



29 September 2023

Ms. Kimberly Blair  
Portfolio Management Specialist  
U.S. Department of Housing and Urban Development  
Office of Public Housing, New England  
Thomas P. O'Neill, Jr. Federal Building  
10 Causeway Street  
Boston, MA 02222-1092

RE: ME015, 2024 Annual Plan Submission.

Dear Kimberly:

Enclosed is the FY2024 Annual Plan, (form HUD -50075-HCV exp., 3/31/2024), for The Housing Authority of The City of Westbrook, ME015, with required supporting attachments.

1. Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan, HUD Form 50077-SL
2. Form HUD 50077-ST-HCV-HP exp., 3/31/2024 Certification of Compliance with PHA Plan and Related Regulations.

The 2024 Annual Year Plan was presented to the Resident Advisory Board in July of 2024 with no comments or challenges by the RAB. The FY2024 Plan was made accessible to the public for viewing on the Westbrook Housing website or in person at the Westbrook Housing Administration Office for requisite 45-day period of review and comment with the Public Hearing held on 31 August 2023. There were no members of the public attending the Public Hearing and no comments submitted electronically or by mail. The Board of Commissioners approved the plan by a unanimous resolution on 28 September 2023.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris LaRoche".

Christopher LaRoche  
Executive Director





July 12, 2023

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

Enclosed please find a copy of Westbrook Housing's 2024 Annual Plan. The Housing Authority is required to provide an updated Annual Plan that identifies updates and changes to the Housing Authority's approved 5-Year Plan for the period of 2020-2024. 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). As a result of the conversion of its Public Housing through the HUD - Rental Assistance Demonstration Program, Westbrook Housing Authority no longer has Public Housing which is identified in its update to its goals. Please Note, that this FY2024 Annual Plan provides updates from the FY2023 Annual Plan to Section B.1 reflecting the changes in the area's Housing Needs and the Housing Authority's responding Housing Strategy and reflects the residual impact of COVID-19, the economic inflation, and the rise in homelessness due to the influx of asylum seekers. The other changes include in Section B.1 the projected FY2024 Funding Sources. The only other area of change is an update of the Goals that reflect further results made in achieving goals from previous Annual Plan submissions. In addition, the FY2024 Annual Plan Update form includes Section D.1 Affirming Furthering Fair Housing Updates. Due to previous changes by Congress, the Housing Authority has not been required to submit a plan for approval and thus is not required to complete this section at this time.

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

This Plan will be on display from Thursday, July 13 until Thursday, August 31 at the following locations: Westbrook Housing Administration Office, 30 Liza Harmon Drive. An electronic copy may be viewed at Westbrook Housing's website [www.westbrookhousing.org](http://www.westbrookhousing.org).

There will be a public hearing at 9:00 A.M., on Thursday, August 31, at Westbrook Housing's Administration Office, 30 Liza Harmon Drive, Westbrook, ME.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris LaRoche".

Christopher LaRoche  
Executive Director



<b>Streamlined Annual PHA Plan (HCV Only PHAs)</b>	<b>U.S. Department of Housing and Urban Development Office of Public and Indian Housing</b>	<b>OMB No. 2577-0226 Expires 03/31/2024</b>
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**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, including changes to these policies, 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-HCV is to be completed annually by **HCV-Only PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, High Performer PHA, Small PHA, or Qualified PHA do not need to submit this form. Where applicable, separate Annual PHA Plan forms are available for each of these types of PHAs.

**Definitions.**

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS and SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

A.	PHA Information.																				
A.1	<p><b>PHA Name:</b> The Housing Authority of the City of Westbrook <span style="float: right;"><b>PHA Code:</b> ME015</span>  <b>PHA Plan for Fiscal Year Beginning:</b> 01/2024  <b>PHA Inventory</b> (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)  <b>Number of Housing Choice Vouchers (HCVs)</b> 1026  <b>PHA Plan Submission Type:</b> <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p><b>Availability of Information.</b> 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 of 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 the main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website.</p> <p><b>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:</b></p> <p><b>The Housing Authority of the City of Westbrook</b>  <b>Administration Office</b>  <b>30 Liza Harmon Drive</b>  <b>Westbrook, ME 04092</b></p> <p><b>The Housing Authority of the City of Westbrook's website – <a href="http://www.westbrookhousing.org">http://www.westbrookhousing.org</a></b></p> <p><input type="checkbox"/> <b>PHA Consortia:</b> (Check box if submitting a joint Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th style="width: 25%;">Participating PHAs</th> <th style="width: 10%;">PHA Code</th> <th style="width: 25%;">Program(s) in the Consortia</th> <th style="width: 20%;">Program(s) not in the Consortia</th> <th style="width: 20%;">No. of Units in Each Program</th> </tr> </thead> <tbody> <tr> <td>Lead HA:</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <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	Lead HA:														
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<b>B.</b>	<b>Plan Elements.</b>				

B.1

**Revision of Existing PHA Plan Elements.**

a) Have the following PHA Plan elements been revised by the PHA since its last Annual 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.
- Operation and Management.
- Informal Review and Hearing Procedures.
- Homeownership Programs.
- Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements.
- Substantial Deviation.
- Significant Amendment/Modification.

(b) If the PHA answered yes for any element, describe the revisions for each element(s):

**1. Housing Needs and Strategy for Addressing Housing Needs:**

The Following Statement of Housing Needs and strategy for addressing 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.

In 2021, 2022, and continuing into 2023 there have been significant changes have taken place in the economy due to the COVID-19 Pandemic that have magnified the critical needs identified in the 2019 submission of the PHA 5-Year Plan. This has been further amplified by two other economic and market events including the high inflation rate in 2022 and 2023 and the influx of over 1,500 families seeking asylum. The unemployment rate has fallen to 3.4% in 2021 and 2.6% in 2022 and is now 2.0% in 2023. To combat the housing crisis, the state of Maine issued an ARPA funded rent subsidy program to assist non-HCV households with rent and utility payments. This program has been extended into the summer of 2023. However, the families assisted are being housed in temporary quarters such as hotels. Due to the lack of housing inventory, many of these households are facing homelessness without the ability to obtain shelter due to the lack of shelter capacity in the Portland MSA or throughout the state. The total HAP payment in 2023 increased to an \$1002.88 monthly average and as of April of 2023. This is a 38.81% increase in the past 5 years. As reported on the HUD Dashboard, as of April 2023, the statewide average HAP payment is \$824.73, and neighboring Portland HA is \$1199.89 and South Portland HA is \$1056.05 and for Westbrook Housing is \$1002.88. Wages have increased due to competition for employees and the City of Portland local ordinance mandating a \$14.00 per hour minimum wage and the State of Maine 2023 minimum wage of \$13.80 per hour. For the elderly, they have received the highest Social Security cost of living adjustment recorded. The increase in wages and social security benefits have been offset by inflation which is also reflected in corresponding inflation of rental housing. An additional social economic impact to many low-income families continues to be the significant reduction and availability of daycare and thus they remain hampered to access the workforce vs. care for children. The Housing Authority has conducted outreach and will continue to conduct outreach to its HCV clients to ensure that they are provided stable housing through appropriate HAP adjustments through annual and interim recertifications. Through various means of a Public Awareness campaign the Westbrook, Portland, and South Portland Housing Authorities have and will continue to collaborate to engage landlords to rent to the HCV clients. Due to these market conditions the Housing Authority continues to experience a significant impact of its Housing Choice Voucher Mainstream MS-811 voucher holders to find apartments. To meet the response of the HUD-HCV program and the Housing Authority

administrative operational capacity it has implemented the statutory HUD authorized waivers as identified in Notices PIH 2020-05 and PIH 2020-13. These waivers have expired, and the HA has not applied for any additional waivers. The Housing Authority's Housing Choice Voucher Program remains 100% utilized and the Mainstream 811 program is 85% utilized and the Non Elderly Disabled Housing Choice Vouchers program remains 100% utilized.

**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 2023, the Portland MSA began to experience an influx of the working population resulting in a 2019 unemployment rate of 2.4%, 13.6% for 2020, 3.4% for 2021, 2.6% in 2022, is currently at 2.0% in 2023. There continues to be a reduction in vacancy rates that remain below 3%. A major cause of this reduction in rental availability has been caused by people relocating to Maine from the large out of state metropolitan areas to escape high infection rates. In addition, Investors are purchasing rental properties and increasing rents by \$400-\$500 per month. This has been further negatively impacted by an average market rent increase of apartments averaging \$1,540 - (\$1,507 in 2022) for a zero-bedroom efficiency apartment, \$1,837 - (\$1,386 in 2022) for a one-bedroom apartment, and \$2,313-(\$1,769 in 2022) for a two-bedroom apartment. In 2019 The Westbrook, Portland, and South Portland PHA's combined to challenge the proposed HUD published FMR and were successful with the resulting 2021 FMR being increased. The current HUD 2023 HUD FMR still do not reflect the inflationary impact on the market, and Westbrook Housing Authority and the Portland, and South Portland Housing Authorities are operating with a HCV Payment Standard at 110%. The Portland MSA HUD Fair Market Rent for an efficiency apartment is \$1,243, a one-bedroom apartment is \$1,448, for a two-bedroom apartment \$1,859, for a three-bedroom apartment \$2,344, and \$2,732 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 a limited number of apartments and limited opportunities for new construction. This is further exasperated by the unchecked increase in construction costs caused by the runaway inflation of construction materials and the increased interest rates set by the Federal Reserve. Westbrook Housing Authority, Portland Housing Authority, and South Portland Housing Authority have approximately 500 units of affordable apartments for family and elderly housing placed in service or under construction to be placed in service by 2023-2025. Of this number 115 units are in the construction phase of development by Westbrook Housing which includes 115 elderly units. We have 100 units of family units in the predevelopment stage with expected 2024 construction start. Westbrook Housing placed 91 new elderly units in service in 2021. Westbrook Housing is partnering with two other developers to place its low-income developments as part of larger scheme developments of market rate housing. The goal is to mix income demographics. The market rate housing related to these WHA affordable housing developments will account for 725 market rate units. In Westbrook, there is an additional 500 units of market rate apartments in predevelopment that have planning board approval and another 55 units of low-income elderly apartments planned by the non-profit Avesta Housing. However, many of the market rate developments that were due to start construction in 2022 and 2023 have been stalled due to the increased interest rates. All Westbrook Housing developments 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). WHA will pursue the 202 program for its elderly housing developments per future NOFA's. 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 98.92% voucher utilization rate in 2021 and as of July 2022 is experiencing a near 100% voucher utilization rate with an 85.54% utilization rate of its Mainstream 811 Vouchers. Voucher recipients require extensions beyond 60 days to secure affordable apartments and due to COVID19 state of emergency all voucher holders have been issued a 12-month extension that will end in 2022.

Additional impact to our ability to develop affordable housing is the removal of one of the two census tracts in the city no longer qualifying as a Difficult to Develop Area and the removal of the 130% equity boost for the 4% Low Income Housing Tax Credit Program. Positive events that will assist in the development of affordable housing is pending implementation of the State Legislature’s bill LD2003 that will increase density and affordable housing development as a requirement of municipalities. Other pending legislation includes increased subsidy funding and Housing First funding. Westbrook Housing Authority will identify opportunities to partner with other agencies to develop a Housing First model with the intent to develop buildings for this model of housing.

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

1	2	3	4/5+
Bedroom	Bedroom	Bedroom	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 – 7.7%; children under 18 below poverty level is 10% and older adults age 65 and over is 8%. 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. (Note, Westbrook Housing received an additional 58 Mainstream 811 vouchers in 2020 through the CARES Act.) 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 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. The following information is updated from the submission of the 2019 5-Year Plan to reflect the current 2023 data. The data identifies a continual increase of households need for vouchers that is disproportionate to the increase in the statewide increase in population. The data has shifted from the previous two years’ annual plan and is reflective of the Combined Wait List data being purged per its 3-year schedule. The total number of households throughout the state has decreased by 27% and in Cumberland County it has decreased 35%. For the Westbrook Housing jurisdiction, there is a marked decrease of 31% that is reflective of the statewide and county decrease. This can be explained by the shift of population from the city of Portland to the surrounding communities that encircle Portland and make up the Westbrook Housing jurisdiction. The reason for the population shift is the high rental and homeownership costs for Portland and the lower rent and increase in rental availability in the communities that make up the Westbrook Housing jurisdiction. This has placed a greater burden on Westbrook Housing to serve the community. This data signifies the immediate need for subsidized affordable housing, that is new construction affordable housing supported by project-based vouchers. The 2023 data shows a significant reduction from the 2020 data that is a function of a significant number of names pulled from the waiting list to lease up 91 project-based voucher units placed into service in 2021 along with increase of ninety-three MS-811 vouchers through notice of award and 58 vouchers received through the CARES Act. The result has been a significant draw down of the waiting list to identify eligible voucher recipients for the issuance of vouchers.

*Waiting List Total Westbrook Housing Local Preference:*

<i>2023 Data</i>	<i># of Families</i>	<i>% of Families</i>		
<i>Waiting List Statewide Total CWL</i>	<i>19,063</i>	<i>100%</i>		
<i>Waiting List Cumberland County CWL</i>	<i>3,946</i>	<i>21%</i>		
<i>Live or Work in Preference Area</i>	<i>1,596</i>	<i>8% (% of CWL)</i>		
<i>Disabled</i>	<i>377</i>	<i>24% (% of WHA Jurisdiction)</i>		
<i>Family with Minor Children/Dependents</i>	<i>543</i>	<i>34%</i>	<i>“</i>	<i>“</i>
<i>Elderly</i>	<i>292</i>	<i>18%</i>	<i>“</i>	<i>“</i>
<i>Single Non-Elderly &amp; Disabled</i>	<i>181</i>	<i>11%</i>	<i>“</i>	<i>“</i>
<i>Family of 2 or More</i>	<i>727</i>	<i>46%</i>	<i>“</i>	<i>“</i>
<i>Veterans</i>	<i>45</i>	<i>3%</i>	<i>“</i>	<i>“</i>
<i>Chronically Homeless</i>	<i>160</i>	<i>10%</i>	<i>“</i>	<i>“</i>
<i>Extremely Low Income</i>	<i>1,231</i>	<i>77%</i>	<i>“</i>	<i>“</i>
<i>Very Low Income</i>	<i>230</i>	<i>18%</i>	<i>“</i>	<i>“</i>
<i>Low Income</i>	<i>63</i>	<i>4%</i>	<i>“</i>	<i>“</i>
<i>Caucasian</i>	<i>1,160</i>	<i>73%</i>	<i>“</i>	<i>“</i>
<i>African American</i>	<i>210</i>	<i>13%</i>	<i>“</i>	<i>“</i>
<i>American Indian</i>	<i>213</i>	<i>2%</i>	<i>“</i>	<i>“</i>
<i>Asian</i>	<i>42</i>	<i>3%</i>	<i>“</i>	<i>“</i>



<i>Native Hawaiian</i>	4	.3%	“	“
<i>Hispanic</i>	75	5%	“	“
<i>Undeclared</i>	222	14%	“	“

See B.1 Addendum for April 2023 Rent Reasonableness Report commissioned by Westbrook Housing Authority for the Portland MSA and the January 2022 Fair Market Rent Survey commissioned by Westbrook Housing Authority/Portland Housing Authority/South Portland Housing Authority that was submitted to HUD that resulted in approved FY2022 increase in Portland MSA Fair Market Rent increases as published in the Federal Register.

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 of the 5 Year Plan of 2019-2024:

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, Larrabee Commons-Dr. Arthur O. Berry Apartments, Robert L. Harnois Apartments, and the Lewis H. Emery Apartments.
7. Maintain program participation at or near 100% voucher utilization with payment standard at 110% per funding availability; and as market conditions dictate, and funding availability return to 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 voucher types including but not limited to: HCV, Mainstream, 811, 202, FUP, VASH, or any other specialty type voucher including those targeted toward homeless or VAWA.
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, HUD 202, HUD 811, or through State housing programs.
14. Promote and adhere to HUD Fair Housing, Section 3, and De-concentration of Poverty with update of Fair Housing policies per any changes to renewal of HUD Affirming Furthering Fair Housing as defined by Congress.
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 and will prepare its AFFFH per 2021 updated enactment and pending future instructions by HUD.
21. Westbrook Housing continues to affirm its strategy and commitment to participate in the Cumberland County 2021 assessment of Affirmatively Furthering Fair Housing (AFFH) and will use its current AI and future outreach and data to support the AFFH plan.
22. Continue MOU with Continuum of Care provider Preble Street Shelters Inc., to house homeless and to re-house youth transitioning from their homeless youth program.
23. Addition of preference for HCV program for MS-811 vouchers for homeless or at risk Of homeless youth transitioning from Preble Street Shelters Inc. programs
24. Addition of preference for HCV program for new specialty vouchers targeting homeless who are referred through Preble Street Shelters Inc. COC programs with the emphasis on developing a Housing First property.
25. WHA will prioritize and plans to apply to be a Moving to Work agency depending upon cohort eligibility.
26. Prioritize the development of Housing First buildings with services provided through Preble Street Shelters Inc., or another service provider.

## 2. Financial Resources:

The following financial resources are projected based upon FY2023 awards and productivity and are projections for FY2024. The actual FY2024 Federal Budget is not yet determined, and business income is subject to the volatility of the economy and the timing of development activities.

HUD HAP	\$ 9,359,763
HUD Admin Fee	\$ 1,143,242
HUD Mainstream	\$ 1,988,206
HUD Mainstream Admin Fee	\$ 310,016
HUD FSS	\$ 77,893
HCV Admin Reserve	\$ 188,000
Business Income	\$ 450,000

Estimated Total Financial Resources 2024: \$ 13,517,120

## 3. Rent Determination.

On February 14, 2023, HUD releases a Final rule to implement sections 102, 103, and 104 of the Housing Opportunity Through Modernization Act of 2016. These changes deliver important benefits to the Housing Choice Voucher program participants and reduces the administrative burdens of the public housing authority. Section 102 and 104 changes will be applied to Westbrook Housing's Housing Choice Voucher program. Since Westbrook Housing Authority does not have Public Housing properties, Section 103 does not apply.

The following identifies an highlights of the final rule and the resulting changes that will be made to the Westbrook Housing Administrative Plan to be effective for January 1, 2024.

#### Section 102: Income Reviews

- Fewer Interim Reexaminations: HOTMA creates a 10% adjusted income increase/decrease threshold for conducting Interim Reexaminations, and in most cases requires that increases in earned income are not processed until the next Annual Reexamination, allowing families to keep more of their earnings before receiving a rent increase. The new requirements should lead to fewer Interim Reexaminations overall, alleviating burden for both participants and PHAs.
- Streamlined Verifications: Several provisions will streamline the verification process for housing providers.
  - o Adults Only Need to Sign Consent Form Once: HOTMA revises the required consent form that all adult household members sign, allowing them to sign the form only once instead of annually.
  - o Use of Income Determinations from Other Programs: HOTMA allows PHAs to use income determinations made under other federal benefits programs for reexaminations.
  - o Review of EIV Not Required at Interim Reexamination: HOTMA eliminates the requirement for PHAs to use EIV to verify tenant employment and income information during an interim reexamination, significantly reducing administrative burden.
- Increased Standard Deduction for Elderly/Disabled Households: HOTMA increases standard deductions for families with a head, co-head, or spouse who is elderly or a person with a disability.
- Additional Income Exclusions: The rule codifies additional income and asset exclusions, including:
  - o Amounts received from Medicaid or other state/local programs meant to keep a family member with a disability living at home
  - o Veterans' aide and attendant care
  - o Distributions of principal from non-revocable trusts, including Special Needs Trusts.
- Threshold for Claiming Medical/Disability Expenses Increased: HOTMA increases the allowance for unreimbursed health and medical care expenses from 3% of annual income to 10%, phased-in over two years.

- Higher Threshold for Imputing Asset Income: HOTMA raises the imputed asset threshold from \$5,000 to \$50,000, incentivizing families to build wealth without imputing income on those assets.
- Hardship Relief: HOTMA provides hardship relief for expense deductions, lessening the impact of the increased threshold for medical expenses. HOTMA permits PHAs to grant hardship relief to families unable to pay rent because of unanticipated medical/disability expenses and families who are no longer eligible for the childcare expense deduction.

#### Section 104: Asset Limits

- Asset Limitation: HOTMA imposes a \$100,000 asset limit for eligibility and continued assistance. Families are also ineligible for assistance if they own real property suitable for occupancy. PHAs have the option of delaying enforcement/termination for up to six months if the family is over the asset threshold at the time of annual reexamination.
- Exclusion of Retirement and Educational Savings Accounts: Retirement accounts and educational savings accounts will not be considered a net family asset. This is a major benefit to families, incentivizing savings for important life milestones and opportunities. This will also provide significant administrative relief to PHAs by allowing them to stop verifying and calculating these assets altogether.
- Self-Certification of Assets under \$50,000: HOTMA allows self-certification of net assets if estimated to be at or below \$50,000. This will be a time-savings for families and lower administrative burden for PHAs recertifying income.

#### Cross-Cutting

- Adjustments for Inflation: Deductions and the asset limitation will be adjusted for inflation annually, ensuring that deductions do not lose value over time and that families are able to build more wealth without losing program assistance. The current deduction amounts have never been adjusted

	New Activities. – Not Applicable
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**B.3 Progress Report.**

Provide a description of the PHA's progress in meeting its Mission and Goals described in its 5-Year PHA Plan.

1. Goal: Maintain 100% utilization of HCV program, including Mainstream NED, VASH.

Update: FYE 2022 resulted in a 99.56% HCV Voucher utilization rate, 81.77% utilization of MS-811 & 5 Year Mainstream NED Vouchers combined, Note the MS-811/5-year Mainstream/NED utilization rate increase from the previous year due to the timing of lease up of additional award of vouchers that were accounted for but could not be leased due low vacancy rate in the MSA.

2. Goal: Apply for additional HCV vouchers such as HCV, Mainstream, NED, VASH, FUP

Update: FY19 responded to NOFA and applied for 50 Mainstream 811 vouchers and awarded 35 vouchers. Awarded 18 Mainstream 811 vouchers through CARES Act and applied for and awarded additional 40 MS-811 vouchers if NOFA is issued in 2020. WHA responded to a NOFA in 2022 and did not receive an award for this submission.

3. Goal: Maintain and expand Family Self Sufficiency (FSS) program.

Update: The FSS program had 26 persons enrolled on December 31, 2022, and in 2023 has 27 enrolled.

4. Goal: Project base the maximum number of Housing Choice Vouchers allowed by HUD regulations.

Update: The Housing Authority had previously fully utilized its project-based voucher capacity under HOTMA. Due to being issued 118 additional MS-811 vouchers it is possible that an additional 35 – 54 project-based vouchers could be issued. The Housing Authority will submit its determination to HUD and will look to project base for any additional vouchers for eligible projects. As of July 1, 2023, the Housing Authority has not applied for HUD determination, nor has it issued an RFP for Project Based Vouchers.

5. Goal: Apply for Project Based Voucher programs such as HUD 202 or HUD 811 programs.

Update: The PHA did not respond to the FY19 or the FY20 HUD 202 NOFA due to project timing. The Housing Authority will respond to any future NOFAs for 202 Housing and 811 Housing as projects are identified.

6. Goal: Administer HUD-RAD project-based vouchers

Updated: Achieved – administering 83 HUD-RAD project-based vouchers at the Riverview Terrace RAD development.

7. Goal: 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.

Update: WHA has entered into a MOU with Preble Street Shelters Inc. to target and re-house youth ages 18 -24 who graduate from their housing youth program. Also, WHA and Preble Street Shelters Inc., in September of 2022, entered into a MOU to target re-housing of homeless.

8. Goal: 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.

Update: Harnois project-based development construction completed with 13 units set aside for homeless. Hired a Licensed Clinical Social Worker. In April of 2020, Acquired Congregate Care Services Program from Southern Maine Area on Aging at Larrabee Village and hired 20 supportive services staff members. Received grant funding and supported with Housing Authority business income to provide meals to shelter in place residents during COVID-19 pandemic. Established MOU with the University of New England to provide onsite medical education and support with the use of their teaching curriculum as the HA will become a site based in service component of the UNE education. In addition, UNE will be providing tele-health research and services to WHA elderly residents. All the UNE related services are provided at no fee to residents with the exception of certain dental fees that are Medicare paid. This program is in place in 2022 with some COVID-19 restrictions. In 2021-2022 and in 2022-2023 over 600 low-income elderly residents were provided services and over 200 UNE students participated in placed based learning. The UNE collaboration received a NAHRO Award of Excellence for this program in April of 2023.

9. Goal: 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.

Update: Robert L. Harnois Apartments – 61 units, elderly age 62 and over, construction completed with full occupancy in March 2021. Lewis H. Emery Apartments – 30 units for elderly age 55+ scheduled completed in October of 2021 and fully leased in December of 2021. Development activities for a 60-unit 55+ development and a 55-unit 55+ development have commenced with construction of each development started in July of 2023 and a 2024 or 2025 lease up. Predevelopment activities for a potential 100 units of family housing is in process for a potential 2024 or 2025 construction start. This development has been delayed due to resistance from the City Administration, but it is hopeful that by the fall of 2023 the HA will be able to move this project forward in the Planning Board process. All of these developments will be funded with the Low-Income Housing Tax Credit Program (LIHTC) and will be a combination of apartments targeting households at or below 60% Area Median Income as defined by the LIHTC program and market rate apartments. The Housing Authority in partnership with Westbrook Development Corporation a HUD Community Housing Development Organization will respond to any HCV RFPs for these projects and will respond to HUD 202 or 811 funding NOFAs for these projects. A \$535,000 and \$565,000 ARPA award were received for the 55 unit and the 60-unit elderly low-income apartment developments. An application for \$1,000,000 in ARPA funds is submitted for the 100 unit family development.



	<p>10. Goal: Continue to manage Housing Authority owned and non-Housing Authority owned properties whether it does or does not have a controlling interest.</p> <p>Updated: Achieved and forward-looking continued goal. Note, the aggregate occupancy rate is 98.5%</p> <p>11. Goal: 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.</p> <p>Update: Achieved to date includes obtaining grants for a MOU collaborative between the Housing Authority and the University of New England (UNE) to have a tele health initiative to include multiple disciplines of the various UNE medical schools plus tele health research initiative. Program launched in 2021. This program received a NAHRO Award of Excellence in April of 2023</p> <p>12. Goal: Prioritize project-based vouchers for non-elderly disabled head of household and elderly households.</p> <p>Update: This goal is restricted by the limitations of HOTMA. The HA has 118 new MS-811 vouchers issued and as a result will seek to project base the estimated maximum vouchers. The Housing Authority has applied for additional MS-811 vouchers in 2022 but did not receive an additional award.</p> <p>13. Goal: 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.</p> <p>Update: Goal achieved with the Board of Commissioners closing out the development in January of 2020 and final project reporting submitted to HUD for removal of the AMP form the HUD ACC. HUD issued Letter and removed Public Housing from ACC in January of 2021</p>
<b>B.4</b>	<b>Capital Improvements.</b> – Not Applicable
<b>B.5</b>	<p><b>Most Recent Fiscal Year Audit.</b></p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N N/A  <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<b>C.</b>	<b>Other Document and/or Certification Requirements.</b>

C.1	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) have comments to the 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 PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
C.2	<p><b>Certification by State or Local Officials.</b></p> <p><a href="#">Form HUD-50077-SL</a>, <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>
C.3	<p><b>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</b></p> <p>Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.4	<p><b>Challenged Elements.</b> 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.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N  <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>

**D. Affirmatively Furthering Fair Housing (AFFH).**

D.1	<p><b>Affirmatively Furthering Fair Housing (AFFH).</b></p> <p>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.</p> <table border="1" data-bbox="181 1136 1450 1587"> <tr> <td data-bbox="181 1136 1450 1178"><b>Fair Housing Goal:</b></td> </tr> <tr> <td data-bbox="181 1178 1450 1587"><u>Describe fair housing strategies and actions to achieve the goal</u></td> </tr> <tr> <td data-bbox="181 1247 1450 1587">Left blank per instruction.</td> </tr> </table> <table border="1" data-bbox="181 1608 1450 1650"> <tr> <td data-bbox="181 1608 1450 1650"><b>Fair Housing Goal:</b></td> </tr> </table>	<b>Fair Housing Goal:</b>	<u>Describe fair housing strategies and actions to achieve the goal</u>	Left blank per instruction.	<b>Fair Housing Goal:</b>
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<b>Fair Housing Goal:</b>					

Describe fair housing strategies and actions to achieve the goal

Left blank per instruction.

**Fair Housing Goal:**

Describe fair housing strategies and actions to achieve the goal

Left blank per instruction.

## Instructions for Preparation of Form HUD-50075-HCV Annual PHA Plan for HCV-Only PHAs

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

**A.1** Include the full **PHA Name**, **PHA Code**, **PHA Type**, **PHA Fiscal Year Beginning** (MM/YYYY), **Number of Housing Choice Vouchers (HCVs)**, **PHA Plan Submission Type**, and the **Availability of Information**, specific location(s) of all information relevant to the public hearing and proposed PHA Plan.

**PHA Consortia:** Check box if submitting a Joint PHA Plan and complete the table. ([24 CFR §943.128\(a\)](#))

**B. Plan Elements.** All PHAs must complete this section. ([24 CFR §903.11\(c\)\(3\)](#))

**B.1 Revision of Existing PHA Plan Elements.** PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the “yes” box. If an element has not been revised, mark “no.”

**Statement of Housing Needs and Strategy for Addressing Housing Needs.** Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA’s strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR 5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR § 903.7(a)).

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(2)(i)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA's reasons for choosing its strategy. (24 CFR §903.7(a)(2)(ii))

**Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.** A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for HCV. (24 CFR §903.7(b))

**Financial Resources.** A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA HCV funding and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. (24 CFR §903.7(c))

**Rent Determination.** A statement of the policies of the PHA governing rental contributions of families receiving tenant-based assistance, discretionary minimum tenant rents, and payment standard policies. (24 CFR §903.7(d))

**Operation and Management.** A statement that includes a description of PHA management organization, and a listing of the programs administered by the PHA. (24 CFR §903.7(e))

**Informal Review and Hearing Procedures.** A description of the informal hearing and review procedures that the PHA makes available to its applicants. (24 CFR §903.7(f))

**Homeownership Programs.** A statement describing any homeownership programs (including project number and unit count) administered by the agency under section 8y of the 1937 Act, or for which the PHA has applied or will apply for approval. (24 CFR §903.7(k))

**Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements.** A description of any PHA programs relating to services and amenities coordinated, promoted, or provided by the PHA for assisted families, including those resulting from the PHA's partnership with other entities, for the enhancement of the economic and social self-sufficiency of assisted families, including programs provided or offered as a result of the PHA's partnerships with other entities, and activities subject to Section 3 of the Housing and Community Development Act of 1968 (24 CFR Part 135) and under requirements for the Family Self-Sufficiency Program and others. Include the program's size (including required and actual size of the FSS program) and means of allocating assistance to households. (24 CFR §903.7(l)(i)) Describe how the PHA will comply with the requirements of section 12(c) and (d) of the 1937 Act that relate to treatment of income changes resulting from welfare program requirements. (24 CFR §903.7(l)(iii)).

**Substantial Deviation.** PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. (24 CFR §903.7(r)(2)(i))

**Significant Amendment/Modification.** PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan.

If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.

**B.2 New Activities.** This section refers to new capital activities which is not applicable for HCV-Only PHAs.

**B.3 Progress Report.** For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.11(c)(3), 24 CFR §903.7(r)(1))

**B.4 Capital Improvements.** This section refers to PHAs that receive funding from the Capital Fund Program (CFP) which is not applicable for HCV-Only PHAs

**B.5 Most Recent Fiscal Year Audit.** If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. (24 CFR §903.7(p))

**C. Other Document and/or Certification Requirements.**

**C.1 Resident Advisory Board (RAB) comments.** If the RAB had comments on the annual plan, mark "yes," submit the 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 §903.13(c), 24 CFR §903.19)

**C.2 Certification by State of 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. (24 CFR §903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

**C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.** Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154; or 24 CFR 5.160(a)(3) as applicable (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with

any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations, impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o)).

**C.4 Challenged Elements.** If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must 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 (AFFH).**

**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.

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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 Annual PHA Plan. The Annual PHA Plan provides 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 for serving the needs of low- income, very low- income, and extremely low- income families.

Public reporting burden for this information collection is estimated to average 6.02 hour 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

Westbrook Housing Authority

Annual Plan FY2024

Addendum B.1

Housing Rental Data

Rent Reasonableness Report April 2023 as Submitted to HUD for Fair Market Rent Determination

Prepared by Market Vision Partners, Inc.

And

Rent Reasonableness Report January 2022 as Submitted to HUD for Fair Market Rent Determination

Prepared by Econometrica, Inc.



Market Vision Partners, Inc.

*Solving the Rent Reasonableness Dilemma for Housing Authorities*

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**Rent Reasonableness System Report**



April 19th, 2023

Christine Syska  
HCV Program Director  
Westbrook Housing  
30 Liza Harmon Drive  
Westbrook, ME 04092

Re: Rent Reasonableness Market Report

Dear Ms. Syska,

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 MsExcel 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.

You are also free to request any additional information or clarification needed or wanted.

Sincerely,

A handwritten signature in black ink that reads 'Regina Geissler'. The signature is written in a cursive, flowing style.

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 Count
	0	1	2	3	4	5	
Condo	2	9	24	5			40
Duplex			3	1	1		5
High Rise	3	12	8	5		1	29
Low Rise	25	129	199	85	21	3	462
Row		1	21	15	6		43
Single Fam		9	39	69	26	4	147
Unknown		4	3	7	2		16
<b>Totals</b>	30	164	297	187	56	8	742

In general, records are kept active for one year. The list above includes records collected to date which are not supplanted by newer data. A complex may be surveyed several times a year, but only the most recent rents are active. Not every advertised rent is used. At minimum, the record must have an address, bedroom count and rental amount. Also suppressed are luxury properties far above the averages typical for this market. In general, we are presently cutting off rents higher than \$4500, although for the largest bedroom count properties we may not eliminate a rent this high if the property is not a luxury house.

This set only includes the cities specified at the end of this report.



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 high bedroom count units. The trend is clear enough, however to estimate expected averages.

Building Types	BEDROOM SIZE						Record
	0	1	2	3	4	5	Count
Condo	\$1,743	\$2,825	\$3,054	\$3,316			40
Duplex			\$2,032	\$3,300	\$4,500		5
High Rise	\$1,596	\$2,146	\$2,381	\$2,235		\$5,500	29
Low Rise	\$1,401	\$2,014	\$2,415	\$2,882	\$3,507	\$4,600	462
Row		\$1,350	\$2,366	\$2,851	\$4,240		43
Single Fam		\$2,664	\$2,752	\$3,338	\$3,566	\$3,788	147
Unknown		\$2,109	\$2,652	\$2,686	\$2,363		16
Overall Avg.	\$1,444	\$2,102	\$2,505	\$3,037	\$3,590	\$4,306	
Count	30	164	297	187	56	8	742

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**

Shown below are average rents across the selected zip codes. Only 16 five bedrooms units are represented, so while they are presented, the change in average cannot be interpreted without additional information, such as housing quality. Surprisingly, 111 zero bedroom units are available for the three year period so the low end of the bedroom count range has more relevance. What we see is that from 2021 to 2022, one, two and three bedrooms rents experienced strong upward pressure while studios (zeros) and four bedroom units trended lower. From 2022 to 2023, the market appears to be moderating somewhat with two, three, and four bedroom units averaging lower. Studios and one bedroom units are trending upward.

Year	Bedroom Count						Record
	0	1	2	3	4	5	Count
2021	\$1,390	\$1,653	\$2,067	\$2,588	\$4,341	\$5,286	875
2022	\$1,265	\$1,890	\$2,510	\$3,168	\$3,964	\$4,558	718
2023	\$1,540	\$2,122	\$2,455	\$2,987	\$3,710	\$3,367	525
Average	\$1,367	\$1,837	\$2,313	\$2,908	\$4,051	\$4,653	2118



Market Vision Partners, Inc.

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Finally, a look at all of the communities where a minimum of 10 units were found in 2022 and 2023 is presented. While in most of these areas too few units are available to properly evaluate the averages, the range of prices from city to city is discernible. In general, we see some of the highest prices in suburban locations. Westbrook tends to be a bit more affordable than Portland and South Portland. No area seems to be significantly off of the overall median across all sizes, though one or two bedroom counts may show a significant variation.

Municipality	Bedroom Count						Record
	0	1	2	3	4	5	Count
Cape Elizabeth		\$2,500	\$3,096	\$4,073	\$4,400		35
Falmouth		\$2,205	\$2,406	\$3,758	\$4,364		60
Gorham		\$1,825	\$1,883	\$2,943	\$2,900	\$2,950	15
Old Orchard Beach	\$1,340	\$1,733	\$2,045	\$2,960	\$2,638	\$5,500	56
Portland	\$1,315	\$2,024	\$2,604	\$2,995	\$3,854	\$7,050	621
Saco	\$1,286	\$1,579	\$2,042	\$2,725	\$3,100	\$2,967	41
Scarborough		\$2,358	\$2,495	\$3,026	\$3,813	\$3,000	49
South Portland	\$1,850	\$1,846	\$2,453	\$3,203	\$4,004		203
Westbrook		\$1,465	\$2,086	\$2,740	\$3,000		34
Windham	\$1,300	\$1,638	\$2,654	\$2,387	\$4,200		28
Yarmouth	\$1,496	\$1,792	\$2,215	\$3,110	\$5,750		71
Overall Average	\$1,348	\$1,987	\$2,488	\$3,086	\$3,866	\$4,306	
Overall Count	60	332	488	267	58	8	1213

**CONCLUSION:**

As during the last cycle, 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 beginning to be revised lower after exposure to the market at a higher price is unsuccessful.

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

On the following pages is a brief explanation of how Rentellect calculates rents followed by a list of the specific cities that are the subject of this report. While the historical trends consider the regional area, the active rents presented at the beginning of the report are limited to the cities specified.

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



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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.

Table with 6 columns: Detail, Quantity, Factor, Result, and Test Result. Rows include Neighborhood, Bedrooms, Baths, Building type, Avg. condition, Appliances, Yard, Garage, Utilities, and Test Result (\$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.

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



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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



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**DATA COVERAGE REQUESTED BY WESTBROOK HOUSING AUTHORITY**

<b>ZIP Code</b>	<b>City</b>	<b>County</b>
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 3/31/2024

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

I, Daniel E Brennan, the Director of Maine State Housing Authority certify that the Annual PHA Plan for fiscal year 2024 of the Housing Authority of the City of Westbrook 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

**Housing Authority of the City of Westbrook (ME015)**

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 Housing Authority of the City of Westbrook 2024 Annual Plan provides for the improvement of existing housing and an increase in the supply of affordable housing. These plans are consistent with the State of Maine Consolidated Plan housing priorities to improve the quality of housing and to expand the supply of affordable housing. The Westbrook Housing Authority will promote and adhere to Fair Housing policies. Westbrook Housing completed an Analysis of Impediments (AI) to Fair Housing in May of 2019.

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:

Daniel E. Brennan

Title:

Director

Signature:



Date: July 11, 2023

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.

**Certifications of Compliance with  
PHA Plan and Related Regulations  
(Standard, Troubled, HCV-Only, and  
High Performer PHAs)**

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 3/31/2024

**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 2024 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 January 1, 2024, 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 (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when 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 Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (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 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 PHA Plans that include 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 2011-65);



- 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 a site-based waiting list 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 a 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(o)(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 2 CFR 200.333 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).

The Housing Authority of the City of Westbrook  
PHA Name

ME015  
PHA Number/HA Code

Annual PHA Plan for Fiscal Year 2024

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

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: Christopher LaRoche

Name Board Chairman: Colette Gagnon

  
Signature

9/28/2023  
Date

  
Signature

9/28/2023  
Date

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