

PHA Name : Brockton Housing Authority

PHA Code : MA024

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 1/1/2023

PHA Program Type: Combined

MTW Cohort Number: Landlord Incentives

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

The Brockton Housing Authority is seeking to expand housing choice for low-income families by seeking to implement, 2.a, 80-150% SAFMR in the Brockton Metro HUD FMR Area, so that families will have a greater choice of apartments and not be stuck in the poorer areas of the city.

Also, in order to increase housing choice, the Brockton Housing Authority is seeking to adopt, 4.a, the vacancy payment waiver in order to attract more landlords to the program. Currently, a landlord can tenant a cash tenant much quicker than a section 8 tenant due to the time for inspections, lease negotiations, rent reasonableness, etc. In order to incentivize landlords to hold the apartment for a section 8 tenant, we will pay a one moth vacancy payment.

In order to incentivize working and self sufficiency, the Brockton Housing Authority is seeking to adopt, 1.w, Income Exclusion. The proposed activity will exclude certain income from non disabled, non elderly families, that voluntarily leave TANF (welfare), while still eligible.

C. The policies that the MTW agency is using or has used (currently implement, plan to implement in the submission year, plan to discontinue, previously discontinued).

1. Tenant Rent Policies	
a. Tiered Rent (PH)	Not Currently Implemented
b. Tiered Rent (HCV)	Not Currently Implemented
c. Stepped Rent (PH)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
e. Minimum Rent (PH)	Not Currently Implemented
f. Minimum Rent (HCV)	Not Currently Implemented
g. Total Tenant Payment as a Percentage of Gross Income (PH)	Not Currently Implemented
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Not Currently Implemented
i. Alternative Utility Allowance (PH)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Not Currently Implemented
k. Fixed Rents (PH)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented
m. Utility Reimbursements (PH)	Not Currently Implemented
n. Utility Reimbursements (HCV)	Not Currently Implemented
o. Initial Rent Burden (HCV)	Not Currently Implemented
p. Imputed Income (PH)	Not Currently Implemented
q. Imputed Income (HCV)	Not Currently Implemented
r. Elimination of Deduction(s) (PH)	Not Currently Implemented
s. Elimination of Deduction(s) (HCV)	Not Currently Implemented
t. Standard Deductions (PH)	Not Currently Implemented
u. Standard Deductions (HCV)	Not Currently Implemented
v. Alternative Income Inclusions/Exclusions (PH)	Not Currently Implemented
w. Alternative Income Inclusions/Exclusions (HCV)	Plan to Implement in the Submission Year
2. Payment Standards and Rent Reasonableness	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Plan to Implement in the Submission Year
b. Payment Standards- Fair Market Rents (HCV)	Not Currently Implemented
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Not Currently Implemented
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Not Currently Implemented
b. Alternative Reexamination Schedule for Households (HCV)	Not Currently Implemented
c. Self-Certification of Assets (PH)	Not Currently Implemented
d. Self-Certification of Assets (HCV)	Not Currently Implemented
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Plan to Implement in the Submission Year
b. Damage Claims (HCV-Tenant-based Assistance)	Not Currently Implemented
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Not Currently Implemented
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Not Currently Implemented
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Not Currently Implemented
d. Alternative Inspection Schedule (HCV)	Not Currently Implemented
6. Short-Term Assistance	
a. Short-Term Assistance (PH)	Not Currently Implemented
b. Short-Term Assistance (HCV)	Not Currently Implemented
7. Term-Limited Assistance	
a. Term-Limited Assistance (PH)	Not Currently Implemented
b. Term-Limited Assistance (HCV)	Not Currently Implemented
8. Increase Elderly Age (PH & HCV)	

Increase Elderly Age (PH & HCV)	Not Currently Implemented
9. Project-Based Voucher Program Flexibilities	
a. Increase PBV Program Cap (HCV)	Not Currently Implemented
b. Increase PBV Project Cap (HCV)	Not Currently Implemented
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Not Currently Implemented
d. Alternative PBV Selection Process (HCV)	Not Currently Implemented
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Not Currently Implemented
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	Not Currently Implemented
10. Family Self-Sufficiency Program with MTW Flexibility	
a.PH Waive Operating a Required FSS Program (PH)	Not Currently Implemented
a.HCV Waive Operating a Required FSS Program (HCV)	Not Currently Implemented
b.PH Alternative Structure for Establishing Program Coordinating Committee (PH)	Not Currently Implemented
b. HCV Alternative Structure for Establishing Program Coordinating Committee (HCV)	Not Currently Implemented
c.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
c.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Not Currently Implemented
e.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
e.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
11. MTW Self-Sufficiency Program	
a.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
a.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
b.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
b.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
12. Work Requirement	
a. Work Requirement (PH)	Not Currently Implemented
b. Work Requirement (HCV)	Not Currently Implemented
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
Use of Public Housing as an Incentive for Economic Progress (PH)	Not Currently Implemented
14. Moving on Policy	
a. Waive Initial HQS Inspection Requirement (HCV)	Not Currently Implemented
b.PH Allow Income Calculations from Partner Agencies (PH)	Not Currently Implemented
b.HCV Allow Income Calculations from Partner Agencies (HCV)	Not Currently Implemented
c.PH Aligning Tenant Rents and Utility Payments Between Partner Agencies (PH)	Not Currently Implemented
c.HCV Aligning Tenant Rents and Utility Payments Between Partner Agencies (HCV)	Not Currently Implemented
15. Acquisition without Prior HUD Approval (PH)	
Acquisition without Prior HUD Approval (PH)	Not Currently Implemented
16. Deconcentration of Poverty in Public Housing Policy (PH)	
Deconcentration of Poverty in Public Housing Policy (PH)	Not Currently Implemented
17. Local, Non-Traditional Activities	
a. Rental Subsidy Programs	Not Currently Implemented
b. Service Provision	Not Currently Implemented
c. Housing Development Programs	Not Currently Implemented

C. MTW Activities Plan that Brockton Housing Authority Plans to Implement in the Submission Year or Is Currently Implementing

1.w. - Alternative Income Inclusions/Exclusions (HCV)
The Brockton Housing Authority plans to implement the following income exclusion. For families who voluntarily leave TANF (welfare), while still eligible, the Brockton Housing Authority will exclude the earned income from employment that is greater than the TANF payment, for one year. The goal is to incentivize families to leave TANF and become employed. This MTW activity is intended to meet the statutory requirement of establishing a reasonable rent policy designed to encourage employment and self-sufficiency. This MTW activity will not apply to the elderly or disabled.
This MTW activity serves the following statutory objectives: Self-sufficiency
This MTW activity has the following cost implications: Increased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households
This MTW activity applies to: New admissions and currently assisted households
An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other). The MTW activity applies only to selected family types
The MTW activity applies to all tenant-based units
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. First year of implementation
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Brockton Housing Authority MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
Following inclusions or exclusions will be eliminated, modified, or added. The MTW activity is adding that certain income from non disabled, non elderly families, that voluntarily leave welfare, while still eligible, is excluded.

2.a. - Payment Standards- Small Area Fair Market Rents (HCV)

Brockton area voucher holders will have a greater choice of apartments. The Rental Assistance staff has recognized that voucher holders in Brockton are not able to rent in various developments because the rent exceeds the current payment standards. Currently, voucher holders are forced into less desirable sections of the city or move to adjacent towns that are in another FMR area and has a higher payment standard. Being forced to move to adjacent towns causes a disruption to the family being away from the supports of other family members, current schools, friends, and community support. Brockton has an excellent public transportation system and extensive shopping that are lacking in the surrounding towns. There are numerous reported cases of voucher holders taking an apartment in surrounding towns in order to not lose the voucher and looking to move back to Brockton at the end of the first year. In the past 12 months, we have had 11% of issued vouchers returned as the family could not find a place to rent.

This MTW activity serves the following statutory objectives:

Housing choice

This MTW activity has the following cost implications:

Increased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

The MTW activity applies only to a subset or subsets of assisted households

This MTW activity applies to:

New admissions and currently assisted households

An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other).

The MTW activity applies to all family types

This MTW activity applies to the following housing choice voucher unit types: The MTW activity will only impact those units in the Brockton HUD Metro FMR Area.

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

This is a new implementation.

This MTW activity requires a Hardship Policy. The Hardship Policy is attached.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Brockton Housing Authority MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

This MTW activity requires an Impact Analysis. The Impact Analysis is attached.

The following describes the payment standards by ZIP code or 'grouped" ZIP codes: The Brockton Housing Authority will analyze and adopt a Payment Standard between 80% -150% for each of the zip codes in the Brockton HUD FMR Area

4.a. - Vacancy Loss (HCV-Tenant-based Assistance)
The Brockton Housing Authority proposes to pay a vacancy payment to a Section 8 landlord who tenants to another Section 8 tenant at the end of the tenancy of the first Section 8 tenant. There will be a cap of one month, the unit must have actually been vacant and will be paid upon signing the new HAP agreement.
This MTW activity serves the following statutory objectives: Housing choice
This MTW activity has the following cost implications: Increased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. This is the first year.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Brockton Housing Authority MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This policy applies to To all units
The types of units policy applies to:
Maximum payment to the landlord is \$One months rent..
0 payments were issued under this policy y in the most recently completed PHA fiscal year.
\$0 issued under this policy in the most recently completed PHA fiscal year.

D.	Safe Harbor Waivers.
D.1	Safe Harbor Waivers seeking HUD Approval: No Safe Harbor Waivers are being requested.

E.	Agency-Specific Waiver(s).
E.1	Agency-Specific Waiver(s) for HUD Approval: The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, Agency-Specific Waivers may be requested. No Agency-Specific Waivers are being requested.
E.2	Agency-Specific Waiver(s) for which HUD Approval has been Received: MTW Agency does not have approved Agency-Specific Waivers

F.	Public Housing Operating Subsidy Grant Reporting.
F.1	Total Public Housing Operating subsidy amount authorized, disbursed by 9/30, remaining, and deadline for disbursement, by Federal Fiscal Year for each year the PHA is designated an MTW agency.

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
	\$0			
2022	\$9,537,532	\$0	\$0	

G.	MTW Statutory Requirements.	
G.1	75% Very Low Income – Local, Non-Traditional. HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
	Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
	80%-50% Area Median Income	
	49%-30% Area Median Income	
	Below 30% Area Median Income	
	Total Local, Non-Traditional Households	0

*Local, non-traditional income data must be provided in the MTW Supplement form until such time that it can be submitted in IMS-PIC or other HUD system.

G.2	Establishing Reasonable Rent Policy.
MTW agency did not established a rent reform policy to encourage employment and self-sufficiency The Brockton Housing Authority plans to implement MTW Activity 1.w as described previously, in 2023 ,to encourage self sufficiency.	

G.3	Substantially the Same (STS) – Local, Non-Traditional.
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	0 # of unit months
The total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	0 # of unit months

Number of units developed under the local, non-traditional housing development activity that were available for occupancy during the prior full calendar year:

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if 'Population Type' is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?

G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.
To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix" of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying	

local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.

Family Size:	Occupied Number of Local, Non-Traditional units by Household Size
1 Person	
2 Person	
3 Person	
4 Person	
5 Person	
6+ Person	
Totals	0

H.	Public Comment
Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.	

I.	Evaluations.
No known evaluations.	

MTW CERTIFICATIONS OF COMPLIANCE**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF PUBLIC AND INDIAN HOUSING****Certifications of Compliance with Regulations:
Board Resolution to Accompany the MTW Supplement to the Annual PHA Plan**

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (DD/MM/YYYY), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

- (1) The PHA made the proposed MTW Supplement and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the MTW Supplement and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board(s) or tenant associations, as applicable) before approval of the MTW Supplement by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the annual MTW Supplement.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the MTW Supplement in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) all regulations implementing these authorities; and other applicable Federal, State, and local civil rights laws.
- (5) The MTW Supplement is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The MTW Supplement contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the MTW Supplement is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing, which means that it will: (i) take meaningful actions to further the goals identified by the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150-5.180 and 903.15; (ii) take no action that is materially inconsistent with its obligation to affirmatively further fair housing; and (iii) address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3) and 903.15(d). Note: Until the PHA is required to submit an AFH, and that AFH has been accepted by HUD, the PHA must follow the certification requirements of 24 CFR 903.7(o) in effect prior to August 17, 2015. Under these requirements, the PHA will be considered in compliance with the certification requirements of 24 CFR 903.7(o)(1)-(3) and 903.15(d) if it: (i) examines its programs or proposed programs; (ii) identifies any impediments to fair housing choice within those programs; (iii) addresses those impediments in a reasonable fashion in view of the resources available; (iv) works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and (v) maintains records reflecting these analyses and actions.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low- or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of housing quality standards as required in PIH Notice 2011-45, or successor notice, for any local, non-traditional program units. The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982, for any Housing Choice Voucher units under administration.
- (22) The MTW PHA will undertake only activities and programs covered by the Moving to Work Operations Notice in a manner consistent with its MTW Supplement and will utilize covered grant funds only for activities that are approvable under the Moving to Work Operations Notice and included in its MTW Supplement. MTW Waivers activities being implemented by the agency must fall within the safe harbors outlined in Appendix I of the Moving to Work Operations Notice and/or HUD approved Agency-Specific or Safe Harbor Waivers.
- (23) All attachments to the MTW Supplement have been and will continue to be available at all times and all locations that the MTW Supplement is available for public inspection. All required supporting documents have been made available for public inspection along with the MTW Supplement and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its MTW Supplement and will continue to be made available at least at the primary business office of the MTW PHA.

Brockton Housing Authority

MA024

MTW PHA NAME

MTW PHA NUMBER/HA CODE

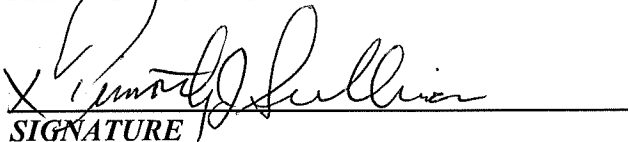
I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Timothy Sullivan

Board Chair

NAME OF AUTHORIZED OFFICIAL

TITLE


SIGNATURE

9.22.22

DATE

* *Must be signed by either the Chairperson or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairperson or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.*

Impacts of 80-150% SAFMR Brockton FMR Area

This analysis must consider the following factors, as applicable:

1. Impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution);

The Brockton Housing Authority (BHA) anticipates that there will be a budgetary impact on the authority's section 8 program. An analysis of a random selection of 50 vouchers, indicates that raising the payment standard to 150% for all SAFMR in the Brockton FMR area, after rent reasonableness is factored in, would be an average increase of \$292 per voucher, per month. This is almost a 14% increase in per month cost. The authority must carefully analyze the payment standards in each SAFMR before setting it after the FMR is published.

2. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs);

It appears that will not be an impact on the families as they will still be paying the same portion of their income.

3. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist);

There should be no impact on the waitlist.

4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency);

We do not anticipate a change in termination rate.

5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program;

The proposed MTW activity does not impact public housing. The HCV utilization rate should increase, as families will be able to find a better unit that they can now afford and will not lose the voucher by not leasing up in time.

6. Impact on meeting the MTW statutory goals of cost effectiveness, self sufficiency, and/or housing choice;

This MTW Activity is being implemented to increase housing choice and deconcentration of poverty. We believe that adjusting the Payment Standards to reflect local conditions will help families find better units. Brockton area voucher holders will have a greater choice of apartments. The Rental Assistance staff has recognized that voucher holders in Brockton are not able to rent in various developments because the rent exceeds the current payment standards. Currently, voucher holders are forced into less desirable sections of the city or move to adjacent towns that are in another FMR area and has a higher payment standard. Being forced to move to adjacent towns causes a disruption to the family, being away from the supports of other family members, current schools, friends, and community support. Brockton has an excellent public transportation system and extensive shopping that are lacking in the surrounding towns. There

are numerous reported cases of voucher holders taking an apartment in surrounding towns in order to not lose the voucher and looking to move back to Brockton at the end of the first year. In the past 12 months, we have had 11% of issued vouchers returned as the family could not find a place to rent.

7. Impact on the agency's ability to meet the MTW statutory requirements; The BHA will ensure that the following statutory requirements are met.; 75% Very Low Income, reasonable rent policy that encourages self sufficiency, assist substantially same number of households, continue to assist the same type of households by family size and meet HQS.

8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity;

This is the first year of this MTW Activity

9. Across the other factors above, the impact on protected classes (and any associated disparate impact).

The BHA does not anticipate any disparate impact.

Hardship Policy for 2.a SAFMR

The Brockton Housing Authority will consider requests for a hardship exemption from participants.

The Brockton Housing Authority (BHA) has adopted this written policy for determining when a requirement or provision of an MTW activity constitutes a financial or other hardship for the family. The BHA will review its hardship policy(s) with HCV participants during initial briefing and during its recertification processes.

The BHA will consider if a voucher holder qualifies for a hardship exemption at the time of a potential termination of assistance that is due to this MTW activity.

Requesting a Hardship Exception

The family must formally request a hardship exception by submitting a completed Request for Hardship Exception in writing to the BHA.

When a voucher holder requests a hardship exemption from this MTW activity, the BHA will suspend the activity for the household, beginning the next month after the request, until the BHA has determined if the request is warranted. The BHA shall make the determination of whether a financial or other hardship exists within 10 days after the family's request. If BHA determines that a financial or other hardship exists, the BHA will continue to provide an exemption from the MTW activity at a reasonable level and duration, according to the BHA's written policy. If the BHA determines that the request did not meet its hardship standards, the MTW Activity will be enforced retroactively.

Appeals

Families who disagree with the hardship review decision may appeal in writing addressed to the Executive Director, within 10 days of receipt of the decision.

Payment Standards –Where a family believes that the payment standards cause a household hardship, the BHA will apply its review of the alleged hardship under this policy.

Hardship

If the following occur, they may constitute a hardship, if the circumstances are related to the MTW activity.

The family has lost eligibility for or is awaiting an eligibility determination for a federal, state, or local assistance program;

The family would be evicted as a result of the imposition of MTW activities;

The family has experienced a decrease in income because of changed circumstances, including loss or reduction of employment, death in the family, or reduction in or loss of earnings or other assistance;

The family has an increase in expenses because of changed circumstances, such as for medical costs, childcare, transportation, education, or similar items; and
Such other situations and factors determined by the agency to be appropriate.

Required Record Keeping

The BHA will preserve all records of hardship requests, determinations, and appeals for the duration of its MTW participation.

The BHA will maintain records to ensure traceability of activities and comply with all applicable regulations. When compliant and reasonable, documentation will be maintained in electronic format.

Records will be available for public review and inspection at the agency's principal office during normal business hours and supplied to HUD if requested.

Account Number:	673385
Customer Name:	Brockton Housing Authority
Customer Address:	Brockton Housing Authority Po Box 7070 Brockton MA 02303-7070
Contact Name:	Brockton Housing Authority
Contact Phone:	5084279095
Contact Email:	
PO Number:	PO #47634

Date:	07/28/2022
Order Number:	7587001
Prepayment Amount:	\$ 0.00

Column Count:	1.0000
Line Count:	1.0000
Height in Inches:	0.0000

Print

Product	#Insertions	Start - End	Category
NEO wickedlocal.com	1	08/02/2022 - 08/02/2022	Public Notices
NEO BRC The Enterprise	1	08/02/2022 - 08/02/2022	Public Notices

Total Order Confirmation	\$260.28
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Ad Preview

**LEGAL NOTICE
BROCKTON HOUSING
AUTHORITY
Annual, Moving to Work
Supplement and Capital
Plans**

The Brockton Housing Authority has prepared its 2023 Annual Plan, its Moving to Work Annual Plan Supplement and its Five Year and Annual Capital Plan. These plans outline the accomplishments of the Authority along with the Authority's polices, future plans in providing housing services and how Capital Funds will be spent over the next five years. These plans are available for public review and comment. Any interested person may review the plans at the Authority's Administrative Offices at 45 Goddard Road, Brockton, Massachusetts 02301 or by visiting the Authority's web site at WWW.Brocktonhousingauthority.com. Copies of the plan are also available at no cost by writing to the above address or calling the Authority at (508) 588-6880. A public hearing will be held on Thursday September 22 2022 2:00 PM at 45 Goddard Rd Brockton MA 02301

The Authority will accept both written and oral comments at the meeting. Written comments are encouraged for submission prior to and on the date of the meeting. All comments and the Brockton Housing Authority's response will become part of the plan.

Thomas G. Thibeault
Executive Director

AD#7587001
BE 08/02/2022