persons by committing funds to development of new units in the city and potentially rehabilitation of affordable units.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

The Brockton Housing Authority portfolio meets the required threshold of Specially Designed Units. The Authority often has difficulty finding appropriate applicants for these units.

Activities to Increase Resident Involvements

Is the public housing agency designated as troubled under 24 CFR part 902?

No

Plan to remove the ‘troubled’ designation

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

The creation of significant large scale housing development which contains many affordable units is politically hard to support locally. The City already contains more than the State mandated permanently restricted affordable housing.

The City of Brockton's current Zoning Ordinances are one of the greatest impediments to the creation of affordable housing and private investment in residential projects. The city's zoning map has not seen a major update in several decades. Large areas of the City are zoned for single family residential homes. Many of the other areas which are zoned for multifamily are fully developed. Most of the parcels in the R-2 and R-3 zones are built out. Vacant parcels are usually small undersized parcels and those which are buildable are affected by current market conditions which do not support the development of new housing. Other areas of the city where it would be appropriate to change zoning to allow for multifamily development and mixed-use developments are currently zoned for commercial use only. The city's planning capacity is severely limited which creates limitations on the ability to write and pass zoning amendments. Major zoning amendments of the type necessary to allow for the creation of significant new multifamily housing developments usually need to be supported by a comprehensive planning study to receive political support for passage.

As the City does not have control to determine what is affordable and what is not for existing properties, that is a negative effect on what is able to be done and how things are helped. Additionally, our past affordable properties are grouped together creating gentrification, whereas the City should be looking at mixed-income properties such as with 40R, requiring the 20/80 split in properties developed.

There are no structural public policies known to the Authority in the City of Brockton that prevent the construction or operation of affordable housing.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The city is seeking mixed income projects in the downtown to spur economic growth and bring back the vitality to the area. If this effort is successful as it has been in other gateway cities this plan could be applied to other traditional commercial centers of the city. This would allow the city to expand the number of affordable units but within a context of larger number of market rate units and within mixed use developments. The Redevelopment Authority will also continue its current policy of creating affordable units within small multifamily dwellings needing renovation, usually two or three family homes, which will be renovated with CDBG funds.

For over 35 years the Authority has been using Capital grants from the US Department of Housing and Urban Developments (HUD) and the Massachusetts Department of Housing and Community Development (DHCD) to address the upkeep of its portfolio. Unfortunately these funds have not been adequate and the capital needs have far outpaced funding resulting in periodic shuttering of our units.

In response to this issue the Authority has applied for and been granted the status of a Moving to Work Agency by HUD which grants the Authority flexibility in the execution of many of its federal programs. This flexibility is being used in combination with HUD's repositioning strategy to change the way our public housing units are financed. In repositioning our portfolio the Authority will free up some Faircloth authorization which will be used to federalize our state portfolio. These steps will ensure that our units are kept in good repair and available to our applicants for years to come. The Authority is also exploring methods to increase the number of units that are available to our participants.

SP-60 Homelessness Strategy – 91.215(d)

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

The City of Brockton and Father Bill's and MainSpring would like to partner with community entities to outreach and engage the unsheltered homeless community and would like to prioritize this group for possible housing subsidies through Brockton Housing Authority. The city would also like to participate in a community run group to identify chronic people living on the street and provide targeted outreach and housing resources. FBMS has a full-time street outreach team working in the communities in the region with the highest numbers of unsheltered persons (Quincy, Brockton, and Plymouth). The outreach staff establish relationships with individuals, conduct assessments, encourage them to enter shelter, and assist with rehousing. They also provide access to basic needs, such as food and clothing, and facilitate connections to medical care and other support services. People experiencing homelessness also often present at the shelters or call for assistance. All walk-ins or phone calls are assessed for services and provided with referrals and/or intake into relevant programs. In addition, BAMSI COPE center often engages in outreach activities that include homeless persons, but the program focus is harm reduction for people who use drugs

Addressing the emergency and transitional housing needs of homeless persons

FBMS operates shelter and over 600 units of permanent housing in the south shore. Through the portfolio, they strive to provide access to emergency shelter and housing for all who need it. In addition, they continue to develop additional units of PSH to address the housing needs of those who are most vulnerable and experiencing chronic homelessness. FBMS work to establish partnerships with other housing providers, such as Brockton Housing Authority and NeighborWorks Housing Solutions. They are in the process of creating a new housing resource center to replace their existing MainSpring House emergency shelter. This new Housing Resource Center will feature 32 supportive housing units, on-site health clinic and 128 emergency shelter beds.

BAMSI Helpline assists families with RAFT applications and works hand in hand with Father Bill's & MainSpring (eviction diversion program and tenant preservation program), the Department of Transitional Assistance, and the Department of Housing and Community Development. Helpline also assists individuals and families in finding beds at local shelters.

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.

Providing support services to permanent housing programs will significantly increase the ability of households to maintain their homes. Referral of homeless individuals and families to WorkReady Family, WorkExpress, Brockton CareerWorks, and other community programs will help to increase income and the ability of these individuals and families to afford housing. The implemented Coordinated Entry system ensures resources are targeted to those who are most vulnerable, and easily accessible to people regardless of where and how they present for assistance. Continue to develop and administer housing programs as an agency and with community partners to serve the homeless. Advocating for and developing affordable housing will help to make more housing opportunities available to more individuals and families, which will in turn help to prevent homelessness.

FBMS operates over 600 units of permanent housing as well as rapid rehousing programming. Homeless households receive housing search and placement services beginning as soon as they enter shelter or outreach programming. We attempt to connect them with the type of housing that best suits their needs and interest (e.g., unit size and location). Each person housed through one of these programs receives individualized stabilization services to help them maintain permanent housing for the long-term

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

As described above, FBMS has several homelessness prevention and shelter diversion programs in partnership with healthcare partners, housing authorities and large property owners, and local Housing Court sessions. Their stabilization programs are also designed to keep people housed once placed into one of their units. In all cases, households are provided with individualized services and housing assistance to meet their needs. The vision is to provide folks with these housing-based solutions as the first step, and to only rely on the shelter system as a last result when the tenancies cannot be preserved. Moving toward the Housing Resource Center model will help to reallocate resources toward housing solutions and limit unnecessary shelter stays.

FBMS provides data to the Interagency Council on Housing and Homelessness, state agencies, and institutions and systems of care on the individuals and families that are discharged to better coordinate/communicate with the state and other systems of care. Father Bill's and MainSpring acts as a convener of over 100 community stakeholders through the South Shore Regional Network Continuum of Care. The CoC has sub-committees focused on homeless individuals, families, veterans, and unaccompanied homeless youth. In addition, BAMSI provides many services to various groups in the community for assistance with staying in their homes and caring for themselves and their families. BAMSI Helpline program provides funding to families experiencing financial hardship for rent, mortgage

payments, and utility bills to help keep families housed. Their Respite program houses individuals discharged from mental health institutions.

Last year BAMSI's Helpline assisted over 2,000 individuals, ACCS served 143 individuals and Respite served 73. BAMSI's Clubhouse, Adult Day Treatment, and Recovery Connections Community served a combined total of 174 individuals and COPE served 1,000 individuals. BAMSI's goal is to assist more individuals next year, depending on available funding.

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

According to the American Community Survey, 71% of homes in Massachusetts were built before 1978 and 83% built before 1978 were of Brockton homes which is a contributing factor to a community's rate of elevated blood lead levels. Lead was widely used in interior and exterior paint prior to 1978 when its use was banned by the Environmental Protection Agency. No reliable calculation exists as to the exact number of Brockton housing units containing lead paint, although it can be assumed that many the older properties have been delead through various State and Federal programs to encourage deleading, to the number of properties with lead paint is slowly diminishing. In FY17 the City of Brockton received a grant of \$3 million to delead 144 units over three years period. In FY20, the City was awarded a grant of \$4.7 million to abate lead paint and hazards in 210 Brockton housing units by 2024. The BRA acting by and through the City of Brockton applied for a grant between \$1-2 million from Healthy Homes Production Grant with hopes to be awarded and continue the efforts to remove Brockton from MA's high risk community of lead poisoning. The key strategies for addressing the problem during the next five years are as follows:

1. The City of Brockton's systematic code enforcement inspections.
2. The Lead-Based paint Hazard Control Program administered by the Brockton Redevelopment Authority.
3. The BRA's CDBG funded property rehabilitation programs and property rescue efforts.
4. Mass Housing's "Get the Lead Out" Program.
5. The BRA's Homeowner Rehabilitation Program with requires testing for lead paint in any unit to be rehabilitated with children under the age of 6 residing at that property.
6. Partner with community organizations to assist with intake.
7. Partner with organizations that receive lead testing and abatement funds.

How are the actions listed above related to the extent of lead poisoning and hazards?

The goal of the Brockton Lead Hazard Control Program and the task force is to dramatically reduce the numbers of lead exposed children to the point where Brockton would no longer be classified as a high-risk community by the Department of Public Health Childhood Lead Poisoning Prevention Program.

How are the actions listed above integrated into housing policies and procedures?

The Brockton Lead-Based Paint Hazard Control Program (LBPHCP) works closely with the Health Department, Neighbor works of Southern Mass, and Self-Help Inc. All agencies refer cases to the program which are enrolled if the owner meets intake criteria.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

Most activities undertaken by the City of Brockton with CDBG funding and other federal and state funds for low-income families are efforts to reduce the number of persons in poverty and improve the quality of life for Brockton residents, either directly or indirectly. The City of Brockton also works in partnership with citizens, other City departments and the public and private sectors to accomplish its goal of reducing poverty. CDBG programs which can be used, and which directly influence the household income level include Job Training, Job Counseling and placement, Education and Business development. Funds can also be used to assist homeowners at or below poverty level by reducing costs such as affordable housing, home repairs, energy efficiency utilities, public transportation, and healthcare assistance.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

Soon the focus will be on job development and economic stabilization. CDBG and HOME programs can be used and can indirectly influence the impact on household living by those at or below the poverty level, by reducing other costs including, affordable housing, energy efficiency and public transportation and health care assistance.

The MassHire Greater Brockton Workforce Board (MassHire) along with the Mayor of Brockton, charters CareerWorks, the One Stop Career Center operated by the University of Massachusetts Donahue Institute and YouthWorks, the youth career and educational resource center. Providing oversight and leveraging resources, BAWIB works with our community leaders to respond to current trends in our region.

MassHire works with employers to bring training resources to the region and to foster collaborations for regional priorities. They also serve as ambassador for the MA Workforce Training fund and conduct training sessions for employers. An additional focus of the Board is to respond to the need for Adult Basic Education (ABE) and English for Speakers of Other Languages (ESOL) resources into our region. Developing new strategies to build the capacity of the region, MassHire has initiated a wide range of programming for ABE & ESOL residents. A full-time staff manages operations and assists the Board in the implementation of policy and practices.

SP-80 Monitoring – 91.230

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

The City of Brockton performs an ongoing monitoring process in compliance with the U. S. Department of Housing and Urban Development (HUD) regulations. The purpose of the monitoring process is to evaluate performance regarding Meeting Goals and Objectives; Compliance with HUD rules; Regulations and Administrative Requirements; timely use of funds; and prevention of fraud and abuse of funds.

Each year when the City accepts proposals for new CDBG funds, applicants are required to supply specific information on primary beneficiaries of the intended project, the number of minority persons served, target populations and service needs. Specifically, applicants are asked to disclose information regarding techniques used to identify, assess, and reach target populations as well as commenting on the goals and objectives of the proposed activity. Module forms are required along with invoices before payments are made monthly. Additionally, each public service agency is required to submit with their application for funding, the previous year's annual audit financial statements, certificate of insurance and forms disclosing compliance with HUD regulation 24 CFR 570.506(g)(3). The Brockton Redevelopment Authority will be responsible for monitoring these activities as described below:

1. **Public Services (non-profits)** - Conduct periodic on site monitoring; review records and other pertinent information. Non-profit agencies will be required to submit regular reports indicating the number of low and moderate income persons being served and the ethnicity of those serviced by the funded programs/activities. Such reports will be required to include particular detail as to how funded programs are benefiting low- and moderate-income persons.
2. **Economic Development** - Maintain Job Creation/Retention records for each business assisted.
3. **Rental Development/Homebuyer Assistance:** 1. Undertake careful review of income eligibility for grants and assistance by means of credible income verification. 2. Undertake outreach to minority members of the community to facilitate their access to these financing tools. 3. Include recapture and/or resale provisions in all homebuyer assistance programs calling for repayment if the property is sold within varying time periods keyed to the amount of assistance provided (recapture and resale provisions are to be secured by liens). 4. Ensure long term code compliance in rental units.
4. **Davis Bacon Compliance** - The Brockton Redevelopment Authority oversees federally funded facility projects with require Davis Bacon compliance. HUD form 1040 - Federal Labor Standards Provisions
5. **Fair Housing Compliance** - Residents and/or property owners with questions, issues or complaints associated with applicable Fair Housing laws may access the technical services of agencies such as the Brockton Redevelopment Authority and the Brockton Housing Authority.

6. **Section 3 Requirements** - If the agency issues a contract more than \$100,000.00, it will require a Section 3 plan from the contractor and will monitor that plan to ensure that businesses used, and individuals hired are used to the greatest extent possible as delineated in that plan. Further, the agency requires all construction contracts using CDBG funds have a minimum of 25% of the contract awarded to Section 3 based businesses, Small Business Enterprises (SBE's), Minority Based Businesses (MBE) and Women Owned Businesses (WBE).

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

The Mayor has directed the Brockton Redevelopment Authority to work closely and collaboratively with public and private housing agencies, other municipal instrumentalities as directed, the Commonwealth’s Department of Housing and Community Development and with several non-profit organizations working in the areas of affordable housing, homelessness, social services, and anti-poverty programs. The Brockton Redevelopment Authority will maintain solid working ties and relationships with the extended network of housing and social service providers operating in Brockton and within the region including the Old Colony Planning Council and the Plymouth County Housing Alliance. Lastly, the BRA will remain active and engaged members and participants of the Mayor’s Economic Advisors which acts as a focal point and clearing house for municipal entities, non-profit organizations and private industry interests pursuing a common economic development agenda.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,270,793	300,000	0	1,570,793	0	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	684,097	0	0	684,097	0	

Table 68 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

Wherever possible and to the greatest extent feasible, Brockton will utilize CDBG and HOME funds to leverage additional state, local and private investments in support of affordable housing, public services, and economic development initiatives. Currently, CDBG has been used to match park grants, fund public services, along with other local developments.

In recent years the HOME funds have leveraged NSP funds from the Massachusetts Department of Housing and Community Development and private financing from area banks to acquire and rehabilitate vacant, foreclosed, bank owned two and three family homes for the purpose of neighborhood revitalization. Renovated properties have proven to be the catalyst in stabilizing neighborhoods and attracting private investment. Recent projects have also utilized State Chapter 40R Smart Growth Zoning and Housing Production funds. Developers are also using local HOME funds to leverage both state and historic tax credits along with DHCD State Affordable Housing Trust Funds, state HOME funds and Brownfield funds. Continued bridge building with stakeholders in the neighborhoods is important to ensure long term vitality. The Brockton Housing Authority’s Massachusetts Rental Voucher Program will fulfill the City’s HOME Match Program.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

Discussion

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator

Table 69 – Goals Summary

Goal Descriptions

Projects

AP-35 Projects – 91.220(d)

Introduction

Projects

#	Project Name

Table 70 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

AP-38 Project Summary
Project Summary Information

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

Downtown Core Neighborhoods Census Tract 5109 had 79% of the households listed in the ACS as low and moderate income. This neighborhood is in the very core of the city. This area is a high crime area and is patrolled by the specially equipped Brockton Police Anti-Crime Unit.

Highland, Newbury and Green Street Neighborhoods Census Tract 5108 has 61% of the households listed as low and moderate income. The City has made great strides in this area relative to home acquisitions and renovations. Although there is still much to do, the City has committed to completing projects by way of renovations to vacant or abandoned properties to bring them to habitable condition and demolitions of properties that are beyond repair.

Montello Neighborhood There are two low- and moderate-income census tracts with this neighborhood, census tract 5105-02 and 5103. The City of Brockton and the Brockton Redevelopment Authority will assist homeowners in these census tracts with repairs to their homes and will concentrate on vacant or abandoned properties within these areas.

The Village Census Tract 5110 is within this neighborhood and is made up of 65% low- and moderate-income residents.

Campello Neighborhood Census tract 5114 and 5116 are within the Campello Neighborhood and has 52% of its residents low and moderate income in tract 5114 and 51% in Census Tract 5116.

East Side Neighborhood Census Tract 5112 has 52% of the residents listed as low and moderate income.

Pleasant/Prospect Neighborhood is within census tract 5104 and has over 52% of its residents listed as low- and moderate-income households.

Geographic Distribution

Target Area	Percentage of Funds
Downtown - Main Street	10
Downtown Corridor/Business District	5
City Wide	60
Census tract 5104, 5108, 5109, 5114	10
Low and Moderate Census Tracts	15

Table 71 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City of Brockton is not allocating percentages of funds for specific geographic locations within the City except for the Brockton Police Cadet program which are specifically for the downtown corridor and surrounding neighborhoods.

Discussion

The City of Brockton has 21 Census Tracts that divide up the City of Brockton. Of the 21 census tracts, nine of them are low and moderate income areas according to ACS estimates. The target neighborhoods indicated above are all within low- and moderate-income census tracts. The BRA will utilize funds to carry out activities and projects that will benefit low-moderate-income individuals.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

There are several services and programs which will assist the achievement of the housing goals. Listed below are the programs that will assist in providing affordable housing to families in the City of Brockton. Father Bill's and MainSpring will provide create a Supportive Housing Resource Center which will provide 32 studio units (11 HOME-assisted), 128 emergency beds and on-site health clinic. NeighborWorks of SouthernMass will provide 39 rental units in the downtown area in which 6 will be HOME assisted units, and two other housing developments which will combine a total of 110 housing units. In addition, the BRA will carry out a new construction HOME project of two units (23-25 Park Street) which will be sold to a qualified first-time homebuyer and the Rescue of Foreclosed Homes activity for rehabilitation and sale of homes in the City for qualified potential homeowners. Last, the planning office of Urban Affairs will complete a housing development of 175 units which some will be designated as HOME-assisted units.

One Year Goals for the Number of Households to be Supported	
Homeless	11
Non-Homeless	0
Special-Needs	0
Total	11

Table 72 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	13
Rehab of Existing Units	11
Acquisition of Existing Units	0
Total	24

Table 73 - One Year Goals for Affordable Housing by Support Type

Discussion

The City has severely limited resources due to the cuts in the CDBG and HOME programs. The HOME funds will be used to leverage private investment for the development of units for moderate income families city wide. Brockton must create neighborhoods that are financially viable for those who inhabit them. The Brockton Housing Authority will continue to create accessible units through its public housing and affordable housing programs to meet current need.

AP-60 Public Housing – 91.220(h)

Introduction

Actions planned during the next year to address the needs to public housing

The Brockton Housing Authority has the following planned:

- Comprehensive window replacement Roosevelt Heights
- Installation of security cameras at Roosevelt Heights and Hillside Village
- Comprehensive modernization of 16 units at Caffrey Towers
- Installation of backup generators
- Upgrades to common area handicapped accessible doors in federal elderly/disabled complexes.
- Comprehensive upgrades to electrical panels at Manning Tower and Belair Tower.
- Replacement of flooring and stair covering in family developments
- Upgrade of fire alarm systems at Hillside Village
- Replacement of glazing and door systems at Kennedy Drive
- Renovation of community room at Kennedy Drive
- Repair of balconies at Rainbow Terrace

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

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

The PHA is not designated as troubled.

Discussion

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

The City of Brockton and Father Bill's and MainSpring would like to partner with community entities to outreach and engage the unsheltered homeless community and would like to prioritize this group for possible housing subsidies through Brockton Housing Authority. Additionally, the development of one resource/opportunity center with community partners would be an ideal method for assessing the individual needs of those who are homeless or are in danger of being homeless. The City would also like to participate in a community run group to identify chronic people living on the street and provide targeted outreach and housing resources.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

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

FBMS has a full-time street outreach team working in the communities in the region with the highest numbers of unsheltered persons (Quincy, Brockton, and Plymouth). The outreach staff establish relationships with individuals, conduct assessments, encourage them to enter shelter, and assist with rehousing. They also provide access to basic needs, such as food and clothing, and facilitate connections to medical care and other support services. People experiencing homelessness also often present at the shelters or call for assistance. All walk-ins or phone calls are assessed for services and provided with referrals and/or intake into relevant programs.

Addressing the emergency shelter and transitional housing needs of homeless persons

FBMS operates shelter and over 600 units of permanent housing in the south shore. Through the portfolio, they strive to provide access to emergency shelter and housing for all who need it. In addition, they continue to develop additional units of PSH to address the housing needs of those who are most vulnerable and experiencing chronic homelessness. FBMS work to establish partnerships with other housing providers, such as Brockton Housing Authority and NeighborWorks Housing Solutions. They are in the process of creating a new housing resource center to replace their existing MainSpring House emergency shelter. This new Housing Resource Center will feature 32 supportive housing units, on-site health clinic and 128 emergency shelter beds.

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

FBMS operates over 600 units of permanent housing as well as rapid rehousing programming. Homeless households receive housing search and placement services beginning as soon as they enter shelter or outreach programming. FBMS attempt to connect them with the type of housing that best suits their needs and interest (e.g., unit size and location). Each person housed through one of these programs receives individualized stabilization services to help them maintain permanent housing for the long-term.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: 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); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

FBMS has several homelessness prevention and shelter diversion programs in partnership with healthcare partners, housing authorities and large property owners, and local Housing Court sessions. Their stabilization programs are also designed to keep people housed once placed into one of their units. In all cases, households are provided with individualized services and housing assistance to meet their needs. The vision is to provide folks with these housing-based solutions as the first step, and to only rely on the shelter system as a last result when the tenancies cannot be preserved. The move toward the Housing Resource Center model will help to reallocate resources toward housing solutions and limit unnecessary shelter stays.

Discussion

Helping homeless individuals and families is and will continue to be a challenge in Brockton. The solution to this problem will entail a collaborative and multi-pronged effort including the creation of living wage jobs in Brockton for Brockton residents and affordable housing opportunities, along with services for those with mental health and substance abuse challenges, and assistance for persons with disabilities. Only by tackling all of these challenges in a collaborative manner will the City end homelessness.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

Actions it planned 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

Discussion:

AP-85 Other Actions – 91.220(k)

Introduction:

Actions planned to address obstacles to meeting underserved needs

Actions planned to foster and maintain affordable housing

Actions planned to reduce lead-based paint hazards

Actions planned to reduce the number of poverty-level families

Actions planned to develop institutional structure

Actions planned to enhance coordination between public and private housing and social service agencies

Discussion:

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	70.00%

HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

None.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used

for homebuyer activities as required in 92.254, is as follows:

Period of Affordability

The minimum period of affordability is determined by the HOME subsidy amount per unit:

<\$15,000 = 5 Year Minimum

\$15,000 to \$40,000 = 10 Year Minimum

> \$40,000 = 15 Year Minimum

Resale Provisions

Resale provisions shall be required when the subsidy is provided in the form of a development subsidy in which HOME funds are divided among each assisted unit and not provided as a direct subsidy to the homebuyer. The resale option ensures that the assisted unit remains affordable over the entire period of affordability. Affordable units shall meet the following criteria:

- The new purchaser must be low-income, meeting the HOME Program definition, and occupy the property as the family principal residence.
- The sales price must be affordable to low-income families at 70-80% of area median income paying no more than 32% of income for principal, interest, property taxes and insurance.
- Under no circumstances may the affordable sales price exceeds 95% of the median purchase price for the area.
- Net proceeds from the sale must provide the original homebuyer, now the home seller, a "fair return" on their investment (including any down payment and capital improvement investment made by the owner since purchase, as calculated using the following formula: Maximum Permitted Resale Price = (The initial sales price/Initial AMI) x Resale AMI

Resale requirements shall be enforced through deed restrictions, covenants, land use restriction agreements, or other similar mechanisms filed with the Registry of Deeds and the requirements within shall be triggered upon sale or transfer of the property.

Recapture Provisions

Recapture provisions shall be enforced in cases where HOME funds are provided as a direct subsidy to the homebuyers as down payment, closing costs and/or purchase price assistance. This allows the city to recapture the subsidy, subject to net proceeds, if the recipient decides to sell the unit within the period of affordability at whatever price the market will bear. The homebuyer may sell the property to any willing buyer. The sale of the property during the period of affordability triggers repayment of the direct subsidy, subject to net proceeds, to the HOME Investment Partnerships local account. The recapture provision shall be enforced through a mortgage filed with the Registry

of Deeds, and a note filed at the offices of the Brockton Housing Authority. The city elects to reduce the amount subject to recapture on a prorated basis for the time the homeowner has owned and occupied the home measured against the required affordability period. Net proceeds are the sales price minus the superior non-HOME loan and closing costs. Upon receipt of recaptured funds, the city shall prepare a discharge of mortgage document for the original homebuyer to record with the Registry of Deeds.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

City of Brockton - Resale and Recapture Guidelines for Homebuyers - 24 CFR 92.254(a)(5)

These guidelines apply when a homebuyer or developer is assisted with HOME Investment Partnerships Program funds and the homebuyer sells or transfers ownership of the assisted property during the period of affordability.

Period of Affordability - See above

The City of Brockton, acting through subrecipients, CHDOs or other entities, may use HOME Program funds to provide homeownership assistance. The forms of subsidy to be used to assist homebuyers and/or developers may include down payment and closing cost assistance, development cost subsidy, deferred payment loans or some combination of these methods. The City of Brockton shall determine, based upon the type of subsidy, whether the period of affordability shall be enforced by either Resale or Recapture provisions.

Resale Provisions

Activity Types – Resale provisions as outlined in 24 CFR Part 92.254(a)(5)(i)(A) and (B) shall be required when the HOME subsidy is provided in the form of a development subsidy in which HOME funds are divided among each HOME-assisted unit and not provided as a direct subsidy to the homebuyer.

Methods – The resale option ensures that the HOME-assisted unit remains affordable over the entire period of affordability.

The new purchaser must be low-income, meeting the HOME Program definition, and occupy the property as the family's principal residence.

- The sales price must be “affordable to a reasonable range of low-income homebuyers”, defined as a family at 70-80% of area median income paying no more than 32% of income for principal, interest, property taxes and insurance.
- Under no circumstances may the “affordable” sales price exceed 95% of the median purchase price

for the area.

- Net proceeds from the sale must provide the original homebuyer, now the home seller, a “fair return” on their investment (including any down payment and capital improvement investment made by the owner since purchase. Capital improvements are not considered to be normal “wear and tear” or maintenance replacement items. In general, the City of Brockton shall consider “fair return” to be the maximum sales price as calculated using the following formula:

Initial Area Median Income is defined as the Area Median Income corresponding to a household size at the time of purchase.

Resale Area Median Income is defined as the Area Median Income corresponding to a household size at the time of intent to sell.

Enforcement Mechanisms – Resale requirements shall be enforced through deed restrictions, covenant, land use restriction agreement, or other similar mechanism filed with the Plymouth County Registry of Deeds and the requirements within shall be triggered upon sale or transfer of the HOME-assisted property.

Recapture Provisions - See above

Repayments – Repayments of recaptured funds shall be remitted directly to the City of Brockton HOME Investment Partnerships Program local trust account.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

No refinancing is proposed.

Appendix - Alternate/Local Data Sources

1	<p>Data Source Name</p> <p>Residential Community Survey</p>
	<p>List the name of the organization or individual who originated the data set.</p> <p>Brockton Redevelopment Authority</p>
	<p>Provide a brief summary of the data set.</p> <p>The survey is 21 questions long, and composed of demographic questions and questions used to gather the input of residents on housing, infrastructure, recreation, open space, economic development needs in the city.</p>
	<p>What was the purpose for developing this data set?</p> <p>The purpose of the survey was to gain understanding of what the residents feel are the needs of the city.</p>
	<p>Provide the year (and optionally month, or month and day) for when the data was collected.</p> <p>The survey was open and available for the community to answer from October 12, 2022 through December 31, 2022.</p>
	<p>Briefly describe the methodology for the data collection.</p> <p>The survey was online and in paper format. The online survey was advertised with local community groups, word of mouth, at community events/meetings, through City Hall, and the Chamber of Commerce. Paper surveys and flyers were also handed out at various locations in the City of Brockton starting on October 12, 2022.</p>
	<p>Describe the total population from which the sample was taken.</p> <p>The survey was available to all residents of the city.</p>
	<p>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</p> <p>We were able to target almost 3,000 residents through our community resident survey. Of the overall target reach, we only received a total of 884 responses. 450 (58.90%) respondents were female, 313 (40.97%) were male and 1 (0.13%) specified as other. Regarding demographics: Whites (58.5%), Black/African American (21%), American Indian/Alaskan Native (15.9%), Asian (7.5%), Native Hawaiian/Other Pacific Islander (2.3%) and Others (3.5%). 361 (47.2%) respondents were of Hispanic or Latino descent whereas 403 (52.8%) were not of Hispanic and Latino descent.</p>