

B. Plan Elements Submitted with 5-Year PHA Plans. Required elements for Small PHAs completing this document in years in which the 5-Year Plan is also due. This section does not need to be completed for years when a Small PHA is not submitting its 5-Year Plan. See sub-section below for required elements in all other years (Years 1-4).

B.1 Revision of Existing PHA Plan Elements.
 (a) Have the following PHA Plan elements been revised by the PHA since its last **Five-Year PHA Plan** submission?
 Y N
 Statement of Housing Needs and Strategy for Addressing Housing Needs.
 Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
 Financial Resources.
 Rent Determination.
 Homeownership Programs.
 Substantial Deviation.
 Significant Amendment/Modification

(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):
Substantial Deviation.
 The Brookline Housing Authority (BHA) is changing its definition for substantial deviation to the PHA Plan in the following respects: As part of the Rental Assistance Demonstration (RAD) and Section 18 Demo/Disposition Program (Section 18), BHA is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD and Section 18 specific items: a. The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance. b. Changes to the Capital Fund Budget produced as a result of each approved RAD or Demo/Disposition Conversion, regardless of whether the 3434958.3 042028 CORR proposed conversion will include use of additional Capital Funds. c. Changes to the construction and rehabilitation plan for each approved RAD conversion or Section 18 Demo/Disposition; and d. Changes to the financing structure for each approved RAD conversion and Section 18 Demo/Disposition.

(c) The PHA must submit its Deconcentration Policy for Field Office review.

B.2 New Activities.
 (a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?
 Y N
 Hope VI or Choice Neighborhoods.
 Mixed Finance Modernization or Development.
 Demolition and/or Disposition.
 Conversion of Public Housing to Tenant Based Assistance.
 Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.
 Project Based Vouchers.
 Units with Approved Vacancies for Modernization.
 Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan

Demolition and/or Disposition.
 The Brookline Housing Authority has applied for RAD conversion of all of its remaining Federal Public Housing. 33-1 Walnut Street Apartments: Brookline Housing Authority has submitted its application for Section 18 Demo Disposition for the redevelopment of 22 High-Walnut Apartments. This project involves demolishing four buildings on the site in two phases. In Phase 1, BHA will demolish 32 units across three buildings and replace them with a 96-unit building. Residents from the remaining building at 22 High Street will relocate to this new structure. In Phase 2, the remaining building at 22 High Street will be demolished and additional affordable housing units built in the second phase. 33-7 Kickham Apartments: The Brookline Housing Authority has received a Commitment to Enter into Housing Assistance Payments ("CHAP") from HUD to redevelop the Kickham Apartments, 190 Harvard Street, Brookline, Massachusetts consisting of 39 units of housing for elderly and disabled residents, through the use of federal low-income housing tax credits and tax-exempt bonds and to convert to project-based voucher assistance through a RAD/Section 18 Construction Blend.

Conversion of Public Housing to Tenant Based Assistance.
 The BHA will utilize tenant-based vouchers in our Section 18 conversion to assist tenants during construction. It may consider strategic conversions to Tenant Based Assistance as the final 139 units of public housing are redeveloped to facilitate the process and ultimately exit the Section 9 program.

Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.
 The Brookline Housing Authority has applied for RAD/Section 18 conversion of all of its remaining Federal Public Housing.
 33-7 Kickham Apartments 190 Harvard St. Kickham Apts. (33-7) 2BR.....1 1BR38 TOTAL 39

33-1 Walnut Street Apts. (Family & Elderly) 22 High St.
 4-24 Walnut St. 28-42 Walnut St. Walnut St. Apts. (33-1) 4BR.....8 3BR.....27 2BR.....27 1BR
38 Total 100

Project Based Vouchers.
 BHA is actively pursuing the conversion of its remaining public housing stock through the Rental Assistance Demonstration (RAD) and Section 18 programs, and 139 units will be designated for Project-Based Vouchers or RAD vouchers, which will be used as part of this conversion process. In completing the two-phase Walnut-High project the BHA will be creating additional affordable housing units in Brookline that are supported by Project Based Vouchers to facilitate deeper affordability at the project. The use of Project-Based Vouchers is consistent with the BHA's Plan, as it aligns with the overarching goal of maintaining and improving affordable housing stock while addressing the pressing needs for rehabilitation and revitalization in the community, while also strategically expanding affordable housing in Brookline. The planned project-based units will serve to enhance the housing options for low-income families and ensure that these units remain affordable in the long term, as well as align with the authority's goals for housing equity and community improvement.

Units with Approved Vacancies for Modernization.

33-7 Kickham Apartments: The Brookline Housing Authority has received a Commitment to Enter into Housing Assistance Payments ("CHAP") from HUD to redevelop the Kickham Apartments, 190 Harvard Street, Brookline, Massachusetts consisting of 39 units of housing for elderly and disabled residents, through the use of federal low-income housing tax credits and tax-exempt bonds and to convert to project-based voucher assistance through a RAD/Section 18 Construction Blend. The BHA will hold vacancies in preparation modernization.

<p>B.3</p>	<p>Progress Report. Provide a description of the PHA’s progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan. Attached is a description of the BHA’s progress in meeting its Mission and Goals described in the PHA 5-Year Plan</p>
<p>B.4</p>	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved. BHA 5 year plan - submitted to HUD in May 2024 and was approved by HUD in August 2026. Copy attached.</p>
<p>B.5</p>	<p>Most Recent Fiscal Year Audit. (a) Were there any findings in the most recent FY Audit? Y <input type="checkbox"/> N <input checked="" type="checkbox"/> (b) If yes, please describe:</p>
<p>Plan Elements Submitted All Other Years (Years 1-4). Required elements for all other fiscal years. This section does not need to be completed in years when a Small PHA is submitting its 5-Year PHA Plan.</p>	
<p>B.1</p>	<p>New Activities (a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year? Y N <input type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods. <input type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development. <input type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition. <input type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance. <input type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD. <input type="checkbox"/> <input type="checkbox"/> Project Based Vouchers. <input type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization. <input type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). (b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. (c) If using Project-Based Vouchers, provide the projected number of project-based units, general locations, and describe how project-basing would be consistent with the PHA Plan. (d) The PHA must submit its Deconcentration Policy for Field Office Review.</p>
<p>B.2</p>	<p>Capital Improvements Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved. Attached for reference.</p>
<p>C. Other Document or Certification Requirements for Annual Plan Submissions. Required in all submission years.</p>	
<p>C.1</p>	<p>Resident Advisory Board (RAB) Comments. (a) Did the RAB(s) have comments to the PHA Plan? Y <input type="checkbox"/> N <input checked="" type="checkbox"/> (b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. During our Resident Advisory Board Meeting, residents asked questions but did not challenge the plan or suggest changes. Our RAB Meeting materials are attached.</p>
<p>C.2</p>	<p>Certification by State or Local Officials. <u>Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</u>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p>C.3</p>	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. <u>Form HUD-50077-CRT-SM, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</u>, must be submitted by the PHA as an electronic attachment to the PHA Plan</p>
<p>C.4</p>	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA’s response to the public. (a) Did the public challenge any elements of the Plan?</p>

	Y <input type="checkbox"/> N <input checked="" type="checkbox"/> If yes, include Challenged Elements.
D.	Affirmatively Furthering Fair Housing (AFFH).
D.1	Affirmatively Furthering Fair Housing (AFFH). Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.

Form identification: MA033-Brookline Housing Authority Form HUD-50075-SM (Form ID - 2896) printed by Lisa Brown in HUD Secure Systems/Public Housing Portal at 01/07/2025 04:48PM EST

B.2. Brookline Housing Authority: New Activities

The Brookline Housing Authority has applied for RAD conversion of all of its remaining Federal Public Housing.

33-7 Kickham Apartments: The Brookline Housing Authority has received a Commitment to Enter into Housing Assistance Payments (“CHAP”) from HUD to redevelop the Kickham Apartments, 190 Harvard Street, Brookline, Massachusetts consisting of 39 units of housing for elderly and disabled residents, through the use of federal low-income housing tax credits and tax-exempt bonds and to convert to project-based voucher assistance through a RAD/Section 18 Construction Blend.

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Development #	Development Name	Address	No. of Units
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Federal Public Housing			
33-7	Kickham Apartments	190 Harvard St.	<u>Kickham Apts. (33-7)</u> 2BR.....1 1BR38 39
33-1	Walnut Street Apts. (Family & Elderly)	22 High St. 4-24 Walnut St. 28-42 Walnut St.	<u>Walnut St. Apts. (33-1)</u> 4BR.....8 3BR.....27 2BR.....27 1BR38 Total 100

B.3 Progress Report

Our Mission

The Brookline Housing Authority provides low-income families, seniors, and people of all abilities with safe, decent, accessible, and affordable places to live in a community rich with opportunities. The BHA works in collaboration with government and civic organizations to support and encourage the well-being and economic self-sufficiency of BHA residents; to sustain a diverse population in Brookline; and to maintain attractive residential neighborhoods

Goal

[Engage in long-term planning. Set ambitious and obtainable goals for the BHA.](#)

Progress

The BHA completed a Strategic Plan which set three main goals: 1. Comprehensive rehabilitation of our older housing; 2. a strengthened approach to service coordination and self-sufficiency for adult residents of our family housing; and 3. improved social service support for our senior citizens. The BHA has made considerable progress toward all three goals.

The Section 18 redevelopment of Sussman House reached substantial completion in October 2024 and, as of December 20, 2024, is fully occupied. The Section 18 redevelopment of Col. Floyd Apartments is currently underway, with 100 units being rehabilitated and 115 new units being produced. The BHA has hired an architect to begin the 39-unit RAD redevelopment of Kickham Apartments (190 Harvard Street). Additionally, the BHA has submitted a Section 18 application for the redevelopment of 22 High-Walnut Apartments. This project involves demolishing four buildings on the site in two phases. In Phase 1, BHA will demolish 32 units across three buildings and replace them with a 96-unit building. Residents from the remaining building at 22 High Street will relocate to this new structure. In Phase 2, the remaining building at 22 High Street will be demolished.

The BHA has significantly expanded both the range of services and the number of residents served by its comprehensive adult service programs. Service coordination has been extended to all elderly properties, and enhanced services for elderly and disabled residents now include visiting nurses and on-site medical care through a partnership with the non-profit Hebrew Senior Life. Finally, The BHA received FSS Grant approval from HUD and will begin its Self-Sufficiency program in January 2025, available to HCV voucher holders, PBV voucher holders, and Public Housing residents in Brookline.

Goal

Maintain a SEMAP ranking of High Performer.

Progress

BHA is a perennial SEMAP High Performer, including the most recent rankings dated 7-23-24 as well as, 7-20-23.

Goal

Achieve annual break-even operations agency-wide and in all programs. Maximize operating income and minimize expenses to the greatest extent possible.

Progress

In FY 2024 the BHA operated at a combined surplus across all programs of \$3,955,630.00 not counting GASB 68 and 75 accruals. The Federal Public Housing program operated at a surplus of \$537,249.00 and the Sec. 8 HCV program at a surplus of \$5,460.00. We project to continue to have positive net income in FY 2025 across all programs.

Goal

Operational excellence: Maintain occupancy of 98%, rent collections of at least 95%, and work order response time no longer than three workdays, among other key indicators.

Progress

Our operational metrics have been strong over the past year, with occupancy averaging approximately 98% and rent collections near 90%. Routine work orders are typically completed within 5 days, while emergency work orders are resolved within 24 to 48 hours.

Goal

Provide effective social services to residents.

Progress

The BHA continues to provide a wide range of services and coordination for our residents. In 2024, through the comprehensive Senior Services and Wellness Grant, the BHA partnered with Hebrew Senior Life to expand health and wellness services at its elderly and disabled properties. This includes on-site nursing and fitness services. Additionally, the BHA maintains its contract with the Brookline Community Mental Health Center (BCMHC), which offers various counseling services to BHA residents as needed. Springwell, also contracted by the BHA, provides aging-in-place services to residents of all elderly properties. These programs support residents in maintaining compliance with their leases and help them retain their housing at the BHA.

The BHA has been granted a HUD FSS waiver and a grant from the Town of Brookline ARPA funds to create an FSS program and will expand self-sufficiency programs to Section 8 and federal public housing residents in 2025.

Goal

[Maintain up-to-date residency and admissions policies.](#)

Progress

The BHA updated its ACOP in 2021 for redevelopment purposes and is currently preparing additional updates to align with the HOTMA Section 102 and 104 requirements, set for implementation in July 2025.

In October 2023, the BHA updated its Section 8 Administrative Plan to incorporate improved operational practices and revised payment standards that are easier to administer. This includes adopting the HUD-published payment standards instead of the local housing authority's standard for Fair Market Rents (FMRs). The BHA is also preparing further updates to its Section 8 Administrative Plan to incorporate the HOTMA requirements, effective July 2025.

Goal

[Support and encourage tenant organizations and participation.](#)

Progress

Board meetings are widely advertised across all developments to encourage resident participation. All BHA open meetings, including the monthly board meetings, are held in a hybrid format, offering both in-person and virtual attendance options via Zoom. This approach enhances accessibility, allowing more residents to engage. Resident comments and concerns are welcomed by all attendees, whether in-person or virtual. Turnout has remained consistently strong, particularly for meetings concerning properties undergoing RAD or Section 18 conversions for redevelopment.

Capital Fund Program - Five-Year Action Plan

Status: Approved

Approval Date: 08/14/2024

Approved By: POPE , TALITHA

Part I: Summary						
PHA Name : Brookline Housing Authority		Locality (City/County & State)				
PHA Number: MA033		<input checked="" type="checkbox"/> Original 5-Year Plan		<input type="checkbox"/> Revised 5-Year Plan (Revision No:)		
A.	Development Number and Name	Work Statement for Year 1 2024	Work Statement for Year 2 2025	Work Statement for Year 3 2026	Work Statement for Year 4 2027	Work Statement for Year 5 2028
	MORSE APARTMENTS (MA033000001)	\$999,773.00	\$999,773.00	\$999,773.00	\$999,773.00	\$999,773.00

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 1 2024				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	MORSE APARTMENTS (MA033000001)			\$999,773.00
ID0000057	Administration(Administration (1410)-Other,Administration (1410)-Salaries)	Admin.		\$99,977.30
ID0000058	Operations(Operations (1406))	Operations		\$249,943.25
ID0000059	A/E fees and miscellaneous costs. (Contract Administration (1480)-Other Fees and Costs)	A/E fees and miscellaneous costs. A/E fees are associated with the window replacement project at Kickham Apts. and a resident coordinator if necessary.		\$79,999.45
ID0000060	window replacement project(Dwelling Unit-Exterior (1480)-Windows)	Replace all windows at Kickham Apts.		\$569,853.00
	Subtotal of Estimated Cost			\$999,773.00

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 3 2026				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	MORSE APARTMENTS (MA033000001)			\$999,773.00
ID0000068	Administration(Administration (1410)-Other,Administration (1410)-Salaries)	Admin.		\$99,977.30
ID0000069	Operations(Operations (1406))	Operations.		\$249,943.25
ID0000070	A/E fees and miscellaneous costs(Contract Administration (1480)-Other Fees and Costs)	A/E fees and miscellaneous costs associated with projects, and resident coordinator if necessary.		\$79,999.45
ID0000071	Lighting Improvements (Non-Dwelling Interior (1480)-Other)	Upgrades to common area lighting at Walnut Street		\$100,000.00
ID0000072	Parking lot and driveway resurfacing(Non-Dwelling Site Work (1480)-Asphalt - Concrete - Paving,Non-Dwelling Site Work (1480)-Curb and Gutter,Non-Dwelling Site Work (1480)-Landscape,Non-Dwelling Site Work (1480)-Lighting)	Repave and re-stripe parking lot to the property, including sidewalks (22 High St)		\$78,301.00
ID0000077	Community room upgrades(Non-Dwelling Interior (1480)-Common Area Finishes,Non-Dwelling Interior (1480)-Common Area Flooring,Non-Dwelling Interior (1480)-Common Area Kitchens,Non-Dwelling Interior (1480)-Common Area Painting,Non-Dwelling Interior (1480)-Community Building)	Upgrade flooring, fixtures, painting to the community room at 22 High Street		\$178,301.00

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 5		2028		
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	MORSE APARTMENTS (MA033000001)			\$999,773.00
ID0000078	Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	Admin		\$99,977.30
ID0000079	Operations(Operations (1406))	Operations		\$249,943.25
ID0000080	A/E fees and miscellaneous costs(Contract Administration (1480)-Other Fees and Costs)	A/E fees and miscellaneous costs associated with the projects and resident coordinator fees if necessary.		\$79,999.45
ID0000081	Unit interior painting (Dwelling Unit-Interior (1480)-Interior Painting (non routine))	Paint all apartments at 22 High Street		\$119,853.00
ID0000082	Kitchen Upgrades(Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets)	Full upgrades to kitchens including flooring, and cabinet replacement at Walnut Street.		\$300,000.00
ID0000083	Appliance replacement(Non-Dwelling Interior (1480)-Appliances,Non-Dwelling Interior (1480)-Electrical)	Replace stoves and refrigerators and associated work as necessary at 22 High Street		\$150,000.00

Brookline Housing

Resident Advisory Board – RAB

Date: Oct 30, 2024

Time: 1:00 PM – 2:00 PM

22 High Street Community Room or Via Zoom

Join Zoom Meeting

<https://us02web.zoom.us/j/83075225268?pwd=6tJsilM4qOwXh3UZ7vtZzVsCThSEae.1>

Meeting ID: 830 7522 5268

Passcode: 668860

Call in

1- 929 -205 - 6099

Meeting ID: 830 7522 5268

Passcode: 668860

Resident Advisory Board (RAB) Meeting Summary

Date: 10/30/2024

Attendance:

BHA Staff:

- Amelia Youngstrom
- Hannah Cross
- Ana De La Puente
- Sheila O'Flaherty
- Chris Devoll
- Lisa Brown
- Danielle Mendola
- John Kelley
- John Hillis
- Kelley Chambliss
- Jenny Tran (HSL)

BHA Residents:

- Kimberley Richardson
- Catherine Harris
- Julie Levesque
- Jules Latouche
- Kelley Pope
- Edouard Lunie
- Miriam Nussbaum
- Zoom user
- Jane Caulfield
- Evelyn Mellett
- Khayriyah Berry

Meeting Summary

Opening Remarks

Lisa Brown, Interim Executive Director, welcomed attendees and highlighted the significance of resident involvement in the HUD Annual Plan. She acknowledged the BHA staff's hard work and announced the restart of the Executive Director search process. Lisa also introduced a new BHA alert system and shared updates regarding upcoming job updates at 22 High Street and 61 Park Street.

Resident Services Updates

Danielle Mendola, Director of Resident Services, provided an overview of her plans to enhance support and build community for residents:

Partnerships and Programs: Service coordination at senior sites through Hebrew Senior Life, and at family sites with the Brookline Center for Community Mental Health.

Self-Sufficiency Programs: Expansion of employment coaching and asset building, with plans to extend to federal housing in 2025.

Current Engagement: Ongoing focus groups and open houses related to the Town of Brookline's Comprehensive and Consolidated Planning Processes.

Technology Access: Computer classes at Trustman this summer, and now at High Street Veterans this fall. A self-service computer station at Trustman will be available soon.

Building Upgrades and Grant Plans Updates for 2024

Chris Devoll, Director of Maintenance & Modernization, provided updates on building improvements:

Federal Housing Properties: Kickham and Walnut Street Apartments remain part of the Federal Housing Authority portfolio. 32 Marion and 50 Pleasant Street have been converted to RAD (Rental Assistance Demonstration) and are now part of LLCs.

- Walnut Street Updates: Completed flooring replacement. Future projects include:

- Common hallway and stairwell painting
- Landscaping, repaving, and parking lot updates
- Lighting upgrades
- Community Room improvements
- Future RAD conversion for Walnut Street Apartments.

State Public Housing: Chris also discussed plans for replacing boilers, roofs, and fire alarm systems, with a grant secured for the first phase of roof replacement at Egmont Street. The full grant amount will potentially include Trustman. These projects are scheduled to be completed by the end of December 2026.

Property Management Updates and Changes

Ana De la Puente, Director of Property Management, introduced new property management assignments:

- Property Managers:
- Nery Otero - High Street Village (HSV)
- Jacksel Castro - Egmont Street and Trustman
- Melisa Pagan - 22 High Street
- Kelley Chambliss - 61 Park Street
- Sandra Santiago - 190 Harvard Street and 90 Longwood
- Rosie Caraballo - 50 Pleasant Street

Ana also discussed the potential impact of HOTMA (Housing Opportunity Through Modernization Act) updates and changes to 760 CMR State Aided Public Housing Regulations on income calculations, especially for residents receiving Social Security or working. She encouraged residents to reach out with any questions.

Federal Public Housing Portfolio Update

Hannah Cross, Redevelopment Department, provided an update on the redevelopment of the Federal Public Housing portfolio:

50 Pleasant Street: Project nearing completion.

32 Marion Street: Development underway, with completion expected by January 2026.

190 Harvard Street (Kickham Apartments): Architect developing design for renovation, pending funding.

Walnut High: Design in progress; currently in Site Plan Review with the Town Planning Board. This project will add 81 new affordable housing units.

Hannah emphasized the use of HUD programs like RAD and Section 18, along with low-income housing tax credits, for these projects.

Resident Questions and Comments

1. Air Conditioning and Apartment Relocation Concerns

(50 Pleasant Street) resident expressed concerns about the air conditioning units in her building, particularly their noise level and lack of clear usage instructions. Hannah Cross confirmed that BHA is working on providing clearer instructions and will look into the noise issue.

2. Resident Relocation

(22 High-Walnut Street Apartments) resident raised concerns about the relocation of residents from 4 and 24 Walnut Street to 32 Marion Street. Kelley emphasized the need for more information and preliminary discussions with other residents. Hannah Cross assured that residents would have the option to move to 32 Marion or return to Walnut High after Phase One of Walnut High is complete. Additional meetings will be scheduled to discuss relocation further. Kelley also inquired about the size of the new one-bedroom apartments at 32 Marion.

Closing Remarks

The meeting concluded with a reminder for residents to stay engaged and reach out with any further questions or concerns. Additional meetings and discussions will be scheduled for further updates on relocation plans and building improvements.

Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan (All PHAs)	U.S. Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226 Expires 09/30/2027
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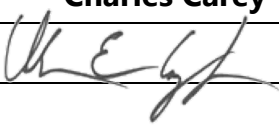
Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan

I, Charles Carey, the Town Administrator certify that the 5-Year PHA Plan for fiscal years 2025-2029 and/or Annual PHA Plan for fiscal year 2025 of the MA033 - Brookline Housing Authority is consistent with the Consolidated Plan or State Consolidated Plan including the Analysis of Impediments (AI) to Fair Housing Choice or Assessment of Fair Housing (AFH) as applicable to the Town of Brookline pursuant to 24 CFR Part 91 and 24 CFR § 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or State Consolidated Plan.

The Brookline Housing Authority's (BHA) Annual Plan aligns with the Town of Brookline's Consolidated Plan. The Town and BHA collaborate to create and preserve affordable housing, as demonstrated by the Town's financial support of BHA projects and programs through the Community Development Block Grant (CDBG). CDBG funds support various capital improvement projects and social service initiatives that assist low-income families, seniors, and individuals with disabilities, providing access to free food, health and social services, and opportunities for increased self-sufficiency. Additionally, the BHA's recent expansion of the Mainstream and VASH Voucher programs aligns with the Town's efforts to better serve people with disabilities and veterans.

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:	Charles Carey 	Title: Town Administrator
Signature:	Date: December 19, 2024	

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure consistency with the consolidated plan or state consolidated plan.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Form identification: *MA033-Brookline Housing Authority form HUD-50077-SL (Form ID - 2509) printed by Lisa Brown in HUD Secure Systems/Public Housing Portal at 12/17/2024 01:39PM EST*

Certifications of Compliance with PHA Plan and Related Regulations (Small PHAs)

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 09/30/2027

PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations including PHA Plan Elements that Have Changed

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year and/or X Annual PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning 04/2025 in which the PHA receives assistance under 42 U.S.C. 1437f and/or 1437g in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice (AI) or Assessment of Fair Housing (AFH) as applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Board or Boards in developing the Plan, and considered the recommendations of the Board or Boards (24 CFR § 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA certifies that the following policies, programs, and plan components have been revised since submission of its last Annual PHA Plan (check all policies, programs, and components that have been changed):

- 903.7a Housing Needs
- 903.7b Deconcentration and Other Policies Governing Eligibility, Selection, Occupancy, and Admissions Policies
- 903.7c Financial Resources
- 903.7d Rent Determination Policies
- 903.7h Demolition and Disposition
- 903.7k Homeownership Programs
- 903.7r Additional Information

- A. Progress in meeting 5-year mission and goals
- B. Criteria for substantial deviation and significant amendments
- C. Other information requested by HUD

- 1. Resident Advisory Board consultation process
- 2. Membership of Resident Advisory Board
- 3. Resident membership on PHA governing board

The PHA provides assurance as part of this certification that:

- (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
- (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
- (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.

5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d—4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.
8. For a PHA Plan that includes a policy for site-based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2010-25);
 - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of site-based waiting lists would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such waiting list is consistent with affirmatively furthering fair housing; and
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(c)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.

11. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
16. 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.
17. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Brookline Housing Authority

MA033

PHA Name

PHA Number/HA Code

5-Year PHA Plan for Fiscal Years 20_-20_

Annual PHA Plan for Fiscal Year 2025

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 Executive Director: MRS Lisa Brown		Name of Board Chairman: Michael Jacobs	
Signature	Date	Signature	Date

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Form identification: *MA033-Brookline Housing Authority form HUD-50077-CRT-SM (Form ID - 117) printed by Lisa Brown in HUD Secure Systems/Public Housing Portal at 01/07/2025 02:54PM EST*



Brookline Housing Authority

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BOARD OF COMMISSIONERS

Michael Jacobs, Chairman
Susan C. Cohen, Vice-Chair
Barbara Dugan, Treasurer
Judith A. Katz, Commissioner
Kimberley Richardson, Commissioner
Lisa M. Brown, Interim Executive Director

Brookline Housing Authority Deconcentration Policy

The Brookline Housing Authority Deconcentration Policy is part of its ACOP which states that within the preference categories the BHA uses, 50% of placements will be made to households with incomes at or less than 30% of AMI and the remaining 50% of placements in the 2nd preference category, will be made to households with incomes at or exceeding 30% of AMI. There are few applicants to the BHA with incomes greater than 30% of AMI in reality.

The Brookline Housing Authority (BHA) is changing its definition for substantial deviation to the PHA Plan in the following respects:

As part of the Rental Assistance Demonstration (RAD) and Section 18 Demo/Disposition Program (Section 18), BHA is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD and Section 18 specific items:

a. The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance.

b. Changes to the Capital Fund Budget produced as a result of each approved RAD or Demo/Disposition Conversion, regardless of whether the 3434958.3 042028 CORR proposed conversion will include use of additional Capital Funds.

c. Changes to the construction and rehabilitation plan for each approved RAD conversion or Section 18 Demo/Disposition; and

d. Changes to the financing structure for each approved RAD conversion and Section 18 Demo/Disposition.