

LEGAL NOTICE

On March 12, 2024 a Draft 5-Year Plan for the Holbrook Housing Authority, as required by the U.S. Department of Housing and Urban Development (HUD), was made available for a forty-five (45) day public review and comment period. The Draft is available to view by the public on the housing authority website at <https://holbrookha.com/>, and at the main office for our managed agencies located at 80 Clay Street, Quincy, MA 02170. Should you need a reasonable accommodation to access the Plan, please contact the Quincy Housing Authority office. A public hearing to consider comments will be held on Thursday, May 23, 2024 at Holbrook Housing Authority, located at One Holbrook Ct., Community Room at 4:30pm. This plan will also be presented to the Quincy Housing Authority Board of Commissioners on May 23rd. Written comments will also be accepted by mail to the attention of Andrew Rocha, to Quincy Housing Authority, 80 Clay Street, Quincy, MA 02170. To submit comments electronically, or for questions or concerns, please contact Andrew Rocha, Assistant Executive Director at 617-847-4350 ext. 702 or by email at arocha@quincyha.com.

**5-Year PHA Plan
(for All PHAs)**

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

OMB No. 2577-0226
Expires: 03/31/2024

Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

Applicability. The Form HUD-50075-5Y is to be completed once every 5 PHA fiscal years by all PHAs.

A. PHA Information.

A.1 PHA Name: Holbrook Housing Authority **PHA Code:**MA072

PHA Plan for Fiscal Year Beginning: (MM/YYYY): 07/2024

The Five-Year Period of the Plan (i.e. 2019-2023): _____

PHA Plan Submission Type: 5-Year Plan Submission Revised 5-Year Plan Submission

Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information on the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official websites. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.

PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below.)

Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	
				PH	HCV
Lead PHA:					

B.	Plan Elements. Required for <u>all</u> PHAs completing this form.
B.1	<p>Mission. State the PHA’s mission for serving the needs of low-income, very low-income, and extremely low-income families in the PHA’s jurisdiction for the next five years.</p> <p>It is the mission of the Holbrook Housing Authority to enhance the Town of Holbrook’s community by creating and sustaining safe, decent, sanitary and affordable housing environments for people of low income. The Holbrook Housing Authority (HHA) is committed to provide quality housing for our residents. We service a diverse community acting as a catalyst for positive change. While creating and sustaining the best housing experience, individual lives are enhanced by HHA’s programs, services, support and recreational facilities. We provide a tailored approach to managing quality and safe affordable housing while working within the constraints of governing regulations.</p>
B.2	<p>Goals and Objectives. Identify the PHA’s quantifiable goals and objectives that will enable the PHA to serve the needs of low-income, very low-income, and extremely low-income families for the next five years.</p> <ul style="list-style-type: none"> • The Holbrook Housing Authority is centralizing recertification and administrative process under the management agreement established with Quincy Housing Authority to create greater efficiencies. • The Holbrook Housing Authority is centralizing the maintenance functions, including time entry and work orders under the management agreement established with Quincy Housing Authority to create greater efficiencies. • The Holbrook Housing Authority is implementing a new lockbox rental payment system to streamline rental payments for residents and to strengthen fiscal administrative functions. <p>HOTMA</p> <p>The Holbrook Housing Authority is in the process of implementing HOTMA legislative amendments that will have implications on administrative processes. Changes to Holbrook Housing Authority processes will be amended and governed by the Quincy Housing Authority’s included in the agency’s Admissions and Continued Occupancy Plan (ACCOP) and Leased Housing Administrative Plans. Board and resident engagement, and administrative plans will be updated in 2024 to be in compliance by CY 2025. Please see the attached summary of the HOTMA changes.</p> <p>RESIDENT ENGAGEMENT & SERVICES</p> <p>Under the management agreement with Quincy Housing Authority, the Holbrook Housing Authority will continue to strive to provide the highest quality housing and supportive services for our residents by seeking new opportunities and partnerships to improve the quality of life for our residents.</p>
B.3	<p>Progress Report. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.</p> <ul style="list-style-type: none"> • This is a new 5-year plan. The Holbrook Housing Authority established a management agreement with the Quincy Housing Authority in February 2023 for a contract term of 1-year and 4 months, expiring June 2024. Holbrook Housing Authority anticipates extending the management agreement for another contract term, pending Board approval. • The Holbrook Housing Authority’s Leased Housing programs are administered by Dedham Housing Authority. This management agreement is in place until 2026. Upon termination of the agreement with Dedham, the Dedham HCVP will be managed by the Quincy Housing Authority and will adhere to the QHA administrative plan except for local preferences. • Holbrook Housing Authority’s inspections are currently being performed under the management agreement with Quincy Housing Authority. Quincy Housing Authority has switched from using HQS as the standard inspection system to INSPIRE, and adheres to the Massachusetts State Sanitary code for all inspections.
B.4	<p>Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA’s goals, activities, objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking.</p> <p>The HHA will continue to educate the public, landlords and program participants on the VAWA Act. We also provide hotline numbers and local shelter information to our participants. We will seek out awareness and prevention programs for our residents and participants.</p>
C.	Other Document and/or Certification Requirements.

<p>C.1</p>	<p>Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.</p> <p>The HHA has defined what constitutes a “substantial deviation” or “significant amendment/modification” as follows:</p> <ol style="list-style-type: none"> 1. Changes in waiting list preference criteria that are not already included in the plan. 2. Establishment of new and/or substantively revised policies or procedures in Section 8 that have not previously been submitted as part of the current or previous year’s Agency Plans, which are not required by HUD through law, rule or regulation. 3. Loss or inadequate funding for a program <p>If there is a “substantial deviation” or “significant amendment/modification” to the Authority’s Agency Plan, the following procedures outlined in 24 CFR 903.21 will be followed:</p> <p>HHA will amend or modify its Agency Plan upon the occurrence of a significant amendment/modification. The HHA may not adopt an amendment or modification until the HHA has duly called a meeting of its Board of Commissioners, and the modification or amendment is adopted, at a meeting open to the public, and, may not implement the amendment or modification until notification of the amendment or modification is provided to HUD and approved by HUD in accordance with HUD’s plan review procedures. Each significant amendment or modification to the plan submitted to HUD is subject to the requirements of 903.13, 903.15 and 903.17.</p>
<p>C.2</p>	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the 5-Year PHA Plan?</p> <p>Y N <input type="checkbox"/> <input type="checkbox"/> The Holbrook Housing Authority does not have a RAB Board, however all Housing Choice Voucher holders were notified of the Quincy Housing Authority’s intention to submit a 5-Year plan on behalf of HHA and informed of their rights in being able to submit comments.</p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
<p>C.3</p>	<p>Certification by State or Local Officials.</p> <p><u>Form HUD-50077-SL</u>, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p>C.4</p>	<p>Required Submission for HUD FO Review.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, include Challenged Elements.</p>
<p>D.</p>	<p>Affirmatively Furthering Fair Housing (AFFH).</p>

D.1

Affirmatively Furthering Fair Housing. (Non-qualified PHAs are only required to complete this section on the Annual PHA Plan. All qualified PHAs must complete this section.)

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.

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

While affirmatively furthering fair housing is a critical tenant of the Holbrook Housing Authority's administrative practices, the Holbrook Housing Authority is not required to submit at FHA at this time.

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Instructions for Preparation of Form HUD-50075-5Y - 5-Year PHA Plan for All PHAs

A. PHA Information. All PHAs must complete this section. (24 CFR § 903.4)

- A.1** Include the full **PHA Name, PHA Code, PHA Fiscal Year Beginning (MM/YYYY), Five-Year Period** that the Plan covers, i.e. 2019-2023, **PHA Plan Submission Type**, and the **Availability of Information**, specific location(s) of all information relevant to the hearing and proposed PHA Plan.

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table.

B. Plan Elements.

- B.1 Mission.** State the PHA's mission for serving the needs of low- income, very low- income, and extremely low- income families in the PHA's jurisdiction for the next five years. (24 CFR § 903.6(a)(1))
- B.2 Goals and Objectives.** Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low- income, very low- income, and extremely low- income families for the next five years. (24 CFR § 903.6(b)(1))
- B.3 Progress Report.** Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5- Year Plan. (24 CFR § 903.6(b)(2))
- B.4 Violence Against Women Act (VAWA) Goals.** Provide a statement of the PHA's goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking. (24 CFR § 903.6(a)(3)).

C. Other Document and/or Certification Requirements.

C.1 Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the 'Sample PHA Plan Amendment' found in Notice PIH-2012-32, REV 2.

C.2 Resident Advisory Board (RAB) comments.

- (a) Did the public or RAB have comments?
- (b) If yes, submit comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR § 903.17(b), 24 CFR § 903.19)

C.3 Certification by State or Local Officials.

Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan.

C.4 Required Submission for HUD FO Review.

Challenged Elements.

- (a) Did the public challenge any elements of the Plan?
- (b) If yes, include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

D. Affirmatively Furthering Fair Housing.

(Non-qualified PHAs are only required to complete this section on the Annual PHA Plan. All qualified PHAs must complete this section.)

D.1 Affirmatively Furthering Fair Housing. The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: "To implement goals and priorities in an AFH, strategies and actions shall be included in program participants' ... PHA Plans (including any plans incorporated therein) Strategies and actions must affirmatively further fair housing" Use the chart provided to specify each fair housing goal from the PHA's AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D.; nevertheless, the PHA will address its obligation to affirmatively further fair housing in part by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own 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 maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year PHA Plan. The 5-Year PHA Plan provides the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families and the progress made in meeting the goals and objectives described in the previous 5-Year Plan.

Public reporting burden for this information collection is estimated to average 1.64 hours per year per response or 8.2 hours per response every five years, 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.

Privacy Act Notice. 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.

Holbrook Housing Authority

Summary of

HOTMA POLICY DECISIONS

Expected Implementation Date: 1/1/2025

(may vary based on guidance from HUD and program software implementation)

1. SELF-CERTIFICATION OF NET FAMILY ASSETS

24 CFR 5.603(b) "Net Family Assets" para. (2); 5.618(b)

The PHA will determine net family assets and anticipated income earned from assets at new admission and at recertification by fully verifying the information reported by the family, regardless of the family having assets that are equal to or less than \$50,000.

Asset Limits: Asset Limitation for Interim and Annual Reexamination (24 CFR § 5.618)

At admission, a family may not be assisted if they have \$100,000 or more in assets or real property ownership. The PHA will not enforce the \$100,000 asset limit at recertification for participant families.

2. DETERMINING NET FAMILY ASSETS

24 CFR 5.603(b)(3) and (4)

The PHA must include the value of non-necessary items of personal property if the combined value exceeds \$50,000.

3. HARDSHIP EXEMPTIONS FOR HEALTH/MEDICAL CARE EXPENSES & REASONABLE ATTENDANT CARE & AUXILIARY APPARATUS EXPENSES – GENERAL RELIEF

24 CFR 5.611(c)(1) and 5.611(c)(2)

The Health and Medical Care Expenses deduction will be capped at qualifying expenses in excess of 10% of annual income. The PHA will incrementally implement this policy for current participants with medical expenses. "Phased in Relief", will begin automatically as 5% in the first year; 7.5% for the second year and 10% for the third year.

A family that did not previously have medical expenses may request a hardship exemption (deduction capped at qualifying expense in excess of 5%) for an unexpected increase in health or medical care expenses.

4. HARDSHIP EXEMPTION TO CONTINUE CHILDCARE EXPENSES DEDUCTION

24 CFR 5.611(a)(4)

The PHA may extend the childcare expense deduction for additional 90-day periods if the family demonstrates that they are unable to pay their rent because of loss of the childcare expense deduction, and the childcare expense is still necessary even though the family member is no longer employed, looking for work, or furthering his or her education

5. INTERIM REEXAMINATIONS

24 CFR §§ 960.257(b)(6); 982.516(c)(4); and 882.515(b)(4) - (b)(5).

Families must report all changes in family income or composition within 10 business days from the effective date of the change to be considered "timely."

6. DECREASES IN INCOME

24 CFR §§ 960.257(b)(2); 982.516(c)(2); and 882.515(b)(2)

Mandatory Policy

An interim reexamination will be conducted when the PHA is notified by the family that the family's adjusted income has changed by an amount that is estimated to result in a decrease of 10% or more of the family's annual adjusted income

7. INCREASES IN INCOME

24 CFR §§ 5.657(c)(3); 960.257(b)(3); 982.516(c)(3); and 882.515(b)(3)

All families are required to report any changes in family income that will result in an increase of 10% or more in annual adjusted income, with the exception that families are not required to report any increase in income during the last 3 months before their regular annual examination.

8. AUTHORIZATION FOR THE RELEASE OF INFORMATION and REVOCATION OR CONSENT

24 CFR 5.230 and 24 CFR 5.232(c)

Applicants and participants must sign and submit the HUD-9886, as applicable, at admission and no later than the next interim or regularly scheduled income reexamination. Once an applicant or participant has signed and submitted a consent form, they do not need to resign a subsequent HUD-9886. Families have the right to revoke consent by notice to the PHA, however, revoking consent will result in termination or denial of assistance at the next annual reexamination.

9. DE MINIMIS ERRORS

24 CFR §§ 5.609(c)(4); 960.257(f); 982.516(f); 882.515(f); and 882.808(i)(5)

Once the PHA becomes aware of the existence of an income calculation error, the error(s) will be corrected retroactive to the effective date of the action, regardless of the dollar amount associated with the error. Families will not be required to repay the PHA in instances where the PHA miscalculated income resulting in a family being undercharged for

rent. The PHA will take corrective action to credit or repay a family if the family was overcharged tenant rent.

10. HUD'S ENTERPRISE INCOME VERIFICATION (EIV)

24 CFR 5.233

The PHA will use HUD's verification hierarchy when verifying each household's income, assets, deductions, and expenses. The PHA will access the EIV system and obtain an Income Report for each household during annual recertifications.

11. DETERMINATION OF INCOME USING OTHER MEANS-TESTED PUBLIC ASSISTANCE, I.E., "SAFE HARBOR"

24 CFR 5.609(c)(3)

The PHA **will not** accept income calculation information from other means-tested forms of federal public assistance.

12. SSN Number Requirement

If a member of the family is unable to provide a Social Security card or other evidence of their SSN, the PHA will accept a document stating the person's name and a declaration from the person stating 1) why they cannot obtain their Social Security card and 2) what their SSN is.

13. SYSTEM ZERO INCOME REVIEWS

24 CFR § 5.609(b)(24)(vi); 24 CFR §§ 5.657(c)(3); 960.257(b)(3); 982.516(c)(3); and 882.515(b)(3)

The PHA will continue to conduct zero-income reviews for zero-income families. The PHA will not assign monetary values to non-monetary in-kind donations received to calculate annual income.

Additional Important Changes Under HOTMA

Calculation of Income — 24 CFR 5.609(c): For initial occupancy/assistance and interim reexaminations, the PHA must estimate the family income for the upcoming 12-month period using current income. For all annual reexaminations, the PHA must determine the family income for the previous 12-months unless using a streamlined income determination, taking into account any redetermination from an interim reexamination and any unaccounted-for income changes.

Mandatory deductions.

(1) \$480 for each dependent, which amount will be adjusted by HUD annually in accordance with the Consumer Price Index for Urban Wage Earners and Clerical Workers, rounded to the next lowest multiple of \$25.

(2) \$525 for any elderly family or disabled family, which amount will be adjusted by HUD annually in accordance with the Consumer Price Index for Urban Wage Earners and Clerical Workers, rounded to the next lowest multiple of \$25.

Helpful Resource Sheets from HUD:

<https://files.hudexchange.info/resources/documents/HOTMA-Hardship-Exemptions-Resource-Sheet.pdf>

<https://files.hudexchange.info/resources/documents/Interim-Income-Reexaminations-Resource-Sheet.pdf>

<https://files.hudexchange.info/resources/documents/Income-and-Exclusions-Resource-Sheet.pdf>

<https://files.hudexchange.info/resources/documents/Income-and-Assets-Fact-Sheet.pdf>

Helpful Resources for our Families:

HUD published some good sample tenant information to help explain HOTMA to our families:

<https://files.hudexchange.info/resources/documents/HOTMA-Resident-Fact-Sheet-Income-Calculation-and-Reviews.pdf>

<https://files.hudexchange.info/resources/documents/HOTMA-Resident-Worksheet-Interim-Reviews.pdf>

<https://files.hudexchange.info/resources/documents/HOTMA-Resident-Fact-Sheet-Health-Medical-Childcare-Deductions.pdf>

Non-HOTMA Changes to Administrative Plan

A. National Standards for the Physical Inspection of Real Estate

The new inspection standards that replace HQS called NSPIRE becomes effective October 1, 2024.

B. Repeal of the Earned Income Disregard

The EID allowed eligible families to have a portion of their earned income excluded from annual income for a maximum period of 24 consecutive months. The Earned Income Disregard (EID) will not apply to any family who is not eligible for and already participating in the disallowance as of December 31, 2023. Families who were receiving the EID benefit as of December 31, 2023, may continue to receive the full benefit until the remaining timeframe for an individual family's EID expires. Because the EID lasts up to 24 consecutive months, no family will still be receiving the EID benefit after December 31, 2025.