

City of Brockton, Massachusetts

FFY 2024 Annual Action Plan – Draft

Previously prepared by the Brockton Redevelopment Authority

Please direct questions to Planning@cobma.us or 508-580-7113

Executive Summary

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

1. Introduction

Under the direction of our five (5) member board of directors and the City of Brockton’s Mayor’s Office, the Brockton Redevelopment Authority (BRA) works closely with the City’s Department of Planning and Economic Development, as well as with all city departments, 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 as in years past. 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, while working to build new relationships to further advance the city’s housing and economic development activities in equitable manner. The City has been faced with many new challenges as a result of the ongoing Pandemic, while the core needs of the community remain the same and amplified. There are additional needs and approaches that need to be taken, and the management of these federal grants will be done so with participation from the community members, businesses and organization directors, surveyed needs of the community, and innovative ideas to progress the City forward as we address the issues that directly affect our most vulnerable populations

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The objectives and outcomes for this Annual Action Plan include the City addressing emergency critical basic needs; stabilization of an increase in pricing of ownership properties over the last 12-24 months the lack of rental housing stock and the ongoing need for more low-income housing has been exacerbated. Analysis of the housing market in Southeastern Massachusetts have seen the values drastically increase and supply decrease causing higher acquisition prices for rental and ownership housing units. Through our consultations our critical need for all income levels of permanent affordable housing units; accessibility modifications to public facilities to enable people with mobility impairments

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to enjoy public assets and services; improving the vitality of the City's downtown and increasing the appeal of local businesses opportunities; supporting and providing a broad range of public service needs for lower income residents; and supporting other special needs, including housing and supportive services, of Brockton residents.

In assigning priority to projects and need categories the City considers a variety of factors including: community input, the community's emerging and critical needs, significant public facility capital needs, and the service needs of residents. The city also considers the number of low-income people served, and the number and relative percentage of people in need.

The City of Brockton intends to support efforts to reduce crime better address food insecurities; enhance the quality of community life through the provision of better public facilities, neighborhood stabilization efforts, and infrastructure improvements aimed at supporting economic development. The city actively works to reduce poverty and improve the quality of life for people living at or below the poverty level by expanding economic opportunities and supporting vital social/public service providers and facilities that help create and/or retain jobs. The City will also act to stabilize, improve and increase access to owner occupied housing for low- and moderate-income residents, by addressing the community's significant needs providing equitable access to capital for down payment and closing assistance; and increasing the supply of affordable rental units for low- and moderate-income community members as well as residents with special housing and service needs.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

For many years now, the Brockton Redevelopment Authority has utilized this federal funding in very similar ways. The dollars are always spent to their max or are allocated in preparation for specific larger projects. The programs and projects that run year over year operate smoothly with great satisfaction from the community. Challenges with the ongoing Pandemic have allowed us room for growth, improvement, and innovation. We will continue to push forward to evaluate and then meet the communities needs in the most effective, impactful way possible.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The Citizen Participation Process for this Annual Action Plan includes the following steps:

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Upon the closure of the comment period, the Annual Action Plan draft was updated with any comments received.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

No comments were received.

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

None.

7. Summary

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PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity 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 (optional)

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 Partnerships Program (HOME). It is the responsibility of the BRA, under the direction of the Mayor, to prepare and submit the City of Brockton's HUD reporting, manage the tracking and spending of the funds, and all other needs and responsibilities that come with having the funds.

Consolidated Plan Public Contact Information

50 School Street, 2nd Floor
Brockton, MA 02301

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AP-10 Consultation – 91.100, 91.200(b), 91.215(l)

1. Introduction

The City of Brockton, acting through the Brockton Redevelopment Authority, has continuously sought input as to the most pressing needs facing the City of Brockton. More specifically, the City has sought input on ensuring that the needs are met of its low and moderate income, and minority populations. A number of methods were employed to consult with Brockton residents, non-profit organizations, and social service providers including: inter-agency meetings, public hearings, and forums. The City has relied heavily on these consultations in the development of the 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(l))

The City of Brockton and the Brockton Redevelopment Authority participate in many regular group meetings to bridge the gap between housing providers and agencies supporting the city. Some of these identified agencies include: the Brockton Housing Partnership, South Shore Continuum of Care, Brockton Neighborhood Initiative (BNI/Brockton HUB), and Transformative Development Initiative District Group. In addition, part of the application process for funding through CDBG and HOME requires that the applying agency disclose all working partners and explain to us their knowledge of those providing the same or similar services and how they interact or support one another in their efforts. Also, most all the agencies funded through public service provide case management to the clients to ensure they are receiving the full wrap-around support services needed to thrive.

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 Brockton Redevelopment Authority holds a board position on the Continuum of Care for the South Shore region. Collaborations with the Brockton/Plymouth Continuum of Care and Father Bills & MainSpring through the planning process have taken into consideration the assessments of homeless persons and other concerned parties. This included directing attention to facilities, service and program needs of homeless individuals, and homeless families with children. Emergency shelter for individuals

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will be provided by Father Bills & MainSpring, located on North Main Street. Father Bill's & MainSpring also provides shelter for families through their Scattered Sites and Congregate Shelters. Emergency shelter for families will also be provided by the Old Colony YMCA David Jon Louison Center, located on Newbury Street. The David Jon Louison Center utilizes an extensive community collaborative partnership that collectively meets families' needs. An example of collaboration is the partnership with the Brockton Housing Partnership (consortium of financial lenders and community partners) who provides financial literacy, credit counseling, and individual income and expense counseling to families at the shelter. Other agencies that they collaborate with include NeighborWorks Housing Solutions, DOVE (Domestic Violence Ended), Family and Community Resources Inc., Northeast Behavioral Health Services, Catholic Charities, South Bay Early Intervention, Brockton Public School District, School on Wheels, and St. Patrick's Church.

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

Although the city of Brockton does not receive ESG funding directly, The City does work closely with the Continuum of Care for the region to ensure all public services that are impacted with CDBG and HOME funds are utilizing the proper HMIS policies and procedures. As a member of the Executive Committee and Board of Directors of South Shore Continuum of Care (SSCoC), we consult at a minimum once a quarter with our local partners to evaluate funding activities, operational policies and procedures in accordance with local standards, and Emergency Solutions Grant funds. It is the SSCoC staff that is responsible for the administration of the Homeless Management Information System (HMIS).

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

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Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Father Bill's & MainSpring
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-homeless Services-Health Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy HOPWA Strategy Anti-poverty Strategy

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	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The BRA consults with Father Bill's and MainSpring (FBMS) on a monthly basis to provide needs assessment on employment training for economic opportunity and community revitalization for public service needs in the city. The WorkExpress program by FBMS anticipates the enrolment of 50 participants, where 90% of graduates will gain housing and 70% will gain employment. WorkExpress also provides critical landscaping, cleanup and graffiti removal services to improve Brockton neighborhoods
2	Agency/Group/Organization	Brockton Housing Authority
	Agency/Group/Organization Type	Housing PHA Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Brockton Housing Authority and Brockton Redevelopment Authority have met to analyze and discuss the need for affordable housing in the City of Brockton. One measurable outcome from our discussions is the Housing Authority's assistance with the BRA and Father Bill's MainSpring on a pilot program to create 6 bedrooms in a two-family dwelling for chronic homeless individuals. We are also working collaboratively to address the disparities and impediments to affordable housing in the city of Brockton.

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3	Agency/Group/Organization	BROCKTON AREA MULTI SERVICES INC.
	Agency/Group/Organization Type	Services - Housing Services-Elderly Persons Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children

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<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Through our discussions and collaboration with BAMSI Helpline we provide community resources for individuals and families, particularly at times of financial instability. Our goal is to provide information, referral, and advocacy to residents within the City of Brockton. From our discussions we have assisted Brockton residence with housing, food, rental assistance, foreclosure assistance, and emergency services. The helpline anticipates supporting approximately 1,200 individuals annually through its Emergency Services Program that will assist low-income households in Brockton who are facing severe financial hardships which may jeopardize their housing needs. Many of the services include assistance with housing-related issues, utility issues, food and information on public assistance.</p> <p>Annual Action Plan 2024</p>
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	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children
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	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Annually we meet with the David Jon Louison Family Center staff as part of our review process. David Jon Louison Family Center anticipates providing shelter for twenty-three (23) families daily. All Families receive Case Management services and 24-hour support staff to provide a safe, healthy, positive environment with extensive array of support services to meet their needs. Each family has established goals and objectives to achieve as part of their "Family Care Plan". These plans include housing search, job search, childcare as well as other objectives to achieve a positive environment.
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?	Anti-poverty Strategy

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	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Our consultations with Family Community Resources, Inc. (FCR) monthly to discuss data and services to victims of domestic violence. FCR provides comprehensive services to individuals and families (women and their children) impacted by trauma at home, school or in the community. FCR specializes in supporting the needs of children, adolescents and adults affected by domestic violence. Our funds will provide FCR the ability to service women who are victims of domestic violence, substance abuse issues and parenting challenges.
5	Agency/Group/Organization	BROCKTON NEIGHBORHOOD HEALTH CENTER
	Agency/Group/Organization Type	Health Agency
	What section of the Plan was addressed by Consultation?	Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	BNHC is a non-profit, multicultural, community health center that serves low-income, diverse, medically underserved patients in Greater Brockton and surrounding communities. BNHC is consulted for their tracking data, education, knowledge regarding Brockton low-income children and adults with elevated levels of LEAD. Education to this target population on the effects of LEAD (especially children under six) is essential outcome of our consultations.
6	Agency/Group/Organization	Brockton Board Of Health
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	State and Local Sanitary Code Enforcement

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	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Brockton Board of Health is an essential member of the City's Code Enforcement. As a member of Code Enforcement, the Brockton Redevelopment Authority consults with the Board of Health on a weekly basis to address violations of the State and Local sanitary of vacant properties. The BRA continues to work with the Board of Health and other members of the City's Code Enforcement to address issues of distressed properties in the City of Brockton.
7	Agency/Group/Organization	Brockton Housing Partnership
	Agency/Group/Organization Type	Services - Housing Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Brockton Housing Partnership is consulted on a quarterly basis. As a collaboration between local financial institutions and non-profit social service organizations to foster housing resources for low and moderate-income residents in the City of Brockton. Since its formation, BHP has focused on the development and funding of affordable and market rate housing. As a member of the BHP, we continue to assist to the restoration, rehabilitation, education and financial literacy regarding home-buying process and all housing related matters.

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8	Agency/Group/Organization	Brockton Department of Planning and Economic Development
	Agency/Group/Organization Type	Housing Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Agency - Managing Flood Prone Areas Agency - Management of Public Land or Water Resources Agency - Emergency Management Other government - Local Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Market Analysis Economic Development Anti-poverty Strategy

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	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Brockton Department of Planning & Economic Development is consulted on a regular/weekly basis regarding our Urban Revitalization Plan, the City's Homeless Strategy, Anti-Poverty Strategy and economic development efforts. As a result of several strategic revitalization efforts and plans using CDBG funds to stimulate investment, we anticipate a pipeline of housing development investment in Brockton's downtown district. The Department of Planning and Economic Development in the City of Brockton has a full time Conservation Agent whose primary responsibilities include the management of flood prone areas, public land or water resources and emergency management agencies. Additionally, the Planning Department and the BRA have been working with businesses on bringing a fiber network through Downtown Brockton to connect from Boston to New York City to enhance the city's connection and access to growing technology.
9	Agency/Group/Organization	Brockton Area Branch National Association for the Advancement of Color People
	Agency/Group/Organization Type	Services - Housing Services-Health Services-Education Service-Fair Housing Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Anti-poverty Strategy

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	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consultations are on a regular monthly basis with the Brockton Area Branch of the NAACP's Housing Committee members. Review of the City's housing strategy and its impact on the housing needs assessments. Brockton is the only city in Plymouth County and is the only city municipality in the surrounding area. Its housing policies and strategies are impacted by its abutting communities. Through our continued consultations it's important that communication of policies and economic development activity is shared. This organization also plays an important role in our Fair Housing Strategy and where residents can get assistance with housing, education, employment and health issues.
10	Agency/Group/Organization	NeighborWorks Housing Solutions
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless Service-Fair Housing Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Economic Development Anti-poverty Strategy Lead-based Paint Strategy

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	<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>City of Brockton through the Brockton Redevelopment Authority has an ongoing relationship with NeighborWorks Housing Solutions (NHS). NHS provides housing services to city residents but is also a non-profit development organization in the City of Brockton. NHS is considered a one-stop shop for finding and maintaining safe, affordable, high-quality housing and developing city residents' financial skills and resources. NHS as a regional non-profit provides City residents with services to support individuals and families' needs. NHS list of services include rental assistance; emergency financial help; shelter and homelessness prevention; first-time homebuyer education and counseling; financial coaching; foreclosure prevention; affordable residential and small business loans; and construction and management of high-quality rental housing across Southern Massachusetts. Through our continued consultations we anticipate knowledgeable first-time homebuyers, financial and budget literate residence, income mixed residential development, commercial development, and participation in the city's housing strategy.</p>
11	<p>Agency/Group/Organization</p>	<p>MassHire Greater Brockton Workforce Board</p>
	<p>Agency/Group/Organization Type</p>	<p>Services-Education Services-Employment Business and Civic Leaders</p>
	<p>What section of the Plan was addressed by Consultation?</p>	<p>Economic Development Anti-poverty Strategy</p>

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	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Working with MassHire Greater Brockton Workforce Board (MHGBWB) on a weekly basis through our small business assistance program, MHGBWB is a business-led, policy-setting board that oversees workforce development initiatives in Brockton and nine other communities in the region. MassHire Greater Brockton Workforce Board, along with the Mayor of Brockton, charters MassHire Greater Brockton Career Center, 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, MassHire Greater Brockton Workforce Board works with our community leaders to respond to current trends in our region.
12	Agency/Group/Organization	Comcast Service Center
	Agency/Group/Organization Type	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Comcast has a program that allows qualified low-income families access to affordable broadband internet. The program is called Internet Essentials and households must meet eligibility requirements such as recipients of SNAP, SSI, Medicaid, Assisted Housing, or others. This program helps bridge the digital divide.

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

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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	Father Bill's & MainSpring	The plan includes a Housing First approach by creating permanent supportive housing for chronically homeless people. 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.
Urban Revitalization Plan	City of Brockton Planning Department/Brockton Redevelopment Authority	The plan covers a wide range of topics including housing, transportation, economic development, land use and zoning, open space, natural resources, and municipal services. Comprehensive planning is a process that determines community goals and aspirations in terms of community development. The outcome of this process is the Comprehensive Plan which dictates public policy in terms of transportation, utilities, land use, recreation, and housing. Comprehensive plans typically encompass large geographical areas, a broad range of topics, and cover a long-term time horizon.
Brockton Housing Strategy Plan	City of Brockton Planning Dept.	The housing strategy plan has been prepared in accordance with the Massachusetts Department of Housing and Community Development guidelines and provides a framework and strategy to guide its housing policies and plans to increase the production of affordable housing in Brockton over the next decade (2018-2028).

Table 3 – Other local / regional / federal planning efforts

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Narrative (optional)

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AP-12 Participation – 91.105, 91.200(c)

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

The Citizen Participation Process for this Annual Action Plan includes the following steps:

Citizen Participation Outreach

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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Table 4 – Citizen Participation Outreach

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Expected Resources

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

Introduction

The Brockton Redevelopment Authority will maintain solid working relationships with the extended network of housing and social service providers operating in Brockton and within the region. The City of Brockton expects funding for CDBG at \$1,270,793, \$2,096,451 for HOME-ARPA Funding, and HOME at \$684,097 during time of drafting the FY2022 Annual Action Plan.

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		1,319,856	0		0	0	
HOME	public - federal		576,279.16	0	0	0	0	

Table 5 - Expected Resources – Priority Table

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

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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, along with other local developments through the Section 108 Loan, each public service has additional funding sources, and now the LEAD Program is matching homeowner rehabilitation projects. DHCD has given the BRA a grant opportunity based on the current CDBG Homeowner Rehabilitation Program model to help alleviate that waiting list.

Recent projects have 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.

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

None.

Discussion

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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
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Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	
	Goal Description	
2	Goal Name	
	Goal Description	
3	Goal Name	
	Goal Description	

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4	Goal Name	
	Goal Description	
5	Goal Name	
	Goal Description	
6	Goal Name	
	Goal Description	
7	Goal Name	
	Goal Description	
8	Goal Name	
	Goal Description	
9	Goal Name	
	Goal Description	
10	Goal Name	
	Goal Description	

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Projects

AP-35 Projects – 91.220(d)

Introduction

In considering funding priorities for this period, the City is attempting to focus on the following: supporting and providing a broad range of public service needs for lower income residents, improving the vitality of the City's downtown and increasing the appeal of local businesses opportunities, addressing the deteriorating rental housing stock and the ongoing need for more low-income housing, and accessibility modifications to public facilities.

In assigning priority to projects and need categories, the city considers a variety of factors including community input, the community's emerging and critical needs, significant public facility capital needs, and the number of low to moderate income people served.

The City of Brockton intends to support efforts to enhance the quality of community life through the provision of better public facilities, neighborhood stabilization efforts, and infrastructure improvements aimed at supporting economic development. It is also critical for the City to address the need reduce poverty and improve the quality of life for people living at or below the poverty level by expanding economic opportunities and supporting vital social/public service providers and facilities that help create and/or retain jobs.

City of Brockton, Massachusetts

FFY 2024 Annual Action Plan – Draft

Previously prepared by the Brockton Redevelopment Authority

Please direct questions to Planning@cobma.us or 508-580-7113

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

The basis for these allocation decisions lies in the ongoing consultations with the extensive network of public service agencies and public entities dealing with housing and community development issues in Brockton, public input from hearings and meetings, survey results and the experience of the lead agencies over many years.

Obstacles to meeting underserved needs are clearly attributable to insufficient resources with which to address the growing needs. With an emphasis on urban needs and on energy conservation assistance, Brockton is hopeful that with an increase in funding it will be better able to meet more of the housing and public service needs that continue to multiply in the city. As in other cities throughout the country, Brockton continues to face multiple and interrelated new housing and social problems stemming from subprime mortgages and foreclosures.

Throughout program year, the City of Brockton will continue to work as it has done in the past to pursue partnerships with an extensive network of providers and programs at all levels of government and in the private sector will be working to craft and employ effective responses to this ongoing national housing crisis. Brockton will employ all new public and private mechanisms that become available could further meet the underserved needs and it will continue to seek out creative local approaches to addressing these identified and prioritized needs.

City of Brockton, Massachusetts

FFY 2024 Annual Action Plan – Draft

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AP-38 Project Summary

Project Summary Information

1	Project Name	
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$0
	Description	
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
2	Project Name	
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$0
	Description	
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	
	Planned Activities	
3	Project Name	Public Services
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$0
	Description	
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	

	Location Description	
	Planned Activities	
4	Project Name	Public Facilities
	Target Area	
	Goals Supported	
	Needs Addressed	Public Facilities
	Funding	CDBG: \$0
	Description	
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
	5	Project Name
Target Area		
Goals Supported		
Needs Addressed		
Funding		CDBG: \$0
Description		
Target Date		6/30/2025
Estimate the number and type of families that will benefit from the proposed activities		
Location Description		
Planned Activities		
6	Project Name	
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$0
	Description	
	Target Date	6/30/2025

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
7	Project Name	
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$0
	Description	
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
8	Project Name	
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$0
	Description	
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
9	Project Name	
	Target Area	City Wide
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$0

	Description	
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
10	Project Name	
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$0
	Description	
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
11	Project Name	
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$0
	Description	
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
12	Project Name	
	Target Area	
	Goals Supported	

	Needs Addressed	
	Funding	CDBG: \$0
	Description	
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
13	Project Name	
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$0
	Description	
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
14	Project Name	
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$0
	Description	
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
15	Project Name	

	Target Area	
	Goals Supported	
	Needs Addressed	Public Facilities
	Funding	CDBG: \$0
	Description	
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
16	Project Name	
	Target Area	City Wide
	Goals Supported	
	Needs Addressed	Rental Housing
	Funding	HOME: \$0
	Description	
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	
	Planned Activities	
17	Project Name	HOME Administration
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	HOME: \$0
	Description	
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	

	Planned Activities	
18	Project Name	
	Target Area	
	Goals Supported	
	Needs Addressed	Rental Housing
	Funding	HOME: \$0
	Description	
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
19	Project Name	Down Payment Assistance Program
	Target Area	City Wide
	Goals Supported	Increase Access for Homeownership
	Needs Addressed	Owner Occupied Housing
	Funding	HOME: \$0
	Description	
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
20	Project Name	
	Target Area	
	Goals Supported	Increase Supply of Affordable Housing
	Needs Addressed	Rental Housing
	Funding	HOME: \$0

	Description	
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
21	Project Name	
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	HOME: \$0
	Description	
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
22	Project Name	
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	HOME: \$0
	Description	
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	

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 87.35% 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 80.72% of the households listed in the 2020 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 This neighborhood is made up of census tracts 5105-02 and 5103 with 61.53% of low- to moderate-income households. 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 67.85% low- and moderate-income residents.

Campello Neighborhood Census tract 5114 and 5116 are within the Campello Neighborhood and has 61.76% of its residents low and moderate income in tract 5114 and 62.95% in Census Tract 5116.

East Side Neighborhood Census Tract 5112 has 53.3% of the residents listed as low and moderate income.

Pleasant/Prospect Neighborhood is within census tract 5104 and has over 75.63% of its residents listed as low- and moderate-income households.

Geographic Distribution

Target Area	Percentage of Funds
Downtown - Main Street	22
Downtown Corridor/Business District	1
City Wide	41
Census tract 5104, 5108, 5109, 5114	0
Low and Moderate Census Tracts	36

Table 7 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Overall, the population of the City of Brockton is made up of more than 51% low- to moderate-income households. Because of this, most efforts are designed to target city-wide needs due to them not being central to any one specific tract. However, we end up with a few target areas due to focusing extra efforts and funding into one area at a time for revitalization which allows for greater impact in the short term. The City's Downtown area has been a major focus for the City over the last few years and will continue to be since we continue to make progress in large strides as a community. The Census tracts 5104, 5108, 5109, 5114 are located in and around Downtown and have been identified for having the highest crime rates in Brockton. Lastly, , a few census tracts within the City do not have a majority low-income population, so we will focus on those that do for public facilities, park renovations, public services, rental housing and rental housing cost assistance when possible.

Discussion

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	19
Special-Needs	0
Total	19

Table 8 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	45
The Production of New Units	19
Rehab of Existing Units	3
Acquisition of Existing Units	0
Total	67

Table 9 - One Year Goals for Affordable Housing by Support Type

Discussion

AP-60 Public Housing – 91.220(h)

Introduction

The Brockton Housing Authority (BHA) manages over 2,000 apartments in 16 public housing developments throughout Brockton as well as 1,000 rent-assisted apartments/houses. BHA also serves about 7,000 residents, or about 7% of Brockton's population. In addition, BHA manages programs to help develop affordable private homes for ownership and rental that enable families to move beyond public assistance and become self-sufficient. The current waitlist for admission into public housing continues to be extremely long. Though not as long as the wait for state public rental subsidies (almost 15-20 years) BHA is seeing their waitlist grow upwards of 10 years.

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

- **Under construction of comprehensive modernization at Caffrey Towers;**Completion of comprehensive balcony and façade restoration.Completion of comprehensive modernization to forty-five (45) units.
- **Under construction of energy efficient upgrades as follows in our Federal Developments;**Air make-up units to be replaced at Manning Tower, Caffrey Towers, Sullivan Tower, and Belair High-Rise. Rooftop Units to be replaced in Caffrey Towers Community Room.Comprehensive window replacement at Roosevelt Heights.Comprehensive furnace replacement at Hillside Village.Sullivan Tower roof replacement.Comprehensive water closet replacement at Hillside Village.
- **Under construction with UFAS compliant egress doors and automatic door operators at Manning Tower, Caffrey Towers, and Sullivan Tower.**Manning Tower replacement of doors and installation of door operators.Caffrey Towers installation of door operators.Sullivan Tower installation of door operators.
- **Under construction with the installation of surveillance cameras.**Manning Tower upgrade existing system and the addition of new locations throughout the Development.Crescent Court repair/replace system underground cabling, additional locations, the upgrade of the existing.
- **Under construction with the roof replacement of Belair High-Rise**Contract award anticipated.
- **Campello High-Rise Revitalization**Campello High-Rise is comprised of 398 apartments for senior- and disabled residents in two 10-story buildings on Main Street in Brockton. In the October of 2021, the BHA received approval to convert Campello High-Rise from the public housing program to the Section 8 project-based voucher program. This switch will increase the amount of money Brockton will receive to operate the Campello high-rise allowing it to make meaningful improvements while keeping the development in the control of the BHA and at the current affordability levels. BHA is currently planning for the comprehensive revitalization of Campello Hi-Rise which is one of the most critical affordable housing resource for senior and non-senior disabled residents in Brockton.

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

participate in homeownership

The city, along with the Housing Authority will continue to encourage residents and staff to participate in monthly meetings that encourage good communication, transparency, and strides made towards the continued effort to bring the community together.

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

The Public Housing Authority is not designated as troubled.

Discussion

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

Introduction

The City continues to work on ways in which to increase the attention to the homeless population. The City actively collaborates with the CoC and shelter providers such as Father Bill's and MainSpring (FBMS) and the Old Colony YMCA, as well as providing input on how to increase affordable housing stock. FBMS continues to work on innovative ways to address those experiencing homelessness, or those who are at risk of homelessness. Recently, they've begun renovations to convert a hotel in Brockton into housing to house 62 formerly homeless individuals. The City also continues to seek collaboration and input from community partners, non-profit and for-profit organization, as well as residents of the community on how to best maximize efforts to combat the continued struggles with homelessness in the city of Brockton.

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

Outreach is conducted to homeless unaccompanied adults in Brockton to assess their needs and provide assistance. Father Bill's & MainSpring (FBMS) operates MainSpring House, a low-barrier emergency shelter for homeless adults. Any homeless adult is provided shelter so long as the individual does not pose a safety risk. FBMS street outreach staff also conducts outreach and engagement of unsheltered individuals to encourage them to enter shelter and/or access housing directly. Their ability to provide this was impacted by COVID-19 and their need for response and safety, but efforts have since restarted and stronger than before.

The CoC still uses an evidence-based assessment tool, the Vulnerability Index & Service Prioritization Decision Assessment Tool (VI-SPDAT), with every homeless individual and family. Households are assessed for service needs and assisted with action plans for successful exits to housing or treatment. They are prioritized for HUD CoC permanent supportive housing and rapid rehousing assistance based on this assessment.

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

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

Addressing the emergency shelter and transitional housing needs of homeless persons

More than ten years ago, Brockton shifted its homeless shelter response to reduce barriers to entry and to engage, assess, and shelter nearly all homeless adults. No one is denied shelter unless they are a safety risk.

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

The CoC operates with a Housing First approach. Whenever possible, homeless persons are moved directly from the streets or shelter to housing, rather than requiring compliance with treatment or their placement in transitional housing as an interim step. The CoC also offers a 15-unit Grant and Per Diem transitional housing program in Brockton for homeless veterans funded by the Veterans Administration. This program has a high success rate of placement into housing.

This year, Neighborworks Housing Solutions completed construction of their 48-Unit Housing Project located in downtown Brockton. 11 of these units are HOME units, reserved for low-income families.

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

In 2013, the Brockton Leadership Council recalibrated the Ten-Year Plan to End Chronic Homelessness with a goal of moving 50 chronically homeless individuals to housing in five years. Since then, FBMS was selected as the South Shore region's provider for the statewide Social Innovation Fund (SIF) initiative to house chronically homeless individuals. FBMS is providing 35 units, 20 of which are funded with new state rental subsidies; several of these are being targeted to chronically homeless individuals in Brockton. In addition, FBMS is working on the substantial rehabilitation of the Rodeway Inn (a former motel located in Brockton) that will house approximately 62 formerly homeless individuals. The CoC also continues to prioritize chronically homeless individuals and families for any HUD CoC-funded permanent

supportive housing units that become available upon turnover. Homeless individuals and families are assisted to access any affordable housing resource, but such resources remain extremely scarce given limited federal and state funding for affordable housing, especially long-term deep subsidies so households exiting homelessness do not experience homelessness again.

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

A priority for the CoC is to add housing resources for homeless unaccompanied youth given their rising numbers and the scarcity of housing targeted to their needs. The CoC's Unaccompanied Homeless Youth Committee was relaunched in 2015 with this housing goal.

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.

Low-income families on the brink of becoming homeless are directed to the MA Department of Transitional Assistance (DTA) in Brockton where they are assessed for eligibility for shelter under the state EA mandate. Both FBMS and NeighborWorks Housing Solutions have staff co-located at the Brockton DTA to assess and assist families to avoid homelessness. Families that are deemed homeless, but who might be diverted from shelter to housing, are assisted by FBMS using state HomeBASE funds. Families that are not homeless, but at-risk, are assisted by FBMS and NeighborWorks Housing Solutions and may receive state prevention funds. Brockton Area Multi Services (BAMSI) Helpline also provides information, referral and prevention assistance to both families and individuals in the Brockton area using funds from the Emergency Food & Shelter Program (EFSP) and from private resources. South Coast Legal Services, Inc. provides free legal representation to low-income residents of Brockton who are in danger of losing their housing. FBMS operates the Tenancy Preservation Program (TPP) in this region, staffing an office at the Brockton Housing Court. TPP aids tenants who are at-risk of eviction due to their disability to remain housed. NeighborWorks Housing Solutions has continued to administer RAFT funds throughout the duration of the Pandemic to renters who might otherwise be rendered homeless without the use of the funding, and have also begun to administer HAFT funds for homeowners who have been significantly impacted by the Pandemic Finally, the CoC tracks discharges from publicly funded institutions through its assessment of every homeless individual entering MainSpring House

shelter, tracking where they stayed in the last seven days. Data on discharges from other systems of care is analyzed by the CoC and used to advocate with publicly funded institutions and policy makers to address inappropriate discharges to homelessness.

Discussion

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

Introduction:

Barriers to Affordable Housing are something that the City is continuously working to overcome. The City, in conjunction with the Housing Authority, and several other stakeholders is currently working on updating the Affirmatively Furthering Fair Housing (AFFH) policy for the city. The creation of this document and the implementation of this policy serve as critical pieces in order to ensure that the City identifies and addresses those barriers that loom over individuals as they seek to move into affordable housing. The City is actively working to ensure that all residents of the city have fair, equal, and equitable access to affordable housing.

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

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

The City has also been exploring the use of an overlay zoning to facilitate this use.

Limited public funding and private investment interest are remaining barriers to increasing the supply of affordable housing. Nevertheless, the City is taking steps to create attractive development and redevelopment opportunities including improving the appearance and curb appeal of business districts, by demolishing derelict buildings and by clearing and cleaning up vacant lots.

The City has also established the Brockton Neighborhood Initiative (BNI) that is a Chapter 180 nonprofit organization comprised of a Six-Member board of directors. The goal of BNI is to acquire vacant and dilapidated housing units within the city, provide necessary renovations and sell these properties to first-time homebuyers. In addition, BNI is working to establish on the job training for these units by utilizing students from the local high school and community college to conduct some of the work on the buildings to provide them with a series of skills trainings.

The City is currently taking substantial steps towards amending its last Urban Revitalization Plan. A series of public meetings have taken place to garner input from the public on recommended changes, and suggestions to overcome barriers to affordable housing that will help shape the outcome of the amendment. In addition, the City is working on the newest version of its Affirmatively Furthering Fair Housing (AFFH) plan to further address these barriers to accessing fair housing.

Discussion:

AP-85 Other Actions – 91.220(k)

Introduction:

The City has engaged in extensive and collaborative public planning to improve economic opportunity, housing choices, and public facilities and overall quality of life. The envisioned community improvements and investments will utilize public and private resources to address the needs identified through the planning process. The City's investments will add to the revitalization of neighborhoods and provide adequate infrastructure to support private housing and economic development.

Actions planned to address obstacles to meeting underserved needs

Obstacles to meeting underserved needs are clearly attributable to insufficient resources with which to address growing needs. Brockton's entitlement amounts for CDBG and HOME as well as other federal and state assistance to urban areas have been on a downward trend over the past few years so there has been a lot of work with other organizations in the City to leverage funding and find other sources and means to meet underserved needs. The goals with most funded projects from CDBG and HOME are designed to assist more than with just that immediate financial support, but to give households the tools needed to require less support in the future or with other areas of their lives.

Actions planned to foster and maintain affordable housing

Brockton's limited supply of affordable housing is one of the community's most significant barriers to housing choice. Lower income households experience a higher rate of housing problems than other households in Brockton, and this impacts minority households and people with disabilities in the community disparately because they are more likely to be low-income households.

The City of Brockton will continue to work with local and regional nonprofits and others to pursue opportunities to develop new affordable housing. Networks like the Massachusetts Smart Growth Alliance can provide resources and organize support to promote equitable growth, including increased housing opportunities. The City is also continuing to focus on ways to increase access to affordable housing and making this item a priority in all conversations with developers who seek to develop housing units within the city.

Actions planned to reduce lead-based paint hazards

The City of Brockton and the Brockton Redevelopment Authority will work closely with intake partners Self Help Inc. and Neighborworks of Southern MA to reduce, if not eliminate lead-based paint from properties in the City of Brockton. Additionally, the Brockton Redevelopment Authority runs a Homeowner Rehabilitation program to benefit low and moderate-income residents. When lead is present in these homes, the CDBG Program Manager will inform the homeowners of the BRA's lead program to help rehabilitate and de-lead the property.

Actions planned to reduce the number of poverty-level families

Actions planned to develop institutional structure

The Brockton Redevelopment Authority (BRA) will carry out the Annual Plan on behalf of the City of Brockton. The BRA is accountable to the Mayor, as Chief Executive Officer of the City of Brockton. Day-to-day responsibility for administration of the CDBG and HOME programs and certain other grant funded activities will rest with the CDBG Program Manager and the Executive Director of the BRA. The Brockton Redevelopment Authority Director will also be responsible for energy policy coordination and long-term planning functions on behalf of the City. The BRA 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 also plays a central and critical role in the planning, implementation and coordination of Brockton's multi-faceted and interrelated community and economic development efforts.

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

The City will continue to work closely with its non-profit partners to both monitor the success of existing programs and generate ideas for new programs to serve the changing needs of Brockton's low-income population. BRA Staff will meet with sub-grantees during the year to assess the existing program and discuss changes needed as well as ideas for new directions. The BRA Staff will also meet with non-profit and public housing providers to reassess needs and opportunities.

The Brockton Redevelopment Authority and Brockton Housing Authority regularly interact with locally and regionally based agencies and community-based organizations seeking ideas and input as to the most pressing needs facing the City of Brockton, particularly its low- and moderate-income and minority populations. Again this year, the BRA and the BHA rely heavily on these consultations in developing this Annual Action Plan. The BRA and BHA encourage and maintain open lines of communication with all these organizations and agencies. This has been the case in the development of the Annual Action Plan as well as the Consolidated Five-Year Plan.

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.	99.00%

**HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(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:

Recapture provisions as outlined in 24 CFR Part 92.254(a)(5)(ii)(A)(1-7) shall be enforced in cases where HOME funds are provided as a direct subsidy to a homebuyer as down payment or closing cost assistance.

Methods – The recapture option allows the City of Brockton to recapture the direct HOME subsidy, subject to net proceeds, if there is a transfer of ownership of the HOME assisted property OR if the property ceases to be homebuyer’s principal residence during the life of the loan. If the property is sold after the period of affordability has expired, there are no restrictions in terms of resale or recapture of HOME funds that apply to such a transaction. However, if the sale occurs, either voluntarily or involuntarily, before the period of affordability has expired, certain regulatory limitations apply, as established in this policy.

Triggers- Actions Triggering Recapture: Specific actions triggering Recapture of the City provided assisted funding include: a property sale (whether voluntary or involuntary); a transfer of title (except between spouses or other approved qualified low-income homebuyer); or, refinancing and incurring additional debt.

Accelerated Items of Default Triggering Recapture- The following shall be considered accelerated items of default and will trigger the Recapture of the direct HOME subsidy: failure to maintain the property as a principal residence; failure to maintain the property up to code; or, failure to carry adequate homeowner’s insurance, naming the City as an interested party and beneficiary.

Enforcement Mechanisms – Recapture provisions shall be enforced through a HOME Agreement, Lien Mortgage, both are recorded with the Plymouth County Registry of Deeds, and a Promissory Note kept on file with the Brockton Redevelopment Authority.

Amount of Recapture- Direct HOME Subsidy is the amount of HOME assistance, including any program income that enabled the homebuyer to buy the unit. The City shall recoup the full amount of direct HOME subsidy provided to the assisted homeowner based on the net proceeds available. Net proceeds shall be limited to the sale price of the unit less the balance of the first loan (ahead of the City mortgage) and any closing costs. This will apply to all units assisted and whether the sale of the unit is voluntary or involuntary.

Mortgage Discharge – Upon receipt of recaptured funds, the City of Brockton shall prepare a discharge of mortgage to record with the Plymouth County Registry of Deeds to discharge the original HOME mortgage. Repayments of recaptured funds shall be remitted directly to the City of Brockton HOME Investment Partnerships Program.

Subordination – The Brockton Redevelopment Authority may, in limited situations, agree to

subordinate its lien position upon request by the homebuyer. The homebuyer must submit a written request to the BRA explaining in detail the reason for the request.

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:

For HOME-funded affordable housing development projects, the City's shall enforce the recapture provision requiring the repayment of all HOME loans and funds expended for the project. The recaptured HOME funds will be repaid to the Authority's local HOME Investment Trust Fund Account. The requirements include, by way of example, but are not limited to: (1) requirements related to rent limitations; (2) requirements related to tenant income, and any required reporting and certification requirements; (3) requirements related to the provision of HOME Program-required tenant and participant protections; (4) requirements related to HOME Program nondiscrimination requirements and Affirmative fair housing marketing requirements.

The City will ensure that projects are sustainable over the long term and will review management practices, fiscal soundness and other financial commitments through its subsidy layering and underwriting review to determine that long term needs of the project and the targeted populations can be met during the period of affordability. In the event of noncompliance, the City must be repaid the total amount of HOME funds invested in the housing. This includes any HOME development subsidy in the project plus any direct subsidy provided to the buyer (i.e., HOME down payment or closing cost assistance). The City is required to repay HUD the entire HOME investment in the event of noncompliance.

For HOME-funded homebuyer assistance loans, the Promissory Note, Deed, and Homebuyer Agreement stipulate the terms for early loan repayment or repayment due to default. The City chooses to recapture the funds if the repayment occurs during the affordability period, rather than to place continued affordability restrictions upon subsequent buyers/owners of the properties, as long as the Borrower remains in compliance with the terms of the Note, the Mortgage, the Loan Agreement and the Affordable Housing Restriction. If the HOME-assisted homebuyer fails to occupy the unit as his or her principal residence (i.e., unit is rented or vacant), or the home was sold or otherwise transferred during the period of affordability and the applicable recapture provision was not enforced, then the project will be considered in noncompliance.

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.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).
6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).
7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

