

**MTW Expansion Cohort #4 MTW  
Application Package  
Moving to Work Plan, Landlord  
Incentive Activities Information, and  
Appendices**

**Brockton Housing Authority  
MA024**

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## **(1) Vision for PHA's Local MTW Program**

The Brockton Housing Authority (BHA), located in Brockton, Massachusetts, a 2009 and 2013 NAHRO National Award of Excellence winner and consistent SEMAP High Performer, is applying for Moving to Work (MTW) designation in Cohort #4, Landlord Incentives. The affordable housing market in Brockton is extremely tight and unaffordable for many city residents. As further described in the Landlord Assessment section of our application, a 2020 study conducted by the National Low Income Housing Coalition found the Brockton metropolitan area to be the 4<sup>th</sup> highest in terms of mismatches between local rents and the income levels of renter households. The extreme housing costs, exacerbated when combined with the relatively low wages in the metro area, create hardships for low-income households in Brockton and demonstrate the need to preserve and increase the supply of affordable housing. The BHA is applying for MTW status to help create new affordable units, grow our FSS program to increase self-sufficiency among the families we serve, to attract more landlords to the HCV program and to increase the Fair Market Rent (FMR), to allow participants to find decent housing, especially in areas of economic opportunity.

The statutory objectives of the MTW Program are to:

1. Reduce costs and increased cost-effectiveness
2. Increase self-sufficiency; and
3. Increase housing choice

All of these goals are consistent and align with current objectives of the Brockton Housing Authority (BHA), as further illustrated in its most recent FY21 Annual Plan. The flexibilities offered by MTW participation, both through fungibility of public housing and housing choice voucher funds and the waivers of certain housing regulations, will enable PHA to test and implement housing and self-sufficiency strategies not otherwise available due to funding and/or regulatory restrictions. In particular, BHA is interested in:

- Expanding participation opportunities in its existing family self-sufficiency (FSS) program;
- Increasing supply of affordable housing in the City of Brockton, including by funding projects undertaken by local non-profit developers;
- Encouraging households to increase income without any adverse impact to their current housing status or escrow accounts;
- Repositioning its public housing portfolio;
- Implementing technology enhancements to increase the efficiency and effectiveness of daily operations and provide increased reporting capabilities;
- Facilitating the ability of BHA households to access rental units in non-impacted neighborhoods in Brockton and surrounding communities through changes in owner rents and payment standards;
- Implementing policies and processes that incentivize owners to participate in the HCV program such as vacancy and damage payments, incentive payments for new owners in certain zip codes, the creation of an Owner's Committee and Portal.

BHA wants to participate in the MTW program so that it can use its flexibilities to further its policy goals for the benefits of current households, participants and applicants, and to increase the supply of affordable housing in the City of Brockton. The goal is to both improve service delivery and reduce costs, which will enable BHA to stretch its funds to satisfy other initiatives, especially as it relates to preserving and expanding the supply of affordable housing.

### **Key Personnel**

Key personnel of the Brockton Housing Authority who will be responsible for the administration and oversight of the local MTW program will include:

Thomas Thibeault, Executive Director, has been employed by the Brockton Housing Authority since July of 1990. In 2013, he was appointed to the position of Executive Director. Mr. Thibeault has his Bachelor of Arts degree in Political Science from the University of Massachusetts, Amherst and his Master of Public Administration from Bridgewater State University. He serves on several boards within the community and currently acts as the Chief Executive Officer for the Abington (MA) Housing Authority through an existing contract and until recently, acted also as the Executive Director under contract with the Hanson (MA) Housing Authority.

Attorney Thomas L. Plouffe, Assistant Executive Director –Atty. Plouffe has worked for BHA since 2005, advising the Executive Director on legal issues and exercising supervisory oversight over the Admissions (public housing and housing choice voucher), Leased Housing, Affordable Housing (scattered site housing with PBV subsidy), Family Self-Sufficiency and Human Resources departments. He has experience in multiple federal grant programs in support of both redevelopment and supportive services, has current experience and knowledge as to the Housing Choice Voucher (HCV) program and admissions functions for both public housing and HCV and has extensive contacts in the local community, both through existing BHA partnerships and through prior roles as City Solicitor and as a City Councilor in Brockton. He is a NAHRO certified Public Housing Manager and adjunct faculty in Business law at Massasoit Community College.

Bruna Campbell, Rental Assistance Landlord Participant Facilitator, a newly created position within BHA in December 2020 with the goal of recruiting and increasing the current number of landlord participants in the BHA service area, promoting the BHA to owners to educate regarding the benefits of working with voucher households and maintaining an existing vacancy list to share with households searching for voucher with a housing choice voucher. Ms. Campbell was formerly the BHA Scattered Site Portfolio Manager covering 98 units, as well as a previous Leasing Agent within the Leased Housing Program responsible for a case load of 300 families. Ms. Campbell is a NAHRO certified Public Housing Manager and also has PIC Training Certification. Ms. Campbell started with the BHA in high school and has earned her Associate's, Bachelor's, & Master's degrees since first becoming associated with the BHA.

Michael Pacious, Chief Financial Officer at BHA since 2014, has almost fifteen (15) years of experience in housing authority finance and budget issues. He assists with the development of annual operating budgets of the public housing (federal and state) and housing choice voucher programs, oversees preparation of monthly financial reports for over 13 funding sources,

oversees monthly reporting of monthly VMS information and data and is a co-author of BHA internal controls policies and procedures. Mr. Pacious previously served as the Finance Director for the Medford (MA) Housing Authority which had about 700 federal housing units and 1,000 housing choice vouchers. He is a NAHRO certified Public Housing Manager and has a bachelor's degree in accounting.

Angela Pilling, Assistant Director of Finance, has just recently been re-hired by BHA. Ms. Pilling was previously an Accountant and Affordable Housing Grant Manager for BHA for 7 years, administering City affordable housing grants as part of her job duties. She was an Accountant for approximately 13 years for the Brockton Redevelopment Authority who maintained records and filed monthly financial reports of all HUD funds received by the City of Brockton.

### **Fair Housing**

The BHA certifies that it will carry out its MTW Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990. The BHA will affirmatively further fair housing by examining our programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the BHA's involvement and maintain records reflecting these analyses and actions.

The greatest barriers to increased availability of high-quality, affordable housing continues to be limited public funding and more limited private sector interest in developing affordable housing in Brockton or the surrounding area. The real estate market continues to remain tight, and rents and sale prices are still out of reach for many low- and moderate-income households due to rapid escalation in recent past years, combined with uncertainty in the market on the parts of buyers, sellers, financiers and investors. The Authority continues to see an increase in the number of voucher holders experiencing difficulty finding units that meet the parameters of the various rental assistance programs managed by the Authority. Increased outreach efforts are being made to recruit quality landlords with affordable units and the Authority has increased our payment standards to 110% of HUD's fair market rent for our area. The Authority has included a new outreach position to assist voucher holders find and lease units. The Authority is currently conducting an Addressed Based Survey to Appeal the 2021 FMR.

### **(2) Plan for Future Community/Resident Engagement**

BHA will continue to engage its assisted households, the broader community and stakeholders as it further develops and implements its local MTW program. It will include the following measures:

- Monthly meetings with our Resident Advisory Board (RAB) comprised of public housing residents
- Creation of an Owner's Committee to consist of existing landlords in the HCV program

- Communications with our current service partners who interact with BHA households, as well as by BHA Service and FSS Coordinators and Property and Asset Managers who have contacts with many of BHA households with children
- Periodic mailers to HCV participants
- Outreach to City partners, including some of the current committees and Boards on which the BHA Executive Director serves

Virtual options will be provided for meetings, especially during the ongoing pandemic. Meetings will be held in accessible locations and translators will be made available for Spanish, Cape Verdean and Haitian populations, all of whom exceed 5% of the City of Brockton population.

### **(3) PHA Operating and Inventory Information**

The Brockton Housing Authority (BHA) is an organization that manages approximately 2,000 units of affordable housing (both federal and state) and approximately 2,500 vouchers funded by a variety of federal and state sources. It is governed by a five-member Board of Commissioners with the Executive Director in charge of the day-to-day operations and outside legal counsel in place to further advise the Board. BHA has two affiliated non-profit organizations, Southeastern Massachusetts Housing Assistance Corporation (SMHAC) and Montello Affordable Housing Corporation (MAHC), neither of which has a Board that mirrors that of BHA for full control, and a non-profit, Brockton Housing Development Corporation (BHDC), which does have a mirror Board. BHA also provides management oversight of the Abington (MA) Housing Authority and had just ended oversight of the Hanson Housing Authority in September 2020. BHA also administers the Family Self Sufficiency (FSS) program on behalf of the Milton (MA) Housing Authority.

#### **Demographics**

For the HCV program head of households based on current 1,886 participants as of October 8, 2021:

- 27 0-BR, 528 1-BR, 749 2-BR, 477 3-BR, 99 4-BR, 5 5-BR 1 6-BR
- 84.3% female and 15.7% male
- 24.2% elderly and 75.8% non-elderly
- 41.8% disabled and 58.2% non-disabled
- 40.7% white, 58.9% African-American, 0.5% Other; 3.1% declined to provide
- 17.0% Hispanic/Latino, 83.0% non-Hispanic/Latino, 1.2% declined to provide
- 41.7% families with children, 58.3% families without children
- 70.0% as extremely low-income (30% AMI); 18.4% as very low-income (50% AMI), 10.4% as low-income (80% AMI) and 1.2% as not low-income

For the federal public housing program based on 1,573 households as of October 8, 2021:

- 1 0-BR, 1263 1-BR, 129 2-BR, 138 3-BR, 35 4-BR, 7 5-BR
- 63.1% female and 36.9% male
- 69.7% elderly and 30.3% non-elderly



- 42.8% disabled and 57.2% non-disabled
- 44.3% white, 55.2% African-American, 0.5% Other (Asian, American Indian among); 14.5% declined to provide
- 10.4% Hispanic/Latino, 89.6% non-Hispanic/Latino, 0.1% declined to provide
- 11.1% families with children, 88.9% families without children
- 81.3% as extremely low-income (30% AMI), 13.7% as very low-income (50% AMI), 4% as low-income (80% AMI) and 1.0% as not low-income

BHA does not anticipate any major changes to the existing demographics, at least for the short-term. Our self-sufficiency and supportive service measures are designed to increase the level of successful tenancies of existing households (public housing) and participants (HCV). A major goal of BHA is to preserve and increase the supply of affordable housing, which many of our proposed plan measures are focused on. Achieving this goal should allow for an increase in total participants and households. Through affirmative fair housing marketing plans, efforts will be made to conduct outreach to those least likely to apply for housing, which would cover some of the groups currently included as part of the “Other” Category.

### **Plans for Housing Stock**

The repositioning of our public housing portfolio is a top priority for BHA and one which MTW participation will help to facilitate. A Section 18 application for demolition/disposition has been approved by HUD’s Special Application Center (SAC) for the future tax credit self-development rehabilitation of the Campello high-rise consisting of 398 units for the elderly and disabled. It is BHA’s intent to explore other opportunities through RAD or HUD Mixed Finance for other properties, including:

- Hillside Village
- Belair Heights and Belair High-rise
- Manning Tower
- Crescent Court
- Caffrey Towers
- Sullivan Tower
- Roosevelt Heights

Identifying capital needs, determining financial feasibility and optimal structure, designing scopes of work and obtaining private and public sources of funding are all elements that can be provided by third parties for which use of MTW funds would be utilized in support.

### **Challenges**

Major existing challenges that BHA faces as it seeks to fulfill its mission include:

- The lack of supply of affordable housing inventory given the large waiting lists for both the public housing and HCV programs (Approximate wait times, HCV 11 years, Federal Elderly, 3 years, Federal Family, 4 years); this also applies to special needs populations, especially the chronically homeless

- The current lack of private sector initiative to create affordable units in the City of Brockton, thus necessitating that BHA play an increased role moving forward
- A tight real estate market with rents out of reach for many Brockton residents which has only been exacerbated by the eviction moratorium which has further increased the already difficult task of finding a unit by voucher holders
- Fair market rents in surrounding communities outside the rent and payment standards of BHA voucher holders – many of which are located in non-impacted neighborhoods
- Difficulty in attracting local owners to participate in the HCV program

### **Innovation and Creativity**

Beginning in 2005, BHA partnered with the City of Brockton, the Brockton Redevelopment Authority, Habitat for Humanity, Old Colony YMCA YouthBuild, Brockton Interfaith Community, the Paul and Phyllis Fireman Foundation, Massachusetts DHCD, and Southeastern Massachusetts Affordable Housing Corporation to develop over 100 scattered site Affordable housing units. This was a mix of new construction home ownership, single family rental, duplex, and rehabilitated, foreclosed, abandoned 3 deckers. The Pleasant Prospect Revitalization, as the project was known, received a NAHRO Award of Excellence in Community Revitalization. We are hoping to use MTW flexibility to create this type of community-based development of affordable units in other neighborhoods in the City of Brockton.

In 2020, the BHA created the position of Landlord Participant Facilitator to help HCV participants find units and encourage more landlords to join the program. We are hoping that the MTW Cohort #4 Landlord Incentives will help this fledgling program grow. A more complete description of job duties is included below.

BHA has participated in the Capital Fund Financing Program (CFFP) and refinanced its debt to fund the replacement of two elevators in Manning Tower, as well as finance building envelope issues at Hillside Village. We have completed a self-performing energy performance contract to reduce usage of water, gas and electricity to fund energy saving devices and the replacement of ten other failing elevators in high rise developments. We have participated in the construction of solar fields that resulted in a net metering agreement with Sun Edison with a projected \$14 million in savings over the 20-year contract.

#### **(4) Plan for Local MTW Program**

Based upon current policy priorities of the Brockton Housing Authority, we would initially anticipate to seek to implement the following type of initiatives under the flexibilities available through participation in the MTW program:

#### **Development of Affordable Housing**

1. Evaluate the possibility to provide loans, grants and/or gap funding to non-profit developers to facilitate the preservation and new development of affordable housing.



2. Evaluate the possibility of making more PBVs available to developers through program and project cap flexibilities to spur development of additional affordable units in Brockton.

### **Cost Effectiveness**

1. Fungibility of public housing capital and operating funds, as well as HCV housing assistance payment funds and administrative fees, so that BHA can better allocate its resources to achieve its policy priorities of preserving and increasing the supply of affordable housing
2. Evaluate increasing payment standards up to 120% in certain zip codes to attract more owner units in non-impacted communities for which voucher holders would have access
3. Conduct our own rent reasonableness determination on units owed and/or managed by BHA. As BHA intensifies its efforts to reposition its existing public housing portfolio, we expect to increase the supply of units subsidized with project-based vouchers
4. Evaluate the possibility of creating an alternative schedule for re-examinations from annual to every two or three years – this could be initially tested for public housing households and HCV participants currently on fixed incomes
5. Evaluate the implementation of asset self-certification in an effort to streamline the re-examination process in the public housing and HCV programs
6. Eliminate the selection process for self-awards of PBV assistance
7. Allow for the ability to conduct our own HQS inspections for units owned/managed by BHA or its affiliates/instrumentalities
8. Explore the opportunity of creating our own alternative procurement policy to facilitate access to goods and services

### **Self-Sufficiency**

1. As part of the Family Self-Sufficiency (FSS) program, modify certain terms of the current participation contract which is a HUD template document. This could include a change in policies for treating increased income or amount of funds moved to escrow
2. Evaluate the viability of modifying existing selection procedures, including potentially allowing household members other than the head of household to participate in the FSS program when the head of household is not working
3. Potentially allow for an increased term of FSS participation beyond the current five years for up to an additional five-year period
4. Use of fungible funds, including funds that currently revert to the operating budget, for resident training and technology enhancements
5. Extend the time period for over-income LIPH households to remain in the program as this will encourage residents to increase their income without fear of losing their existing housing in the short-term
6. Explore use of escrow funds to pay down debt, subject to restrictions, when credit clean-up is an essential component of becoming a homeowner as part of FSS goals

## **Housing Choice**

1. Use of funds to provide gap financing as a permanent funding source for preservation and development of additional affordable housing
2. Explore the feasibility of establishing a local rental subsidy program which can further support operations of lower-performing properties in the federal portfolio, as a potential source in support of local special needs projects that add affordable units and possibly to maintain financial feasibility of certain state public housing properties that may become federally subsidized through Faircloth to RAD or some other repositioning structure
3. Use of funds to directly cover costs of providing supportive services to supplement existing partnerships and leveraging of funds and serviced referrals
4. Creation of short-term assistance programs, especially those with supportive services for targeted populations
5. Increase PBV program cap to up to 50% of lower of either BHA's total authorized units or annual budget authority
6. Increase PBV project cap to allow for up to 100% PBV units
7. Increase PBV rent to owners to increase private developer participation for those offering affordable units, as well as to increase financial feasibility of BHA development projects
8. Waive the requirement to give tenant-based vouchers to project-based participants after 12 months, which otherwise delays opportunities to those on the HCV waiting list
9. Explore the possibility of establishing our own TDC limits.

### **(5) Proposed Use of MTW Funds**

BHA is expressly requesting the authority to flexibly use its eligible public housing and HCV funds across the Section 8 and 9 programs as part our application to participate in the MTW program. We have just recently undergone an organizational and operational assessment conducted by an experienced outside consulting firm. Several of the recommendations that were contained as part of the final report dovetail into some of the flexibilities that would be made available as part of MTW. While recognizing that some of these expenses could be incurred without MTW, the fungibility offered by MTW would allow for the BHA to undertake some larger scale expenses in support of its policy priorities; to preserve and expand affordable housing opportunities, expand self-sufficiency support activities, attract landlords, and increase housing choice for HCV participants. The BHA believes that it otherwise would not be prudent to incur some of these expenses for innovations, as it constantly balances funding day to day operations and maintaining an adequate level of reserves. Exercising fiscal responsibility prepares BHA for periods of economic downturn, as shown by the ability of BHA to successfully navigate through the pandemic on behalf of the families it serves.

Some of the anticipated use of funds would include:

1. Conduct annual rent surveys/studies by local college or university, so that more detailed information can be obtained by zip code or groups of zip codes to support future small area FMRs or increased payment standards
2. Technology enhancements to increase the efficiency and cost-effectiveness of program operations – this could include the transition to paperless transactions in the

admissions, occupancy and recertification processes, accessing portals not currently purchased on the current I.T. system to allow for more efficient daily transactions and the ability for system-generated reports to replace the time-consuming ad-hoc reports currently produced by BHA staff

3. Creation of an Owner's Portal on the BHA website to support the HCV program. This would enable landlords to have real-time access to check status of monthly payments, inspection schedules and results and other pertinent program information
4. Creation of professionally designed promotional materials to attract additional owners, membership in local landlord associations and trade groups to increase access to local owners
5. Creation of professionally designed promotional materials and set up trainings to promote benefits of participation in the FSS program
6. Use of third parties to identify feasibility and best structure for asset repositioning of portfolio – may include development consultants, architects, engineers, capital needs assessments, market studies, appraisals, environmental consultants, construction representatives
7. Provide funds as a permanent funding source for future BHA repositioning and/or redevelopment projects
8. Provide funds to directly obtain supportive services (while also continuing to use existing partners and referral) for families and special needs populations
9. Various security upgrades which would involve upgraded security cameras based on a public safety plan and improved door access systems, especially as it relates to senior developments
10. Use of outside executive search firms to assist BHA in identifying and hiring talented individuals to fill key senior staff vacancies who would be charged with administering MTW activities
11. Payment of increased HAP to owners who lease units to HCV participants in economic opportunity areas
12. Hiring of additional self-sufficiency staff to support increased activities if not covered by a HUD FSS grant

#### **(6) Evidence of Significant Partnerships**

The Brockton Housing Authority has numerous existing significant partnerships which can be utilized and expanded upon to further BHA's vision and target results for participation in the MTW program. These include:

- Brockton Redevelopment Authority (BRA) is a quasi-public agency contracted by the City of Brockton, whose main mission is community development and economic revitalization, specifically for the benefit of low- and moderate-income households and areas of Brockton. The BRA administers the HOME and CDBG grants for the City of Brockton. The BHA, the City of Brockton, Habitat for Humanity, YouthBuild, and the BRA partnered to create over 100 affordable rental and home ownership units using vacant city lots, HOME funds, NSP funds and private financing. The BHA acted as developer and coordinator. This development earned the BHA a NAHRO National

Award of Excellence and activated millions of dollars in private investment in the transformed neighborhoods.

- BHA contracts with Brockton Area Multi-Services, Inc. (BAMSI) to provide Service Coordinators as part of the BHA Resident Services Department who act as liaisons who connect residents with available resources. BAMSI makes referrals to numerous public and private service organizations with which it has relationships on behalf of BHA. BAMSI staffing consists of the Director of Resident Services, five Service Coordinators, and one clinician. All five Service Coordinators and the Clinician report to the Director of the department, Fred Welsh, an employee of BAMSI. The Director Fred Welsh reports to the Executive Director, who in turns reports to BHA executive/senior staff. The Director is a licensed mental health coordinator in addition to his position as Director of Resident Services. He responds to emergencies that asset managers and service coordinators inform him of. He makes recommendations for people in emergency situations to receive care. The service coordinators identify the needs of residents. Some of the things they help residents with are: applying for food stamps, difficulty paying rent, a problem with their monthly social security check. The coordinators identify the problem and help connect the resident with the appropriate resource. They also handle the disbursement of the food donations they receive every month (which totals over 700 bags disbursed each month). Their main goal is to empower their tenants by addressing issues relating to health, financial insecurity and related services.
- Brockton Area Workforce Investment Board (BAWIB) – the BHA Executive Director currently sits on the BAWIB Board of Directors. The entity is a business-led, policy-setting board that oversees workforce development initiatives in the ten-community 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, we can continue to use this partnership to strengthen our FFS program success by connecting our FSS participants this job counseling and training.
- The BHA's Executive Director is a member of the Mayor's Homeless Task Force, composed of local business persons and other stakeholders which is focused on local solutions to addressing chronic homelessness by stressing a 'housing first' approach to promote increased affordable housing opportunities, while also streamlining access to essential supportive services. Efforts have included creation of a community day center (The Haven) for a place to stay after having to leave homeless shelters during the morning hours. Fundraising for cash resources, as well as private donations of computers, electronics, furniture and literature, as well as volunteers is a key part of maintaining The Haven's existence.
- BHA also has a partnership with Father Bill's and MainSpring (FBMS), a local non-profit whose mission is to end and prevent homelessness in Southern Massachusetts with programs that provide emergency and permanent housing and help people struggling with



homelessness, or at risk of homelessness, to obtain skills, jobs, housing, and services. The BHA is currently working with FBMS on our Mainstream voucher program and our Emergency Housing program.

- BHA is a member of the Brockton Housing Partnership a consortium of local banks, credit unions, and non-profit agencies. The group sponsors homebuyer workshops that put individuals in contact with real estate brokers, insurance agents, attorneys and loan originators and learn about various down payment assistance programs and mortgage options. They have developed a foreclosure hotline for homeowners to call and leave a message. The message is returned by a staff member who speaks the homeowner's language and the homeowner is referred the counseling or financial education programs.
- The Brockton branch of the Old Colony YMCA provide a variety of after-school and other youth programs. The Youth Focus Program offers a safe environment for comprehensive education, fitness, leadership and character development programming to support youth and families on-site in four Brockton Housing Authority developments. It also acts as an information and referral program to link youth and families to existing outside services provided by local non-profits, faith-based organizations, and educational institutions. Specific activities include homework help, operating a computer lab, mentoring groups, health and fitness activities, arts and crafts and sports leagues. BHA has previously collaborated with the YMCA on a YouthBuild program combining education and on-site work skills where students build or renovate housing units and receive a stipend.
- City Council – BHA works closely with its members and the Assistant Executive Director is a former Councilor. Areas include local affordable housing issues, support for local resources to be utilized for the preservation and/or creation of affordable housing and funding for service agencies which provide resources and assistance to BHA households.
- State legislators – BHA works closely with its State Representatives and Senator on policies and legislation impacting both affordable housing policy and resources available to support the expansion of affordable housing.
- Old Colony Elderly Services – provides numerous services through its Supportive Housing Program to elderly residents and persons with disabilities in high-rises in the areas of legal, health care and counseling areas. It includes attention to daily personal care needs such as chores, laundry and housekeeping, medication reminders and safety checks.
- City of Brockton Police Department (BPD) – BPD currently has two full-time officers assigned to BHA properties, one during the daytime and one at night, who drive the BHA public housing and Section 8 properties, including where private night-time security guards are stationed. The BPD Night-time Supervisor reviews reports provided by the private security firm(s). A good illustration of success with this partnership is where



BHA worked with BPD to establish a hybrid-community policing program to address public safety concerns in the Pleasant Prospect neighborhood.

- Veteran’s Administration Hospital – We were awarded 14 PBV VASH vouchers which were Project Based on the grounds of the VA Hospital in Brockton, which allows the participants the ability to access services on the VA campus and have a fantastic working relationship with the VA.
- We have partnered with Family and Community Resources, a local Domestic Violence provider, for many years on a variety of projects.

The above partnerships will help to achieve the MTW vision by providing opportunities to an increased number of households to participate in FSS programs, or access services that promote self-sufficiency even if not a formal FSS participant. This will increase the incidences of successful tenancies which is important given the scarce supply of affordable housing. They will create a network of local partners that are potential providers of funding or in-kind services that count as leverage for purposes of competitive funding applications that seek to preserve or increase affordable housing. Our partners can also promote the availability of housing assistance to those in the community who otherwise may not apply for either public housing or an HCV.

These partnerships will also allow the BHA to help create additional affordable units by using the relationships to find and fund non-profit developers.

## **Landlord Incentive Activities Information**

### **(1) Landlord Needs Assessment**

In addition to the regulatory burdens that can act as a deterrent to owner participation in the MTW program, existing conditions in the local rental market are the major reason behind some of the proposed Landlord Incentive Activities proposed in our Plan.

A 2020 study by the National Low Income Housing Coalition ranked the Brockton area housing market as among the most unaffordable in the country for local renters. The annual study of housing costs across the country estimated the average renter in Brockton and its surrounding towns earns \$11.69 an hour, less than the state’s minimum wage. To afford a typical two-bedroom apartment in the area — “affordability” by the coalition’s definition meaning housing costs less than 30 percent of income — the average renter would need to work nearly 100 hours per week.

The coalition found only three metro areas in the country with more severe mismatches between rent and renter’s incomes: Santa Cruz, California; Ocean City, New Jersey; and the portion of Greater Boston that stretches into southeastern New Hampshire. Renters in major cities like San Francisco, Seattle and New York City earn higher wages on average than Brockton’s renters, thus making the extreme housing costs in those cities more affordable to local renters, according to the report. The housing crisis in Boston may actually be negatively impacting Brockton as rents are being charged that Boston-area households can afford in Brockton, but not in Boston.

Other notes from the report specific to Brockton include:

- 2-bedroom FMR of \$1,528 per month
- Hourly wage of \$29.38 and annual income of \$61,120 required to afford a 2-bedroom unit, which would require 2.3 full-time jobs based on estimated hourly wages earned

Landlord participants in the HCV program vary from owners of single units to owners with multiple buildings. Additionally, BHA also owns and operates units that receive project-based voucher assistance and this is expected to increase going forward as BHA redevelops its existing public housing portfolio. We also provide PBVs to private owners.

Even though denial of housing is not allowed under Massachusetts State law, there is still a reluctance by many owners to participate in the program. Reasons include:

- Limits as to what HAP and total rent can be paid based on existing FMRs – this is especially so in the surrounding suburbs; as described above there is a very hot rental market so owners have options that may provide rents over and above what BHA is allowed to pay
- Regulatory process which can delay lease-up as owners wait to pass HQS inspection, which often requires a follow-up inspection; owners complain about the stringent inspection protocols overall and/or about how it is applied by the inspectors
- Concern as to potential unit damages from low-income families, even if unfounded
- Massachusetts has very strong tenant protections built-in such that Owners are concerned that it may take several months to effectuate an eviction, whether for non-payment of rent or other cause

Additionally, as part of outreach to landlords as part of evaluating whether to participate in the MTW program, BHA did receive “pro” and “con” comments as to the various landlord incentive activities available under this Cohort. These comments were provided by an Owner who has worked with subsidized tenants for eight (8) years. The complete comments and BHA response are included as part of the public process documentation included as Appendix 2 in our application.

#### Strengths and Weaknesses of HCV Program

BHA just had an organizational and operational assessment conducted by an independent third-party consultant which included the Leased Housing Department.

Strengths of the Department included:

- Majority of staff has been with BHA for long time periods and has strong knowledge of program rules and regulations, as evidenced by long history of SEMAP high performance
- Established quality assurance process in place with dedicated staff
- Serve a variety of special needs populations through dedicated vouchers

Weaknesses were identified as:

- Need for greater automation so can transition to paperless transactions

- Better use of existing IT system so can generate reports rather than create ad-hoc which are very time-consuming for staff
- To alleviate work loads of case workers, consider streamlining the process of income verification and frequency of re-examinations for those on fixed incomes

## (2) MTW Cohort #4 Activities

BHA is proposing to implement the following five (5) cohort-specific activity as identified from the 4<sup>th</sup> Cohort MTW Activities List:

- **2.b. Payment Standards – Fair Market Rents** – payment standards may be established up to 120% FMR; no reduction in payment standards below 90% would be anticipated; these could be used as well to attract units in non-impacted areas, as well as potentially for PBV units owned and/or operated by BHA and its affiliates
- **4.a. Vacancy Loss** – The BHA will pay a landlord up to one-month contract rent as reimbursement for the time the unit is spent vacant between HCV participants; payments will be made upon execution of the next HAP contract between the Owner and BHA and the Administrative Plan will be amended to reflect this change in policy
- **4.b. Damage Claims** – pay landlord reimbursement for tenant-caused damages after first accounting for the security deposit to cover costs; the amount of damages will not exceed the lesser of the costs of the repairs or 2 months of contract rent and payment will be made upon execution of the next HAP contract between the Owner and BHA; the Administrative Plan will be updated to reflect this policy change
- **4.c. Other Landlord Incentives** – provide incentive payments up to one month rent to incentivize landlords to join HCV program: If any issues arise i.e. issues with inspection, landlord not able to submit certain paperwork to complete lease up for month that was planned for - - BHA can pay one month's rent upon HAP contract execution to hold the unit for new landlords - - to hold that is delayed due to inspection etc.; these incentive payments may be targeted to properties in neighborhoods where vouchers are difficult to use in order to attract new units in non-impacted areas that provide better economic and other opportunities for HCV participants
- **5.a. Pre-qualifying unit inspection** – allow units to be pre-inspected for HQS approval to accelerate the lease-up process and minimize landlord lost revenue during period of vacancy; inspection would occur within 90 days of the HCV participant occupying the unit.

BHA believes that these actions will be successful in meeting policy goals to provide participant access to units in areas of economic opportunity by providing the ability to make higher HAP payments to owners in such locations through revised payment standards which are otherwise unattainable under existing regulations and existing FMRs.

Even though Massachusetts prohibits refusal to accept voucher holders, anecdotal evidence would indicate this still does take place to some extent. Owner reluctance to participate in the HCV program can sometimes be traced to reluctance to deal with the regulatory process that can

sometimes delay the leasing process and cause economic loss such that incentive payments, vacancy and damage payments and pre-qualifying HQS can help to alleviate.

### **(3) Other Landlord Incentives and Initiatives**

No other Agency Specific Waivers related to landlord incentives proposed at this time.

#### Non-MTW Initiatives to Implement

1. Establish Owner Committee of local owners to coordinate with the Landlord Facilitator regarding proposed initiatives, provide feedback on BHA current processes and make recommendations on methods to streamline and provide feedback on customer service issues with Leased Housing staff
2. Create an online Owner Portal so that landlords will have real-time information as to monthly payment status, scheduling of and results of HQS inspections and other relevant program information

#### Previously Implemented Activity

In December 2020, BHA established a Rental Assistance Landlord Participant Facilitator, a newly created full-time position with primary oversight of the Leased Housing department's efforts to recruit responsible landlords to the program, assist participants in housing search, coordinate with FSS department to increase participation, act as the department's "Homeownership" expert, maintain a caseload, in addition to other duties. Reporting to the Leased Housing Administrator, and in addition to maintaining a case load of participants, major responsibilities specific to landlord outreach and improving lease-up success rates include:

- Research apartments, landlords, and rental opportunities for HCV participants to facilitate successful lease up.
- Recruit landlords not currently working with BHA housing programs through various methods, including but not limited to networking, newspapers, on-line databases, attending landlord coalition meetings, and other methods of landlord recruitment.
- Call landlords, making a positive first impression, to promote the Brockton Housing Authority and educate them about the benefits of working with HCV participants.
- Spend time doing outreach with potential landlords by visiting them and calling them regularly, attending landlord or realtor association meetings, and maintain great landlord relationships and ensure that needs are met in a positive and timely manner.
- Maintain a listing of up-to-date current vacancies in the Brockton area and compile and update a landlord database.
- Propose, oversee and/or implement new strategies to recruit landlords and identify the barriers to landlords participating in programs and propose solutions.
- Assess landlords to ensure they will be a good match for participant needs.
- Assist with briefings of new voucher holders
- Monitor lease up 'success' rate and work to increase that rate for those who are issued new vouchers

## **Appendix 1 – Certifications**

Included as part of this appendix are:

1. Moving to Work Certifications of Compliance – Attachment I of PIH Notice
2. Commitment to Participate in the Fourth Cohort Evaluation – Attachment II of PIH Notice
3. BHA Board Resolution



**ATTACHMENT I**  
**Moving to Work Certifications of Compliance**

**CERTIFICATIONS OF COMPLIANCE**

**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**  
**OFFICE OF PUBLIC AND INDIAN HOUSING**

**Certifications of Compliance with HUD and Federal Requirements and Regulations:  
Board Resolution to Accompany Application to the Moving to Work Demonstration Program**

Acting on behalf of the Board of Commissioners of the applicant public housing agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the application to the Moving to Work (MTW) Demonstration Program for the PHA and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the application and implementation thereof:

- (1) The PHA will adhere to the MTW Operations Notice or successor notice and all requirements therein.
- (2) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to ensure at least 75% of families assisted are very low-income as defined in Section 3(b)(2) of the 1937 Act throughout the PHA's participation in the MTW Demonstration Program.
- (3) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in establishing a reasonable rent policy that is designed to encourage employment and self-sufficiency.
- (4) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to assist substantially the same total number of eligible low-income families as would have been served absent MTW throughout the PHA's participation in the MTW Demonstration Program.
- (5) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to maintain a comparable mix of families (by family size) as would have been provided had the funds not been used under the MTW Demonstration Program throughout the PHA's participation in the MTW Demonstration Program.
- (6) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to ensure housing assisted under the MTW Demonstration Program meets housing quality standards established or approved by the Secretary throughout the PHA's participation in the MTW Demonstration Program.
- (7) The PHA published a notice that a hearing would be held, that the application and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the application by the Board of Commissioners, and that the PHA conducted a public hearing to discuss the application and invited public comment.
- (8) The PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the application by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the application.

- (9) The PHA certifies that the Board of Commissioners 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).
- (10) The PHA certifies that it will carry out its application in conformity with: Title VI of the Civil Rights Act of 1964 (42 USC 2000d-2000d-4); the Fair Housing Act (42 USC 3601-19); Section 504 of the Rehabilitation Act of 1973 (29 USC 794); Title II of the Americans with Disabilities Act of 1990 (42 USC 12101 et seq.); all regulations implementing these authorities; other applicable Federal, State, and local civil rights laws; and that it will affirmatively further fair housing by fulfilling the requirements set out in HUD regulations found at Title 24 of the Code of Federal Regulations, including regulations in place at the time of this certification, and any subsequently promulgated regulations governing the obligation to affirmatively further fair housing. The MTW PHA is always responsible for understanding and implementing the requirements of HUD regulations and policies and has a continuing obligation to affirmatively further fair housing in compliance with the 1968 Fair Housing Act, the Housing and Community Development Act of 1974, The Cranston-Gonzalez National Affordable Housing Act, and the Quality Housing and Work Responsibility Act of 1998. (42 U.S.C. 3608, 5304(b)(2), 5306(d)(7)(B), 12705(b)(15), and 1437C-1(d)(16)).
- (11) The PHA will carry out its plan in conformity with HUD's Equal Access Rule at 24 CFR 5.105(a)(2) and will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status.
- (12) The application is consistent with the applicable Comprehensive Plan (or any plan incorporating such provisions of the Comprehensive Plan) for the jurisdiction in which the PHA is located.
- (13) The application certifies that according to the appropriate State or local officials that the application is consistent with the applicable Consolidated Plan.
- (14) The PHA complies 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.
- (15) The PHA complies with the Violence Against Women Act and its implementing regulations at 24 C.F.R. Part 5, Subpart L and Parts 960 and 966.
- (16) The PHA complies with the Architectural Barriers Act of 1968 and its implementing regulations at 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (17) The PHA complies 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 75.
- (18) The PHA complies with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (19) The PHA complies 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 and implementing regulations at 49 CFR Part 24.
- (20) The PHA complies 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.
- (21) The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).

- (22) The 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 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.
- (23) With respect to public housing the 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.
- (24) The PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.
- (25) The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (26) The PHA will comply with the requirements of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Rewards at 2 CFR Part 200.
- (27) The application and all attachments are available at the primary business office of the PHA and at all other times and locations identified by the PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

Brockton Housing Authority

MA024

**PHA NAME**

**PHA NUMBER/HA CODE**

*I certify that the information provided on this form and in any accompanying documentation is true and accurate. I acknowledge that making, presenting, or submitting a false, fictitious, or fraudulent statement, representation, or certification may result in criminal, civil, and/or administrative sanctions, including fines, penalties, and imprisonment.*

Timothy J. Sullivan

Board Chair

**NAME OF AUTHORIZED OFFICIAL\***

**TITLE**

**SIGNATURE**

**DATE**

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

**ATTACHMENT II**  
**Commitment to Participate in the HUD-Sponsored Evaluation of the**  
**Fourth Cohort of the MTW Expansion**

**COMMITMENT TO PARTICIPATE**

**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**  
**OFFICE OF PUBLIC AND INDIAN HOUSING**

**Commitment to Participate in the HUD-Sponsored Evaluation of the Fourth Cohort of the MTW**  
**Expansion**

In addition to the elements described in PIH Notice 2021-03, HUD will provide additional scope and information about the HUD-sponsored evaluation of the fourth cohort of the MTW Expansion and any additional requirements that the PHA must adhere to.

Acting on behalf of the Board of Commissioners of the applicant public housing agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I agree to ensure participation of the PHA in the HUD-sponsored evaluation of the first cohort of the MTW Expansion as described in PIH Notice 2021-03 understanding the following considerations:

- (1) The PHA must participate in the HUD-sponsored evaluation of the fourth cohort of the MTW Expansion whether or not it receives an MTW designation through the lottery process described in PIH Notice 2021-03.
- (2) The PHA must follow PIH Notice 2011-65 or its successor notice whether or not it receives an MTW designation through the lottery process described in PIH Notice 2021-03. Adherence to PIH Notice 2011-65 regarding "Timely Reporting Requirements of the Family Report (form HUD-50058 and form HUD- 50058 MTW) into the Public and Indian Housing Information Center" is important to HUD's ability to evaluate the fourth cohort of the MTW Expansion.
- (3) In event the PHA is not selected to be in the treatment group, the PHA may apply to future cohorts of the MTW Expansion to which the PHA is eligible. Despite a potential designation under a future cohort, the PHA may continue to have obligations under the HUD-sponsored evaluation of the fourth cohort of the MTW Expansion as well. Despite a potential designation under a future cohort, the PHA may not implement MTW activities in the Cohort #4 MTW Activities List in PIH Notice 2021-03 for the duration of the HUD-sponsored evaluation of the fourth cohort of the MTW Expansion.
- (4) The PHA will cooperate fully with HUD and its contractors for the duration of the HUD-sponsored evaluation of the fourth cohort of the MTW Expansion. Failure to comply with the HUD-sponsored evaluation of the fourth cohort of the MTW Expansion may affect the PHA's ability to apply to future cohorts of the MTW Expansion.

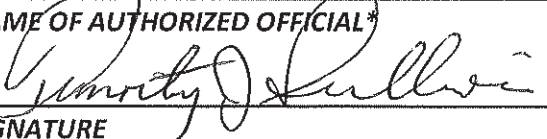
Brockton Housing Authority  
**PHA NAME**

MA024  
**PHA NUMBER/HA CODE**

*I certify that the information provided on this form and in any accompanying documentation is true and accurate. I acknowledge that making, presenting, or submitting a false, fictitious, or fraudulent statement, representation, or certification may result in criminal, civil, and/or administrative sanctions, including fines, penalties, and imprisonment.*

Timothy J. Sullivan  
**NAME OF AUTHORIZED OFFICIAL\***

Board Chair  
**TITLE**

  
**SIGNATURE**

10/15/2021  
**DATE**

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

RESOLUTION No. 21-05

A RESOLUTION OF THE BOARD OF COMMISSIONERS OF THE BROCKTON HOUSING AUTHORITY (BHA) AUTHORIZING THE SUBMISSION BY THE BROCKTON HOUSING AUTHORITY OF AN APPLICATION TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT FOR PARTICIPATION IN THE MOVING TO WORK (MTW) PROGRAM UNDER THE LANDLORD INCENTIVES COHORT; AND THAT THOMAS G. THIBEAULT, EXECUTIVE DIRECTOR OF BHA, ACTING SINGLY, OR TIMOTHY J. SULLIVAN, CHAIR OF THE BOARD OF COMMISSIONERS OF BHA, ALSO ACTING SINGLY, IS EACH HEREBY AUTHORIZED, EMPOWERED, AND INSTRUCTED TO ENTER INTO, ACKNOWLEDGE, AMEND AND/OR DELIVER ON BEHALF OF BHA ANY AND ALL INSTRUMENTS AND DOCUMENTS, AND TO TAKE ANY OTHER ACTION, AS MAY BE NECESSARY OR APPROPRIATE, IN EITHER OF THEIR SOLE AND CONTINUING DISCRETION, IN ORDER TO EFFECTUATE THE CONSUMMATION OF THE ACTION DESCRIBED ABOVE.

WHEREAS, the Brockton Housing Authority (BHA) currently operates both a public housing and housing choice voucher program under the rules and regulations of the Housing Act of 1937, as currently amended; and

WHEREAS, the United States Department of Housing and Urban Development (HUD) operates a Moving to Work (MTW) program that provides participating housing authorities with exemptions from certain rules and funding flexibility in how they use their federal funds; and

WHEREAS, HUD has offered housing authorities the opportunity to apply for participation in the MTW program under a Landlord Incentives Cohort, as further spelled out in PIH Notices 2021-3 and 2021-19; and

WHEREAS, the Brockton Housing Authority has policy goals to increase housing choices for its residents, including in areas of economic opportunity, and to help its residents become more self-sufficient; and

WHEREAS, the Brockton Housing Authority believes that participation in the MTW program will help to further its policy goals for the benefit of its residents; and

WHEREAS, if selected for MTW participation, the Brockton Housing Authority fully intends to comply with MTW objectives, statutory requirements and the MTW Operations Notice; and

WHEREAS, the Brockton Housing Authority has confirmed that it has met the public process requirements required for submission of an application; and



WHEREAS, the Brockton Housing Authority states its commitment to implement the landlord incentive activities as discussed in our proposed MTW Plan and application package;

NOW, THEREFORE, BE IT RESOLVED, that the Board of Commissioners endorses the submission by the Brockton Housing Authority of an application to the U.S. Department of Housing and Urban Development for participation in the Moving to Work program under the Landlord Incentives Cohort;

AND BE IT FURTHER RESOLVED that the Executive Director of BHA, acting singly, or the Board Chair of BHA, also acting singly, is each hereby authorized, empowered, and instructed to enter into, acknowledge, amend and/or deliver on behalf of BHA any and all instruments and documents, and to take any other action, as may be necessary or appropriate, in either of their sole and continuing discretion, in order to effectuate the consummation of the action described above.

**ADOPTED AND APPROVED** by the Board of Commissioners of the Authority this 14th day of October, 2021.

[SEAL]

**BROCKTON HOUSING AUTHORITY**

By: 

Timothy J. Sullivan  
Chairman

## Appendix 2 – Public Process Documentation

The Brockton Housing Authority utilized the following schedule to comply with the public process requirements as contained in PIH Notice 2021-3:

August 20, 2021 – mailed notice of intent to participate in the MTW Demonstration Program and notice of August 31, 2021 HCV participant meeting to all HCV participants and also posted notice of intent to participate in MTW in the lobby of the Rental Assistance office in English and other languages consistent with BHA Language Access Plan

August 23, 2021 – posted notice of intent to participate in the MTW Demonstration Program and notice of September 7, 2021 resident advisory board meeting in the lobbies of all public housing developments

August 31, 2021 – conducted in person meeting with HCV participants with interpreters available

September 7, 2021 – conducted in person meeting with Resident Advisory Board

September 8, 2021 – public notice of intent to participate in MTW, date of public hearing (September 14, 2021) and of draft MTW Plan and Landlord Incentive Activities Information availability and ability to comment published in major local newspaper of general circulation

September 10, 2021 – notice of public hearing posted on BHA website in both public notice and Section 8 tabs of the website; copy of draft MTW Plan and Landlord Incentive Activities Information posted on website for public access **which was at least 30 days before Plan submission.**

September 14, 2021 – conducted required public hearing to discuss BHA intent to participate in MTW – in-person and virtual access provided; only attendees were BHA staff and consultant and no public comments received as a result of this meeting

October 13, 2021 – date until which public comments on draft MTW Plan can be submitted – other than comments received directly from an HCV owner on potential landlord incentive activities, a copy of which is included here, along with BHA response, no other public comments were received on the draft MTW Plan and Landlord Incentive Activities Information

October 14, 2021 – BHA Board of Commissioners meeting to approve the MTW Plan and application package. Resolution contains: confirmation of the BHA's desire to obtain MTW designation under the fourth cohort of the MTW Expansion; a statement of the intention to comply with the MTW objectives, the MTW statutory requirements and the MTW Operations Notice; confirmation that the BHA met the public process requirements as contained in the PIH Notice; and a statement of the commitment to implement the landlord incentive activities proposed in the MTW Plan and application package **which was at least 15 days after the Public Hearing.**

October 15, 2021 – BHA submission of MTW Plan, Landlord Incentive Activities Information, application package and appendices submitted by email to Marianne Nazzaro, Director, Moving to Work Demonstration Program at [MTWCohort4@hud.gov](mailto:MTWCohort4@hud.gov)

\*In addition to the above, we solicited comments from local Owners potentially impacted by MTW participation and received written comments from one landlord who has been in the program for several years.

\*BHA has also solicited input from several of its long-standing community partners and has received multiple letters of support for BHA's participation in Moving to Work. Copies of the support letters are included as part of Appendix 4.

Included as part of our public process documentation in this appendix:

- Participant and resident meeting notices, sign-in sheets and minutes
- Supporting materials for the meeting describing MTW and some of the potential activities under consideration by BHA
- Public meeting newspaper advertisement, other notices, sign-in sheet and supporting information on the MTW demonstration program
- Copy of Owner comments and BHA response regarding potential Landlord Incentive Activities Information

Pre Plan Meeting 1

In Person

With HCV Participants

August 31, 2021

Notices & Minutes

HCV

The Brockton Housing Authority is considering filing application for Moving to Work (MTW) status under PIH Notices 2021-03 and 2021-19. If successful in its application, MTW designation will allow the Brockton Housing Authority flexibility in dealing with landlords on rent limits, vacancy payments, damage loss, unit inspections, and/or incentives to join the program. We will be having a meeting to discuss this on August 31, 2021 at 3:30PM at 1090 Main St. You are welcome to attend.

### Spanish

La Autoridad de Vivienda de Brockton esta considerando llenar una solicitud para el estatus de Mudanza para Trabajar (Moving to Work) MTW bajo de aviso PIH 2021-03 and 2021-19. Si tiene exito en su solicitud, la designacion Mudanza Para Trabajar (Moving to Work) MTW. Permitira a la Autoridad de Vivenda de Brockton flexibilidad para tratar con los propietarios sobre limites de alquiler, pagos por vacantes, perdidas por daños, inspecciones de unidades y/o incentivos para unirse al programa. Tendremos una reunion para discutir esto el Agosto 31, 2021 a las 3:30p.m. estamos ubicados en el 1090 Main Street. Les invitamos a asistir a esta reunion.

### Haitian Creole

The Brockton Authority, Konsidere ranpli aplikasyon pou sila ki gen estati "deplase pou travay" (Moving to Work) [MTW] anba PHI Avi yo pou 2021-03 ak 2021-19. Si aplikasyon sa reyisi ("deplase pou travay ") (Moving To Work) [MTW] l'ap pèmèt Brockton Authority ase fasil pou regle ak mèt kay yo sou zafè limit nan lwaye a, sou zafè. Pèman pòs vid lan, sou zafè pèt domaj lan, sou zafè enspeksyon yo, e/oubyen zafè ankourajman yo pou rantre nan pwogram nan. N'ap gen yon reyinyon pou diskite koze sa. Le Aut 31, 2021 apati de 3:30PM nan adrès 1090 Main St. Nou envite'w pou ou paticipè. Mèsi anpil.



Cape Verdean Creole

Brockton Housing Authority está considerando preencher uma aplicação de Moving to Work (MTW) status sob PIH Avisos 2021-03 and 2021-19. Se for bem sucedido nesta aplicação, MTW a designação permitirá Brockton Housing Authority flexibilidade ao lidar com proprietários sobre limites de aluguer, pagamentos de vagas, perda de danos, inspeções de apartamentos, e incentivos para aderir ao programa. No terrenos uma reunião para discutir isso em Agosto 31, 2021 at 3:30PM at 1090 Main St. Você é bem-vindo para participar.

Mailed to all HCV  
participants

8/31/21

# Syn In HCV M/TW meeting

Name

Address

MARIA DONAHOE

392 High st. Apt #2

Nina Hall

Bridgewater MA 02324

Julio et Marie  
Glenterscam

23 Inter ville st

Brockton Mass  
02302

272 Chatham Dr MA 023

Maria Luisa Monteiro  
Glorias chery

82 George St. #3

Roxbury MA. 02119

James phesp.

77 Bailey St dorchester

JEAN JOSSAINT

Ave MA, 02124

→ 35 MAZING Street  
Apt #2

Sandra Dumesle

Boston MA 02121

Gabriela T. Jorge 47

→ 396 Norfolk St #3

Dorchester, MA 02124

A. ALAYON

→ 312 Chatham West Dr  
Brockton MA 02301

\*100 Perkins Ave #306  
Brockton MA 02302

Diane V. Ransom Dim T. Connor

168 Prospect St. #2 Brockton 02301

Guerebalina Gomes

→ 43 East Main Street

Julise Bastien

→ 735 Randolph St Apt 9C Canton  
MA 02021

Adezyne Carvalho

88 N. Main 348 Chatham W.D

Masela Barros

Brockton MA 02301

VIVIANE Bordes → 141 Chatham West Dr Brockton, Ma 02301  
Cathy Okonko ~~Griffith~~ 10306 Chestnut West Randolph Mass 10308  
DONALD BROWN 101 Higginbotham St. Roxbury, Mass. 02109  
MARIA JOSE MONTROND 23 NEWTON ST. FLOOR 2 BROCKTON  
MASS 02301

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Spanish

CV

Written

in the past

available

Handout at HCV meeting 1090

## PURPOSE OF THE DEMONSTRATION

Moving to Work (MTW) is a demonstration program for public housing authorities (PHAs) that provides them the opportunity to design and test innovative, locally designed strategies that use Federal dollars more efficiently, help residents find employment and become self-sufficient, and increase housing choices for low-income families. MTW allows PHAs exemptions from many existing public housing and voucher rules and provides funding flexibility with how they use their Federal funds. PHAs in the MTW demonstration have pioneered a number of innovative policy interventions that have been proven to be successful at the local level, and subsequently rolled out to the rest of the country's PHAs.

The Department's vision for the MTW demonstration is to evaluate program innovations (i.e., MTW activities) being implemented at the PHA level, learn from those innovations, and then offer innovations proven to be successful to all 3,000+ PHAs across the country. To date, the MTW demonstration has had a strong influence in improving the delivery of low-income housing, specifically through the public housing and Housing Choice Voucher programs.

Some of the items being considered are

- Payment Standards – Small Area Fair Market Rents (SAFMR): The PHA may establish payment standards between 80% and 150% of the SAFMR.
- Payment Standards – Fair Market Rents (FMR): The PHA may establish payment standards between 80% and 120% of the FMR..
- Vacancy Loss: The PHA may pay a landlord up to one-month contract rent as reimbursement for time the unit spent vacant in between HCV participants.
- Damage Claims: The PHA may pay a landlord reimbursement for tenant-caused damages after accounting for any security deposit.
- Pre-Qualifying Unit Inspections: The PHA may allow units to be pre-inspected for Housing Quality Standard (HQS) approval, to accelerate the lease-up process and minimize the landlord's lost revenue during a period of vacancy.
- Alternative Inspection Schedule: The PHA may implement an alternative schedule for conducting HQS inspections

## Minutes for August 31, 2021 MTW Demonstration

At 3:30pm Thomas Plouffe started meeting

1. Signing sheet were passed around
2. Thomas Plouffe began explaining the reason for this meeting  
  
3 translators we're there for our non-English speaking participant [Spanish, Haitian Creole and Cape Verdean Creole]
3. Thomas Plouffe explained that the BHA is applying for the MTW and we are required to inform all the HCV participant of BHA intentions to participant in this program, reason for our meeting.
4. It was also explained that this program is designed for PHAs to test different strategies that use Federal dollars more efficiently i.e. help retain more landlord for our HCV program to increase housing choice for low-income families, help resident find employment and become self-sufficient.
5. Thomas Plouffe asked if anyone had questions or concerns about the MTW Demonstration ...
6. Meeting was adjourned at 4:09pm by Thomas Plouffe



Pre Plan Meeting 2

In Person

With PH Resident Advisory Board

September 7, 2021

Notices & Minutes

## Tom Plouffe

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**From:** Tom Plouffe  
**Sent:** Tuesday, August 24, 2021 12:07 PM  
**To:** Diane Frazier; Dennis Sheedy; Melissa O'Malley; Lillian Antenor; Linda Dower; Elizabeth Riordan  
**Cc:** Bruna Campbell  
**Subject:** Moving to Work Notice  
**Attachments:** MTW initial Notice Public Housing.docx

Please post the attached 2 page notice on the official bulletin board of your Federal developments.

Thank you,

Tom

**Thomas L. Plouffe, Esq.**  
Senior Counsel &  
Division Director of Housing Administration  
Brockton Housing Authority  
45 Goddard Road  
Brockton, MA 02301  
P (508) 588 6880  
F (508) 427 9065  
TTY (800) 439 2370

# NOTICE

PH  
Posted in  
all Federal  
Brockton

## English

The Brockton Housing Authority is considering filing application for Moving to Work (MTW) status under PIH Notices 2021-03 and 2021-19. If successful in its application, MTW designation will allow the Brockton Housing Authority flexibility in its Section 8 Program in dealing with landlords on rent limits, vacancy payments, damage loss, unit inspections, and/or incentives to join the program. We will be meeting with the Resident Advisory Board to discuss this. Once the plan is developed we will have a Public Hearing on the plan.

## Spanish

La Autoridad de Vivienda de Brockton esta considerando llenar una solicitud para el estatus de Mudanza para Trabajar (Moving to Work) MTW bajo de aviso PIH 2021-03 and 2021-19. Si tiene exito en su solicitud, la designacion Mudanza Para Trabajar (Moving to Work) MTW permitira a la Autoridad de Vivenda de Brockton flexibilidad en el programa de Seccion 8 (Section 8 Program) para tratar con los propietarios sobre limites de alquiler, pagos por vacantes, perdidas por daños, inspecciones de unidades y/o incentivos para unirse al programa. Tendremos una reunion con la consulta asesora de residente (Resident Advisory Board) para discutir esto. Cuando se desarrolle el plan, tendremos una audiencia publica sobre el plan.

# NOTICE

## Cape Verdean Creole

Brockton Housing Authority está considerando preencher uma aplicação de Moving to Work (MTW) status sob PIH Avisos 2021-03 and 2021-19. Se formos bem sucedido nesta aplicação, MTW a designação permitirá Brockton Housing Authority flexibilidade ao lidar com proprietários sobre limites de aluguer, pagamentos de vagas, perda de danos, inspeções de apartamentos, e incentivos para aderir ao programa. Estaremos nos reunindo com o Conselho Consultivo Residente para discutir o assunto. Assim que o plano for desenvolvido, teremos uma Audiência Pública sobre o plano.

## Haitian Creole

The Brockton Authority, Konsidere ranpli aplikasyon pou sila ki gen estati "deplase pou travay" (Moving to Work) [MTW] anba PHI Avi yo pou 2021-03 ak 2021-19. Si aplikasyon sa reyisi ("deplase pou travay ") (Moving To Work) [MTW] l'ap pèmèt Brockton Authority ase fasil pou regle ak mèl kay yo sou zafè limit nan lwaye a, sou zafè pèman pòs vid lan, sou zafè pèt domaj lan, sou zafè enspeksyon yo, e/oubyen zafè ankourajman yo pou rantre nan pwogram nan. Nou ap rankontre avek Komite Konsey Rezidan la pou diskite sou sa. Yon fwa plan an devlope, nou ap gen yon Odyans Piblik sou plan an.

MTW RAR 9/2/21

GAIL SMITH  
BRIAN PITT  
JOHNNIE SHANNON  
JOHN FREDO

Margaret Simon  
Carol Roberts  
Kevin Downen  
Cheryl Duren  
Rosemary Rittenberg  
Kevin Connor  
Michael Coz  
LARRY MAES  
WAYNE COOK

Belair Heights  
Belair Heights  
Belair Tower  
Belair Tower  
Belair Heights  
Caffrey Towers  
Crosby Garden  
Sullivan Tower  
Hill Street  
Kennedy Dr.  
Manning Tower  
~~SA~~ Manning Tower  
CAMPALCO R



Hand out at  
RAB meeting

## PURPOSE OF THE DEMONSTRATION

Moving to Work (MTW) is a demonstration program for public housing authorities (PHAs) that provides them the opportunity to design and test innovative, locally designed strategies that use Federal dollars more efficiently, help residents find employment and become self-sufficient, and increase housing choices for low-income families. MTW allows PHAs exemptions from many existing public housing and voucher rules and provides funding flexibility with how they use their Federal funds. PHAs in the MTW demonstration have pioneered a number of innovative policy interventions that have been proven to be successful at the local level, and subsequently rolled out to the rest of the country's PHAs.

The Department's vision for the MTW demonstration is to evaluate program innovations (i.e., MTW activities) being implemented at the PHA level, learn from those innovations, and then offer innovations proven to be successful to all 3,000+ PHAs across the country. To date, the MTW demonstration has had a strong influence in improving the delivery of low-income housing, specifically through the public housing and Housing Choice Voucher programs.

Some of the items being considered are

- Payment Standards – Small Area Fair Market Rents (SAFMR): The PHA may establish payment standards between 80% and 150% of the SAFMR.
- Payment Standards – Fair Market Rents (FMR): The PHA may establish payment standards between 80% and 120% of the FMR..
- Vacancy Loss: The PHA may pay a landlord up to one-month contract rent as reimbursement for time the unit spent vacant in between HCV participants.
- Damage Claims: The PHA may pay a landlord reimbursement for tenant-caused damages after accounting for any security deposit.
- Pre-Qualifying Unit Inspections: The PHA may allow units to be pre-inspected for Housing Quality Standard (HQS) approval, to accelerate the lease-up process and minimize the landlord's lost revenue during a period of vacancy.
- Alternative Inspection Schedule: The PHA may implement an alternative schedule for conducting HQS inspections

MTW 9/7/21

Colby Towne

New Board member Comments

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- Rosemary - Don't  
copy Cambridge

Carol Roberts  
Need more elderly housing

- need more family housing

- Kevin O'Connor -  
workshops to employ  
elderly

# NOTICE

## English

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Public Meeting

In Person and Zoom

September 14, 2021

Newspaper Advertisement, Notices & Minutes



## Tom Plouffe

---

**From:** Donna Undzis  
**Sent:** Thursday, September 09, 2021 10:01 AM  
**To:** Diane Frazier; Dennis Sheedy; Melissa O'Malley; Linda Dower; Elizabeth Riordan; Lillian Antenor  
**Subject:** Public Notice Posting  
**Attachments:** Plan Public Notice (00000003) 9-2021.docx

Good Morning,

Can you please print and post the attached Public Notice where you post notices for tenants?

Please confirm that you received this email and that it is posted.

Thank you  
Donna Undzis

## Tom Plouffe

---

**From:** Tom Plouffe  
**Sent:** Tuesday, September 07, 2021 11:41 AM  
**To:** Owen Ahearn  
**Subject:** MTW Public Meeting Notice  
**Attachments:** Plan Public Notice.docx

Owen,  
Can you put this on website; Public Notices?  
Thanks

**Thomas L. Plouffe, Esq.**  
Senior Counsel &  
Division Director of Housing Administration  
Brockton Housing Authority  
45 Goddard Road  
Brockton, MA 02301  
P (508) 588 6880  
F (508) 427 9065  
TTY (800) 439 2370

## Tom Plouffe

---

**From:** Tom Plouffe  
**Sent:** Friday, September 10, 2021 10:51 AM  
**To:** Owen Ahearn  
**Subject:** RE: MTW Draft plan

Thank you

**Thomas L. Plouffe, Esq.**  
Senior Counsel &  
Division Director of Housing Administration  
Brockton Housing Authority  
45 Goddard Road  
Brockton, MA 02301  
P (508) 588 6880  
F (508) 427 9065  
TTY (800) 439 2370

**From:** Owen Ahearn  
**Sent:** Friday, September 10, 2021 10:51 AM  
**To:** Tom Plouffe <TomP@brocktonha.com>  
**Cc:** Thomas Thibeault <TomT@brocktonha.com>  
**Subject:** RE: MTW Draft plan

All set

**From:** Tom Plouffe  
**Sent:** Friday, September 10, 2021 10:00 AM  
**To:** Owen Ahearn <OwenA@brocktonha.com>  
**Cc:** Thomas Thibeault <TomT@brocktonha.com>  
**Subject:** MTW Draft plan

Owen,  
Can you please post this today under public notices and on the Section 8 page.  
Thanks

**Thomas L. Plouffe, Esq.**  
Senior Counsel &  
Division Director of Housing Administration  
Brockton Housing Authority  
45 Goddard Road  
Brockton, MA 02301  
P (508) 588 6880  
F (508) 427 9065  
TTY (800) 439 2370

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*Website*

[Browse Our Site](#) ☰

[Moving to Work Draft Plan September 10, 2021](#)

[Moving to Work Plan Availability and Public Hearing Notice](#)

**The Brockton Housing Authority is conducting a survey of rents in our area. We have employed the firm of ICF Macro to do the survey. If you get a survey, please complete it. Thank you.**

[Moving to Work Initial Notice](#)

[2022 HUD Annual and Capital Plan Draft](#)

[2022 State Annual Plan Draft](#)

[City of Brockton FY21 Amended Annual Action Plan - Brockton Redevelopment Authority](#)

[Brockton Housing Authority Amended Annual Plan](#)

[Southern Massachusetts Affordable Housing Corporation RFP Landscape Services and Maintenance](#)

[Brockton Housing Authority Federal Family Waiting List Advertisement](#)

[Brockton Housing Authority Federal Family Waiting List Opening Public Notice](#)

[Campello Section 18 Application](#)

[Section 18 Public Meeting Notice](#)

[Inventory Removals Application](#)

[Demolition and Disposition Addendum](#)

## Brockton Housing Authority MTW Plan Availability & Public Hearing

The Brockton Housing Authority is submitting an application to the US Department of Housing and Urban Development (HUD) for Moving to Work (MTW) status. A copy of our plan will be available on September 10, 2021 on our website [www.brocktonhousingauthority.com](http://www.brocktonhousingauthority.com) or by emailing to [tomp@brocktonha.com](mailto:tomp@brocktonha.com) or at our offices at 45 Goddard Road, Brockton, MA 02301. Comments on the plan will be accepted until October 13, 2021 at [tomp@brocktonha.com](mailto:tomp@brocktonha.com) or by mailing to Brockton Housing Authority, 45 Goddard Road, Brockton, MA 02301. There will be a public hearing on the plan on September 14, 2021 at 3PM at the Carpenter Board Room, 45 Goddard Road, Brockton, MA 02301 or zoom <https://us02web.zoom.us/j/89529310892> Meeting ID: 895 2931 0892 : phone 1 646 558 8656 US (New York)







Sept 14 2021 3pm

MTW Public Hearing  
Hybrid Zoom  
In Person

Name Address

Thomas Plouffe		BHA
Bruce Campbell	Zoom	BHA
Paul Galvin	Zoom	TAG
Ava Hewitt	<del>Zoom</del>	BHA

Closed at ~~3:15~~ 3:15

no questions  
or comments



Handbook  
for public  
meeting



## What are the benefits of MTW for my community?

The MTW demonstration program can provide numerous benefits to your agency. Below we have listed a few of the benefits.

- *Authority to waive statutory and/or regulatory barriers* - As an MTW agency you are exempted from certain Sections 8 & 9 regulations. These exemptions allow your agency to implement new rent policies, increase self-sufficiency for families, provide incentives to landlords for participation in the voucher program, and many other things.
- *Ability to create policies that address your local needs* - MTW agencies can target assistance to specific populations or address specific issues within their community.
- *Rethink your current administration of public housing and voucher programs* - MTW agencies can streamline administrative procedures which saves staff time and costs. The money saved can be used to create additional resources for tenants and can help them achieve self-sufficiency, accomplish educational goals or increase their earned income.
- *Become an industry leader* - As demonstrated through the provisions in HOTMA and the Streamlining Rule, innovative policies implemented by MTW agencies have been instrumental improving the overall public housing and voucher programs for all public housing authorities.

Is there a policy you wish your agency could implement but a Section 8 and/or 9 requirement stands in your way? If so, MTW may be the program that will allow you to do that.

## When can I apply?

Agencies will be selected to participate in the MTW demonstration program through competitive Selection Notices. Each Selection Notice will invite a group of interested agencies to apply to a cohort that will test a specific policy change. These policy changes were determined based upon the advice of the MTW Federal Advisory Committee. Selected agencies will be able to implement any of the MTW Waivers contained in the MTW Operations Notice to the extent that the waiver does not adversely impact the cohort study. We encourage interested agencies to review the Table of MTW Expansion Cohorts and begin thinking about which MTW cohort you believe your agency would be most interested in participating in.

## What is MTW?

The Moving to Work (MTW) demonstration program provides select public housing authorities with a unique opportunity to become industry leaders. MTW agencies are able to design and test innovative, locally-designed housing and self-sufficiency strategies for low-income families rather than administering their public housing and Housing Choice Voucher (HCV) programs under the "one-size-fits-all" approach.

MTW agencies have the flexibility to apply fungibility across their HCV, Operating Funds, and Capital Funds. MTW agencies are also able to flexibly administer their public housing and HCV programs. MTW designated agencies are granted exemptions from existing public housing and voucher rules. Because of the exemptions provided, designated MTW agencies can create policies that address local needs.

Engaging your community is a critical component to the success of your MTW initiatives. It is never too early to start having conversations with your community, residents and stakeholders regarding your interest in MTW and policies you would like to implement.

## Table of MTW Expansion Cohorts

**Overall Impact of MTW Flexibility:** This cohort will evaluate the overall effects of MTW flexibility on a PHA and the residents it serves.

This will be the first cohort. Selection process to begin in the summer of 2018.

**Rent Reform:** This cohort will evaluate different rent reform models that may or may not be income based, to include tiered rents, and/or stepped-up rents.

This will be the second cohort. Selection process to begin in the summer of 2018.

**Work Requirements:** This cohort will evaluate work requirements for residents/participants who are at least 18 years old, non-elderly and non-disabled.

This will be the third or the fourth cohort. More information on this cohort will be coming soon.

**Landlord Incentives:** This cohort will evaluate how to improve landlord participation in the HCV program through incentives such as participation payments, vacancy payments, alternate inspection schedules and other methods.

This will be the third or the fourth cohort. More information on this cohort will be coming soon.

Interested agencies are encouraged to start thinking about what types of policies they would like to implement as part of the MTW demonstration program. Examples of the types of policies that have already been implemented by agencies can be found in the approved MTW Plans and accepted MTW Reports which are all available on our website ([www.hud.gov/intw](http://www.hud.gov/intw)).

More information regarding the cohorts can be found on the MTW website. We also suggest that interested agencies review some of the resources below to find out more about MTW.

Resources: [\*Innovations in the Moving to Work Demonstration Report\*](#)  
[\*Testing Performance Measures for the MTW Program\*](#)

## What are some examples of flexibilities that are available to MTW agencies?

Through the exemptions MTW agencies receive from certain Sections 8 and 9 requirements, MTW agencies can implement various innovative policies. These MTW policies must achieve at least one of three statutory objectives: 1. Cost Effectiveness; 2. Self-sufficiency; or 3. Housing Choice. The Table of MTW Statutory Objectives and Policy Examples shows a few of policies implemented by MTW agencies and the accompanying bulleted list provides more detailed policy examples.

Table of MTW Statutory Objectives and Policy Examples

Cost Effectiveness	Self Sufficiency	Housing Choice
Using the MTW Funds to leverage funds	Linking rental assistance with supportive services	Developing mixed-income, tax credit properties, and other affordable housing
Streamlining HUD processes	Earned income exclusions	Developing sponsor-based voucher program to assist homeless and other at-risk groups
Simplification of rent calculations	Self sufficiency/ employment requirements	Encouraging moves to opportunity areas



- MTW agencies can adopt and implement policies for setting tenant rents in the tenant-based voucher program, project-based voucher program and public housing. These policies may include an alternative calculation of tenant rent that is not based on income, the elimination of utility reimbursement payments, the ability to eliminate deductions, and many other rent policies that can be found in the MTW Waivers.
- MTW agencies can establish an alternate reexamination schedule for both public housing and HCV households.
- MTW agencies can limit the duration of assistance for families in both public housing and the HCV program.
- MTW agencies may raise the PBV cap within a project up to 100%.
- MTW agencies may use MTW funds to provide a rental subsidy to a third-party entity.
- MTW agencies may use MTW funds to provide services for low-income non-residents and supportive services to residents.

*For more information on MTW please visit our website at [www.hud.gov/mtw](http://www.hud.gov/mtw)*



## **Overview of Landlord Incentive For a Housing Choice Voucher Participant.**

### **Sec 2.a. Payment Standard-**

- Pro- Having more range leeway allows for HCV participants to apply for the apartment.
- Pro- setting payment standards above the SAFMR
- Con- FMR should be evaluated more often in order to maintain the participation of the landlords. These payment standards should stay consistently up to date.

### **Sec 4.a. Vacancy Loss-**

- Pro- Reimbursement of lost rent to landlord for time the unit spent vacant in between HCV participants

### **Sec 4.b. Damage Claims**

- Con- Reimbursement should include the cost of repairs to the unit, and should be inspected
- Con- HCV participant should be accountable for property damage and clean up of Unit and inspected.

### **Sec 4.c Landlord Incentive**

- Pro- One month rent incentive for landlords to join the HCV program.
- Con- The incentive needs to be more informative to the landlord.

### **Sec 5.a. Pre-Qualifying Unit Inspections**

- Pro- HQS approval to be accelerated if unit is vacant
- Con- HCV units inspected and if failed the HCV participant should be held accountable if HCV participant has resided in an apartment for a year.

### **Sec 5.d. Alternative Inspection Schedule**

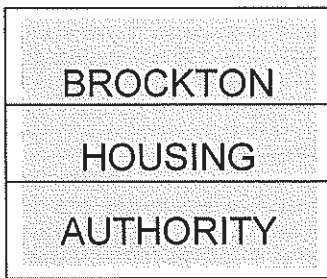
- Pro- inspection should include a walkthrough with the landlord.
- Con- less frequent inspection leads to many repairs, and could cause negligence on The HCV participant.

I have currently been a Rental property owner for 8 years. I feel my experience working with subsidized tenants has given me many learning experiences. I believe that many rental property owners need to be educated on how to accept a HCV participant. Advertising the program to the rental property owners may be key to educating them, may give them an incentive to take a HCV participant on as a tenant.

Heather Chin



TDC Realty  
Guiding Light Realty



Timothy J. Sullivan, *Chairman*  
Ernest Pettiford, *Vice Chairman*  
David Teixeira, *Treasurer*  
Carol Roberts, *Assistant Treasurer*  
Janet Trask, *Member*

Thomas G. Thibeault, *Executive Director*

*Creating Windows of  
Opportunity*

Ms. Chin,

Thank you for taking the time to review the Brockton Housing Authority's Moving to Work Draft Plan and for your comments on the MTW Landlord Incentives. Please see responses to your comments below.

**Comment**

**Sec 2.a. Payment Standard-**

Pro- Having more range leeway allows for HCV participants to apply for the apartment.

Pro- setting payment standards above the SAFMR

Con- FMR should be evaluated more often in order to maintain the participation of the landlords. These payment standards should stay consistently up to date.

**Response**

Currently the Brockton Housing Authority (BHA) has established the payment standard at 110% of the FMR, and with this MTW designation we may go to 120% of the FMR and up to 150% if we use SAFMR, – this will allow the BHA greater leeway in setting the FMR based upon market conditions and our participants are able to have access to homes in better neighborhoods offering increased economic opportunities. We are currently performing a survey of rents in our area.

**Comment**

**Sec 4.a. Vacancy Loss-**

Pro- Reimbursement of lost rent to landlord for time the unit spent vacant in between HCV participants

**Response**

With this MTW designation, the BHA may reimburse landlord for a 1-month loss of contract rent if unit is vacant between rentals to HCV participants.

**Comment**

**Sec 4.b. Damage Claims**

Con- Reimbursement should include the cost of repairs to the unit, and should be inspected

Con- HVC participant should be accountable for property damage and cleanup of Unit and inspected.

**Response**

With this MTW designation, the BHA may reimburse a landlord for cost of repairs, caused by a tenant, that is beyond normal wear and tear after accounting security deposit. Payment would be the lesser of actual cost of repairs or 2 months' contract rent.

**Sec 4.c Other Landlord Incentives**

Pro- One month rent incentive for landlords to join the HCV program.

Con- The incentive needs to be more informative to the landlord.

**Response**

With this MTW designation, the BHA would be able to have incentives for new landlords to join the HCV program. The BHA could provide payment up to one month of contract rent. The BHA is currently working on forming a landlord committee to help the BHA better understand different concerns from our landlords. With this committee, we will be able to hear matters from the landlord and also educate them regarding the benefits of our HCV program in an effort to increase future participation.

**Sec 5.a. Pre-Qualifying Unit Inspections**

Pro- HQS approval to be accelerated if unit is vacant

Con- HCV units inspected and if failed the HCV participant should be held accountable if HCV participant has resided in an apartment for a year.

**Response**

The MTW designation would apply to new lease ups – not for reoccurring annual inspections. This activity may speed up how we complete our annual inspections.

**Sec 5.d. Alternative Inspection Schedule**

Pro- inspection should include a walkthrough with the landlord.

Con- less frequent inspection leads to many repairs, and could cause negligence on The HCV participant.

**Response**

We don't foresee this activity to change how we currently complete our annual inspections. It's in our Administrative Plan that we are to complete inspections at least biannually, but to your concern, we complete inspections on an annual basis to ensure that our HCV participants are residing in units of safe physical conditions. A landlord or tenant can always ask for a special inspection. At this time, we do not intend to implement this activity, but reserve the right to re-visit this issue in the future.

Thank you for your prompt attention to this matter.

Respectfully,  
Rental Assistance Department

### **Appendix 3 – Required Standard Forms**

Included as part of this appendix are:

1. Certification of Consistency with the Consolidated Plan (HUD-2991)
2. Certification of Payments (HUD-50071)
3. Disclosure of Lobbying Activities (SF-LLL)

# Certification of Consistency with the Consolidated Plan

U.S. Department of Housing  
and Urban Development

I certify that the proposed activities/projects in the application are consistent with the jurisdiction's current, approved Consolidated Plan.  
(Type or clearly print the following information:)

Applicant Name: Brockton Housing Authority

Project Name: All

Location of the Project: 45 Goddard Road

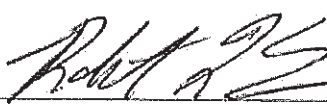
Brockton, MA 02301

Name of the Federal Program to which the applicant is applying: Moving to Work (MTW) cohort 4

Name of Certifying Jurisdiction: City of Brockton

Certifying Official of the Jurisdiction Name: Robert F. Sullivan

Title: Mayor

Signature: 

Date: 10/12/21

# Certification of Payments to Influence Federal Transactions

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing

Public reporting burden for this information collection is estimated to average 30 minutes. This includes the time for collecting, reviewing, and reporting data. The information requested is required to obtain a benefit. This form is used to ensure federal funds are not used to influence members of Congress. There are no assurances of confidentiality. HUD may not conduct or sponsor, and an applicant is not required to respond to a collection of information unless it displays a currently valid OMB control number.

Applicant Name

Brockton Housing Authority

Program/Activity Receiving Federal Grant Funding

Moving to Wok application

The undersigned certifies, to the best of his or her knowledge and belief, that:


(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

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)

Name of Authorized Official	Title
Thomas L. Thibeault	Executive Director
Signature	Date (mm/dd/yyyy)
	10/14/21



## DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352  
(See reverse for public burden disclosure.)

Approved by OMB  
0348-0046

<b>1. Type of Federal Action:</b> <input type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	<b>2. Status of Federal Action:</b> <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	<b>3. Report Type:</b> <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change <b>For Material Change Only:</b> year _____ quarter _____ date of last report _____
<b>4. Name and Address of Reporting Entity:</b> <input checked="" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known:  Congressional District, if known: MA 08	<b>5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime:</b>  Congressional District, if known:	
<b>6. Federal Department/Agency:</b>  HUD	<b>7. Federal Program Name/Description:</b>  CFDA Number, if applicable: _____	
<b>8. Federal Action Number, if known:</b>	<b>9. Award Amount, if known:</b> \$	
<b>10. a. Name and Address of Lobbying Registrant</b> (if individual, last name, first name, MI): NONE	<b>b. Individuals Performing Services</b> (including address if different from No. 10a) (last name, first name, MI):	
<b>11.</b> Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.	Signature: _____ Print Name: <u>Thomas G. Thibeault</u> Title: <u>Executive Director</u> Telephone No.: <u>508 588 6880</u> Date: <u>10/14/2021</u>	
<b>Federal Use Only:</b>		Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)

## INSTRUCTIONS FOR COMPLETION OF SF-LLL, DISCLOSURE OF LOBBYING ACTIVITIES

This disclosure form shall be completed by the reporting entity, whether subawardee or prime Federal recipient, at the initiation or receipt of a covered Federal action, or a material change to a previous filing, pursuant to title 31 U.S.C. section 1352. The filing of a form is required for each payment or agreement to make payment to any lobbying entity for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with a covered Federal action. Complete all items that apply for both the initial filing and material change report. Refer to the implementing guidance published by the Office of Management and Budget for additional information.

1. Identify the type of covered Federal action for which lobbying activity is and/or has been secured to influence the outcome of a covered Federal action.
2. Identify the status of the covered Federal action.
3. Identify the appropriate classification of this report. If this is a followup report caused by a material change to the information previously reported, enter the year and quarter in which the change occurred. Enter the date of the last previously submitted report by this reporting entity for this covered Federal action.
4. Enter the full name, address, city, State and zip code of the reporting entity. Include Congressional District, if known. Check the appropriate classification of the reporting entity that designates if it is, or expects to be, a prime or subaward recipient. Identify the tier of the subawardee, e.g., the first subawardee of the prime is the 1st tier. Subawards include but are not limited to subcontracts, subgrants and contract awards under grants.
5. If the organization filing the report in item 4 checks "Subawardee," then enter the full name, address, city, State and zip code of the prime Federal recipient. Include Congressional District, if known.
6. Enter the name of the Federal agency making the award or loan commitment. Include at least one organizational level below agency name, if known. For example, Department of Transportation, United States Coast Guard.
7. Enter the Federal program name or description for the covered Federal action (item 1). If known, enter the full Catalog of Federal Domestic Assistance (CFDA) number for grants, cooperative agreements, loans, and loan commitments.
8. Enter the most appropriate Federal identifying number available for the Federal action identified in item 1 (e.g., Request for Proposal (RFP) number; Invitation for Bid (IFB) number; grant announcement number; the contract, grant, or loan award number; the application/proposal control number assigned by the Federal agency). Include prefixes, e.g., "RFP-DE-90-001."
9. For a covered Federal action where there has been an award or loan commitment by the Federal agency, enter the Federal amount of the award/loan commitment for the prime entity identified in item 4 or 5.
10. (a) Enter the full name, address, city, State and zip code of the lobbying registrant under the Lobbying Disclosure Act of 1995 engaged by the reporting entity identified in item 4 to influence the covered Federal action.  
  
(b) Enter the full names of the individual(s) performing services, and include full address if different from 10 (a). Enter Last Name, First Name, and Middle Initial (MI).
11. The certifying official shall sign and date the form, print his/her name, title, and telephone number.

According to the Paperwork Reduction Act, as amended, no persons are required to respond to a collection of information unless it displays a valid OMB Control Number. The valid OMB control number for this information collection is OMB No. 0348-0046. Public reporting burden for this collection of information is estimated to average 10 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0046), Washington, DC 20503.

#### **Appendix 4 – Other Supporting Documentation**

Included as part of this appendix are:

1. Letter of Support from the City of Brockton
2. Letter of Support from Brockton Redevelopment Authority
3. Letter of Support from BAMSI – resident services partner
4. Letter of Support from Father Bill's and MainSpring
5. Letter of Support from Family and Community Resources, Inc.
6. Resume of Assistant Executive Director – who currently exercises direct supervisory oversight over key BHA departments that would be involved in MTW administration if selected
7. Resume of Rental Assistance Landlord Participant Facilitator – who will be the main point of contact with owners/landlords



# City of Brockton

Office of the Mayor

PS 1

**ROBERT F. SULLIVAN**

*Mayor*

October 8, 2021

Marianne Nazzaro, Director  
Moving to Work Demonstration Program  
U.S. Department of Housing and Urban Development  
451 7<sup>th</sup> Street, S.W.  
Washington, DC 20410

Re: Brockton (MA) Housing Authority Moving to Work (MTW) Application

Dear Ms. Nazzaro,

It is with great enthusiasm that we write in support of the Brockton Housing Authority's (BHA) application for participation in HUD's Moving to Work program under the Landlord Incentive Cohort. As a long-standing partner with BHA, we have seen first-hand their commitment to low-income housing residents throughout the City of Brockton. This includes both the provision of housing units and assistance, as well as coordinating access to supportive and other self-sufficiency services.

MTW participation by the Brockton Housing Authority would enable it to focus increasingly limited financial resources on the areas of greatest need in our community. For the City of Brockton and its residents, this includes the preservation of an aging and distressed public housing stock and increasing the supply of affordable housing where possible. This also involves increasing limited current local owner participation in the housing choice voucher program through streamlined processes and financial incentives. Finally, BHA would be able to provide increased housing access for residents in surrounding communities where there are more abundant economic opportunities but where rents exceed BHA payment standard limits.

BHA would be an excellent steward of federal monies should it be selected and it would be innovative in the implementation of policies that directly benefit local families. We are excited about the opportunity to continue to work with the Authority and its residents under these new flexibilities provided as a part of participation in the Moving to Work program.

Sincerely,

Robert F. Sullivan  
Mayor  
City of Brockton

*"City of Champions"*

PS 2

# Brockton Redevelopment Authority

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50 School Street, 2nd Floor • Brockton, Massachusetts 02301

October 8, 2021

Marianne Nazzaro, Director  
Moving to Work Demonstration Program  
U.S. Department of Housing and Urban Development  
451 7<sup>th</sup> Street, S.W.  
Washington, DC 20410

Re: Brockton (MA) Housing Authority Moving to Work (MTW) Application

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BHA would be an excellent steward of federal monies should it be selected and it would be innovative in the implementation of policies that directly benefit local families. We are excited about the opportunity to continue to work with the Authority and its residents under these new flexibilities provided as a part of participation in the Moving to Work program.

Sincerely,



Robert Jenkins  
Executive Director

October 8, 2021

Marianne Nazzaro, Director  
Moving to Work Demonstration Program  
U.S. Department of Housing and Urban Development  
451 7<sup>th</sup> Street, S.W.  
Washington, DC 20410

RE: Brockton (MA) Housing Authority Moving to Work (MTW) Application

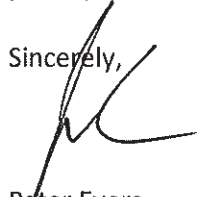
Dear Ms. Nazzaro,

It is with great enthusiasm that we write in support of the Brockton Housing Authority's (BHA) application for participation in HUD's Moving to Work (MTW) program under the Landlord Incentive Cohort. As a long-standing community partner with BHA, we have witnessed their commitment to low-income housing residents throughout the City of Brockton. This includes both the provision of housing units and assistance, as well as coordinating access to supportive and other self-sufficiency services.

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BHA would be an excellent steward of federal monies should it be selected and it would be innovative in the implementation of policies that directly benefit local families. We are excited about the opportunity to continue to work with the Authority and its residents under these new flexibilities provided as part of participation in the Moving to Work program.

Sincerely,



Peter Evers  
Chief Executive Officer

89 4



October 8, 2021

Marianne Nazzaro, Director  
Moving to Work Demonstration Program  
U.S. Department of Housing and Urban Development  
451 7<sup>th</sup> Street, S.W.  
Washington, DC 20410

Re: Brockton (MA) Housing Authority Moving to Work (MTW) Application

Dear Ms. Nazzaro,

It is with great enthusiasm that we write in support of the Brockton Housing Authority's (BHA) application for participation in HUD's Moving to Work program under the Landlord Incentive Cohort. As a long-standing community partner with BHA, we have seen first-hand their commitment to low-income housing residents throughout the City of Brockton. This includes both the provision of housing units and assistance, as well as coordinating access to supportive and other self-sufficiency services.

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BHA would be an excellent steward of federal monies should it be selected and it would be innovative in the implementation of policies that directly benefit local families. We are excited about the opportunity to continue to work with the Authority and its residents under these new flexibilities provided as a part of participation in the Moving to Work program.

Sincerely,

April Connolly  
Chief Operating Officer





October 8, 2021

Marianne Nazzaro, Director  
Moving to Work Demonstration Program  
U.S. Department of Housing and Urban Development  
451 7<sup>th</sup> Street, S.W.  
Washington, DC 20410

Re: Brockton (MA) Housing Authority Moving to Work (MTW) Application

Dear Ms. Nazzaro,

It is with great enthusiasm that we write in support of the Brockton Housing Authority's (BHA) application for participation in HUD's **Moving to Work** program under the Landlord Incentive Cohort. As a long-standing community partner with BHA, Family and Community Resources, Inc. has seen first-hand their commitment to low-income housing residents throughout the City of Brockton. This includes both the provision of housing units and assistance, as well as coordinating access to supportive and other self-sufficiency services.

MTW participation by the Brockton Housing Authority would enable it to focus increasingly limited financial resources to the areas of greatest need in our community. For the City of Brockton and its residents, this includes preservation of an aging and distressed public housing stock and increasing the supply of affordable housing where possible. This also involves increasing limited current local owner participation in the housing choice voucher program through streamlined processes and financial incentives. Finally, it also includes providing increased housing choice access for residents in surrounding communities where there are more abundant economic opportunities, but which are denied by current rents which exceed BHA payment standard limits.

BHA would be an excellent steward of federal monies should it be selected and it would be innovative in the implementation of policies that directly benefit local families. Family and Community Resources, Inc. excited about the opportunity to continue to work with the Authority and its residents under these new flexibilities provided as a part of participation in the Moving to Work program.

Sincerely,

Patricia Kelleher-Parker  
President/CEO

18 Newton Street, Brockton, MA 02301  
T: (508) 583-6498 · F: (508) 583-3775 · [www.FCR-MA.org](http://www.FCR-MA.org)



United Way of  
Greater Plymouth County