

**Supplement to HUD Form 50075-ST(1):  
Revision of PHA Plan Elements and New Activities  
October 27, 2017**

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## Section B.1 Revision of PHA Plan Elements

### 1. Housing Needs of Families in the Jurisdiction/s Served by the PHA and Strategy for Addressing Housing Needs

Based upon the information contained in the Consolidated Plan/s applicable to the jurisdiction, and/or other data available to the PHA, provide a statement of the housing needs in the jurisdiction by completing the following table. In the “Overall” Needs column, provide the estimated number of renter families that have housing needs. For the remaining characteristics, rate the impact of that factor on the housing needs for each family type, from 1 to 5, with 1 being “no impact” and 5 being “severe impact.” Use N/A to indicate that no information is available upon which the PHA can make this assessment.

<b>Housing Needs of Families in the Jurisdiction by Family Type</b>									
<b>Family Type*</b>	<b>Overall**</b>	<b>% of Over all*</b>	<b>Afford - ability</b>	<b>Sup ply</b>	<b>Quali ty</b>	<b>Access- ability</b>	<b>% Over- crowded*</b>	<i>Size</i>	<b>Location</b>
Income <= 30% of AMI***	59,855	52.1	5	3	2	2	N/A	1	N/A
Income >30% but <=50% of AMI****	29,050	25.3	5	3	2	2	N/A	2	N/A
Income >50% but <80% of AMI****	26,040	22.6	4	3	2	2	N/A	2	N/A
Elderly <80%****	35,280	30.7	4	3	2	2	N/A	N/A	N/A
Families with Disabilities <80%****	18,485	16.1	3	4	2	2	N/A	N/A	N/A
White <80%*****	34,470	43.4	4	3	2	2	N/A	N/A	N/A
Black African American Households <80%*****	21,440	27.0	4	3	2	2	N/A	N/A	N/A
Hispanic Households <80%*****	14,165	17.8	5	3	2	2	N/A	N/A	N/A
American Indian / Alaska Native <80%*****	314	.4	5	3	2	2	N/A	N/A	N/A
Asian / Pacific Islander <80%*****	6399	8.1	4	3	2	2	N/A	N/A	N/A
All Minority Households <80%*****	42,318	53.3	4	3	2	2	N/A	N/A	N/A
All Households <80% AMI***	114,945	100	4	3	2	2	N/A	1	N/A

\*There is likely some overlap in the data. For example, elderly households will include persons with disabilities who are elderly and disabled families will include both single persons and persons with children.

\*\*Overall renter households eligible for public housing, those below 80% of Area Median Income

\*\*\*Total Households = 114,945

\*\*\*\*2008-2010 American Community Survey 3 year average, Table 6

\*\*\*\*\*From Boston Consolidated Plan - based on 2005-2009 CHAS has one of more of four housing problems: lacks complete kitchen or plumbing facilities, more than one person per room, or cost burden greater than 30%. Total = 79,370

- Consolidated Plan of the Jurisdiction/s  
Indicate year: 7/1/2013 to 6/30/2018.
- U.S. Census data: the State of the Cities Data Systems: Comprehensive Housing Affordability Strategy (“CHAS”) dataset 2005-2009 as presented in Boston Consolidated Plan
- American Housing Survey data  
Indicate year:
- Other housing market study  
Indicate year:
- Other sources: (list and indicate year of information) Analysis conducted in consultation with staff from the City of Boston’s Department of Neighborhood Development

**B. Housing Needs of Families on the Public Housing and Section 8 Tenant- Based Assistance Waiting Lists**

State the housing needs of the families on the PHA’s waiting list/s. Complete one table for each type of PHA-wide waiting list administered by the PHA. PHAs may provide separate tables for site-based or sub-jurisdictional public housing waiting lists at their option.

<b>Housing Needs of Families on the Waiting List</b>			
Waiting list type: (select one)			
<input checked="" type="checkbox"/>	Section 8 tenant-based assistance		
<input type="checkbox"/>	Public Housing		
<input type="checkbox"/>	Combined Section 8 and Public Housing		
<input type="checkbox"/>	Public Housing Site-Based or sub-jurisdictional waiting list (optional)		
If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	1102		110**
Extremely low income <=30%	1030	93.47%	
Very low income >30% but <=50%	64	5.81%	

<b>Housing Needs of Families on the Waiting List</b>		
AMI)		
Low income (>50% but <80% AMI)	8	.73%
Families with children*	840	76.23%
Elderly families*	40	3.63%
Families with Disabilities*	256	23.23%
White Hispanic	347	31.49%
White Non-Hispanic	146	13.25%
Black Hispanic	127	11.52%
Black Non-Hispanic	425	38.57%
American Indian Hispanic	1	0%
American Indian Non-Hispanic	5	.45%
Asian/Pacific Island Hispanic	1	0%
Asian/Pacific Island Non-Hispanic	18	1.63%

\* The BHA had Single applicants on the waiting list. In addition there were instances of families that fit into more than one category including disabled and minors; disabled and elderly; elderly and minors; and families that fit in all 3 categories.

\*\*BHA ranked 7277 applications on its Section 8 Tenant-Based Waiting List based on the result of the lottery process when it re-opened the waiting list for two weeks in October 2008.

Is the waiting list closed (select one)?  No  Yes

If yes:

**HOW LONG HAS IT BEEN CLOSED? SINCE NOVEMBER 1, 2008**

Does the PHA expect to reopen the list in the PHA Plan year?  No  Yes

Does the PHA permit specific categories of families onto the waiting list, even if generally closed?  No  Yes

Please Note: BHA implemented site-based waiting lists for Section 8 Project-Based and Moderate Rehabilitation Housing Programs effective May 2007 and the waiting lists are open for Priority One Applicants only, except for six Elderly/Disabled Section 8 Project-Based waiting lists that have been open to non-priority elderly 62 years of age and older effective May 9, 2014. In addition, the Section 8 Tenant Based waiting list is open for Super Priority, PBV participants switching to tenant-based vouchers after a year of tenancy in good standing, and Mitigation voucher applicants.

<b>Housing Needs of Families on the Waiting List</b>			
Waiting list type: (select one)			
<input type="checkbox"/>	Section 8 tenant-based		
<input checked="" type="checkbox"/>	Public Housing		
<input type="checkbox"/>	Combined Section 8 and Public Housing		
<input type="checkbox"/>	Public Housing Site-Based or sub-jurisdictional waiting list		
(optional) If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	34,949		3400**
Extremely low income <=30% AMI	32,076	91.78%	
Very low income (>30% but <=50% AMI)	2,587	7.40%	
Low income (>50% but <80% AMI)	286	.82%	
Families with children*	14,720	42.12%	
Elderly families*	4,154	11.89%	
Families with Disabilities*	9,524	27.25%	
White Hispanic***	8,714	24.93%	
White Non-Hispanic***	6,011	17.20%	
Black Hispanic***	1,985	5.68%	
Black Non-Hispanic***	13,486	38.59%	
American Indian Hispanic***	78	.22%	
American Indian Non-Hispanic***	173	.50%	
Asian/Pacific Island Hispanic***	107	.31%	
Asian/Pacific Island Non-Hispanic***	4,189	11.99%	

\*The BHA had Single applicants on the waiting list. In addition there were instances of families that fit into more than one category including duplicates in disabled and children; duplicates in disabled and elderly; duplicates in elderly and children; and families that fit all categories.

\*\*The number of clients, BHA processed for final eligibility for public housing.

\*\*\*The totals numbers for race/ethnicity are missing client records that do not indicate a race.

Characteristics by Bedroom Size (Public Housing)

Housing Needs of Families on the Waiting List		
1BR	18153	51.94%
2 BR	11050	31.62%
3 BR	5007	14.33%
4 BR	634	1.81%
5 BR	95	0.27%
6+ BR	10	0.03%
Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes		
If yes:		
<b>HOW LONG HAS IT BEEN CLOSED (# OF MONTHS)?</b>		
Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input type="checkbox"/> Yes		
Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input type="checkbox"/> Yes		

**Strategy for Addressing Housing Needs.** Provide a brief description of the PHA’s strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. **Note: Small, Section 8 only, and High Performing PHAs complete only for Annual Plan submission with the 5-Year Plan.**

Provide a brief description of the PHA’s strategy for addressing the housing needs of families in the jurisdiction and on the waiting list **IN THE UPCOMING YEAR**, and the Agency’s reasons for choosing this strategy.

**(1) Strategies**

**Need: Shortage of affordable housing for all eligible populations**

**Strategy 1. Maximize the number of affordable units available to the PHA within its current resources by:**

Select all that apply

- Employ effective maintenance and management policies to minimize the number of public housing units off-line
- Reduce turnover time for vacated public housing units
- Reduce time to renovate public housing units
- Seek replacement of public housing units lost to the inventory through mixed finance development
- Seek replacement of public housing units lost to the inventory through section 8 replacement housing resources
- Maintain or increase section 8 lease-up rates by establishing payment standards that will enable families to rent throughout the jurisdiction
- Undertake measures to ensure access to affordable housing among families assisted by the PHA, regardless of unit size required

- Maintain or increase section 8 lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration
- Maintain or increase section 8 lease-up rates by effectively screening Section 8 applicants to increase owner acceptance of program
- Participate in the Consolidated Plan development process to ensure coordination with broader community strategies
- Other (list below)  
Continue to develop and implement the BHA's Approach to Preservation and 5-year Sustainability Plan. The BHA is engaging in partnerships with other agencies to better service the needs of our population and create family supported housing programs.

**Strategy 2: Increase the number of affordable housing units by:**

Select all that apply

- Apply for additional section 8 units should they become available
- Leverage affordable housing resources in the community through the creation of mixed - finance housing
- Pursue housing resources other than public housing or Section 8 tenant-based assistance.
- Other: (list below)  
Utilize Replacement Housing Factor Funding funds to create new public housing units. BHA is eager to pursue any and all sources for the preservation and/or creation of new public housing units. This may include private and public sources, funds for housing specific populations, funds for "green" (energy-efficient and healthy) affordable housing, etc. We welcome specific suggestions.

**Need: Specific Family Types: Families at or below 30% of median**

**Strategy 1: Target available assistance to families at or below 30 % of AMI**

Select all that apply

- Exceed HUD federal targeting requirements for families at or below 30% of AMI in public housing. *However, given the demographics of the public housing wait list it is anticipated that new admissions at or below 30% of median area income will significantly exceed 40%.*
- Exceed HUD federal targeting requirements for families at or below 30% of AMI in tenant-based section 8 assistance. *However, given the demographics of the public housing wait list it is anticipated that new admissions at or below 30% of median area income will significantly exceed 40%.*
- Employ admissions preferences aimed at families with economic hardships
- Adopt rent policies to support and encourage work
- Other: (list below)

**Need: Specific Family Types: Families at or below 50% of median**

**Strategy 1: Target available assistance to families at or below 50% of AMI**

Select all that apply

- Employ admissions preferences aimed at families who are working (in Leased Housing Programs)
- Adopt rent policies to support and encourage work
- Other: (list below)  
HomeBase Program, and Healthy Start in Housing in Public Housing  
Leading the Way Home, Housing Chronically Homeless Elders (age 62 or older),  
Moving On for the City of Boston, Rapid Rehousing Program, City of Boston Coordinated  
Access System Referral and NED Program in Section 8



**Need: Specific Family Types: The Elderly**

**Strategy 1: Target available assistance to the elderly:**

Select all that apply

- X: Seek designation of public housing for the elderly
- X: Apply for special-purpose vouchers targeted to the elderly, should they become available
- X : Other: (list below)  
Housing Chronically Homeless Elders (age 62 or older)  
When possible, develop additional units for low-income elders

**Need: Specific Family Types: Families with Disabilities**

**Strategy 1: Target available assistance to Families with Disabilities:**

Select all that apply

- X: Implementing preference for disabled persons in family public housing
- X: Apply for special-purpose vouchers targeted to families with disabilities, should they become available
- X: Affirmatively market to local non-profit agencies that assist families with disabilities
- X : Other: (list below)
  - Provide preference to developers seeking Section 8 Project Based Vouchers in developments that provide services for families with disabilities.
  - HOPWA in Public Housing
  - Supported Housing Programs in Public Housing
  - Section 8 Moderate Rehab Supported Housing Programs
  - Social Innovation Financing (SIF)
  - VASH Program in Section 8
  - Chronically Homeless
  - Moving On for the City of Boston
  - City of Boston Coordinated Access System Referrals

**Need: Specific Family Types: Races or ethnicities with disproportionate housing needs**

**Strategy 1: Increase awareness of PHA resources among families of races and ethnicities with disproportionate needs:**

Select if applicable

- \_\_\_: Affirmatively market to races/ethnicities shown to have disproportionate housing needs
- X : Other: (list below)

As necessary affirmatively market to races/ethnicities shown to have disproportionate needs in the administration of site based waiting lists in the public housing program (see ACOP).

**Strategy 2: Conduct activities to affirmatively further fair housing**

Select all that apply

- X: Counsel section 8 tenants as to location of units outside of areas of poverty or minority concentration and assist them to locate those units
- X: Market the section 8 program to owners outside of areas of poverty /minority concentrations
- X : Other: (list below)  
Actively participate with the City of Boston in the development of an Assessment of Fair Housing and implementation of the Consolidated Housing Plan for the City of Boston.

**Other Housing Needs & Strategies: (list needs and strategies below)**

**(2)Reasons for Selecting Strategies**

Of the factors listed below, select all that influenced the PHA’s selection of the strategies it will pursue:

- Funding constraints
- Staffing constraints
- Limited availability of sites for assisted housing
- Extent to which particular housing needs are met by other organizations in the community
- Evidence of housing needs as demonstrated in the Consolidated Plan and other information available to the PHA
- Influence of the housing market on PHA programs
- Community priorities regarding housing assistance
- Results of consultation with local or state government
- Results of consultation with residents and the Resident Advisory Board
- Results of consultation with advocacy groups

1  Other: (list below)

## 2. Eligibility, Selection and Admissions Policies, including Deconcentration and Wait list Procedures

### A. Public Housing

Exemptions: PHAs that do not administer public housing are not required to complete this subcomponent.

#### (1) Eligibility

- a. When does the PHA verify eligibility for admission to public housing? (select all that apply)
- When families are within a certain number of being offered a unit: (state number)
  - When families are within a certain time of being offered a unit: (state time)
  - Other: (describe) At the time of preliminary application as well as when the applicant nears the top of the wait list. In addition the BHA verifies eligibility for admission for proposed additions to current households' family composition, personal care attendants/live-in aides, and for residual tenancy applicants.
- b. Which non-income (screening) factors does the PHA use to establish eligibility for admission to public housing (select all that apply)?
- Criminal or Drug-related activity
  - Rental history
  - Housekeeping which may include home visits when negative housekeeping history is documented
  - Other (describe) behavior towards landlords, neighbors, BHA staff, treatment of property, credit history, utility payment history, and eligible immigration status In addition the BHA will comply with the HUD's Enterprise Income Verification (EIV) reporting for bad debts requirements and checking eviction history when reported through the EIV system.
- c.  Yes  No: Does the PHA request criminal records from local law enforcement agencies for screening purposes?
- d.  Yes  No: Does the PHA request criminal records from State law enforcement agencies for screening purposes?
- e.  Yes  No: Does the PHA access FBI criminal records from the FBI for screening purposes? (either directly or through an NCIC-authorized source) The BHA is working on obtaining the access and will abide by all required protocol. In addition the BHA uses the Dru Sjodin –SORI- and the National Sex Offender Registry.

#### (2) Waiting List Organization

- a. Which methods does the PHA plan to use to organize its public housing waiting list (select all that apply)
- Community-wide list

- Sub-jurisdictional lists
- Site-based waiting lists
- Other (describe)

b. Where may interested persons apply for admission to public housing?

- PHA main administrative office
- PHA development site management office (obtain information)
- Other: by mail, if out of state or as a reasonable accommodation  
May obtain application information by phone, via e-mail, and by downloading forms from the BHA website ([www.bostonhousing.org](http://www.bostonhousing.org)). Applications may be mailed for those living out of state or as a reasonable accommodation.

c. If the PHA plans to operate one or more site-based waiting lists in the coming year, answer each of the following questions; if not, skip to subsection **(3) Assignment**

1. How many site-based waiting lists will the PHA operate in the coming year? 50 public housing; and 5 HOPE VI and 1 at Franklin Hill and Old Colony privately operated by the owners.
2.  Yes  No: Are any or all of the PHA's site-based waiting lists new for the upcoming year (that is, they are not part of a previously-HUD-approved site based waiting list plan)?  
If yes, how many lists?
3.  Yes  No: May families be on more than one list simultaneously  
If yes, how many lists? All lists for which they meet the threshold eligibility criteria.
4. Where can interested persons obtain more information about and sign up to be on the site-based waiting lists (select all that apply)?
  - PHA main administrative office
  - All PHA development management offices (obtain information)
  - Management offices at developments with site-based waiting lists
  - At the development to which they would like to apply
  - Other: Obtain information by visiting the BHA's website ([www.bostonhousing.org](http://www.bostonhousing.org)), or by mail, phone, and via e-mail. HOPE VI and other mixed finance redevelopment sites – Mission Main, Orchard Gardens, Orchard Commons, Washington Beech, Maverick Landing, Franklin Hill, and Old Colony Phase I, II, III, and IV - maintain and establish their own waiting lists for public housing units. Waiting lists for all Section 8 project-based voucher and Moderate Rehabilitation units, however, are maintained by BHA. In addition, the BHA will maintain the public housing and Section 8 Project-Based waiting lists for Heritage and Lower Mills.

**(3)Assignment**

a. How many vacant unit choices are applicants ordinarily given before they fall to the bottom of or are removed from the waiting list? (select one)

- One
- Two
- Three or More

b.  Yes  No: Is this policy consistent across all waiting list types?

c. If answer to b is no, list variations for any other than the primary public housing waiting list/s for the PHA:

**(4)Admissions Preferences**

a. Income targeting:

- Yes  No: Does the PHA plan to exceed the federal targeting requirements by targeting more than 40% of all new admissions to public housing to families at or below 30% of median area income? *However, given the demographics of the public housing wait list it is anticipated that new admissions at or below 30% of median area income will significantly exceed 40%.*

b. Transfer policies:

In what circumstances will transfers take precedence over new admissions? (list below)

- Special Circumstances (Every other fourth unit by Bedroom Size by Development will be offered to Special Circumstances Transfers)
- Overhoused: (by 2 or more bedrooms are considered as Administrative Transfers)
- Underhoused: (by 3 or more bedrooms are considered Special Circumstances Transfers)
- Medical justification: (in a life threatening situation)
- Administrative reasons determined by the PHA (e.g., to permit modernization work, address severe over housing, make apartments with special features available to persons with disabilities, address safety needs due to domestic violence related matters, etc.)
- Resident choice: (state circumstances below) Elderly/Disabled living in family housing transfer to elderly/disabled housing; Non-Elderly Disabled residing in Elderly/Disabled Housing transferring to Family Housing; residents living in studio apartments for two years or longer and in good standing may elect to transfer to 1BR units.
- Other: (list below) under or over housed transfers if site is 98% occupied.

Note: Transfers in checked boxes above take precedence over new admissions in highest priority category as follows: 1) Administrative Transfers will take precedence over Special Circumstances Transfers and all new admissions; 2) Special Circumstances will take precedence over new admissions for every other fourth unit by development by

bedroom size; 3) Under or Over housed Transfers will be offered every eighth unit by development by bedroom size if the site is at the 98% occupancy rate.

c. Preferences

1.  Yes  No: Has the PHA established preferences for admission to public housing (other than date and time of application)? (If “no” is selected, skip to next subsection **Occupancy**)
  
2. Which of the following admission preferences does the PHA plan to employ in the coming year? (select all that apply from either former Federal preferences or other preferences)

Former Federal preferences:

- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner [No-Fault Court-Ordered Eviction Only], Inaccessibility [Disabled Applicant Only], Property Disposition, Condemnation, Displacement by any low-rent housing project or by public slum clearance or urban renewal project), Victims of reprisals or hate crimes
- Victims of domestic violence
- Substandard housing
- Homelessness
- High rent burden (rent is > 50 percent of income) (for Elderly/Disabled Program only)
- Imminent Landlord displacement (for Elderly/Disabled housing program only)

Other preferences: (select below)

- Working families and those unable to work because of age or disability
- Veterans and veterans’ families
- Residents who live and/or work in the jurisdiction
- Those enrolled currently in educational, training, or upward mobility programs
- Households that contribute to meeting income goals (broad range of incomes)
- Households that contribute to meeting income requirements (targeting)
- Those previously enrolled in educational, training, or upward mobility programs
- Other preference(s) (list below)
  - Disabled head or co-head (family housing program only) if does not require a wheelchair accessible unit.
  - Designated Housing Preference (for Elderly/Disabled housing program only) if does not require a wheelchair accessible unit.
  - Displaced Resident from a Unit in the City of Boston Preference
  - Supported Housing Programs made housing offers before Priority One Applicants.

3. If the PHA will employ admissions preferences, please prioritize by placing a “1” in the space that represents your first priority, a “2” in the box representing your second priority, and so on. If you give equal weight to one or more of these choices (either

through an absolute hierarchy or through a point system), place the same number next to each. That means you can use “1” more than once, “2” more than once, etc.

Date and Time: Only factor among residents/clients with same priority/preference status

Former Federal preferences:

1 Involuntary Displacement (Natural Disaster, Condemnation, Government Action, Action of Housing Owner [No-Fault Court-Ordered Eviction Only], Inaccessibility [Disabled Applicant Only] Displacement by any low-rent housing project or by public slum, victims of reprisals or hate crimes

1 Victims of domestic violence

1 Homelessness

2 High rent burden (Elderly/Disabled program only)

2 Imminent landlord displacement (Elderly/Disabled program only)

Other preferences (select all that apply)

Working families and those unable to work because of age or disability

Veterans and veterans’ families

Residents who live and/or work in the jurisdiction

Those enrolled currently in educational, training, or upward mobility programs

Households that contribute to meeting income goals (broad range of incomes)

Households that contribute to meeting income requirements (targeting)

Those previously enrolled in educational, training, or upward mobility programs

Other preference(s) (list below)

- Disabled head or co-head (family housing program only) if does not require a wheelchair accessible unit.
- Designated Housing Preference (for Elderly/Disabled housing program only) if does not require a wheelchair accessible unit.
- Displaced Resident from a unit in the City of Boston Preference
- Supported Housing Programs made housing offers before Priority One Applicants.

4. Relationship of preferences to income targeting requirements:

The PHA applies preferences within income tiers: Income tiers are used in our HOPE VI redevelopment sites and at our non-HOPE VI redevelopment sites, including West Broadway and Franklin Hill. Income tiering is in effect only after existing residents in good standing have the opportunity to return to the redeveloped site, regardless of their income.

Not applicable: the pool of applicant families ensures that the PHA will meet income targeting requirements

**(5)Occupancy**

a. What reference materials can applicants and residents use to obtain information about the rules of occupancy of public housing (select all that apply)

- The PHA-resident lease
- The PHA’s Admissions and Continued Occupancy policy
- PHA briefing seminars or written materials
- Other source (list): BHA website ([www.bostonhousing.org](http://www.bostonhousing.org)), BHA Reasonable Accommodation Policy, Limited English Proficiency (LEP) Policy, BHA Pet Policies, Transfer Guide, Violence Against Women Act (VAWA) Policy, Rent Manual – available at management offices. For mixed-finance properties may reference the ACOP and/or Administrative Plan available with management.

b. How often must residents notify the PHA of changes in family composition? (select all that apply)

- At an annual reexamination and lease renewal
- Any time family composition changes
- At family request for revision
- Other (list)

**(6)Deconcentration and Income Mixing**

a.  Yes  No: Did the PHA’s analysis of its family (general occupancy) developments to determine concentrations of poverty indicate the need for measures to promote deconcentration of poverty or income mixing?

b.  Yes  No: Did the PHA adopt any changes to its **admissions policies** based on the results of the required analysis of the need to promote deconcentration of poverty or to assure income mixing?

c. If the answer to b was yes, what changes were adopted? (select all that apply)

- Adoption of site-based waiting lists  
If selected, list targeted developments below:
- Employing waiting list “skipping” to achieve deconcentration of poverty or income mixing goals at targeted developments  
If selected, list targeted developments below:
- Employing new admission preferences at targeted developments  
If selected, list targeted developments below:
- Other (list policies and developments targeted below)



d.  Yes  No: Did the PHA adopt any changes to **other** policies based on the results of the required analysis of the need for deconcentration of poverty and income mixing?

e. If the answer to d was yes, how would you describe these changes? (select all that apply)

- Additional affirmative marketing
- Actions to improve the marketability of certain developments
- Adoption or adjustment of ceiling rents for certain developments
- Adoption of rent incentives to encourage deconcentration of poverty and income-mixing
- Other (list below)

f. Based on the results of the required analysis, in which developments will the PHA make special efforts to attract or retain higher-income families? (select all that apply)

- Not applicable: results of analysis did not indicate a need for such efforts
- List (any applicable) developments below:

g. Based on the results of the required analysis, in which developments will the PHA make special efforts to assure access for lower-income families? (select all that apply)

- Not applicable: results of analysis did not indicate a need for such efforts
- List (any applicable) developments below:

## B. Section 8

Exemptions: PHAs that do not administer section 8 are not required to complete this sub-component.

**Unless otherwise specified, all questions in this section apply only to the tenant-based section 8 assistance program (vouchers, and until completely merged into the voucher program, certificates).**

### (1) Eligibility

a. What is the extent of screening conducted by the PHA? (select all that apply)

- Criminal or drug-related activity only to the extent required by law or regulation
- Criminal and drug-related activity, more extensively than required by law or regulation
- More general screening than criminal and drug-related activity (list factors below)
- Other (list below) eligible immigration status, priority and preference verification

b.  Yes  No: Does the PHA request criminal records from local law enforcement agencies for screening purposes?

- c.  Yes  No: Does the PHA request criminal records from State law enforcement agencies for screening purposes?
- d.  Yes  No: Does the PHA access FBI criminal records from the FBI for screening purposes? (either directly or through an NCIC-authorized source) The BHA is working on obtaining the access and will ensure to comply with all required protocols. In addition the BHA uses the Dru Sjodin –SORI- and the National Sex Offender Registry.
- e. Indicate what kinds of information you share with prospective landlords? (select all that apply)
- Criminal or drug-related activity
- Other (describe below)

**(2)Waiting List Organization**

- a. With which of the following program waiting lists is the Section 8 Tenant-Based assistance waiting list merged? (select all that apply)
- None
- Federal public housing
- Federal moderate rehabilitation
- Federal project-based certificate program
- Other federal or local program (list below)
- b. Where may interested persons apply for admission to section 8 tenant-based assistance? (select all that apply)
- PHA main administrative office Leased Housing Division-Occupancy Department and mail. Application information can be obtained via website ([www.bostonhousing.org](http://www.bostonhousing.org)), phone, and e-mail. The tenant-based waiting list has been closed since October 2008.
- Other: There are several special admissions programs run by the BHA with non-profit partners which allow applications on a referral basis to eligible families.

**(3)Search Time**

- a.  Yes  No: Does the PHA give extensions on standard 60-day period to search for a unit?

If yes, state circumstances below: See Leased Housing Administrative Plan Chapter 7.2 **Voucher Term Length, Tolling, Extension, Expiration and Withdrawal**

**(4) Admissions Preferences**

- a. Income targeting

Yes  No: Does the PHA plan to exceed the federal targeting requirements by targeting more than 75% of all new admissions to the section 8 program to families at or below 30% of median area income?

b. Preferences

1.  Yes  No: Has the PHA established preferences for admission to section 8 tenant-based assistance? (other than date and time of application) (if no, skip to subcomponent **(5) Special purpose section 8 assistance programs**)

2. Which of the following admission preferences does the PHA plan to employ in the coming year? (select all that apply from either former Federal preferences or other preferences)

Former Federal preferences

- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner through no fault of your own, Inaccessibility, Property Disposition), victims of reprisals or hate crimes
- Victims of domestic violence
- Substandard housing
- Homelessness
- High rent burden (rent is > 50 percent of income)

Other preferences (select all that apply)

- Working families and those unable to work because of age or disability
- Veterans and veterans' families
- Residents who live and/or work in your jurisdiction
- Those enrolled currently in educational, training, or upward mobility programs
- Households that contribute to meeting income goals (broad range of incomes)
- Households that contribute to meeting income requirements (targeting)
- Those previously enrolled in educational, training, or upward mobility programs
- Other preference(s) (list below)

1. Project-Based Voucher Residents who have completed 1 Year residency and are in good standing may opt for a tenant-based voucher when available.
2. Condemnation
3. Transfer from BHA public housing or Section 8 Moderate Rehabilitation Program or Project-Based Voucher programs because of health, safety, BHA rehabilitation programs, reasonable accommodation, and humanitarian reasons
4. One or two-persons both elderly, disabled or displaced families (including persons who are displaced as a result of expiring use) over other singles.
5. A participant in a supportive housing program for elderly or disabled persons shall be considered to be imminently in danger of homelessness and shall be eligible for Priority One status if the program participant: 1) has been a tenant in such program for not less than twelve (12) months; AND 2) has outgrown or completed the program's services; AND 3) as a result must relocate from such housing.
6. Displaced Former Boston Resident.

7. Applicants referred by Boston Public Health Commission for participation in The Social Innovation Financing (SIF) Program
8. Applicants referred by Massachusetts Department of Housing and Community Development for Leading the Way Home Program
9. Priority one non-elderly disabled applicants who, in accordance with the BHA's Designated Housing Plan would have otherwise been called in for screening for a BHA public housing unit will be referred to Leased Housing
10. Applicants referred by the City of Boston who currently occupy transitional housing with supportive services and are no longer in need of such services.
11. Applicants referred by HomeStart for the Rapid Rehousing program
12. Applicants referred by the City of Boston for the Coordinated Access System
13. PBV participants who are displaced through no fault of their own
14. Former residents returning to a new construction PBV site that was identified as replacement housing

3. If the PHA will employ admissions preferences, please prioritize by placing a "1" in the space that represents your first priority, a "2" in the box representing your second priority, and so on. If you give equal weight to one or more of these choices (either through an absolute hierarchy or through a point system), place the same number next to each. That means you can use "1" more than once, "2" more than once, etc.

Date and Time: (Only a factor among residents with same

priority status) Former Federal preferences

- 1 Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition), victims of reprisals or hate crimes
- 1 Victims of domestic violence

Other preferences (select all that apply)

- Working families and those unable to work because of age or disability
- Veterans and veterans' families
- Residents who live and/or work in your jurisdiction
- Those enrolled currently in educational, training, or upward mobility programs
- Households that contribute to meeting income goals (broad range of incomes)
- Households that contribute to meeting income requirements (targeting)
- Those previously enrolled in educational, training, or upward mobility programs
- Other preference(s) (list below)

Priority	Category
PBV	Project-Based Voucher Residents who have completed 1 Year residency and are in good standing may opt for a tenant-based voucher when available.*

Special Purpose Vouchers	Special Purpose Vouchers: The BHA will admit an Applicant who qualifies for a particular category of Special Purpose Vouchers to the Section 8 program before all other Applicants on the waiting list if the BHA is not currently assisting the required number of special purpose vouchers families
Super	Transfer from BHA public housing, Section 8 Moderate Rehabilitation Program or Project-Based Voucher programs because of health, safety, BHA rehabilitation programs, reasonable accommodation, and humanitarian reasons*
1	Condemnation
1	Homeless families and individuals residing in shelters
1	A participant in a supportive housing program for elderly or disabled persons shall be considered to be imminently in danger of homelessness and shall be eligible for Priority One status if the program participant: 1) has been a tenant in such program for not less than twelve (12) months; <u>AND</u> 2) has outgrown or completed the program's services; <u>AND</u> 3) as a result must relocate from such housing.
Preference Points	One or two-person elderly, disabled or displaced families (including persons who are displaced as a result of expiring use) over other singles.
Preference Points	Preference Under Olmstead  The BHA has an admissions preference for those qualified individuals with mental and/or physical disabilities exiting institutions or who are at serious risk of institutionalization. Applicants who receive this preference must be willing to participate in services as provided by State Money Follows the Person (MFP) entities or other support service agencies and partnering organizations. The services may include case management and personal care
Preference Points	Homeless Service Organizations Preference The BHA has an admissions preference for those applicants who are referred by a partnering homeless service organization or consortia of homeless service organizations. This preference will be applied to specific site based lists where supported housing services are offered by said organization.
Preference Points	Displaced Resident from a unit in the City of Boston Preference

\*The Section 8 Tenant-Based Voucher waiting list is closed except for current BHA Project Based Housing Choice Voucher participants who meet the eligibility requirements as established in the Administrative Plan and are ranked above all other Section 8 Tenant-Based Housing Choice waiting list applicants, current BHA Residents who are determined to qualify for Super priority and priority one non-elderly disabled public housing applicants who in accordance with the BHA's Designated Housing Plan would have otherwise been called in for screening for a BHA public housing unit. Referrals will be accepted from City of Boston Interagency Council on Housing and Ending Homelessness Programs, and Leading the Way Home as funding permits.

The following chart further demonstrates the BHA's priority/preference categories and how they are ranked:

### Section 8 Admissions Point System

- (a) The **Priority point system** used by BHA to process new Admissions on all waiting lists is as follows:

PBV w/ 1 Year residency	<b>95 points</b>
Super Priority Applicants	<b>75 points</b>
Mitigation Vouchers	<b>60 points</b>
City of Boston ICHH Programs Priority	<b>50 points</b>
Priority One Applicants	<b>30 points</b>
Standard Applicants	<b>0 points</b>

(b) **Preference points** will be added to Priority points as follows for Applicants for Admission only:

1. Project Based Voucher Elderly	<b>100 Points</b>
2. Right of First Refusal	<b>25 Points</b>
3. No Fault Displacement	<b>20 Points</b>
4. Preference under Olmstead	<b>7 Points</b>
5. Homeless Service Organizations	<b>7 Points</b>
6. Single Elderly or Disabled	<b>5 Points</b>
7. Veterans Preference	<b>3 points</b>
8. Displaced Boston Resident Preference	<b>2 points</b>
9. Working Families, Single Disabled, Single Elderly Preference	<b>1 points</b>

4. Among applicants on the waiting list with equal preference status, how are applicants selected? (select one)

- Date and time of application (after lottery for Housing Choice Voucher Program tenant-based)
- Drawing (lottery) or other random choice technique

5. If the PHA plans to employ preferences for “residents who live and/or work in the jurisdiction” (select one)

- This preference has previously been reviewed and approved by HUD for Displaced Resident from a unit in the City of Boston
- The PHA requests approval for this preference through this PHA Plan

6. Relationship of preferences to income targeting requirements: (select one)

- The PHA applies preferences within income tiers
- Not applicable: the pool of applicant families ensures that the PHA will meet income targeting requirements

**(5) Special Purpose Section 8 Assistance Programs**

a. In which documents or other reference materials are the policies governing eligibility, selection, and admissions to any special-purpose section 8 program administered by the PHA contained? (select all that apply)

- The Section 8 Administrative Plan
- Briefing sessions and written materials

Other: Section 8 Moderate Rehabilitation Administrative Plan, Reasonable Accommodation Policy, BHA Limited English Proficiency Policy, Individual program mailings (i.e. Family Self-Sufficiency (FSS) program marketing), advocacy group meetings, support service groups, [www.bostonhousing.org](http://www.bostonhousing.org)

b. How does the PHA announce the availability of any special-purpose section 8 programs to the public?

Through published notices

Other: Press releases and Marketing to targeted support service groups

### 3. Financial Resources

List the financial resources that are anticipated to be available to the PHA for the support of Federal public housing and tenant-based Section 8 assistance programs administered by the PHA during the Plan year. Note: the table assumes that Federal public housing or tenant based Section 8 assistance grant funds are expended on eligible purposes; therefore, uses of these funds need not be stated. For other funds, indicate the use for those funds as one of the following categories: public housing operations, public housing capital improvements, public housing safety/security, public housing supportive services, Section 8 tenant-based assistance, Section 8 supportive services or other.

<b>Financial Resources: Planned Sources and Uses</b>		
<b>Sources</b>	<b>Planned \$</b>	<b>Planned Uses</b>
<b>1. Federal Grants</b>		
1a. Public Housing Operating Fund	\$57,457,803	
1b. Public Housing Capital Fund	\$17,974,951	
1c. HOPE VI Revitalization	-----	
1d. HOPE VI Demolition	-----	
1e. Annual Contributions for Section 8 Tenant-Based Assistance	\$207,426,339	
1f. Public Housing Drug Elimination Program (including any Technical Assistance funds)	-----	
1g. Resident Opportunity/Self-Sufficiency Grants	-----	
1h. Community Development Block Grant	-----	-----
1i. HOME	-----	-----
1j. Project Based Section 8	\$8,881,396	
<b>2. Prior Year Federal Grants (unobligated funds only)</b>		
2a. CGP/DDTF	\$11,456,595	
2b. HOPE VI	\$26,387,068	
3. Public Housing Dwelling Rental Income	\$35,600,000	Operating
4. Other income, Vending /Laundry, Cell Towers, Insurance settlements, Tenant Damages	\$800,000	Operating, Social Services
4a. Investment income	\$10,000	Operating
4b. Non-dwelling rent	\$12,000	Operating
<b>5. Non-federal sources (list below)</b>		
Donations	\$20,000	Social Services
<b>Total resources</b>	<b>\$366,026,152</b>	



#### 4. Rent Determination

##### A. Public Housing

Exemptions: PHAs that do not administer public housing are not required to complete this sub-component.

##### (1) Income Based Rent Policies

Describe the PHA's income based rent setting policy/ies for public housing using, including discretionary (that is, not required by statute or regulation) income disregards and exclusions, in the appropriate spaces below.

a. Use of discretionary policies: (select one)

- The PHA will not employ any discretionary rent-setting policies for income based rent in public housing. Income-based rents are set at the higher of 30% of adjusted monthly income, 10% of unadjusted monthly income, the welfare rent, or minimum rent (less HUD mandatory deductions and exclusions). (If selected, skip to sub-component (2))

---or---

- The PHA employs discretionary policies for determining income based rent (If selected, continue to question b.)

b. Minimum Rent

1. What amount best reflects the PHA's minimum rent? (select one)

- \$0  
 \$1-\$25  
 \$26-\$50

2.  Yes  No: Has the PHA adopted any discretionary minimum rent hardship exemption policies?

3. If yes to question 2, list these policies below:

c. Rents set at less than 30% than adjusted income

1.  Yes  No: Does the PHA plan to charge rents at a fixed amount or percentage less than 30% of adjusted income?

2. If yes to above, list the amounts or percentages charged and the circumstances under which these will be used below:

d. Which of the discretionary (optional) deductions and/or exclusions policies does the PHA plan to employ (select all that apply)

- For the earned income of a previously unemployed household member
- For increases in earned income (between annual recertifications)
- Fixed amount (other than general rent-setting policy)  
If yes, state amount/s and circumstances below:
  
- Fixed percentage (other than general rent-setting policy)  
If yes, state percentage/s and circumstances below:
  
- For household heads
- For other family members
- For transportation expenses
- For the non-reimbursed medical expenses of non-disabled or non-elderly families
- Other (describe below)

e. Ceiling rents

1. Do you have ceiling rents? (rents set at a level lower than 30% of adjusted income) (select one)

- Yes for all developments
- Yes but only for some developments
- No

2. For which kinds of developments are ceiling rents in place? (select all that apply)

- For all developments (includes family and elderly/disabled developments; excludes HOPE VI and redeveloped properties)
- For all general occupancy developments (not elderly or disabled or elderly only)
- For specified general occupancy developments
- For certain parts of developments; e.g., the high-rise portion
- For certain size units; e.g., larger bedroom sizes
- Other (list below)

3. Select the space or spaces that best describe how you arrive at ceiling rents (select all that apply)

- Market comparability study
- Fair market rents (FMR)
- 95<sup>th</sup> percentile rents

- 75 percent of operating costs
- 100 percent of operating costs for general occupancy (family) developments
- Operating costs plus debt service
- The “rental value” of the unit
- Other (list below) Set at Flat Rent levels for each bedroom size (80% of Fair Market Rent)

f. Rent re-determinations:

1. Between income reexaminations, how often must tenants report changes in income or family composition to the PHA such that the changes result in an adjustment to rent? (select all that apply)

- Never
- At family option (if income decreases)
- Any time the family experiences an income increase
- Any time a family experiences an income increase above a threshold amount or percentage: (if selected, specify threshold) \_\$200/month\_\_\_\_\_
- Other (list below)

g.  Yes  No: Does the PHA plan to implement individual savings accounts for residents (ISAs) as an alternative to the required 12 month disallowance of earned income and phasing in of rent increases in the next year?

**(2)Flat Rents**

1. In setting the market-based flat rents, what sources of information did the PHA use to establish comparability? (select all that apply.)

- The section 8 rent reasonableness study of comparable housing
- Survey of rents listed in local newspaper
- Survey of similar unassisted units in the neighborhood
- Other (list/describe below) HOPE VI sites set their own flat rents. For updated flat rent information, contact the respective management offices.

The Boston Housing Authority will set the flat rental amount for each public housing unit that complies with the requirement that all flat rents be set at no less than 80 percent of the applicable Fair Market Rent (FMR) adjusted, if necessary, to account for reasonable utilities costs. For current program participants that pay the flat rental amount, the new flat rental amount will be offered, as well as the income-based rental amount, at the next annual rental option.

The Boston Housing Authority will place a cap on any increase in a family's rental payment that exceeds 35 percent, and is a result of changes to the flat rental amount as follows:

- Multiply the existing flat rental payment by 1.35 and compare that to the updated flat rental amount;
- The BHA will present two rent options to the family as follows:
  - the lower of the product of the calculation and the updated flat rental amount; and
  - the income-based rent.

The Flat rent amount by bedroom size will be reviewed yearly each October and any necessary changes will become effective by 1<sup>st</sup> of January. The BHA will maintain a current listing of its flat rent schedule as an appendix to the BHA Rent Manual and will provide this list to residents at least annually as part of the TSR process.

- A. Financial Hardship: Residents who choose flat rents may request to change to an income-based rent at any time if the family is unable to pay the flat rent because of financial hardship. A financial hardship exists for these purposes when a family's income is reduced or their deductions are increased to the extent that an income-based rent is lower than the flat rent.
- B. Annual Recertifications: Residents who choose flat rents will be asked to update their family information every year, but will only have to re-certify income verification once every three years.

## **B. Section 8 Tenant-Based Assistance**

Exemptions: PHAs that do not administer Section 8 tenant-based assistance are not required to complete this sub-component. **Unless otherwise specified, all questions in this section apply only to the tenant-based section 8 assistance program (vouchers, and until completely merged into the voucher program, certificates).**

### **(1) Payment Standards**

Describe the voucher payment standards and policies.

a. What is the PHA's payment standard? (select the category that best describes your standard)

- At or above 90% but below 100% of FMR
- 100% of FMR
- Above 100% but at or below 110% of FMR
- Above 110% of FMR (if HUD approved; describe circumstances below)

b. If the payment standard is lower than FMR, why has the PHA selected this standard?  
(select all that apply)

- FMRs are adequate to ensure success among assisted families in the PHA's segment of the FMR area
- The PHA has chosen to serve additional families by lowering the payment standard
- Reflects market or submarket
- Other (list below) – Not Applicable

c. If the payment standard is higher than FMR, why has the PHA chosen this level?  
(select all that apply)

- FMRs are not adequate to ensure success among assisted families in the PHA's segment of the FMR area
- Reflects market or submarket
- To increase housing options for families
- Other (list below)

d. How often are payment standards reevaluated for adequacy? (select one)

- Annually
- Other (list below) As needed, but at minimum annually.

e. What factors will the PHA consider in its assessment of the adequacy of its payment standard? (select all that apply)

- Success rates of assisted families
- Rent burdens of assisted families
- Other (list below) Market Conditions

## **(2) Minimum Rent**

a. What amount best reflects the PHA's minimum rent? (select one)

- \$0
- \$1-\$25
- \$26-\$50

b.  Yes  No: Has the PHA adopted any discretionary minimum rent hardship exemption policies? (if yes, list below)

## 5. Operations and Management

Exemptions from this Component: High performing and small PHAs are not required to complete this section. Section 8 only PHAs must complete parts A, B, and C(2)

### A. PHA Management Structure

Describe the PHA's management structure and organization.

(select one)

An organization chart showing the PHA's management structure and organization is on page 82.

A brief description of the management structure and organization of the PHA follows:

DEVELOPMENT NAME	ADDRESS	BHA MANAGED	PRIVATELY MANAGED
Alice H. Taylor	71 Prentiss Street, Roxbury, MA 02120	X	
Amory Street	125 Amory Street, Jamaica Plain, 02119	X	
Annapolis	52 Summer Street, Dorchester, MA 02122	X	
Ashmont	374 Ashmont Street, Dorchester, MA 02124	X	
Ausonia	185 Fulton Street, Boston, MA 02109	X	
Barkley (Cathedral)	1472 Washington Street, Boston, MA 02118	X	
Bellflower	24 Bellflower Street, Dorchester, MA 02125	X	
Charlestown	55 Bunker Hill Avenue, Charlestown, MA 02129	X	
Codman	784 Washington Street, Dorchester, MA 02124	X	
Commonwealth	35 Fidelis Way, Brighton, MA 02135		X
Davison	101 Davison Street, Hyde Park, MA 02136	X	
Eva White	440 Tremont Street, Boston, MA 02116		X
Foley	199 "H" Street, South Boston, MA 02127	X	
Franklin Field	91 Ames Street, Dorchester, MA 02124	X	
Franklin Hill Aptmts.	113 Shandon Road, Dorchester, MA 02124		X
Frederick Douglass	755 Tremont Street, Roxbury, MA 02118	X	
General Warren	47 Washington St #26, Charlestown, MA 02129		X
Groveland	15 Mary Moore Beatty Circle, Mattapan, MA 02126	X	
Hailey (Bromley Park)	42 Horan Way, Jamaica Plain, MA 02130	X	
Hampton House	155 Northampton Street, Roxbury, MA 02118	X	
Hassan	705 River Street, Mattapan, MA 02126	X	
Hailey (Heath Street)	42 Horan Way, Jamaica Plain, MA 02130	X	
Heritage	209 Summer Street, East Boston, MA 02128		X
Highland Park	16 Center Street, Roxbury, MA 02119		X
Holgate	125 Elm Hill Avenue, Roxbury, MA 02121	X	
J.J. Carroll	130 Chestnut Hill Street, Brighton, MA 02136		X

DEVELOPMENT NAME	ADDRESS	BHA MANAGED	PRIVATELY MANAGED
Lenox Street	136 Lenox Street, Roxbury, MA 02118	X	
Lower Mills	2262 Dorchester Avenue, Dorchester, MA 02124	X	
Malone	11 Gordon Avenue, Hyde Park, MA 02136	X	
Mary Ellen McCormack	354 Old Colony Avenue, South Boston, MA 02127	X	
Maverick Landing	42 Border Street, East Boston, MA 02128		X
Meade	5 Melville Avenue, Dorchester, MA 02124	X	
Martin Luther King Tower	280 Martin Luther King Boulevard, Roxbury, MA 02119	X	
Mission Main	43 Smith Street, Roxbury, MA 02120		X
Old Colony	255 East Ninth Street, South Boston, MA 02127	X	
Old Colony Phase 1, 2A, 2B, and 2C	25 James O'Neill Street, South Boston, MA 02127		X
Orchard Commons	2315 Washington Street, Roxbury, MA 02119		X
Orchard Gardens	25 Ambrose Street, Roxbury, MA 02119		X
Pascuicco	330 Bowdoin Street, Dorchester, MA 02122	X	
Patricia White	20 Washington Street, Brookline, MA 02146		X
Peabody/Englewood	1875 Dorchester Avenue, Dorchester, MA 02122	X	
Pond Street	29 Pond Street, Jamaica Plain, MA 02130	X	
Rockland	5300 Washington St., West Roxbury, MA 02132	X	
Roslyn	1 Cliffmont Street, Roslindale, MA 02132	X	
Rutland/E. Springfield	Scattered Site	X	
St. Botolph	70 St. Botolph Street, Boston, MA 02116	X	
Spring Street	23 Spring Street, West Roxbury, MA 02132	X	
Torre Unidad	80 West Dedham Street, Roxbury, MA 02119	X	
Walnut Park	1990 Columbus Avenue, Roxbury, MA 02119	X	
Washington/Beech	4550 Washington Street, Roslindale, MA 02130		X
Washington Manor	1701 Washington Street, Roxbury, MA 02118	X	
Washington Street	35 Fidelis Way, Brighton, MA 02135		X
West Newton Street	630 Tremont Street, Boston, MA 02118	X	
West Ninth Street	195 W. 9 <sup>th</sup> Street, South Boston, MA 02127	X	
Whittier Street	1170 Tremont Street, Roxbury, MA 02120	X	

**Note:** Sample contracts with management companies have been included with the Agency Plan supporting documents available in the Planning Department. In addition, the management assessment form used to evaluate performance at each site for both private management companies and in-house managers is available. Resident input in the evaluation of private management companies is considered through 1-2 private meetings with the resident organizations during the term of the contracts and prior to selection of contractors during contract renewal processes. Regular interaction between Local Tenant Organizations and BHA

supervisory staff informs and guides in assessing management performance at sites directly managed by the BHA.

**B. HUD Programs Under PHA Management (as of April 1, 2018)**

List Federal programs administered by the PHA, number of families served at the beginning of the upcoming fiscal year, and expected turnover in each. (Use “NA” to indicate that the PHA does not operate any of the programs listed below.)

<b>Program Name</b>	<b>Units or Families Served at Year Beginning</b>	<b>Expected Turnover</b>
Public Housing	8404*	613
Section 8 Vouchers	14,481**	720
Section 8 Certificates	0	
Section 8 Project Based voucher Program	1481	89
Section 8 Mod Rehab	738	0
Section 8 New Construction / Substantial Rehab Program	0	0
Special Purpose Section 8 Certificates/Vouchers (list individually)		
Veterans Administration Supportive Housing (VASH)	580	60
Mainstream Housing Program	300	17
Designated Housing Program vouchers for non-elderly disabled currently on BHA’s Elderly/Disabled Public Housing Program waiting list	200	6
Family Unification Program	129	9
NAACP	400	9
Public Housing Drug Elimination Program (PHDEP)	N/A	N/A
Other Federal Programs(list individually)		N/A



Elderly and Disabled Resident Services Program	3335	298
Supportive Housing Services Program	72	15
HOPE VI Resident Services Program	491	N/A
Section 8 Family Self-Sufficiency Program	141***	0
Resident Employment Program	93****	N/A
Public Housing Family Self-Sufficiency	50	N/A
Resident Services Program (ROSS funded)	400	N/A
Jobs Plus Pilot Program	300	N/A
Juvenile Reentry Assistance Program	65	N/A

\* total federal development only anticipated occupancy on 4/1/18.

\*\*This figure includes all HCVP and VASH units.

\*\*\*Currently enrolling new FSS participants.

\*\*\*\*Section 3 is a provision of the Housing and Urban Development (HUD) Act of 1968 that helps foster local economic development, neighborhood economic improvement, and individual self-sufficiency. The Section 3 program requires that recipients of certain HUD financial assistance, to the greatest extent feasible, provide job training, employment, and contracting opportunities for low- or very-low income residents in connection with projects and activities in their neighborhoods.

Section 3 residents are:

- Public housing residents or
- Persons who live in the area where a HUD-assisted project is located and who have a household income that falls below HUD's income limits.

-NA- These programs provide assistance to all eligible applicants so turnover rates are not applicable.

### **C. Management and Maintenance Policies**

List the PHA's public housing management and maintenance policy documents, manuals and handbooks that contain the Agency's rules, standards, and policies that govern maintenance and management of public housing, including a description of any measures necessary for the prevention or eradication of pest infestation (which includes cockroach infestation) and the policies governing Section 8 management.

(1) Agency-wide policies (govern both Public Housing and Section 8): (list below)

- Approach to Preservation
- Cash Management and Investment Policy
- Civil Rights Protection Plan
- Confidentiality & Confidentiality Agreement Policy
- Drug Free Workplace Policy
- EIV Security Manual
- Healthy Beverage Policy (aka Sugar-Sweetened Beverage Policy)
- Limited English Proficiency Policy
- Minority Participation Policy
- Procurement Policy
- Reasonable Accommodation Policy
- Resident Employment Provision
- Section 3 Policy
- Sexual Harassment Policy
- Social Media Participation Policy
- Storm Policy for Staff Attendance
- Sustainability Plan
- Technology Resources Usage Policy (E-mail)
- Tobacco Free Workplace Policy
- Video Surveillance System Policy
- Violence Against Women Act Policy

(1) Public Housing Maintenance and Management:

- (Site-Based) Admissions and Continued Occupancy Policy (ACOP)
- Community Service Policy
- Community Space Use Policy
- Deconcentration Policy
- Demolition/Disposition Policy
- Designated Housing Plan
- Non-Smoking Policy
- Pest Control Policy
- Pet Policy for the Elderly/Disabled Program
- Pet Policy for the Family Program
- Rent Manual
- Resident Relocation and Rehousing Policy
- Site Based Purchasing System Policy
- Standard Operating Procedures for Maintenance
- Tenant Grievance Procedures
- Tenant Participation (LTO) Policy

(2) Section 8 Management: (list below)

- Section 8 Administrative Plan
- Section 8 Moderate Rehabilitation Administrative Plan

## 6. Grievance Procedure

Exemptions from this component: High performing PHAs are not required to complete component 6. Section 8-Only PHAs are exempt from sub-component 6A.

### A. Public Housing

1.  Yes  No: Has the PHA established any written grievance procedures in addition to federal requirements found at 24 CFR Part 966, Subpart B, for residents of public housing?

If yes, list additions to federal requirements below:

Decisions of the Grievance Panel may be appealed to a designee of the Administrator.

In addition, Grievance Procedures are developed for each redevelopment site that transition to private ownership. The BHA worked with residents and owners from these sites and created a consistent, universal Mixed Finance Site Grievance Procedure. Residents seeking a grievance hearing are afforded the option of electing to have a hearing before a Grievance Hearing Panel or a Hearing Officer.

2. Which PHA office should residents or applicants to public housing contact to initiate the PHA grievance process? (select all that apply)

PHA main administrative office  
*BHA Department of Grievances and Appeals  
Hearing Panel Coordinator  
52 Chauncy Street, 9<sup>th</sup> Floor  
(617) 988-4579*

PHA development management offices

Other (list below): For sites owned and managed by private companies (the "Mixed Finance" sites), management offices at those sites.

### B. Section 8 Tenant-Based Assistance

1.  Yes  No: Has the PHA established informal review procedures for applicants to the Section 8 tenant-based assistance program and informal hearing procedures for families assisted by the Section 8 tenant-based assistance program in addition to federal requirements found at 24 CFR 982?

If yes, list additions to federal requirements below:

Please refer to Section 8 Administrative Plan

2. Which PHA office should applicants or assisted families contact to initiate the informal review and informal hearing processes? (select all that apply)

PHA main administrative office

*BHA Department of Grievances and Appeals  
52 Chauncy Street, 9<sup>th</sup> Floors  
(617) 988-4579*

Other (list below)

## 7. Homeownership Programs

### A. Public Housing

1.  Yes  No: Does the PHA administer any homeownership programs administered by the PHA under an approved section 5(h) homeownership program (42 U.S.C. 1437c(h)), or an approved HOPE I program (42 U.S.C. 1437aaa) or has the PHA applied or plan to apply to administer any homeownership programs under section 5(h), the HOPE I program, or section 32 of the U.S. Housing Act of 1937 (42 U.S.C. 1437z-4). (If “No”, skip to next component; if “yes”, complete one activity description for each applicable program/plan, unless eligible to complete a streamlined submission due to **small PHA** or **high performing PHA** status. PHAs completing streamlined submissions may skip to next component.)

2. Activity Description

Yes  No: Has the PHA provided all required activity description information for this component in the **optional** Public Housing Asset Management Table? (If “yes”, skip to next component. If “No”, complete the Activity Description table below.)

<b>Public Housing Homeownership Activity Description (Complete one for each development affected)</b>
1a. Development name: 1b. Development (project) number:
2. Federal Program authority: <input type="checkbox"/> HOPE I <input type="checkbox"/> 5(h) <input type="checkbox"/> Turnkey III <input type="checkbox"/> Section 32 of the USHA of 1937 (effective 10/1/99)
3. Application status: (select one) <input type="checkbox"/> Approved; included in the PHA’s Homeownership Plan/Program <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date Homeownership Plan/Program approved, submitted, or planned for submission: (DD/MM/YYYY)
5. Number of units affected: 6. Coverage of action: (select one) <input type="checkbox"/> Part of the development <input type="checkbox"/> Total development

**B. Section 8 Tenant Based Assistance**

1.  Yes  No: Does the PHA plan to administer a Section 8 Homeownership program pursuant to Section 8(y) of the U.S.H.A. of 1937, as implemented by 24 CFR part 982 ? (If “No”, skip to next component; if “yes”, describe each program using the table below (copy and complete questions for each program identified), unless the PHA is eligible to complete a streamlined submission due to high performer status. **High performing PHAs** may skip to next component.)

2. Program Description:

In accordance with the regulations promulgated by the Secretary of the United States Department of Housing and Urban Development, the Boston Housing Authority has implemented a Housing Choice Voucher Homeownership program. The mission of the Authority is to provide homeownership possibilities, self-sufficiency training and support, and facilitate community growth, while providing parameters which will attempt to minimize defaults which consequently have a negative impact on both the family and the community.

The Leased Housing Department has partnered with the City of Boston’s Department of Neighborhood Development. DND has an established First Time Home Buyers program. By partnering with our sister agency, the Leased Housing Division has dramatically expedited the implementation of this program. The partnership has strengthened and effectively broadened the impact of homeownership opportunities within the City by providing services, support and expertise in a myriad of areas.

**ELIGIBILITY ISSUES**

The homeownership option has and will continue to be offered to families participating in the Housing Choice Voucher Program and the Family Self-Sufficiency Program (FSS). A successful graduate of the FSS Program may also be eligible for homeownership.

**APPLICATION PROCESS**

Families applying or participating in the Housing Choice Voucher Program who indicate homeownership interest will have their eligibility determined by the Leased Housing Department’s Section 8 personnel. At the same time, the family will be referred to a HUD approved housing counseling agency, primarily to DND’s First Time Home Buyers Program or a similarly qualified agency, for the purpose of learning about the various responsibilities of owning a home. The topics may include, but not be limited to the following: home maintenance, budgeting and money management, credit counseling, financing, homeownership opportunities, fair housing lending and real estate settlement procedures. If necessary, the Authority may offer additional homeownership counseling to participants and has discretion to require the family to participate in ongoing counseling.

a. Size of Program  
 Yes  No: Will the PHA limit the number of families participating in the section 8 homeownership option?

If the answer to the question above was yes, which statement best describes the number of participants? (select one)

25 or fewer participants  
 26 - 50 participants  
 51 to 100 participants  
 more than 100 participants

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b. PHA-established eligibility criteria  
 Yes  No: Will the PHA's program have eligibility criteria for participation in its Section 8 Homeownership Option program in addition to HUD criteria?  
If yes, list criteria below:

To be eligible to participate in the BHA's Section 8 Homeownership Program the family must:

- *Must be a Section 8 participant in good standing in the BHA's Section 8 program.*
- *Must be a Family Self Sufficiency program participant (or graduate) and have remained a participant in good standing with respect to the contractual goals and requirements of the family's FSS Individual Training and Service Plan.*
- *Meet all eligibility criteria as described in the Section 8 Homeowner Administrative Plan.*
- *Attend homeownership counseling prior to purchase and post-purchase as offered by BHA-approved counseling agencies.*
- *Secure financing through a lender acceptable to the BHA.*
- *Be able to make the monthly payment of the family's portion of the mortgage payment.*
- *Sign a release allowing the BHA to exchange information with the lender and the lender with the BHA.*
- *Provide a down payment of at least three percent (3%) of the purchase price.*
- *Enter into a "Purchase and Sale Agreement" for a home within 180 days of receiving a homeownership voucher, provided the financing commitment has not expired prior to that date.*
- *Sign an acknowledgment form that the family becomes obligated for the whole mortgage payment in the event of termination of assistance.*
- *Agree that the family may not enter into an agreement to sell or refinance the home unless the BHA has first approved the sale or the refinance.*
- *Sign an acknowledgment form that the family will continue to comply with the appropriate provisions of the HUD Section 8 Rental Assistance regulations, family obligations and the BHA's Section 8 rental assistance and homeownership administrative plans.*
- *Agree to maintain the condition of the home so as to comply with HUD Housing Quality Standards (HQS) (although the BHA will not inspect the home annually for HQS compliance).*



## 8. Community Service and Self-Sufficiency

Exemptions from this Component: High performing and small PHAs are not required to complete this component. Section 8-Only PHAs are not required to complete sub-component C.

### A. PHA Coordination with the Welfare (TANF) Agency

#### 1. Cooperative agreements:

- Yes  No: Has the PHA entered into a cooperative agreement with the TANF Agency, to share information and/or target supportive services (as contemplated by section 12(d)(7) of the Housing Act of 1937)?

If yes, what was the date that agreement was signed? DD/MM/YY

#### 2. Other coordination efforts between the PHA and TANF agency (select all that apply)

- Client referrals  
 Information sharing regarding mutual clients (for rent determinations and otherwise)  
 Coordinate the provision of specific social and self-sufficiency services and programs to eligible families  
 Jointly administer programs  
 Partner to administer a HUD Welfare-to-Work voucher program  
 Joint administration of other demonstration program  
 Other (describe)

### B. Services and programs offered to residents and participants

#### (1) General

##### a. Self-Sufficiency Policies

Which, if any of the following discretionary policies will the PHA employ to enhance the economic and social self-sufficiency of assisted families in the following areas? (select all that apply)

- Public housing rent determination policies  
 Public housing admissions policies  
 Section 8 admissions policies  
 Preference in admission to section 8 for certain public housing families  
 Preferences for families working or engaging in training or education programs for non-housing programs operated or coordinated by the PHA  
 Preference/eligibility for public housing homeownership option participation  
 Preference/eligibility for section 8 homeownership option participation  
 Other policies (list below)

b. Economic and Social self-sufficiency programs

Yes  No: Does the PHA coordinate, promote or provide any programs to enhance the economic and social self-sufficiency of residents? (If “yes”, complete the following table; if “no” skip to sub-component 2, Family Self Sufficiency Programs. The position of the table may be altered to facilitate its use. )

<b>Services and Programs</b>				
Program Name & Description (including location, if appropriate)	Estimated Size	Allocation Method (waiting list/random selection/specific criteria/other)	Access (development office / PHA main office / other provider name)	Eligibility (public housing or section 8 participants or both)
Elderly and Disabled Resident Services Program	3335	Open to all residents	Development Office; case manager’s office	Public Housing
HOPE VI Resident Services Program	491	Recruited on site; wait list if necessary	Trinity Management LLC at Washington Beech, Tierney Learning Center at Old Colony	Public Housing
NAACP	400	Specific criteria	PHA Main Office	Section 8
Veterans Administration Supportive Housing	580	Specific criteria	VA Medical Center in Boston	Section 8
Section 8 Family Self-Sufficiency Program*	132	Open to Section 8 participants	PHA Main Office	Section 8
Leading the Way Home	500	Specific Criteria	DHCD in Boston	Section 8
HOPWA	15	Specific Criteria	AIDS Action Committee	Public Housing
HomeBase Program	200	Specific Criteria	MBHP in Boston	Public Housing

Healthy Start in Housing	75	Specific Criteria	BPHC in Boston	Public Housing
Health Starts at Home	50	Specific Criteria	Boston Medical Center	Public Housing
Chronically Homeless Elders	100	Specific Criteria	DND in Boston	Public Housing
Elders Living at Home - ELAPH	40	Specific Criteria	Boston Medical Center	Public Housing
PACE	12	Specific Criteria	Uphams Corner	Public Housing
JRI	20	Specific Criteria	Justice Resource Institute	Public Housing
Public Housing Family Self-Sufficiency Program* & **	44	Specific Criteria	Development Offices, PHA Main Office, Amory St. CSD office	Public Housing
Resident Services Program (ROSS Program)**	500	Specific Criteria	Alice Taylor, Barkley (Cathedral), Charlestown, Franklin Field, Hailey (Bromley Heath) & W. Newton	Public Housing
Jobs Plus Pilot Program**	250	Specific Criteria	Charlestown Development	Public Housing
Juvenile Re-entry Assistance Program (JRAP)**	51	Specific criteria	Greater Boston Legal Services, Development Offices, 76 Monument St., Charlestown & other community partner sites to be determined.	Public Housing
Resident Employment Program***	93	Specific criteria	PHA Main Office Development Offices	Public Housing

\*With the 2014 Notice of Fund Availability, HUD combined the 2 FSS Programs – (Public Housing and Leased Housing) into one Program; however the funding streams remain separate for the Escrow Accounts for Leased Housing and Public Housing participants.

\*\*estimated current size Oct 2017

\*\*\*Section 3 is a provision of the Housing and Urban Development (HUD) Act of

1968 that helps foster local economic development, neighborhood economic improvement, and individual self-sufficiency. The Section 3 program requires that recipients of certain HUD financial assistance, to the greatest extent feasible, provide job training, employment, and contracting opportunities for low- or very-low income residents in connection with projects and activities in their neighborhoods.

Section 3 residents are:

- Public housing residents or
- Persons who live in the area where a HUD-assisted project is located and who have a household income that falls below HUD’s income limits.

**(2) Family Self Sufficiency program/s**

a. Participation Description

<b>Family Self Sufficiency (FSS) Participation</b>		
<b>Program</b>	<b>Required Number of Participants (start of FY 2013 Estimate)</b>	<b>Actual Number of Participants (As of: DD/MM/YY)</b>
Public Housing	50	44 as of 10/23/17 (with 4 more in process)
Section 8	0	Approximately 132 as of 10/01/17

b.  Yes  No: If the PHA is not maintaining the minimum program size required by HUD, does the most recent FSS Action Plan address the steps the PHA plans to take to achieve at least the minimum program size?

If no, list steps the PHA will take below:

\*Not Applicable for Section 8. Minimum program requirements fulfilled.

**C. Welfare Benefit Reductions**

1. The PHA is complying with the statutory requirements of section 12(d) of the U.S. Housing Act of 1937 (relating to the treatment of income changes resulting from welfare program requirements) by: (select all that apply)

- Adopting appropriate changes to the PHA’s public housing rent determination policies and train staff to carry out those policies
- Informing residents of new policy on admission and reexamination
- Actively notifying residents of new policy at times in addition to admission and reexamination. Post changes / 45 day notice
- Establishing or pursuing a cooperative agreement with all appropriate TANF agencies regarding the exchange of information and coordination of services
- Establishing a protocol for exchange of information with all appropriate TANF agencies

Other: (list below)

2. The PHA is complying with the statutory requirements of section 12(d) of the U.S. Housing Act of 1937 (relating to the treatment of income changes resulting from welfare program requirements) by: (select all that apply)

- Adopting appropriate changes to the PHA's public housing rent determination policies and train staff to carry out those policies
- Informing residents of new policy on admission and reexamination
- Actively notifying residents of new policy at times in addition to admission and reexamination. Post changes / 45 day notice
- Establishing or pursuing a cooperative agreement with all appropriate TANF agencies regarding the exchange of information and coordination of services
- Establishing a protocol for exchange of information with all appropriate TANF agencies
- Other: (list below)

**D. Reserved for Community Service Requirement pursuant to section 12(c) of the U.S. Housing Act of 1937**

Boston Housing Authority  
**PUBLIC HOUSING**

*COMMUNITY SERVICE REQUIREMENTS*

*In compliance with the Quality Housing and Work Responsibility Act of 1998, the Boston Housing Authority has developed a policy to administer the resident community service requirement. This policy describes the community service requirement and includes the following provisions:*

- Definitions of community service and economic self-sufficiency
- How residents will be notified
- Definitions of exemptions from participation
- How the exemptions will be verified, both at the beginning of the program and as an ongoing part of program administration
- How compliance will be determined
- How non-compliance will be treated
- BHA's cooperation with other organizations.

BHA's residential lease includes the community service requirement and a community service policy has been approved as part of the ACOP.

Residents became subject to the requirement on October 31, 2003.

Each year at the time of their annual recertification resident compliance with the community service requirement will be determined and exemption status will be re-verified. Residents will be notified of this at least 90 days before the recertification date and required documentation will be specified in the notice. If a resident does not complete community service as required he or she will have one additional year to make up the required service. If the non-compliant resident does not do so or leave the unit, lease termination proceedings will commence.

The policy includes a description of qualifying work and self-sufficiency activities. These activities include but are not limited to: unsubsidized employment, subsidized private or public sector employment, on the job training, job search and job readiness assistance, vocational educational training, job skills training, education directly related to employment, attendance at a secondary school or GED program or provision of child care services to an individual participating in a community service program.

## 9. Safety and Crime Prevention

Exemptions from this Component: High performing and small PHAs not participating in PHDEP and Section 8 Only PHAs may skip to the next component. High Performing and small PHAs that are participating in PHDEP and are submitting a PHDEP Plan with this PHA Plan may skip to sub-component D.

### A. Need for measures to ensure the safety of public housing residents

1. Describe the need for measures to ensure the safety of public housing residents (select all that apply)

- High incidence of violent and/or drug-related crime in some or all of the PHA's developments
- High incidence of violent and/or drug-related crime in the areas surrounding or adjacent to the PHA's developments
- Residents fearful for their safety and/or the safety of their children
- Observed lower-level crime, vandalism and/or graffiti
- People on waiting list unwilling to move into one or more developments due to perceived and/or actual levels of violent and/or drug-related crime
- Other: Incidence of alleged civil rights violations.

2. What information or data did the PHA used to determine the need for PHA actions to improve safety of residents (select all that apply).

- Safety and security survey of residents
- Analysis of crime statistics over time for crimes committed "in and around" public housing authority
- Analysis of cost trends over time for repair of vandalism and removal of graffiti
- Resident reports
- PHA employee reports
- Police reports
- Demonstrable, quantifiable success with previous or ongoing anticrime/anti drug programs
- Other: Regular consultation with Tenant Task Forces  
Review of Civil Rights Administrative Report Forms  
Consultation with Boston Police Department Community Disorders Unit

3. Which developments are most affected? (list below) Family and Elderly/Disabled Developments

### B. Crime and Drug Prevention activities the PHA has undertaken or plans to undertake in the next PHA fiscal year

1. List the crime prevention activities the PHA has undertaken or plans to undertake:  
(select all that apply)

- Contracting with outside and/or resident organizations for the provision of crime- and/or drug-prevention activities
- Crime Prevention Through Environmental Design
- Activities targeted to at-risk youth, adults, or seniors
- Crime Watch
- Other (describe below)
  1. Utilization of video surveillance equipment in select developments including dissemination to other Law Enforcement Agencies aiding in judicial proceedings
  2. Regular Crime Prevention Education
  3. Key security systems
  4. Lease enforcement activity
  5. Employment of police force
  6. Training program and new uniforms for Safety Officers
  7. Bicycle patrol
  8. Directed patrols / code 19s to address drug issues and violent crimes in high risk areas including follow up “action teams” to address quality of life issues cited in Special Circumstances Transfer applications.

2. Which developments are most affected? (list below) All developments

### C. Coordination between PHA and the police

1. Describe the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities: (select all that apply)

- Police involvement in development, implementation, and/or ongoing evaluation of drug-elimination plan [BHA Police remain committed to this coordination effort despite the loss of the HUD DEP Grant.]
- Police provide crime data to housing authority staff for analysis and action
- Police have established a physical presence on housing authority property (e.g., community policing office, officer in residence)
- Police regularly testify in and otherwise support eviction cases
- Police regularly meet with the PHA management and residents
- Agreement between PHA and local law enforcement agency for provision of above-baseline law enforcement services
- Other activities: Multi-law enforcement task force partnerships geared towards addressing violent crime, youth and gang violence in identified “Hot spots” and drug interdiction.

2. Which developments are most affected? (list below) All developments [including – H a i l e y ( Bromley Heath), Charlestown, Mission Main, Alice Taylor, Franklin Field, Lenox Camden, Mary Ellen McCormack, and Barkley Apartments (Cathedral).]



**D. Additional information as required by PHDEP/PHDEP Plan**

PHAs eligible for FY 2005 PHDEP funds must provide a PHDEP Plan meeting specified requirements prior to receipt of PHDEP funds.

Yes  No: Is the PHA eligible to participate in the PHDEP in the fiscal year covered by this PHA Plan?

Yes  No: Has the PHA included the PHDEP Plan for FY 2005 in this PHA Plan?

Yes  No: This PHDEP Plan is an Attachment. (Attachment Filename: \_\_\_\_\_)

**13. Violence Against Women Act**

**BOSTON HOUSING AUTHORITY  
VIOLENCE AGAINST WOMEN ACT (VAWA) POLICY**

**I. Purpose and Applicability**

Notwithstanding its title, this policy is gender-neutral, and its protections are available to males who are victims of domestic violence, dating violence, or stalking as well as female victims of such violence.

The purpose of this policy (herein called "Policy") is to implement the applicable provisions of the Violence Against Women and Department of Justice Reauthorization Act of 2013 (Pub. L. 113-4) and more generally to set forth BHA's policies and procedures regarding domestic violence, dating violence, sexual assault and stalking, as hereinafter defined.

This Policy shall be applicable to the administration by BHA of all its federally subsidized public housing and Section 8 rental assistance programs under the United States Housing Act of 1937 (42 U.S.C. §1437 *et seq.*).

**II. Goals and Objectives**

This Policy has the following principal goals and objectives:

- A. Maintaining compliance, including training of appropriate staff managing BHA properties, with all applicable legal requirements imposed by VAWA;
- B. Participating, with others, in protecting the physical safety of victims of actual or threatened domestic violence, dating violence, sexual assault or stalking who are assisted by BHA;
- C. Providing and maintaining housing opportunities for victims of domestic violence, dating violence, sexual assault or stalking;

- D. Cooperating, with others, in formation and maintenance of collaborative arrangements between BHA, law enforcement authorities, victim service providers, and others to promote the safety and well-being of victims of actual and threatened domestic violence, dating violence sexual assault and stalking, who are assisted by BHA; and
- E. Responding in accordance with BHA policies and procedures to incidents of domestic violence, dating violence, sexual assault or stalking, affecting individuals assisted by BHA.

### **III. Other BHA Policies and Procedures**

This Policy shall be referenced in and attached to BHA's Five-Year Public Housing Agency Plan and, where appropriate, provisions consistent with this Policy shall be incorporated in and made a part of BHA's Admissions and Continued Occupancy Policy (ACOP), BHA's Section 8 Administrative Plan (Admin Plan), and other BHA policies. BHA's annual public housing agency plan shall also contain information concerning BHA's activities, services or programs relating to domestic violence, dating violence, sexual assault and stalking.

To the extent any provision of this policy shall contradict any previously adopted policy or procedure of BHA, the provisions of this Policy shall prevail.

### **IV. Definitions**

As used in this Policy:

- A. *Domestic Violence* – The term 'domestic violence' includes felony or misdemeanor crimes of violence committed by a current or former spouse of the victim, by a person with whom the victim shares a child in common, by a person who is cohabiting with or has cohabited with the victim as a spouse, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction."
- B. *Dating Violence* – means violence committed by a person—
  - (A) who is or has been in a social relationship of a romantic or intimate nature with the victim; and
  - (B) where the existence of such a relationship shall be determined based on a consideration of the following factors:
    - (i) The length of the relationship.
    - (ii) The type of relationship.
    - (iii) The frequency of interaction between the persons involved in the relationship.

C. *Stalking* – means –

- (A) (i) to follow, pursue, or repeatedly commit acts with the intent to kill, injure, harass, or intimidate another person; and (ii) to place under surveillance with the intent to kill, injure, harass or intimidate another person; and
- (B) in the course of, or as a result of, such following, pursuit, surveillance or repeatedly committed acts, to place a person in reasonable fear of the death of, or serious bodily injury to, or to cause substantial emotional harm to –
  - (i) that person;
  - (ii) a member of the immediate family of that person; or
  - (iii) the spouse or intimate partner of that person;

D. Sexual assault – means, any nonconsensual sexual act proscribed by Federal, tribal, or State law, including when the victim lacks capacity to consent;

E. Affiliated individual - means, with respect to a person –

- (A) a spouse, parent, brother, sister, or child of that person, or an individual to whom that person stands in loco parentis; or
- (B) any person, tenant, or lawful occupant living in the household of that person .

F. *Perpetrator* – means person who commits an act of domestic violence, dating violence, sexual assault or stalking against a victim.

**V. Admissions and Screening**

A. *Denial of Assistance.* BHA will not deny admission to public housing or to the Section 8 rental assistance program to any person because that person is or has been a victim of domestic violence, dating violence, sexual assault or stalking, provided that such person is otherwise qualified for such admission.

B. *Admissions Preference.* Applicants for Public Housing and Section 8 housing assistance from BHA will receive a priority in admission by virtue of their status as victims of domestic violence. This priority is described for Public Housing in the BHA’s ACOP and for Section 8 in its Admin Plan.

C. *Mitigation of Disqualifying Information.* When requested by an applicant for assistance whose history includes incidents in which the applicant was a victim of domestic violence, dating violence, sexual assault and/or stalking, BHA, may take such information into account in mitigation of potentially disqualifying information, such as poor credit history or previous damage to a dwelling. If requested by an applicant to take such mitigating information into account, BHA shall be entitled to conduct such inquiries as are reasonably necessary to verify the claimed history of domestic violence, dating violence, sexual assault and/or stalking and its probable relevance to the potentially disqualifying information. BHA may disregard or mitigate potentially disqualifying information if the applicant household includes a

perpetrator of a previous incident or incidents of domestic violence, dating violence, sexual assault and/or stalking.

## **VI. Termination of Tenancy or Assistance**

A. *VAWA Protections.* Under VAWA, public housing residents, and persons assisted under the Section 8 rental assistance program, have the following specific protections, which will be observed by BHA in administration of its programs:

1. An incident or incidents of actual or threatened domestic violence, dating violence, sexual assault or stalking will not be considered to be a “serious or repeated” violation of the lease by the victim or threatened victim of that violence and will not be good cause for terminating the tenancy or occupancy rights of or assistance to the victim of that violence.

2. In addition to the foregoing, tenancy or assistance will not be terminated by BHA as a result of criminal activity, if that criminal activity is directly related to domestic violence, dating violence, sexual assault or stalking engaged in by a member of the assisted household, a guest or another person under the tenant’s control, and the tenant or an affiliated individual is the victim or threatened victim of this criminal activity. However, the protection against termination of tenancy or assistance described in this paragraph is subject to the following limitations:

- (a) Nothing contained in this paragraph shall limit any otherwise available authority of BHA or a Section 8 owner or manager to terminate tenancy, evict, or to terminate assistance, as the case may be, for any violation of a lease or program requirement not premised on the act or acts of domestic violence, dating violence, sexual assault or stalking in question against the tenant or a member of the tenant’s household. However, in taking any such action, neither BHA nor a Section 8 manager or owner may apply a more demanding standard to the victim of domestic violence, dating violence, sexual assault or stalking than that applied to other tenants.
- (b) Nothing contained in this paragraph shall be construed to limit the authority of BHA or a Section 8 owner or manager to evict or terminate from assistance any tenant or lawful applicant if the owner, manager or BHA, as the case may be, can demonstrate an actual and imminent threat to other tenants or to those employed at or providing service to the property, if the tenant is not evicted or terminated from assistance.
- (c) Nothing contained in this paragraph shall limit any otherwise available authority of the BHA, or a Section 8 owner or manager to honor various court orders issued to either protect the victim or address the distribution of property in case of a household breaks up.

- B. *Removal of Perpetrator.* Further, notwithstanding anything in paragraph VI.A.2. or Federal, State or local law to the contrary, BHA or a Section 8 owner or manager, as the case may be, may bifurcate a lease, or remove a household member from a lease, without regard to whether a household member is a signatory to a lease, in order to evict, remove, terminate occupancy rights, or terminate assistance to any individual who is a tenant or lawful occupant and who engages in acts of physical violence against an affiliated individual or other individual. Such action against the perpetrator of such physical violence may be taken without evicting, removing, terminating assistance to, or otherwise penalizing the victim of such violence who is also the tenant or an affiliated individual. Such eviction, removal, termination of occupancy rights, or termination of assistance shall be effected in accordance with the procedures prescribed by law applicable to terminations of tenancy and evictions by BHA. If such bifurcation occurs, and the removed tenant or lawful occupant was the sole tenant eligible to receive assistance the BHA will provide any remaining household member the opportunity to establish eligibility for housing.

Leases used for all public housing operated by BHA and leases for dwelling units occupied by families assisted with Section 8 rental assistance administered by BHA, shall contain provisions setting forth the substance of this paragraph or as required by the U.S. Department of Housing & Urban Development.

## **VII. Verification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking**

A. *Requirement for Verification.* For those seeking protection under this Policy, the law allows, but does not require, BHA or a section 8 owner or manager to verify that an incident or incidents of actual or threatened domestic violence, dating violence, sexual assault or stalking claimed by a tenant or an affiliated individual is bona fide and meets the requirements of the applicable definitions set forth in this policy. Subject only to waiver as provided in paragraph VII. C., BHA shall require verification in all cases where an individual claims protection against an action involving such individual proposed to be taken by BHA. If there is reason to believe that verification is incomplete or inaccurate, the BHA may require additional documentation of the incident(s). Such documentation requirement shall not place the victim in danger. As necessary, the BHA shall work with the victim to identify appropriate sources of documentation. Section 8 owners or managers receiving rental assistance administered by BHA may elect to require verification, or not to require it as permitted under applicable law.

Verification of a claimed incident or incidents of actual or threatened domestic violence, dating violence, sexual assault or stalking can be accomplished in one of the following three ways:

1. *HUD-approved form* - by providing to BHA or to the requesting Section 8 owner or manager a written certification, on a form approved by the U.S. Department of Housing and Urban Development (HUD) and available from BHA, that the

individual is a victim of domestic violence, dating violence, sexual assault or stalking; that the incident or incidents in question are bona fide incidents of actual or threatened abuse meeting the requirements of the applicable definition(s) set forth in this policy. The incident or incidents in question must be described in reasonable detail as required in the HUD-approved form, and the completed certification must include the name of the perpetrator. If there is reason to believe that the certification is incomplete or inaccurate, the BHA may require additional documentation of the incident(s). Such documentation requirement shall not place the victim in danger. As necessary, the BHA shall work with the victim to identify appropriate sources of documentation.

2. *Other documentation* - by providing to BHA or to the requesting Section 8 owner or manager documentation signed by an employee, agent, or volunteer of a victim service provider, an attorney, or a medical professional, from whom the victim has sought assistance in addressing the domestic violence, dating violence, sexual assault or stalking, or the effects of the abuse, described in such documentation or a record of an administrative agency or documentation signed by the applicant or tenant and a mental health professional from whom the applicant or tenant has sought assistance relating to domestic violence, sexual assault or stalking, or the effect of such actions, and states under penalty of perjury, that the mental health professional believes that the domestic violence, dating violence, sexual assault, or stalking meets the requirement found in VAWA 2013. A form is available from BHA. The professional providing the documentation must sign and attest under penalty of perjury (28 U.S.C. 1746) to the professional's belief that the incident or incidents in question are bona fide incidents of abuse meeting the requirements of the applicable definition(s) set forth in this policy. The victim of the incident or incidents of domestic violence, dating violence, sexual assault or stalking described in the documentation must also sign and attest to the documentation under penalty of perjury.

3. *Police or court record* – by providing to BHA or to the requesting Section 8 owner or manager a Federal, State, tribal, territorial, or local police or court record describing the incident or incidents in question.

- B. *Time allowed to provide verification/ failure to provide.* An individual who claims protection against adverse action based on an incident or incidents of actual or threatened domestic violence, dating violence, sexual assault or stalking, and who is requested by BHA, or a Section 8 owner or manager to provide verification, must provide such verification within 14 business days (*i.e.*, 14 calendar days, excluding Saturdays, Sundays, and federally-recognized holidays) after receipt of the request for verification. Failure to provide verification, in proper form within such time will result in loss of protection under VAWA and this policy against a proposed adverse action. Time for response will be extended upon a showing of good cause.

- C. *Waiver of verification requirement.* The Administrator of the BHA or her Designee, or a Section 8 owner or manager, may, with respect to any specific case, waive the above-stated requirements for verification and provide the benefits of this policy based on the victim's statement or other corroborating evidence. Such waiver

may be granted in the sole discretion of the Administrator/Designee, owner or manager. Any such waiver must be in writing. Waiver in a particular instance or instances shall not operate as precedent for, or create any right to, waiver in any other case or cases, regardless of similarity in circumstances.

### **VIII. Confidentiality**

A. *Right of confidentiality.* All information (including the fact that an individual is a victim of domestic violence, dating violence, sexual assault or stalking) provided to BHA or to a Section 8 owner or manager in connection with a verification required under section VII of this policy or provided in lieu of such verification where a waiver of verification is granted, shall be retained by the receiving party in confidence and shall not be entered in any shared database nor provided to any related entity, except where disclosure is:

1. requested or consented to by the individual in writing, or
2. required for use in a public housing eviction proceeding or in connection with termination of Section 8 assistance, as permitted in VAWA, or
3. otherwise required by applicable law.

B. *Notification of rights.* All tenants of public housing and tenants participating in the Section 8 rental assistance program administered by BHA shall be notified in writing concerning their right to confidentiality and the limits on such right to confidentiality.

### **IX. . Transfer to New Residence**

A. *Application for transfer.* The opportunity to transfer in Public Housing due to incidents of domestic violence, dating violence, sexual assault and/or stalking is described in the BHA's Admissions and Continued Occupancy Policy (ACOP). The opportunity to relocate in the Section 8 rental assistance program due to incidents of domestic violence, dating violence and/or stalking is described in the BHA Administrative Plan. Except with respect to portability of Section 8 assistance, as provided in section B below, the decision to approve or disapprove a transfer shall be made in accordance with the ACOP or Administrative Plan, as applicable. This policy does not create any additional right on the part of any public housing tenant or Section 8-assisted tenant to be granted a transfer.

B. *Portability.* Notwithstanding the foregoing, a Section 8-assisted tenant will not be denied portability to a unit in another location (notwithstanding the term of the tenant's existing lease has not expired, or the family has not occupied the unit for 12 months) so long as the tenant has complied with all other requirements of the Section 8 program and has moved from the unit in order to protect the health or safety of an individual member of the household who is or has been the victim of domestic violence, dating violence, sexual assault or stalking and who reasonably believes that the tenant or other household member will be imminently threatened

by harm from further violence if the individual remains in the present dwelling unit.

## **X. Court Orders/Family Break-up**

A. *Court orders.* It is BHA's policy to honor orders entered by courts of competent jurisdiction affecting individuals assisted by BHA and their property. This includes cooperating with law enforcement authorities to enforce civil protection orders issued for the protection of victims and addressing the distribution of personal property among household members in cases where a family breaks up.

B. *Family break-up.* Other BHA policies regarding family break-up are contained in BHA's ACOP and its Section 8 Administrative Plan.

## **XI. Relationships with Service Providers**

It is the policy of BHA to cooperate with organizations and entities, both private and governmental, that provide shelter and/or services to victims of domestic violence, dating violence, sexual assault and/or stalking. If BHA staff become aware that an individual assisted by BHA is a victim of domestic violence, dating violence or stalking, BHA will provide the victim with written materials about such providers of shelter or services. However, and notwithstanding the foregoing, this Policy does not create any legal obligation requiring BHA either to maintain a relationship with any particular provider of shelter or services to victims of domestic violence, dating violence, sexual assault and/or stalking or to make a referral in any particular case. BHA's annual public housing agency plan shall describe those providers of shelter or services to victims of domestic violence, dating violence and/or stalking known to BHA.

## **XII. Notification**

BHA shall provide written notification to applicants, tenants, and Section 8 owners and managers, concerning the rights and obligations created under VAWA relating to confidentiality, denial of assistance and, termination of tenancy or assistance.

## **XIII. Relationship with Other Applicable Laws**

Neither VAWA nor this Policy implementing it shall preempt or supersede any provision of Federal, State or local law that provides greater protection than that provided under VAWA for victims of domestic violence, dating violence sexual assault, or stalking.

## **XIV. Amendment**

This policy may be amended from time to time by BHA as approved by its Administrator following an opportunity for notice and comment by interested parties.



**Description of Violence Against Women Act (VAWA) activities, services, or programs:**

BHA staff provide information and referral services to victims of domestic violence. Periodic VAWA and domestic violence trainings have occurred and will continue to occur with both internal and external trainers.

Both the Public Housing Admissions and Continued Occupancy Policy and the Leased Housing Administrative Plan contain a priority for serving victims of domestic violence for admission. The BHA public housing transfer policy gives a priority for victims of domestic violence as an Administrative transfer.

The BHA public safety department provides protective services above and beyond that of the Boston Police Department to BHA victims of domestic violence to both prevent domestic violence and to enhance survivor safety. BHA Police Department Officers receive extensive police academy training and updates on domestic violence. They are able to advise victims as to seeking protective orders and resources.

A partial listing of Violence Against Women Act (VAWA) Resources is below. These resources are posted on the BHA public drive and all staff have been advised of its location alongside the VAWA policy. In addition, the BHA will create a VAWA resources link section on its website.

A partial listing of Violence Against Women Act Resources:

Asian Task Force Against Domestic Violence (Boston office)	617-338-2350x244
Asian Task Force Against Domestic Violence (Lowell, MA office)	978-454-3651
Asian Task Force Against Domestic Violence 24hr. Multilingual Hotline	617-338-2355
Association of Haitian Women in Boston	617-287-0096
AWAKE program (Children's Hospital)	617 - 355 - 6369
BARCC 24hr. Boston Area Rape Crisis Center	617-492-7273
Boston Area Rape Crisis Center (Cambridge, MA)	617-492-8306 x1262
Boston Medical Center	617-414-7734
Boston Police 24hr. Domestic Violence Unit	617-343-4350
Center for Violence Prevention and Recovery at Beth Israel Deaconess Medical Center	617-667-8141
Community Legal Services and Counseling Center (Cambridge, MA)	617-661-1010x146
Cooperative Economics for Women (Revere, MA)	781-289-4950
Crittenton Women's Union	617 - 661 - 7203
Department of Social Services	1-800-792-5200
Disability Abuse 24hr. Hotline	1-800-426-9009
Domestic Violence Services Network (Concord, MA)	978-318-3421
Domestic Violence/Sexual Assault Program of Newton Wellesley	617 -243 - 6521

Hospital DOVE, Inc. (Quincy)	888 – 314 – 3683
Elder Abuse 24hr. Hotline	1-800-922-2275
Elizabeth Stone House	617 – 427 – 9801
Finding Options for Change Understanding and Safety (Lowell, MA)	978-458-6282
FINEX House	617 - 288 – 1054
Gay Mens’ Domestic Violence Project	800-832-1901
Greater Boston Legal Services	617-371-1234
Greater Boston Legal Services (alternate number)	617-603-1614
HaborCOV (Chelsea, MA)	617-884-9799x137 or 617 – 884 – 9909
HAVEN at MGH	617 -724-0054
Independence House (Hyannis, MA)	508-771-6507x243
International Institute of Boston	617-695-9990x172
Jewish Family and Children's Services (Waltham, MA)	781-647-5327
Lowell Community Health Center (Lowell, MA)	978-746-3147
Massachusetts Alliance of Portuguese Speakers (Cambridge, MA)	617-864-7600
Mass Coalition for the Deaf and Hard of Hearing	1-800-882-1155
Mass Coalition for the Deaf and Hard of Hearing TTY	617-695-7600 TTY
MGH Chelsea Health Care Center (Chelsea, MA)	617-887-4224
Massachusetts Department of Transitional Assistance (Domestic Violence Specialists)	617 – 348 - 8500
Massachusetts Immigrant and Refugee Advocacy Coalition	617-350-5480x216
Massachusetts Law Reform Institute	617-357-0700x305
Massachusetts Office for Victim Assistance	617-727-5200
Mayor’s 24hr. Housing Hotline	617-635-4500
Merrimack Valley Legal Services, Inc. (Lowell, MA)	978-888-0004
Multicultural AIDS Coalition	617-442-1622
Newton Wellesley Hospital (Newton, MA)	617-243-6521
Nigerian American Community Organization	617-424-7890
Nigerian American Community Organization (alternate number)	617-913-5684
Parental Stress 24hr. Hotline	1-800-632-8188
Passageway at Brigham & Women’s Hospital	617 – 732 – 8753
Portal to Hope (Salisbury)	781 – 306 – 6678
REACH Beyond Domestic Violence (Waltham)	800 – 899 – 4000
Refugee and Immigrant Assistance Center	617-238-2434
Renewal House	617 – 566 – 6881
RESPOND, Inc. (Somerville)	617 – 623 – 5900
“SafeLink 24hr. Statewide Domestic Violence Hotline	

Operated by Casa Myrna Vazquez”	1-877-785-2020
SafeLink 24hr. Statewide Domestic Violence Hotline TTY Operated by Casa Myrna Vazquez	877-521-2601 TTY
SAHELI: Friendship for South Asian Women	866 – 472 - 4354
Samaritans 24hr. Suicide Hotline	617-247-0220
Simmons College	617-521-2480
Somerville Commissions (Somerville, MA)	617-625-6600x2406
Teen 24hr. Hotline	1-800-999-9999
The Network/La Red (ending abuse in lesbian, bisexual, and transgender communities)	617-742-4911 TTY: 617-338-SAFE (7833)
The Second Step (Newton)	617 – 661 – 7203
Transition House (Cambridge, MA)	617-868-1655
United Way Help Line	1-800-231-4377
Victim Rights Law Center	617-399-6720
Whittier Street Health Center	617-989-3249

## 10. Pets

### Summary of the Elderly/Disabled Pet Policy and the Family Pet Policy

In compliance with HUD requirements, the Boston Housing Authority has adopted pet policies and rules for all developments authorizing the keeping of pets in BHA developments. The primary purpose of the rules is to establish reasonable requirements for the keeping of common household pets in order to provide a safe and sanitary environment. The complete BHA Family Pet Policy and BHA Elderly/Disabled Pet Policy and necessary forms are available at your Manager's office. The Elderly/Disabled Pet Policy was adopted and put into effect in October, 2000 and differs in some respects from the Family Pet Policy. The Family Pet Policy was adopted and put in effect in April, 2002. The following is only a summary of the Pet policies. The complete Elderly/Disabled Pet Policy and Family Pet Policy are supporting documents to the Agency Plan. If you have questions please consult the appropriate policy or ask your Manager.

#### **Definitions of Pet and Assistive Animal:**

A pet is defined as a domesticated animal of a species that is commonly kept as a household pet in the community, such as a cat, dog, or canary. A monkey, snake, or spider is an example of an animal that is not commonly kept as a household pet in the community. An assistive animal provides assistance to a person with disabilities that is needed as a reasonable accommodation. Under 24CRF 960.705, this policy does not apply to assistive animals that reside in public housing or that visit BHA properties.

#### **Types and Number of Pets Allowed:**

Family Developments, a maximum of two pets: a cat or a dog, and either a caged bird or birds, or a fish tank not to exceed 20 gallons will be allowed in studio, one- and two-bedroom apartments. However, in place of the fish tank or the birdcage an animal cage of equivalent size housing a reasonable number of hamsters, guinea pigs, ferrets, or gerbils may be kept. A maximum of three pets: a cat or a dog, a caged bird or birds, and a maximum 20-gallon fish tank will be allowed in apartments of three bedrooms or more. Again, in place of the fish tank or the bird cage an animal cage of equivalent size housing a reasonable number of hamsters, guinea pigs, ferrets or gerbils may be kept. A reasonable number of fish or other animals appropriately kept in an aquarium (such as a frog or iguana) will be permitted in a maximum 20-gallon fish tank. A reasonable number shall be the number of animals or fish that may be kept in a similarly sized cage or tank as recommended by a veterinarian.

Elderly/Disabled Developments, a maximum of one cat or dog is allowed per apartment. No elderly/disabled resident shall have more than two birds. No resident shall have more than one aquarium, which shall not have a capacity of more than 20 gallons. A reasonable number of fish or animals suitable for keeping in an aquarium will be permitted. A resident may have a birdcage and an aquarium. Any resident who has a

dog or a cat may, in addition, have either an aquarium or a bird but not both. For example you may have a poodle and a canary or a Siamese cat and a canary or a poodle and an aquarium.

Pets of vicious or aggressive disposition deemed by management to be potentially harmful to the health and safety of others are prohibited.

Family Developments, no pet will be permitted which is expected to exceed 50 pounds in weight at maturity.

Elderly/Disabled, no pet may exceed 40 pounds in weight or 20 inches in height at maturity.

All dogs and cats over the age of 6 months must be spayed or neutered unless there is certification from a licensed veterinarian that the performance of the procedure will compromise the health of the pet.

**Pet Ownership Rules:**

A tenant who wishes to add any new pet must apply in writing at their development management office. The Tenant is responsible for proper care, vaccinations, and clean up after their pet anywhere on BHA property, as well as the provision of identifying tags for dogs and cats. No pet is to remain unattended, without proper care for more than 24 hours. The tenant is responsible and must pay for the cost of all materials and labor required to repair any damage caused by the pet. The tenant is responsible for insuring that the rights of other tenants are not infringed upon with regard to health, safety, or peace and quiet enjoyment. The Tenant will allow the BHA to inspect their unit as required to ascertain compliance with this policy. Pets currently being kept by BHA residents that have been properly identified to site management will be grandfathered into this policy. No pet ownership fee will be charged for these pets but owners must prospectively comply with this policy.

**Non-Compliance:**

Violations of these rules will be considered a violation of a material term of the lease. The development manager may require the removal of a pet upon violation of these rules, or commence eviction procedures. All lease enforcement and eviction actions taken as a result of this policy will comply with the BHA's Lease and Grievance Procedures.

## 11. Asset Management

Exemptions from this component: Section 8 Only PHAs are not required to complete this component. High performing and small PHAs are not required to complete this component.

1.  Yes  No: Is the PHA engaging in any activities that will contribute to the long-term asset management of its public housing stock , including how the Agency will plan for long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs that have **not** been addressed elsewhere in this PHA Plan?
  
2. What types of asset management activities will the PHA undertake? (select all that apply)
  - Not applicable
  - Private management
  - Development-based accounting
  - Comprehensive stock assessment
  - Other: (list below) strategic redevelopment planning  
Approach to Preservation; 5-Year Sustainability Plan
  
3.  Yes  No: Has the PHA included descriptions of asset management activities in the **optional** Public Housing Asset Management Table?

## **12. and 13. Substantial Deviation / Significant Amendment / Modification**

- (a) Significant Amendment and Substantial Deviation/Modification. Provide the PHA's definition of "significant amendment" and "substantial deviation/modification".

Definition of "Substantial Deviation" and "Significant Amendment or Modification":

In the Final Rule issued on 12/14/99, HUD provides that, while PHAs may change or modify their plans or policies described in them, any "significant amendment or modification" to the plan would require PHAs to submit a revised PHA plan that has met full public process requirements. The statute also requires that PHAs define "significant amendment or modification" of the Annual Plan and "substantial deviation" from the 5-Year Plan themselves, by stating the basic criteria for such definitions in an annual plan that has met full public process requirements, including Resident Advisory Board review. The BHA will consider the following actions to be significant amendments or modifications:

- A change which would significantly affect current rent or admissions policies or organization of a waiting list in the Public Housing programs;
- A change which would significantly effect current rent policies in the Section 8 Program;
- A change to admission policies or organization of a waiting list in the Section 8 Program which would impact more than 5% of the total number of HCVP vouchers in the BHA's portfolio.
- Additions of non-emergency work items not included in the current Annual Statement, 5-Year Action Plan, over \$3 million or 10% of total CFP, whichever is greater;
- A substantial change to the demolition or disposition, designation, homeownership programs or conversion activities as described in the presently approved Agency or Five-Year Plan.

An exception to this definition will be made for any of the above that are adopted to reflect changes in HUD regulatory requirements or federal statutory requirements; such changes will not be considered significant amendments by HUD.

**Section B.2**

**14. Hope VI or Choice Neighborhoods**

**HOPE VI, Mixed Finance Modernization of Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers.**

Include statements related to these programs as applicable.

- a) Hope VI or Mixed Finance Modernization or Development

Yes: X No: a) Has the PHA received a HOPE VI revitalization grant? (if no, skip to question c; if yes, provide responses to question b for each grant, copying and completing as many times as necessary)

- b) Status of HOPE VI revitalization grant (complete one set of questions for each grant)

1. Development name: Old Colony Phase Two

2. Development (project) number: MA002000124 (original); MA002002139 (new phase 2A); MA002002140 (new phase 2B); and MA002002143 (new phase 2C)

HOPE VI GrantNo. (MA06URD002I110)

3. Status of Grant: (select the statement that best describes the current status)

:Revitalization of Plan under development

:Revitalization Plan submitted, pending approval

:Revitalization Plan approved

X :Activities Pursuant to an approved Revitalization Plan complete.

Choice Neighborhoods Initiative Implementation grant

1. Development name: Whittier Street

2. Development (project) number: MA002000111 (original); New development to be project-based vouchers

3. Status of Grant: (select the statement that best describes the current status)

:Revitalization of Plan under development

:Revitalization Plan submitted, pending approval

:Revitalization Plan approved

X :Activities Pursuant to an approved Transformation Plan underway.

Yes:

No: X c.) Does the PHA plan to apply for a HOPE VI Revitalization grant in the Plan year?

If yes, list development name/s below:

The BHA applied for and was awarded a Choice Neighborhoods Implementation grant to transform the Whittier Street public housing development in 2016.



**15. Mixed Finance Modernization or Development**

Yes  No: d) Will the PHA be engaging in any mixed-finance development activities for public housing in the Plan year?

If yes, list developments or activities below:

(i) Old Colony – Phase Three

Planning for mixed-finance activities at Charlestown, West Newton, Amory, Lenox, Clippership at Heritage, Whittier, Mary Ellen McCormack, Hailey Apartments, and Eva White.

**16. Demolition and or Disposition**

Yes  No: Does the PHA plan to conduct any demolition or disposition activities (pursuant to section 18 of the U.S. Housing Act of 1937 (42 U.S.C. 1437p)) in the plan Fiscal Year? (If “No”, skip to next component; if “yes”, complete one activity description for each development.)

2. Activity Description

Yes  No: Has the PHA provided the activities description information in the **optional** Public Housing Asset Management Table? (If “yes”, skip to next component. If “No”, complete the Activity Description table below.)

Demolition/Disposition Activity Description	
1a. Development name: Old Colony Phase Three	
1b. Development (project) number: MA002000124	
2. Activity type: Demolition <input checked="" type="checkbox"/> Disposition <input checked="" type="checkbox"/>	
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>	
4. Date application approved: Not yet submitted.	
5. Number of units affected: 459	
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development	
7. Timeline for activity: a. Actual or projected start date of activity: Application to be filed in 2017. b. Projected end date of activity: 2025	

Demolition/Disposition Activity Description	
1a. Development name: Whittier MA002000111	
1b. Development (project) number:	
2. Activity type: Demolition <input checked="" type="checkbox"/> Disposition <input checked="" type="checkbox"/>	
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>	
4. Date application approved: Not yet submitted.	
5. Number of units affected:	
6. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development	
7. Timeline for activity: a. Actual or projected start date of activity: Application to be filed in 2017. b. Projected end date of activity: 2023	
BHA was awarded an FY2016 Choice Neighborhoods implementation grant in Dec 2016, pursuant to which HUD granted demolition approval in September 2017. Disposition approval for the original public housing property will be sought in connection with each individual phase of redevelopment.	

Demolition/Disposition Activity Description	
1a. Development name: Vacant Land Parcel at Mary Ellen McCormack MA002000123	
1b. Development (project) number: (O'Connor Way)	
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/>	
3. Application status (select one) Approved <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>	
4. Date application approved: August 12, 2016.	
5. Number of units affected: 0 units; vacant land only	
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development	
7. Timeline for activity: a. Actual or projected start date of activity: Application approved in 2016. b. Projected end date of activity: 2020	

Demolition/Disposition Activity Description

- 1a. Development Name: Charlestown
- 1b. Development (project) number: MA00200101
- 2. Activity type: Demolition:  
Disposition: X
- 3. Application Status (select one)  
Approved: X  
Submitted, pending approval:  
Planned Application:
- 4. Date application approved: September 6, 2017.
- 5. Number of units affected: 1149
- 6. Coverage of action (select one):  
Part of the Development:  
Total Development: X
- 7. Timeline for activity: Application 2016.
  - a. Actual or projected start date of activity: 2018 b. Projected end date of activity: TBD

Demolition/Disposition Activity Description

- 1a. Development Name: Amory
- 1b. Development (project) number: MA00200245
- 2. Activity type: Demolition:  
Disposition: X
- 3. Application Status (select one)  
Approved:  
Submitted, pending approval:  
Planned Application: X
- 4. Date application approved:
- 5. Number of units affected: TBD
- 6. Coverage of action (select one):  
Part of the Development:  
Total Development: X
- 7. Timeline for activity: Application 2017.
  - a. Actual or projected start date of activity: 2018. b. Projected end date of activity: TBD

The existing Amory public housing development will undergo a RAD conversion to facilitate rehab work. A Section 18 disposition of public housing units may be pursued in conjunction with the RAD conversion. At the same time, a Section 18 disposition of unused (vacant) portions of the site will be submitted in order to permit construction of new housing adjacent to the existing building.

Demolition/Disposition Activity Description

1a. Development Name: Clippership Units at Heritage Development

1b. Development (project) number: MA00200252

2. Activity type: Demolition: X  
Disposition: X

3. Application Status (select one)

Approved:

Submitted, pending approval: X June 25, 2017

Planned Application:

4. Date application approved: Not yet submitted.

5. Number of units affected: 0 public housing units (20 Section 8 units)

6. Coverage of action (select one):

Part of the Development: X

Total Development:

7. Timeline for activity: Application 2017.

a. Actual or projected start date of activity: 2018 b. Projected end date of activity: 2020

Note: the Clippership Units at Heritage are Project-Based Section 8 Units and are not subject to Section 8 disposition requirements. This information is being included for informational purposes only.

Demolition/Disposition Activity Description

1a. Development Name: West Newton/Rutland/East Springfield

1b. Development (project) number: MA00200158

2. Activity type: Demolition:  
Disposition: X

3. Application Status (select one)

Approved:

Submitted, pending approval:

Planned Application: X

4. Date application approved: Not yet submitted.

5. Number of units affected: 3 public housing units (E. Springfield only)

6. Coverage of action (select one):

Part of the Development: X

Total Development:

7. Timeline for activity: Application 2017.

a. Actual or projected start date of activity: 2018 b. Projected end date of activity: 2018

Demolition/Disposition Activity Description

1a. Development Name: Mildred Hailey Apts Phase One

1b. Development (project) number: MA002107119 (partial)

2. Activity type: Demolition: X  
Disposition: X

- 3. Application Status (select one)
  - Approved:
  - Submitted, pending approval:
  - Planned Application: X
- 4. Date application approved: Not yet submitted.
- 5. Number of units affected: 235 public housing units
- 6. Coverage of action (select one):
  - Part of the Development: X
  - Total Development:
- 7. Timeline for activity: Application 2019.
  - a. Actual or projected start date of activity: 2019 b. Projected end date of activity: 2022

Demolition/Disposition Activity Description

- 1a. Development Name: Mary Ellen McCormack
- 1b. Development (project) number: MA002000123
- 2. Activity type:
  - Demolition: X
  - Disposition: X
- 3. Application Status (select one)
  - Approved:
  - Submitted, pending approval:
  - Planned Application: X
- 4. Date application approved: Not yet submitted.
- 5. Number of units affected: 1016 public housing units
- 6. Coverage of action (select one):
  - Part of the Development:
  - Total Development: X
- 7. Timeline for activity: Application 2019.
  - b. Actual or projected start date of activity: 2019 b. Projected end date of activity: 2025

## 17. Designated Housing for Elderly and Disabled Families

Exemptions from this Component; Section 8 only PHAs are not required to complete this section.

1.  Yes  No: Has the PHA designated or applied for approval to designate or does the PHA plan to apply to designate any public housing for occupancy only by the elderly families or only by families with disabilities, or by elderly families and families with disabilities or will apply for designation for occupancy by only elderly families or only families with disabilities, or by elderly families and families with disabilities as provided by section 7 of the U.S. Housing Act of 1937 (42 U.S.C. 1437e) in the upcoming fiscal year? (If “No”, skip to the next component. If “yes”, complete one activity description for each development, unless the PHA is eligible to complete a streamlined submission; PHAs completing streamlined submissions may skip to the next component.)

2. Activity Description

Yes  No: Has the PHA provided all required activity description information for this component in the **optional** Public Housing Asset Management Table? If “yes”, skip to the next component. If “No”, complete the Activity Description table below.

<b>Designation of Public Housing Activity Description</b>
1a. Development name: All Elderly/Disabled Program Developments (See supplemental table below)
1b. Development (project) number: All Elderly/Disabled Program Developments (See supplemental table below)
2. Designation type: Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input checked="" type="checkbox"/> (in ratio of 80% elderly, 20% disabled at each site)
3. Application status (select one) Approved; included in the PHA’s Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/> (In coming months, the BHA plans an application for a new Designated Housing Plan.)
4. Date this designation approved, submitted, or planned for submission: Approved on 06/25/15.
5. If approved, will this designation constitute a (select one) <input checked="" type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan

8. Number of units affected: 3335

7. Coverage of action (select one)

Part of the development (See supplemental table below)

Total development

The new DHP applies to all units across the Elderly-Disabled portfolio except for wheelchair units, all of which are exempt from the DHP. BHA continues to monitor the percentages of elderly and non-elderly disabled households living in each Elderly/Disabled Development on an ongoing basis. When the percentage of elderly households occupying a development reaches 75%, the development is flagged so that each subsequent offer of housing will be reviewed by a Manager in the Occupancy Department. When the percentage of elderly households occupying a development reaches 80%, the BHA will turn off Designated Housing preference points to elderly applicant households for this development and turn on the Designated Housing preference for the disabled. If the percentage of elderly households occupying a development falls below 80%, the BHA will turn on Designated Housing Preference points to elderly applicant households for this development.

### Federal Elderly/Disabled Development Designation

Development Number	Development Name	Available Units	Wheel Chair	Adjusted Available	Elderly 80%	Non-Eld Dis 20%	0 BR With W/C	1 BR With W/C	2 BR With W/C
MA002107119	Mildred C. Hailey (Bromley Park Elderly)	52	0	52	41	11	0	38	14
MA002000226	Pond Street	43	0	43	34	9	0	40	3
MA002000227	Annapolis Street	55	0	55	44	11	0	49	6
MA002000228	Ashmont Street	53	0	53	42	11	0	48	5
MA002000229	Holgate Apartments	80	1	79	64	16	0	80	0
MA002000230	Foley Apartments	95	6	89	76	19	0	95	0
MA002000232	Groveland	63	0	63	50	13	37	25	1
MA002000234	Davison	46	0	46	36	10	31	15	0
MA002000235	Washington Street	81	1	80	64	17	0	72	9
MA002000236	West Ninth Street	83	0	83	66	17	0	76	7
MA002000237	J J Carroll	63	0	63	50	13	0	52	11
MA002000238	Meade Apartments	40	0	40	32	8	0	38	2
MA002000240	MLK Towers	102	1	101	81	21	25	77	0
MA002000241	Eva White	102	0	102	81	21	34	57	11
MA002000242	Walnut Park	162	4	158	129	33	105	50	7
MA002000244	Frederick Douglas	76	8	68	60	16	42	34	0
MA002000245	Amory Street	198	23	175	158	40	90	98	10
MA002000247	General Warren	94	0	94	75	19	55	36	3
MA002000249	Torre Unidad	193	9	184	154	39	110	80	3
MA002000250	Rockland Towers	67	4	63	53	14	40	25	2
MA002000251	Codman Apartments	99	9	90	79	20	60	30	9
MA002002141	Heritage - PHA Owned	29	2	27	23	6	22	3	4



MA002000253	St Botolph Street	130	10	120	104	26	81	47	2
MA002000254	Pasciucco	90	6	84	72	18	63	25	2
MA002002142	Lower Mills-PHA Owned	17	1	16	13	4	9	7	1
MA002000261	Ausonia Homes	99	5	94	79	20	0	93	6
MA002000262	Hassan Apartments	100	8	92	80	20	55	40	5
MA002000270	Spring Street	103	5	98	82	21	0	99	4
MA002000271	Patricia White	223	20	203	178	45	0	216	7
MA002000272	Roslyn Apartments	118	9	109	94	24	0	113	5
MA002000277	Bellflower Street	113	6	107	90	23	0	106	7
MA002000283	Peabody Square	101	9	92	80	21	0	97	4
MA002000290	Malone Apartments	100	4	96	80	20	0	100	0
MA002000295	Commonwealth Elderly	115	10	105	92	23	0	103	12
MA002000298	Hampton House	76	7	69	60	16	41	35	0
MA002000299	Washington Manor	74	7	67	59	15	39	35	0
		3335	175	3160	2655	680	939	2234	162

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\*Only Includes units at 295 and 297 Centre Street, units #'s BP0003 - BP00028 and BP0033 - BP0056. Overall, this is a family development but these units are set aside for the elderly and non-elderly disabled and have their own site-based waiting list.

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## 18. Conversion of Public Housing to Tenant-Based Assistance

### **Boston Housing Authority Voluntary Conversion from Public Housing to Tenant-Based Assistance Initial Assessment**

The Boston Housing Authority determined a Per Unit Monthly (PUM) cost for covered (general occupancy) developments including operating costs with tenant contribution (\$817.30) and capital (\$144.84) for a total of \$962.14 PUM as of September 2017. We then compared that to the average Housing Assistance Payment at \$1151 plus the tenant's contribution at \$420.25 that amounted to \$1571.56 PUM as of September 2017. Therefore, the change to tenant-based assistance would not be cost effective. None of the general occupancy developments in the BHA's portfolio has reached the stage of obsolescence where it would be cost effective to convert to tenant-based assistance rather than to maintain it as public housing.

The BHA is not subject to computing the mandatory conversion calculation because none of our developments meet the 15% vacancy standard for identifying public housing developments subject to the required conversion.

The above formula applies to the following developments:

Development Name	Number of Occupied Units*
Alice Taylor	355
Barkley (Cathedral)	404
Charlestown	1060
Commonwealth	275
Franklin Field	337
Hailey (Bromley Park)	485
Hailey (Heath Street)	211
Lenox Street	278
Mary Ellen McCormack	995
Old Colony	446
West Newton Street	125
Whittier Street	140

\*As of September 2017

## 19. Conversion of Public Housing to Project-Based Assistance under RAD

### Demolition / Disposition Activity Description

1a. Development name: West Newton and Rutland E. Springfield

1b. Development (project) number: MA002000158

2. Activity type: Demolition:

Disposition:

3. Application status (select one)

Approved:

Submitted:

Planned:

4. Date application approved: March 1, 2017

5. Number of units affected: 150

6. Coverage of action (select one)

Part of the development

Total development

7. Timeline for activity:

a. Actual or projected start date of activity: RAD disposition application in 2016

b. Projected end date of activity: 2020

The BHA plans to preserve West Newton as affordable housing under alternative ownership.

### Demolition / Disposition Activity Description

1a. Development name: Lenox

1b. Development (project) number: MA002000104

2. Activity type: Demolition:

Disposition:

3. Application status (select one)

Approved:  CHAP dated 10/16/2017

Submitted:

Planned:

4. Date application approved:

5. Number of units affected: 285

6. Coverage of action (select one)

Part of the development

Total development

7. Timeline for activity: Planned application (Letter of Interest) complete.

a. Actual or projected start date of activity: 2018

b. Projected end date of activity: 2023

### Demolition / Disposition Activity Description

1a. Development name: Amory

1b. Development (project) number: MA002000245

2. Activity type: Demolition:

Disposition:

3. Application status (select one)

Approved:  CHAP dated 10/16/2017

Submitted:  Submitted 10/28/2016

Planned:

- 4. Date application approved:
- 5. Number of units affected: 199
- 6. Coverage of action (select one)
- Part of the development
- Total development

- 7. Timeline for activity: Planned application 2017.
  - a. Actual or projected start date of activity:
  - b. Projected end date of activity: TBD

The existing public housing units at 125 Amory Street will be converted to project-based assistance under RAD.

Demolition / Disposition Activity Description

- 1a. Development name: St. Botolph
- 1b. Development (project) number: MA002000253
- 2. Activity type: Demolition:
- Disposition:

- 3. Application status (select one)
- Approved:
- Submitted:  pending approval, Submitted October 23, 2017
- Planned:

- 4. Date application approved:
- 5. Number of units affected: 132
- 6. Coverage of action (select one)
- Part of the development
- Total development

- 7. Timeline for activity:
  - a. Actual or projected start date of activity:
  - b. Projected end date of activity: 2019

BHA plans to retain ownership and management.

Demolition / Disposition Activity Description

- 1a. Development name: Walnut Park
- 1b. Development (project) number: MA002000242
- 2. Activity type: Demolition:
- Disposition:

- 3. Application status (select one)
- Approved:
- Submitted:  pending approval, Submitted October 23, 2017
- Planned:

- 4. Date application approved:
- 5. Number of units affected: 165
- 6. Coverage of action (select one)
- Part of the development
- Total development

- 7. Timeline for activity:
  - a. Actual or projected start date of activity:
  - b. Projected end date of activity: 2019

BHA plans to retain ownership and management.

Demolition / Disposition Activity Description

1a. Development name: Ausonia

1b. Development (project) number: MA002000261

2. Activity type: Demolition:

Disposition:

3. Application status (select one)

Approved:

Submitted:  pending approval, Submitted October 23, 2017

Planned:

4. Date application approved:

5. Number of units affected: 100

6. Coverage of action (select one)

Part of the development

Total development

7. Timeline for activity:

a. Actual or projected start date of activity:

b. Projected end date of activity: 2019

BHA plans to retain ownership and management.

Demolition / Disposition Activity Description

1a. Development name: Eva White

1b. Development (project) number: MA002000241

2. Activity type: Demolition:

Disposition:

3. Application status (select one)

Approved:

Submitted:

Planned:

4. Date application approved:

5. Number of units affected: 102

6. Coverage of action (select one)

Part of the development

Total development

7. Timeline for activity:

a. Actual or projected start date of activity: 2018

b. Projected end date of activity: 2019

## **20. Occupancy by Over-Income Families**

BHA has no policy for over-income families.

## **21. Occupancy by Police Officers**

See Admissions and Continued Occupancy Policy (ACOP) section 10.6. for policy on Occupancy by Police Officers. BHA doesn't have any units officially occupied by law enforcement officers as reported in PIC.

## 22. Non-Smoking Policies

### **NON-SMOKING POLICY from Section 18 of the BHA Public Housing Lease**

- A. **Purpose of Non-Smoking Policy.** The parties (BHA and the Tenant/Resident) desire to mitigate (i) the irritation and known health effects of secondhand smoke; (ii) the increased maintenance, cleaning and redecorating costs from smoking; (iii) the increased risk of fire from smoking; and (iv) the higher costs of fire insurance for a non-smoke-free building.
- B. **Definition of Smoking.** The term “smoking” means inhaling, exhaling, breathing, or carrying or possessing any lighted cigarette, cigar, pipe or other tobacco product or similar lighted product in any manner or in any form.
- C. **Non-Smoking Area.** Resident agrees and acknowledges that the premises to be occupied by Resident and members of Resident's household and any interior common areas, including but not limited to community rooms, community bathrooms, lobbies, reception areas, hallways, laundry rooms, stairways, offices and elevator, within all living units, and **within a specified distance from building(s), as determined by the property manager in consultation with the residents**, including entry ways, porches, balconies and patios have been designated as a Non-smoking living environment. Resident and members of Resident's household shall not smoke anywhere in said Non-Smoking Area, including in the unit rented by Resident, the building where Resident's dwelling is located, or in any of the common areas or adjoining grounds of such building including the steps, patios or yards, nor shall Resident permit any guests or visitors under the control of Resident to smoke in said Non-Smoking Area.
- D. **Resident to Promote Non-Smoking Policy and to Alert Landlord of Violations.** Resident shall inform Resident's guests of the non-smoking policy. Further, Resident shall promptly give Landlord a written statement of any incident where tobacco smoke is migrating into the Resident's unit from sources outside of the Resident's unit.
- E. **Landlord to Promote Non-Smoking Policy.** Landlord shall post no-smoking signs at entrances and exits, in common areas, and in conspicuous places adjoining the grounds of the Non-Smoking Area.
- F. **Landlord Not a Guarantor of Smoke-Free Environment.** Resident acknowledges that Landlord's adoption of a non-smoking living environment does not make the Landlord or any of its managing agents the guarantor of Resident's health or of the non-smoking condition of the Resident's unit and the common areas. However, Landlord shall take reasonable steps to enforce the non-smoking terms of this leases and to make the Non-Smoking Area as smoke-free as is reasonably possible. Landlord is not required to take

steps in response to smoking unless Landlord knows of said smoking or has been given written notice of said smoking.

**G. Effect of Breach and Right To Terminate Lease.** A breach of this Section of the Lease shall give each party all the rights contained herein, as well as the rights otherwise contained in the Lease. A material or continuing breach of this Section shall be a material breach of the Lease and grounds for termination of the Lease by the Landlord. **Tenant acknowledges that the remedy for smoking within the apartment may be the assessment of a charge of up to two hundred-fifty dollars (\$250.00) for each smoking incident. Charges will be used by the BHA towards the costs of refurbishing the apartment.**

**H. Disclaimer by Landlord.** Resident acknowledges that Landlord's adoption of a non-smoking living environment, does not in any way change the standard of care that the Landlord or managing agent would have to a resident household to render buildings and premises designated as non-smoking any safer, more habitable, or improved in terms of air quality standards than any other rental premises. Landlord specifically disclaims any implied or express warranties that the building, common areas, or Resident's premises will have any higher or improved air quality standards than any other rental property. Landlord cannot and does not warrant or promise that the rental premises or common areas will be free from secondhand smoke. Resident acknowledges that Landlord's ability to police, monitor, or enforce the provisions of this Section is dependent in significant part on voluntary compliance by Resident and Resident's guests, as well as by other residents and guests in other parts of the Non-Smoking Area. Residents with respiratory ailments, allergies, or any other physical or mental condition relating to smoke are put on notice that Landlord does not assume any higher duty of care to enforce this Section than any other landlord obligation under the Lease.



## 23. Project-Based Vouchers

Project-based Vouchers: Boston Housing Authority Section 8 Project Based Voucher Program

### **Background**

As a result of the Fiscal Year 2001 HUD Appropriations Act, regulations were issued incorporating the Project Based Assistance requirements into the merged voucher program. These regulations were originally published in the Federal Register on January 16, 2001 and permitted the BHA to enter into a housing assistance payments (HAP) contracts with otherwise qualified owners provided the HAP contracts were in congruence with the PHA Plan (see 42 U.S.C. 1437c-1, implemented at 24 CFR part 903.) HUD defines “consistency with the PHA Plan” as a demonstration by the PHA that circumstances exist that indicate that project basing of the units, rather than tenant-basing of the same subsidy assistance is an appropriate option. Subsequently, HUD promulgated the Project Based Voucher Program; Final Rule on October 13, 2005, incorporating therein the sum and substance of the January, 2001 Initial Guidance. The following discusses the BHA’s implementation of this important policy tool.

### **PHA Plan**

HUD's initial guidance published January, 2001 and again incorporated into the October, 2005 final rule specifies that PHAs that wish to use the project-based voucher option must attach a statement to the PHA Plan template. 66 Fed. Reg. 3608.

- The statement must include the projected number of project-based units and general locations, and**
- how project basing would be consistent with the PHA plan.**

### **The Projected Number of Project Based Units**

Under the Project Based Voucher (PBV) regulations, the BHA has the option to convert up to 20% of our tenant based voucher allocation to project based assistance. With the BHA’s present portfolio size of 14,481\* tenant-based units, 20% would equate to 2896 units. By the end of BHA Fiscal Year 2017, the BHA anticipates that it will have 1521 units under contract in its PBV Program.

In 2018 and 2019, BHA anticipates a number of PBV projects that will be excluded from the 20% threshold as they will result from Public Housing developments converted under HOTMA.

The BHA may grant project base vouchers only if the contract is consistent with the goals of deconcentrating poverty and expanding housing and economic opportunities. Projects may not be sited in areas where the census data reflects a poverty rate of greater than 20% unless there is evidence that the project will further deconcentration goals. All of the BHA’s Project Based Vouchers under lease have met HUD’s requirements listed above regarding the location of projects.

## **Future Siting of Section 8 Based Voucher Projects:**

### **Strategic Investment**

The PBV rules permit a PHA to give an award of PBV vouchers if a developer has successfully obtained financing from other competitive rounds; where an award of PBV assets was not contemplated. In the event that resources permit and an otherwise qualified project is presented, the BHA reserves the ability to review individual requests. All units must serve homeless households and/or elderly / disabled households.

Future PBV project sites should have strategic importance for the social or economic well-being of the community. This should be demonstrated both by an analysis of how the proposed project will meet a specific community need as well as by the level of public support for the project. By necessity, this will vary depending on the type of project being proposed. The following guidelines should be considered:

**Construction type:** New construction projects have the greatest physical impact on the surrounding community, and thus should provide a clear justification for the choice of location and how the project will impact (positively or negatively) the immediate surrounding neighborhood. Adaptive reuse projects should justify the impact of the converted use on the surrounding area. The rehabilitation of vacant/abandoned buildings should explain why the particular building(s) was selected and the impact its restoration will have on nearby properties and the neighborhood. Preservation projects of occupied buildings generally may or may not have any impact on the surrounding neighborhood. Finally, larger projects of any type tend to have greater impacts than smaller projects.

**Neighborhood needs:** Neighborhood needs can be demonstrated in several ways. The most significant method, for example, is when the project is the outcome of a participatory neighborhood planning process that has identified the strategic importance of specific sites and buildings as part of a larger neighborhood development plan. A similar though less formal method is when a building or site has been identified by a community group as very important for redevelopment (e.g. perhaps it is a major eyesore at a key location) Neighborhood needs may also be supported by data that demonstrate there is a shortage of a particular housing type (e.g. units for single people, large families, etc.).

**Citywide needs:** If the project is intended to serve more of a citywide housing need -- for example, supportive housing for the disabled, elderly, and/or homeless -- the applicant should provide information supporting the need for that housing and as well as the choice of location versus other possible locations.

**Community support:** Ideally, all projects will have already established firm community support. This is not always possible, however. The project should be able to demonstrate local neighborhood support and/or the support of citywide organizations, to the extent the project is serving a broader citywide need. If support has not been established at the time of application, the applicant must submit a plan for further outreach that is appropriate to the type of project being proposed. It is important for projects serving citywide needs to establish meaningful contact with local abutters and neighborhood organizations. It is also important to establish a greater level of support for projects that will have significant physical impacts (e.g. a large new construction project). Final funding commitments will be made only following successful completion of the outreach plan.

How Project Basing is Consistent with the PHA Plan

The BHA has elected to convert tenant-based assistance to project based assistance to encourage new construction and rehabilitation.

Project based housing provides long term assets which are dedicated to housing persons of low income, as well as special needs tenants. These units will not experience fluctuations in availability and price to which the general housing market is subject.

#### **24. Units with Approved Vacancies for Modernization**

See Admissions and Continued Occupancy Policy section 6.2.3 for policy on units with approved vacancies for modernization. BHA currently doesn't have any units officially offline as funded for modernization in PIC.

## 25. Other Capital Grant Programs

Yes  No: e) Will the PHA be conducting any other public housing development or replacement activities not discussed in the Capital Fund Program Annual Statement?

If yes, list developments or activities below:

Replacement Housing Factor (RHF) Funding Plans are available for review in the BHA Real Estate Department. Funds from the current RHF grants have been used in the development of Washington Beech Phase 2 and are now being used in connection with Old Colony Phase 3 redevelopment. RHF grant funding is as follows:

Increment	Grant Year	RHF Grant Number	Dollar Amount	Obligation/Expenditure Status	Use
1	FFY 2012	MA-06-R002-501-12	\$1,232,435	Partially obligated and expended	Old Colony Phase 3
2	FFY 2012	MA-06-R002-502-12	\$992,961	Washington Beech - expended / Old Colony -to be obligated	Washington Beech Phase 2 / Old Colony Phase 3
1	FFY 2013	MA-06-R002-501-13	\$733,139	Unobligated	Old Colony Phase 3
2	FFY 2013	MA-06-R002-502-13	\$1,273,359	Unobligated	Old Colony Phase 3
1	FFY 2014	MA-06-R002-501-14	\$231,469	Unobligated	Old Colony Phase 3
2	FFY 2014	MA-06-R002-502-14	\$1,182,937	Unobligated	Old Colony Phase 3
1	FFY 2015	MA-06-R002-501-15	\$230,515	Unobligated	Old Colony Phase 3
2	FFY 2015	MA-06-R002-502-15	\$828,377	Unobligated	Old Colony Phase 3
1	FFY 2016	MA06-R002-501-16	\$235,125	Unobligated	Old Colony Phase 3
2	FFY 2016	MA06-R002-502-16	\$225,692	Unobligated	Old Colony Phase 3
2*	FFY 2017	MA06-R002-502-17	\$227,036	Unobligated	Old Colony Phase 3

\*There was no increment 1 grant in 2017.

As of 9/30/17

