



October 10, 2019

To the Citizens of Westbrook and the General Public at Large:

Enclosed please find a copy of Westbrook Housing's 2020-2024 Five Year Plan. This copy is for review only and must be left in the office. The scope of this plan pertains only to our Housing Choice Voucher Program (HCV). Through its conversion of through the HUD - Rental Assistance Demonstration Program, Westbrook Housing no longer has Public Housing which is identified in its update to its goals.

If you have any questions, they can be directed to me at 854-6805; or by emailing me at claroche@westbrookhousing.org, or to Jennifer Gordon, Operations Director, at 854-6827, or by email at jhgordon@westbrookhousing.org.

There will be a public hearing at 11:00 A.M., on Tuesday, December 3rd, at Westbrook Housing's Main Conference Room, 30 Liza Harmon Drive, Westbrook, ME.

Sincerely,

Christopher LaRoche
Executive Director

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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: 02/29/2016

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

A.	PHA Information.																																
A.1	<p>PHA Name: <u>The Housing Authority of the City of Westbrook</u> PHA Code: <u>ME015</u></p> <p>PHA Plan for Fiscal Year Beginning: <u>01/2020</u></p> <p>PHA Plan Submission Type: <input checked="" type="checkbox"/> 5-Year Plan Submission <input type="checkbox"/> Revised 5-Year Plan Submission</p> <p>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.</p> <p>The proposed PHA Plan, Plan Elements and all information relevant to the Public Hearing and Proposes Plan are available for inspection at the following locations:</p> <p>The Housing Authority of the City of Westbrook Administration Office 30 Liza Harmon Drive Westbrook, ME 04092</p> <p>Westbrook City Hall City Clerk's Office 2 York Street Westbrook, ME 04092</p> <p>The Housing Authority of the City of Westbrook's website – http://www.westbrookhousing.org</p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1"> <thead> <tr> <th rowspan="2">Participating PHAs</th><th rowspan="2">PHA Code</th><th rowspan="2">Program(s) in the Consortia</th><th rowspan="2">Program(s) not in the Consortia</th><th colspan="2">No. of Units in Each Program</th></tr> <tr> <th>PH</th><th>HCV</th></tr> </thead> <tbody> <tr> <td>Lead PHA:</td><td></td><td></td><td></td><td></td><td></td></tr> <tr> <td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr> <td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr> <td></td><td></td><td></td><td></td><td></td><td></td></tr> </tbody> </table>	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:																							
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B.	5-Year Plan. Required for <u>all</u> PHAs completing this form.
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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.

The Following Statement of Housing Needs identifies the households below 30% AMI, Elderly and disabled families, and households with varying races and ethnic groups. It also addresses the affordability, supply, quality, accessibility, size and location of units, and the description of Westbrook Housing's strategy for the 5 years beginning 2020.

Affordability and Supply, Quality, Accessibility, Size and Location of Units

Westbrook is part of the Portland Maine MSA and is greatly impacted by the population shifts due to the unemployment rate and urban desirability within the MSA. Beginning in 2015 and through 2019, the Portland MSA began to experience an influx of the working population and an unemployment rate that hovers around 3.4%. As a result, there continues to be a reduction in vacancy rates that remain below 3% which has further been negatively impacted by an average market rent increase of apartments averaging \$1,353 for a zero-bedroom efficiency apartment, \$1,451 for a one-bedroom apartment, and \$1,674 for a two-bedroom apartment. Comparatively the HUD Fair Market Rent for an efficiency apartment is \$989, a one-bedroom apartment is \$1,071, \$1,387 for a two-bedroom apartment, \$1,829 for a three-bedroom apartment, and \$2,198 for a four-bedroom apartment. The housing stock is the oldest in the nation and is negatively impacted by high maintenance and heating costs. In addition, much of the old housing stock is inadequate due to the high amount of lead paint that exists in the buildings. Currently there is much construction in the Portland – South Portland MSA that consists of market rate apartment construction. However, within the Housing Authority's jurisdiction in the non-metro area, there exists limited number of apartments and limited opportunities for new construction. Westbrook Housing Authority, Portland Housing Authority, and South Portland Housing Authority have approximately 275 units of affordable apartments for family and elderly housing placed in service or under construction to be placed in service by 2019-2020. All of these units are utilizing the Low-Income Housing Tax Credit program and are targeted for households at or below 60% and 50% of HUD Area Median Income (AMI); with some units set aside for households at or below 30% of HUD AMI. The Cities of Portland and Westbrook have placed into code, and increased staff, to implement and enforce housing quality standards in response to the poor quality of rental housing. As a result, landlords are required to respond to municipal inspections and code enforcement to make requisite safety, health, and quality of living repairs and upgrades to deteriorated rental stock. This has forced an increase in rental rates to compensate for the costs and in some cases large scale removal of inventory from the market to implement upgrades. An additional and new phenomenon is that many affordable apartments are taken out of inventory due to the owners making them available as "Airbnb" rentals. This has forced an increased lack of inventory with a higher than FMR rent experience due to the increase in demand caused by lower availability of rental stock. In Westbrook, according to Sustain Southern Maine, "about 40% of Gen Y households are paying more than 35% of their incomes for rent. High rental housing costs relative to incomes can be a barrier to homeownership and 47% of elderly households are also

rent-burdened.” The inventory of 3,4,5-bedroom apartments is minimal and negatively impacts families, who in many cases have three generations living in the household and are younger immigrant families. As evidenced by portability requests, many of these families with cultural ties in other communities will eventually relocate to other parts of the country such as Minneapolis St. Paul, San Diego, or Urban Michigan areas to find housing and work opportunities. Westbrook Housing maintained a 99.6% voucher utilization rate in 2018 and as of May 2019 is experiencing a near 100% voucher utilization rate. Voucher recipients require extensions beyond 60 days to secure affordable apartments.

**Distribution of all Rental Dwellings by # of Bedrooms in
Cumberland County**

1 Bedroom	2 Bedroom	3 Bedroom	4/5+ Bedroom
37%	41%	16%	6%

30% AMI, Elderly, Disabled Household Demographics

The Poverty Rate for Cumberland County, (Portland Metro and Non-Metro MSA), is as follows: All residents below the poverty level – 3%; All Residents with income below 50% of the poverty level – 1.8%; Poverty Rate among disabled males – 7.4% , and disabled females – 13.6%; Disability rate among males at poverty level – 40.7%, and females at poverty level – 42.6%; Children below poverty level 1.5%; Poverty rate among high school graduates not in families – 11.3%; Poverty rate among people who did not graduate high school not in families 52.3%.

Elderly households constitute 27.9% of the population; of which, 37% have incomes below 80% AMI and 9% are below 30% AMI. Elderly Households consist of 9% males living alone and 16% females living alone. Fifty two percent of elderly renters are cost burden with 24% severely cost burden.

In 2019 all Public Housing Authorities and Maine State Housing Authority have responded to the requirement of the State Statute to maintain a statewide Combined Wait List, (CWL), for the Housing Choice Voucher program. Also, in addition to 6 Housing Authorities, including Maine State Housing Authority, received the newly issued Mainstream 811 vouchers. This resulted in a statewide update of eligibility notification to all households on the CWL. The result was a significant increase of households identifying members with a disability. It is important to note that the data for the Westbrook Housing Authority Preference area has had a significant increase in eligible households. The reason for this is that in 2018 the Board of Commissioners approved the “live or work” preference be expanded from the municipalities of Westbrook, Windham, and Gorham to all of the municipalities within the 10-mile radius of the City of Westbrook, excluding the City of Portland and the City of South Portland. This aligned Westbrook Housing with recent legislative changes to Title 30A of the Maine Statute.

HCV WAITING LIST DATA and DEMOGRAPHICS

2019 Data	# of Families	% of Families	% +/- from 2018
Waiting List Statewide Total CWL	18,223	100%	+ 30%
Waiting List Cumberland County CWL	4,731	26%	+ 27%
Disabled or Family with Disabled Dependent	9,780	54%	+ 27%
Family with Minor Children/Dependents	7,661	42%	+ 34%
Elderly (62 Years or Older)	2,339	13%	+ 22%
Single Non Elderly & Disabled	2,878	16%	+235%
Family of 2 or more	7,991	44%	+ 28%
Chronically Homeless	2,561	14%	+ 56%
Veteran	481	3%	- 15%
Displaced by Domestic Violence	1,063	6%	+246%
Paying 50% of Income for Rent	5,031	28%	+ 25%
Waiting List Total Westbrook Housing Local Preference:			
Live or Work in Preference Area	1,503	100%	+176%
Disabled	610	41%	+217%
Family with Minor Children/Dependents	652	43%	+186%
Elderly	247	16%	+221%
Veterans	33	2%	+ 27%
Chronically Homeless	140	9%	+259%
Extremely Low Income	1,167	78%	+202%
Very Low Income	288	19%	+ 12%
Low Income	48	3%	+240%
Caucasian	1,274	85%	+204%
African American	151	10%	+186%
American Indian	31	2%	+258%
Asian	37	2%	+195%
Native Hawaiian	5	2%	-260%
Hispanic	34	2%	+340%
Undeclared	10	1%	-950%

See B.1 Addendum for May 30, 2019 Rent Reasonableness Study.

Westbrook Housing Authority is a High Performer Housing Choice Voucher only Housing Authority. At the forefront of the Housing Authority's strategy will be to continue to serve its mission as identified in the nineteen listed activities by issuing the maximum number of housing choice vouchers through the following practices that are outlined in the goals and Objectives in section B.5:

1. Maintain participation and draw names of eligible voucher recipients from the Maine Combined Waiting List.
2. Maintain local preferences for the municipality of the City of Westbrook and the surrounding shared jurisdiction as defined by Maine Title 30A.
3. Maintain local preferences of live or work in jurisdiction and shared jurisdiction as defined by Maine Title 30A.
4. Maintain live or work preferences and issue vouchers for specialty vouchers such as Mainstream, Mainstream 811, VASH.
5. Maintain homeless preference.
6. Maintain separate site-based waiting lists for project-based vouchers such as RAD-HCV, or other properties that are identified with project-based HAP contracts such as Larrabee Village or Larrabee Commons.
7. Maintain program participation at or near 100% voucher utilization with payment standard at 100% per funding availability; and when market conditions dictate, and funding is available over 100% per HUD regulations; and when necessary and as funding dictates as low as 90% to maintain maximum voucher utilization.
8. Maintain and promote Family Self Sufficiency (FSS) program.
9. Maintain and promote HCV Home-ownership program.
10. Apply for additional vouchers, both tenant and project based, when HUD issues NOFA for all types of vouchers including but not limited to: HCV, Mainstream, 811, 202, FUP, VASH
11. Apply for HUD programs and grants such as Choice Neighborhood, Supportive Services, Veterans, Homelessness that support and enhance existing HCV activities or establishes new HCV activities.
12. Project base the maximum number of vouchers allowed by HUD regulations to promote household stability.
13. Build or partner with CHDO to construct and manage additional affordable housing through federal programs such as the Low-Income Housing Tax Credit program, Housing Trust Fund, or through State housing programs.
14. Promote and adhere to HUD Fair Housing, Section 3, and De-concentration of Poverty.
15. Utilize for the development and maintenance of affordable housing activities any recaptured assets or funds from previous Public Housing developments that have been removed from the federal deed of trust.
16. Maintain issuance of tenant based and project-based vouchers to deconcentrate poverty.
17. Target special needs populations: families, victims of domestic violence, homeless, non-elderly disabled, elderly, and elderly with limitations of activities of daily living.
18. Protection of vulnerable households who would be affected by lead paint.
19. Prioritize households that are rent burdened.
20. Westbrook Housing has completed an updated Analysis of Impediments (AI) to Fair Housing in May of 2019.
21. Westbrook Housing continues to affirm it's strategy and commitment to participate in the Cumberland County 2019 assessment of Affirmatively Furthering Fair Housing (AFFH) and will use its current AI and future outreach and data to support the AFFH plan.

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.

1. Maintain 100% utilization of HCV program, including Mainstream NED, VASH.
2. Apply for additional HCV vouchers such as HCV, Mainstream, NED, VASH, FUP.
3. Maintain and expand Family Self Sufficiency (FSS) program.
4. Project base the maximum number of Housing Choice Vouchers allowed by HUD regulations.
5. Apply for Project Based Voucher programs such as HUD 202 or HUD 811 programs.
6. Administer HUD-RAD project-based vouchers
7. Partner with other agencies, especially the Portland Continuum of Care and Veterans Administration local contracted providers, to administer or deliver HUD or other federal agencies housing or supportive service programs.
8. Increase supportive services to homeless, veterans, families, and the elderly by applying for and administering outreach and supportive service grants programs issued by HUD or other federal and or state agencies.
9. Singularly as the Housing Authority or in partnership with HUD Community Housing Development Organization, develop through new construction or acquisition & rehabilitation, additional affordable housing developments with the use of federal, state, local, or private funding such as the Low-Income Housing Tax Credit program, the Housing Trust Fund, HUD 202, HUD 811, Federal Home Loan Bank Affordable Housing Program, or any other available funding source.
10. Continue to manage Housing Authority owned and non-Housing Authority owned properties whether it does or does not have a controlling interest.
11. Develop and apply for innovative PILOT programs that target supportive services for the elderly, disabled, and families with an emphasis on maintaining healthy lifestyles through access to medical support and preventative medicine.
12. Prioritize project-based vouchers for non-elderly disabled head of household and elderly households.
13. Conduct Final Accounting of former Public Housing Assets as a result of HUD Rental Assistance Demonstration (RAD) and assure proper removal from Deed of Trust and proper positioning of all assets funded through federal program funds.

Goals Identified In 2015 5-Year Action Plan

Goal # 1: Riverview Terrace: To utilize our capital fund program for the continued progress at our oldest public housing community, first occupied in 1974, as we move to make necessary upgrades for its marketability and accessibility. (On-going goal) Note: Capital Funds will be utilized with full fungibility per regulation and administrative, ordinary maintenance, and extraordinary maintenance will be accounted for capital funds

Strategies:

- Work on ADA compliance issues: handrails, ramps, etc., addressing any common area or unit issues.
- Continued maintenance of brickwork through repointing and sealing.
- Repair/replace doors and windows (common areas and units) as needed with energy efficient products.
- Continue to repair and re-shingle the roof as needed.
- Maintain and repair driveway parking, sidewalks inclusive of crack filling damaged pavement and striping; and resurface as necessary
- Increase energy efficiency through additional insulation in attics walls and other pertinent areas.
- Repair/replace awnings as needed.
- Update the electrical system and fixtures in the common areas and units, including GFCI updates in bathrooms and kitchens, as part of our continued efforts towards becoming more energy efficient and environmentally friendly. We are seeking energy saving alternatives and will take advantage of other opportunities available for system updates whenever feasible.
- Apply for ROSS grant funding, if eligible, to provide supportive services to residents better enabling them to age in place.
- Apply to HUD for approval of an Energy Performance Contract.
- Through the HUD Rental Assistance Demonstration (RAD) Program make approximately 3.25 – 3.5 million dollars in capital upgrades as identified in the GPNA and RPCA
- Conduct and RPCA
- Through the RAD Program, transfer existing Capital Funds, Operating Funds, and Property Reserves to the building owner.
- Through the RAD Program utilize PBV or PBRA.
- Utilize Capital Funds for EPC and RAD administrative, pre-development, and development costs.
- The following listing are all identified projects needed within the next few years through the “GPNA”: roofs, repair soffits, chimney/flumes, repoint walls & sills, seal & stripe parking lots, upgrade insulation, replace windows/flashings, lawn repairs, concrete walks, retaining walls, flooring (internal common/unit), install low flow toilets/shower heads/aerators, meet ADA compliance, change all lighting to LED, replace asphalt parking lots & walkways & driveways, repair fascia/trim, install/repair gutter system, re-caulk all caulking joints, replace entry & unit doors, replace auto door opener, interior/exterior painting, upgrade emergency lights & exit signs, replace acoustical ceiling tile system, replace room intercom units, replace smoke & CO2 detectors, pull stations & horns &

strobes, replace central alarm panel, replace interior hollow core doors, upgrade appliances to energy star, replace kitchen cabinets & countertops, replace kitchen & bathroom faucets, replace tubs & showers, upgrade electrical circuit breaker panels, new GFCI outlets, closet door replacements, replace elevator cab door, replace elevator hydraulic system, replace main distribution panel/switchgear generator, replace ¾" copper iron piping, replace 4 & 6 'cast iron piping, replace air compressor – 3hp 60 gal., breaker panel 800 amps 42 circuits, replace finned ¾ heat tubing, replace glass curtain walls, replace wood timber retaining wall, upgrade hearing impaired units, replace kitchen sinks, replace commercial gas fired water heater, replace common area furniture, upgrade landscaping & lawns, upgrade entry locks to units, replace expansion tanks.

Goal #2: Larrabee Woods: Through the capital funds program we need to address many system items at Larrabee Woods, initially occupied in 1983.

Strategies:

- Update the electrical system and fixtures in the common areas and units, including GFCI updates in bathrooms and kitchens, as part of our continued efforts towards becoming more energy efficient and environmentally friendly. We are seeking energy saving alternatives and will take advantage of other opportunities available for system updates whenever feasible.
- Apply for ROSS grant funding, if eligible, to provide supportive services to residents better enabling them to age in place.
- We continue to seek alternate uses for the large atrium area.
- Replace common area flooring.
- Work on ADA compliance issues: handrails, ramps, etc., addressing any common area or unit issues.
- Continued maintenance of brickwork through repointing and sealing.
- Repair/replace doors and windows (common areas and units) as needed with energy efficient products. Window replacement to higher efficiency windows is scheduled.
- Continue to repair and re-shingle the roof as needed.
- Maintain and repair driveway parking, sidewalks inclusive of crack filling damaged pavement and striping; and resurface as necessary.
- Increase energy efficiency through additional insulation in attics walls and other pertinent areas.
- Repair/replace awnings as needed.
- Update lift to second floor with a replacement unit
- Apply to HUD for approval of an Energy Performance Contract.
- Through the HUD Rental Assistance Demonstration (RAD) Program make approximately 3.25 – 3.5 million dollars in capital upgrades as identified in the GPNA and RPCA
- Conduct and RPCA
- Through the RAD Program, transfer existing Capital Funds, Operating Funds, and Property Reserves to the building owner.
- Through the RAD Program utilize PBV or PBRA.

- Utilize Capital Funds for EPC and RAD administrative, pre-development, and development costs.
- The following listing are all identified projects needed within the next few years through the “GPNA”: roof vents, seal & stripe parking lot, insulation upgrade, window replacement (flashing), concrete walkways, flooring (common areas/units), lawn repairs, replace water heaters, install low flow shower heads/aerators/toilets, clean out holding basin next to road, change all lighting to LED, replace asphalt & parking lots/walkways/driveways, replace metal soffits, repair fascia/trim, install/repair gutter system, re-caulk all caulking joints, replace vinyl siding, replace double doors, replace 12’ x 12’ roll up door, replace auto door opener, interior/exterior painting, upgrade emergency & exit lights, replace acoustical ceiling tile system, replace room intercom units, replace smoke & CO2 detectors, pull stations/horns/strobes, replace central alarm panel, upgrade appliances to energy star, replace kitchen cabinets & counter tops, replace ceiling exhaust fans, replace electric base boards, replace kitchen & bathroom faucets, replace tub and showers, upgrade electrical circuit breaker panels, new GFCI outlets, closet door replacements, replace exterior steel doors, upgrade hearing impaired units, replace kitchen sinks, replace common area furniture, replace bathroom vanities/mirrors/sinks,. Upgrade lawns & landscaping, upgrade unit entry locks, water seal masonry.

Update Goal #1 & #2: The goals of #1 and #2 has been completed achieving all of the outcomes identified in the goals. The properties were transferred through the RAD program on January 19, 2018 with the commencement of 5.5 million dollars of rehabilitation. Rehabilitation included all items within the goals plus additional ADA units in excess of what was required and energy efficiency upgrades without the requirement of an EPC. The project’s construction/rehabilitation was completed on March 14, 2019. The properties are under HAP contract with RAD-PBV funding. Four hundred and forty-four thousand dollars of public housing operating reserves and capital funds were used to fund the capital improvements through the RAD conversion and eighty three thousand dollars used to set up the property’s RAD operating reserve.

Goal #3: We have applied for and have been issued a CHAP and will convert our two public housing buildings (Riverview Terrace and Larrabee Woods) into a Section 8 PBV or PBRA supported buildings, securing the outright ownership and removing them from the HUD public housing roles through the RAD Program.

Update Goal #3: The RAD conversion was completed on January 19, 2018 and transferred to Riverview Terrace, LP with Westbrook Development Corporation as the General Partner. The 83 units are under a RAD-PBV Housing Assistance Payment contract which is administered by Westbrook Housing. Rehabilitation has been commenced and was completed by March 14th, 2019

Goal #4: In addition to considering/waiting for a RAD opportunity, we intend to seek through a SAC application demo disposition 2.25+/- acres of unused grassy/wooded land from the HUD project, Larrabee Woods, for the purpose of developing 38 apartment units of additional low to moderate income housing for elderly households who are at or below 60% of HUD AMI. The primary funding source will be the 9% Low Income Housing Tax Credits (LIHTC), which we will

apply for in 2015. Additional funding sources are through the 4% LIHTC program, or other federal, state, municipal or creditor (bank) funding mechanism.

Update Goal #4: HUD has issued a letter of approval for the disposition of 2.38 acres of land at Larrabee Woods on 8 October 2015. The 38-unit elderly apartments known as the Dr. Arthur O. Berry Apartments at Larrabee Commons was funded through the Maine Housing 4% LIHTC program, the Federal Home Loan Bank of Boston – Affordable Housing Program, The FedHome program, Gorham Savings Bank, Maine State Housing Authority, and the City of Westbrook Tax Increment Financing. The construction closing was October 20, 2017. Construction completion is scheduled for October 19, 2018 with initial lease up commencing November 1, 2018 and 100% occupancy achieved in January of 2019.

Goal #5: We will continue to seek and apply for additional HCV when they become available both tenant and/or project based to include: VASH, Move to Work, Homeless and other specialty groups identified by HUD as they develop strategies to assist those in need.

Update Goal #5: The Housing Authority applied for and received an award of 5 VASH vouchers in 2018. In June of 2018, the Housing Authority applied for 100 Mainstream Vouchers and received an award of 25 Mainstream Vouchers September 5th, 2018.

Goal #6: The HCV tenant-based program is looking into options with existing service providers for some housing assistance for special needs groups.

Update Goal #6: The Housing Authority has obtained commitments from the COCC Preble Street Shelters in anticipation of receipt of award of additional Mainstream Vouchers. To date no VASH Vouchers have been project based. The Housing Authority has entered into a Memorandum of Understanding with Sensio Systems to PILOT with Maine DHHS the use of site based electronic medical tele-health systems to analyze the no cost barrier for increased medical access for very low income elderly households.

Goal #7: Westbrook Housing has established a limited preference of ten (10) vouchers for chronically homeless applicants in the tenant-based Housing Choice Voucher program. The applicants will be specifically for people who are referred by a partnering homeless service organization(s). The residency preference will be applied with consideration given to the applicant's previous residency and circumstances.

Update Goal #7: The preference has been established and Westbrook Housing has a Memorandum of Understanding with Preble Street Shelter and the Portland Continuum of Care to provide outreach and case management support in the coordination of issuing vouchers to this set aside priority. Vouchers are currently issued.

Goal #8: We have regionalized the waiting lists for the HCV tenant-based programs with our sister cities of Portland and So. Portland. We have expanded the scope of the region to include the entire state of Maine to include all PHA's to utilize the regional HCV waiting list.

Update Goal #8: The State of Maine has created a statute under Title 30A requiring all PHA's including Maine State Housing Authority (MSHA) to have a statewide combined waiting list. Maine State Housing Authority has adopted the combined waiting list

developed by Westbrook, Portland, and South Portland Housing Authorities. As of April 2018, all of the Public Housing Authorities, including MSHA, have signed on to the Combined Wait List. The list is web based. As a result of the purging of the combined wait list, all duplication of applicants has been removed and there exists over 15,000 applicants for Housing Choice Vouchers in the state of Maine.

Goal #9: We have received a CHAP for RAD to convert Public Housing into Project Based Vouchers. We will proceed with this initiative and will utilize either Project Based Vouchers or Project Based Rental Assistance, with a preference for Project Based Vouchers.

Update Goal #9: As identified in the update for goal #3, the RAD conversion was completed on January 19, 2018 and transferred to Riverview Terrace, LP with Westbrook Development Corporation as the General Partner. The 83 units are under a RAD-PBV Housing Assistance Payment contract which is administered by Westbrook Housing. Rehabilitation has been commenced and was completed on March 14th, 2019. At the time of conversion 71 units were occupied by tenants and all 71 tenants have signed their new leases and are now on the RAD-PBV HAP rents. The remaining 12 units were leased up under the RAD-PBV HAP rents as the units were available for lease up in February 2019.

Goal #10: We will continue to work with our development, WDC, to bring additional affordable units to our area of operation.

Update Goal #10: The Malcolm A. Noyes Apartments at Millbrook Estates, a 38 unit elderly LIHTC development, commenced construction on April, 13, 2016 and commenced leasing in April of 2017. A similar 38-unit elderly LIHTC apartment building, the Dr. Arthur O. Berry Apartments at Larrabee Commons, 27 Liza Harmon Dr. was removed from the Public Housing deed of trust. Construction was completed in November of 2018 and fully leased up in January of 2019. Another similar 61-unit elderly LIHTC apartment building and a 30 unit affordable LIHTC housing complex have been permitted for construction. The 61-unit 100% project based elderly development has received a 4% LIHTC award and is scheduled to commence construction in September of 2019. The 30 unit development is awaiting notification of a 9% LIHTC award and/or a HUD 202 award and is proposed for a 12 month construction timeline to commence in April of 2020.

Goal #11: We will apply for approval and RFP to upgrade our Public Housing buildings to fund rehabilitation and energy efficient upgrades for Riverview Terrace and Larrabee Woods.

Update Goal #11: The Housing Authority did not proceed with the EPC due to its ability to achieve greater energy savings, without taking on the EPC debt, through its energy efficiency upgrades being made to the Riverview Terrace and Larrabee Woods buildings as a result of the rehabilitation of the properties in relation to the RAD conversion.

Goal #12: Use CFP and/or operating funds to repay debt incurred to finance capital improvements.

Update Goal #12: No application has been made to finance capital improvements. All of the Housing Authorities public housing properties were converted to RAD and as a result this goal was not a needed outcome.

Goal #13: Convert Housing Choice Voucher to Project Based Vouchers up to the maximum allowed by regulation. The Vouchers will be targeted to apartment developments supported by Low Income Housing Tax Credits or for properties targeted to persons with disabilities.

Update Goal #13: The Board of Commissioners approved 18 Housing Choice Vouchers to be project based. A RFP was issued in 2015 and an award was made, and approved by the HUD Boston Field Office, for 8 vouchers to Westbrook Development Corporation, Larrabee Commons, LP a 38 unit elderly affordable housing LIHTC development. No other entity responded to the RFP. In 2018 the Board of Commissioners approved the remaining 10 vouchers to be issued to Westbrook Development Corporation to the identified Larrabee Commons, LP development. In addition, as a result of Congress' passing the Housing Opportunity Through Modernization Act of 2016, H.R. 3700, as submitted, Westbrook Housing continued to seek approval to issue additional Project Based Vouchers to the limit authorized by legislation. In 2018 and 2019 HUD approved a Housing Authority submitted PBV eligibility matrix for 61 and 20 vouchers respectively. The Housing Authority issued an RFP and an award of 61 vouchers to the Westbrook Development Corporation 100% elderly development Robert L. Harnois Apartments; and issued an RFP in May of 2019 for 20 vouchers for developments in a Westbrook census tract with less than 20% poverty rate.

Goal # 14: Will conduct Fair Housing Study as identified by HUD Notice and updated by HUD regulations.

Update Goal #14: Awaiting further HUD guidance. It is the intent and plan of the Housing Authority to participate with the Cumberland County AFFFH initiative in 2019. To date, Congress has removed this requirement. The Housing Authority has conducted an updated Analysis of Impediments in 2019.

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.

VAWA Statement

Westbrook Housing (WH) is committed to assisting individuals and families who have been victims of domestic violence, dating violence, sexual assault, or stalking by ensuring compliance with all aspects of the Violence Against Women Act.

Goals, Objectives, Policies and Programs:

The goals and objectives of Westbrook Housing's policies and procedures as they relate to victims of domestic violence, dating violence, sexual assault, or stalking is to help victims obtain or maintain housing, prevent domestic violence, and enhance survivor safety.

By taking advantage of several regional training opportunities, Westbrook Housing has ensured that staff has the knowledge to effectively administer and comply with all provisions of the Violence Against Women Act.

Westbrook Housing staff works closely with the representatives of Westbrook Police Department and Family Crisis Services to support victims of domestic violence, dating violence, sexual assault, or stalking. Family Crisis Services accepts referrals, offers individual counseling, and group prevention programs to Westbrook Housing staff and tenants. Information about the programs and services are posted prominently in the lobby at all WH facilities.

Westbrook Housing also employs a variety of methods to directly assist victims of domestic violence, dating violence, sexual assault, or stalking to maintain their housing including: evicting the perpetrator so the victim and family can remain in their current apartment, and/or transferring the victim to another public housing unit. All residents are informed of all resources available to victims of domestic violence, dating violence, sexual assault, or stalking at the time of their annual recertification.

Westbrook Housing has:

Amended leases/assistance contracts to reflect provisions of Sections 6(l) and 8(d).

- The Housing Choice Voucher program administered through Westbrook Housing adopted the revised Tenancy Addendum (HUD-52641-A) as soon as it was made available in 1/2007.
- The Violence Against Women and Justice Department Reauthorization Act of 2005 Lease Addendum (HUD-91067) as soon as it was made available in 9/2008.

Amended Housing Assistance Payment contracts (HAP contract).

- The Housing Choice Voucher program administered through Westbrook Housing adopted the revised HAP contract (HUD-52641) as soon as it was made available in 1/2007.

Amended the Administrative Plan.

- The Administrative Plan has been revised to include language throughout as to how Westbrook Housing will manage the new provisions of the act.

Obtained and disseminates certification form HUD-50066

- Notified tenants of rights and owners and managers of rights and obligations.
- Westbrook Housing has mailed documentation to Section 8 participants and owners.
- Westbrook Housing posts information pertaining to VAWA in the lobby of all Westbrook Housing properties.

Updated all forms and actions to conform with guidance in the Final Rule as identified in HUD Notice H2017-5

<p>B.5</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 style="text-align: center;">2020-2024 Significant Amendment and Substantial Deviation/Modification</p> <p>“Significant amendments or modifications to the Annul Plan are defined as discretionary changes in the plans or policy of the Housing Authority that fundamentally change the plans of the agency and which require formal approval of the Board of Commissioners.”</p> <p>The following list identifies actions that would not be a Significant Amendment or Substantial Deviation/Modification to the Housing Authority’s 2020-2024 5Year Plan or Subsequent Annual Plans.</p> <p>1. Corrective language or verbiage that to comply with HUD policies and federal regulation that does not negate or substantially alter the intent of established PHA policy established by Board Resolution does not signify a significant amendment or substantial deviation/modification.</p>
<p>B.6</p>	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the 5-Year PHA Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></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>The Plan was presented to the Resident Advisory Board at its 22 May 2019 Meeting. The Resident Advisory Board by unanimous resolution approved the 2020 -2024 Five Year Plan in its entirety without comment.</p>
<p>B.7</p>	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <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>SEE ATTACHED.</p>

Instructions for Preparation of Form HUD-50075-5Y

5-Year PHA Plan for All PHAs

A. PHA Information [24 CFR §903.23\(4\)\(e\)](#)

A.1 Include the full **PHA Name**, **PHA Code**, **PHA Fiscal Year Beginning** (MM/YYYY), **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. 5-Year Plan.

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\(b\)\(1\)](#)) For Qualified PHAs only, if at any time a PHA proposes to take units offline for modernization, then that action requires a significant amendment to the PHA's 5-Year Plan.

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\(a\)\(3\)](#))

B.5 Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.

B.6 Resident Advisory Board (RAB) comments.

(a) Did the public or RAB provide 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\(a\)](#), [24 CFR §903.19](#))

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 .76 hours 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.

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.



Market Vision Partners, Inc.

Solving the Rent Reasonableness Dilemma for Housing Authorities

May 30th, 2019



Jennifer Haberern Gordon
Operations Director
Westbrook Housing
30 Liza Harmon Drive
Westbrook, ME 04092

Re: Rent Reasonableness Market Report

Dear Ms. Gordon,

You have requested current information concerning your subscription to Rentellect.

This report contains an overview of the system and the comparable data currently installed. A separate MS Excel file contains the actual comparable records. If you require different information or a different format, please let me know.

In addition to the Rentellect program, your support includes specific help including written evaluations of any rent test required. This may happen when the data set does not include a specific property size, such as higher bedroom count units or for any reason you deem necessary. Therefore, although your rent reasonableness process is automated, you have help for any test that needs additional consideration.

If this information is requested for an audit process, please feel free to provide this report to your auditors. They are also free to request any additional information or clarification they may need or wish.

Sincerely,

A handwritten signature in blue ink that reads 'Regina Geissler'.

Regina Geissler, CEO

Solving the Rent Reasonableness Dilemma for Housing Authorities



Market Vision Partners, Inc.

Solving the Rent Reasonableness Dilemma for Housing Authorities

Westbrook Housing Authority

HISTORY

Westbrook Housing Authority contracted with Market Vision Partners, Inc. in 2008 and began using Rentellect in July 2008. Westbrook, along with the housing authorities of Portland and South Portland all subscribed to Rentellect at the same time in order to share comparability data and to save money. The area covered includes all of Cumberland County and a small area in York County. A research plan was developed by finding as many sources of data as possible. Internet advertising dominates the marketing of the rental market in almost all areas of the country at this point.

For this report, you requested a specific set of communities to be reviewed. The list is included as an addendum to this report.

The present data active collection consists of records less than 12 months old and not replaced by newer records for the same property. The following building type quantities are revealed:

Building Types	BEDROOM SIZE							Record
	0	1	2	3	4	5	6	Count
Condo	2	25	36	5	1			69
Duplex		1	12	8	4	1		26
High Rise		12	9	9	1			31
Low Rise	25	139	187	65	4	1		421
Mobile Home				1				1
Row	3	11	32	10	4		2	62
Single Fam		7	30	45	14	8	1	105
Unknown		1	2					3
Totals	30	196	308	143	28	10	3	718

In general, records are kept active for one year. The list above includes all records collected to date and not supplanted by newer data. Not every advertised rent is used. At minimum, the record must have an address, bedroom count and rental amount.



Market Vision Partners, Inc.

Solving the Rent Reasonableness Dilemma for Housing Authorities

AVERAGE RENT RATES BY BUILDING TYPES

Looking at the rent rates by building types, it is noted that there is insufficient information to accurately determine averages for mobile homes and high bedroom count units. The trend is clear enough, however to estimate expected averages.

Building Types	BEDROOM SIZE							Record Count
	0	1	2	3	4	5	6	
Condo	\$1,050	\$1,742	\$2,154	\$2,820	\$3,500			69
Duplex		\$2,000	\$1,920	\$1,974	\$2,511	\$2,025		26
High Rise		\$1,592	\$1,742	\$2,060	\$2,676			31
Low Rise	\$1,092	\$1,287	\$1,610	\$1,925	\$2,575	\$2,600		421
Mobile Home				\$1,400				1
Row	\$1,278	\$1,810	\$1,698	\$2,145	\$2,188		\$3,650	62
Single Fam		\$1,420	\$1,845	\$2,355	\$2,750	\$2,773	\$1,600	105
Unknown		\$2,000	\$1,475					3
Overall Avg.	\$1,108	\$1,405	\$1,720	\$2,114	\$2,635	\$2,681	\$2,967	718

There is a strong correlation between building type and rent rate, but there are a significant number of properties where building type information is unreliable. Also, it is noted that the majority of condo developments are in higher priced downtown areas.

AVERAGE RENT TRENDS

Studios and one-bedroom units are showing a slight moderation from 2018, while high bedroom count units continue to climb.

Year	Bedroom Count					Record Count
	0	1	2	3	4	
2015	\$901	\$1,233	\$1,494	\$1,720	\$1,863	448
2016	\$990	\$1,385	\$1,815	\$2,045	\$2,418	435
2017	\$832	\$999	\$1,220	\$1,506	\$1,433	768
2018	\$1,353	\$1,451	\$1,674	\$2,031	\$2,403	508
2019	\$1,129	\$1,398	\$1,828	\$2,164	\$2,526	380

The 2018 two-bedroom median was \$1500, compared to the \$1674 average asking price with 165 data points. In 2019, the average climbed to \$1828, and the median to \$1650 for 159 data points.

In 2018 the middle 48% of two bedroom asking prices were in the \$1200 to \$1600 range, and 27% of the units advertised were over \$1800. In 2019 only



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41% of two bedrooms are asking \$1200 to \$1600 while over 35% are above \$1800.

Two Bedroom					
Rent	Range	2018	%	2019	%
800	1000	4	2.40%	1	0.63%
1001	1200	11	6.70%	8	5.03%
1201	1400	47	28.50%	26	16.35%
1401	1600	34	20.60%	40	25.16%
1601	1800	23	13.90%	28	17.61%
1801	up	46	27.90%	56	35.22%
Total		165		159	

It is clear that rents are continuing to climb, but it is also clear that landlords continue to expect higher increases than might ultimately be realized, and that many offerings are at the very top end of the range.

If you wish to examine the data set more closely, the current version of it is included in the accompanying MS Excel file.

This concludes the report for Rentellect. Please feel free to call if you have any questions.



Market Vision Partners, Inc.

Solving the Rent Reasonableness Dilemma for Housing Authorities

Rentellect[™], an Internet-Based Application Statement of Rent Reasonableness Testing Methodology



CONCEPTUAL APPROACH

Rentellect is based upon a "unit to market" comparison rather than the more common "unit to unit" method. In this system, the unit to market comparison is refined by weighted average calculations rather than simple average. This means the features of a property add value to the estimate and do not get lost in the average.

DATA COLLECTION

We collect as many records as possible to understand the nuances of a market. Included are both asking rents from advertising and contract rents from broker rent roll information.

ANALYSIS

The addresses for each comparable property are improved with the addition of the map location (latitude and longitude) and census tract location. This is called geo-coding. In addition, individual records for properties are improved with any additional information available, such as tax assessment records or "for sale" flyers from real estate brokerages.

Using a statistical method, all of the rents are analyzed to estimate how much each feature or characteristic is worth. Units that would alter or skew the results, such as extremely high- or low-priced units, are removed from the final set of comparables analyzed; although they are retained in case they are needed. We can then predict how much a tenant might pay for a unit with a particular set of features and amenities. This is called modeling the market.

THE CALCULATOR TEST

The test uses the price of the features to estimate a rent. In the fictional example on the right, we have a single-family house with three bedrooms, two baths, average condition property with two appliances, a fenced yard and a garage and no landlord paid utilities. After adding up the value of the features, the weighted average is \$787.

Weighted average means each factor is given its different "weight" or value. The

resulting weighted average reflects the described unit, rather than just blending the price all units in the set of comparables in a simple average.

Sample Fictional Unit					
Detail	Quantity		Factor		Result
Neighborhood	1	x	165	=	\$165
Bedrooms	3	x	121	=	\$363
Baths	2	x	53	=	\$106
Building type	1	x	95	=	\$95
Avg. condition	1	x	0	=	\$0
Appliances	2	x	8	=	\$16
Yard	1	x	13	=	\$13
Garage	1	x	29	=	\$29
Utilities	0	x	0	=	\$0
Test Result					\$787

SUPPLEMENTAL COMPARABLES

The test result is actually based upon all the comparables available at the time of the analysis, sometime in excess of fifty rental records for a single neighborhood. The Rentellect test then pulls a *small* sample of records geographically close to the test units, preferring the most physically similar units available, and displays them as part of the



Market Vision Partners, Inc.

Solving the Rent Reasonableness Dilemma for Housing Authorities

test record; a valuable visual confirmation of the results. If the sample does not appear to match the test results, the test can be referred back to an analyst for review and additional information. The final printed report includes the unit characteristics entered as well as the supplemental comparables.

Note: The analysis is *Static Multiple Linear Regression*. Model building may include other techniques including trend line analysis and data smoothing. Revision Date: 2/25/2015



Market Vision Partners, Inc.

Solving the Rent Reasonableness Dilemma for Housing Authorities

DATA COVERAGE REQUESTED BY WESTBROOK HOUSING AUTHORITY

ZIP Code	City	County
04093	BUXTON	YORK
04064	OLD ORCHARD BEACH	YORK
04072	SACO	YORK
04107	CAPE ELIZABETH	CUMBERLAND
04021	CUMBERLAND CENTER	CUMBERLAND
04110	CUMBERLAND FORESIDE	CUMBERLAND
04105	FALMOUTH	CUMBERLAND
04038	GORHAM	CUMBERLAND
04039	GRAY	CUMBERLAND
04050	LONG ISLAND	CUMBERLAND
04097	NORTH YARMOUTH	CUMBERLAND
04101	PORTLAND	CUMBERLAND
04102	PORTLAND	CUMBERLAND
04103	PORTLAND	CUMBERLAND
04104	PORTLAND	CUMBERLAND
04109	PORTLAND	CUMBERLAND
04112	PORTLAND	CUMBERLAND
04122	PORTLAND	CUMBERLAND
04123	PORTLAND	CUMBERLAND
04124	PORTLAND	CUMBERLAND
04071	RAYMOND	CUMBERLAND
04070	SCARBOROUGH	CUMBERLAND
04074	SCARBOROUGH	CUMBERLAND
04106	SOUTH PORTLAND	CUMBERLAND
04116	SOUTH PORTLAND	CUMBERLAND
04084	STANDISH	CUMBERLAND
04092	WESTBROOK	CUMBERLAND
04098	WESTBROOK	CUMBERLAND
04096	YARMOUTH	CUMBERLAND
04062	WINDHAM	CUMBERLAND

**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 2/29/2016

**Certification by State or Local Official of PHA Plans
Consistency with the Consolidated Plan or State Consolidated Plan**

I, _____, the _____
Official's Name *Official's Title*

certify that the 5-Year PHA Plan and/or Annual PHA Plan of the

PHA Name

is consistent with the Consolidated Plan or State Consolidated Plan and the Analysis of
Impediments (AI) to Fair Housing Choice of the

Local Jurisdiction Name

pursuant to 24 CFR Part 91.

Provide a description of how the PHA Plan is consistent with the Consolidated Plan or State
Consolidated Plan and the AI.

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

Signature



Date

ANALYSIS OF IMPEDIMENTS

WESTBROOK HOUSING AUTHORITY

20 MAY 2019

PREPARED BY: JENNIFER GORDON, OPERATIONS DIRECTOR

Westbrook Housing conducted an Analysis of Impediments to Fair Housing in the spring of 2019. Information was gathered from numerous sources and different methods were utilized to obtain the information. A Fair Housing Survey was developed and posted on the Westbrook Housing website for 60 days. Notice of the survey was sent to our voucher holders. Two public listening sessions were advertised in the local paper and held. The General Assistance Directors for Westbrook, Windham, Gorham and Scarborough were interviewed and both Pine Tree Legal Assistance and the Maine Human Rights Commission provided data. The following is what was learned from all of the stated sources.

From those who responded to our survey, we found that 70% of those who reported being discriminated against in their search for housing felt they were discriminated against on the basis of their receipt of public assistance. Almost 30% felt discriminated against due to disability or familial status.

While 80% of respondents felt they were able to find housing in an area they wanted to live, we received many responses to the barriers encountered to accessing affordable housing. The largest barrier was the high rents, especially in the city areas of Portland and Westbrook. Even for respondents with vouchers, the rents were higher than the payment standard covered. One respondent felt that in some instances, this was intentional to keep voucher holders ineligible for housing. Lack of public transportation outside the city was cited as a barrier to finding and living in affordable housing in the more rural areas. Lack of enough available assistance to make the market rates more affordable and lack of housing for the disabled whose age was under the age of 55 was also cited as barriers to accessing housing.

At the two public listening sessions it was identified by attendees that the lack of affordable housing for people with disabilities under the age of 55 is a barrier. In addition, the median price of homes in areas close to the city and within reach of public transportation was mentioned as a barrier. The high price of homes prevented people from becoming homeowners even when they had a voucher which would have resulted in the monthly cost of the home being affordable.

In interviews with the General Assistance Directors, high market rents in addition to burdensome security deposit requirements were cited as barriers to decent housing. The rental market is currently very tight so landlords can impose stricter requirements. Poor or no credit and references are barriers to decent housing in this scenario. One General Assistance Director has immigrants as the majority of the municipality's clients. The immigrant families generally have no credit or former references and if they are new immigrants, cannot yet work and do not have or have access to enough money to meet the security deposit requirements. In addition, the immigrant families generally tend to be larger families and have difficulty finding appropriately sized apartments. Due to these barriers, the

apartments available to these families tend to be substandard or barely meeting the building codes and are overcrowded for the family size.

The General Assistance Directors said that they believe that their clients are generally discriminated against on the basis of receipt of public assistance.

The Pine Tree Legal Assistance Fair Housing Initiative Program conducts testing in Maine using testers posing as potential renters. During 2017-2018, 270 Fair Housing tests were conducted in Maine with 22 of those in the Westbrook Housing Jurisdiction: Bar Mills, Buxton, Cape Elizabeth, Cumberland, Falmouth, Gray, Gorham, North Yarmouth, Old Orchard Beach, Scarborough, Standish including Sebago Lake, Steep Falls, Westbrook, Windham and Yarmouth. Four tests were conducted in Cape Elizabeth; 2 disability/assistive animal and 2 familial status. Two tests were conducted in Gorham; both national origin/race. No complaints were filed as a result of those tests. In addition, 16 tests were conducted in Westbrook; 8 national origin/race and 8 disability. Of those tests, four of the national origin/race tests were conducted because of a complaint but no complaints were filed post testing.

In addition to the testing data, Fair Housing Case data in the Jurisdiction from 4/1/2014 to 3/31/2019 was received and reviewed. During this time frame there were 38 cases total; 2 cases had no merit, 2 cases were not Fair Housing complaints, 6 were either an inquiry only or the client did not want to pursue the case, 16 cases were resolved by a reasonable accommodation being granted, 2 cases received affirmative relief, 1 received no relief and in 9 cases a complaint was filed with HUD and/or with the Maine Human Rights Commission. Of the 9 complaints filed with HUD and/or the Maine Human Rights Commission; 4 obtained affirmative relief, 2 received no relief, 1 was not a fair housing complaint, 1 was in litigation at the time the report was received and 1 was deemed other as a resolution.

Data from the Maine Human Rights Commission was received covering the timeframe of 2014-2018. The information is categorized by County and by the State. The information included the alleged basis for the complaints over the time period, the issues being complained about and the resolution of cases.

The alleged basis of complaints is the following: ancestry, color, disability, familial status, gender identity, national origin, other, race, religion, retaliation, sex, sexual orientation and source of income. In Maine for year 2014 there were 153 cases, 103 in 2015, 109 in 2016, 141 in 2017 and 177 in 2018 for a total of 683 cases. In Cumberland county those numbers were; 59 for 2014, 41 for 2015, 25 for 2016, 42 for 2017 and 86 for 2018 for a total of 253 cases or about 37% of all cases in Maine for the timeframe. The top alleged basis for the complaints in the State of Maine for the 5-year time frame was: disability at 40%, retaliation at 15%, race at 8% and national origin at 7%. The top alleged basis for the complaints in Cumberland county were: disability at 30%, retaliation and national origin both at 13% and race at 11%.

The issues that complainants identify in their filing of fair housing complaints include: advertising, benefits, discharge, eviction, exclusion, harassment, intimidation, other, prohibited medical inquiry/exam, reasonable accommodation, unfavorable references, service animal, sexual harassment and terms and conditions. In Maine for year 2014 there were 290 cases, 221 in 2015, 92 in 2016, 131 in 2017 and 175 in 2018 for a total of 909 cases. In Cumberland county those numbers were; 77 for 2014, 93 for 2015, 20 for 2016, 32 for 2017 and 58 for 2018 for a total of 280 or about 31% of all cases in Maine for the timeframe. The top issues in the State of Maine for the 5-year timeframe were: terms

and conditions at 30%, reasonable accommodation at 17%, harassment at 13% and eviction at 12%. The top issues in Cumberland county were: terms and conditions at 35%, reasonable accommodation at 14% and harassment at 12%.

The outcomes for the cases are reported by the year in which the case was filed. The outcomes reported are; administrative dismissal, finding of cause issued, finding of no cause issued, settlement with benefits, split finding case and withdrawal with benefits. In Maine for year 2014; there were 88 cases with outcomes, 72 in 2015, 68 in 2016, 88 in 2017 and 95 in 2018 for a total of 411 cases with outcomes. Sixty five percent of the cases were either administrative dismissals or findings of no cause. In Cumberland county there were 27 cases with outcomes in 2014, 28 in 2015, 18 in 2016, 24 in 2017 and 30 in 2018 for a total of 127 cases with outcomes or about 31% of all cases with outcomes in Maine. Seventy one percent of the cases in Cumberland county were either administrative dismissals or findings of no cause.