# Supplement to HUD Form 50075: Plan Elements November 6, 2014

## Table of Contents

Title	Page	Revised	Not Revised
Section 6			Revised
Eligibility, Selection and Admissions	2		X
Policies, including Deconcentration and			
Wait list Procedures			
Financial Resources	14		X
Rent Determination	15		X
Operation and Management	20		X
Grievance Procedures	25		X
Designated Housing for Elderly and	26	X	
Disabled Families			
Community Services and Self-Sufficiency	29		X
Safety and Crime Prevention	34		X
Pets	37		X
Civil Rights Certification	37		X
Fiscal Year Audit	38		X
Asset Management	39		X
Violence Against Women Act Policy	40		X
Description of VAWA activities, services,	48		X
or programs			
Organization Chart	51		X

1

6.0 PHA Plan Update

1. Eligibility, Selection and Admissions Policies, including Deconcentration and **Wait list Procedures** 

Α.	Pub	lic	Hou	ısing

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

<b>(1)</b>	Tliaibili4.
(1)	<b>Eligibility</b>

(1) Engibility
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, and for residual tenancy applicants.
<ul> <li>b. Which non-income (screening) factors does the PHA use to establish eligibility for admission to public housing (select all that apply)?</li> <li>Criminal or Drug-related activity</li> <li>Rental history</li> <li>Housekeeping which may include home visits when negative housekeeping</li> </ul>
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. X 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
<ul> <li>a. Which methods does the PHA plan to use to organize its public housing waiting list (select all that apply)</li> <li>Community-wide list</li> </ul>
Supplement to HUD Form 50075: Plan Elements

Si	ab-jurisdictional lists te-based waiting lists ther (describe)
<ul><li>□ PH</li><li>□ PH</li><li>□ Ot</li><li>□ Ca</li></ul>	A main administrative office HA development site management office (obtain information) ther: by mail, if out of state or as a reasonable accommodation an obtain application information by phone, via e-mail, and by downloading trms from the BHA website (www.bostonhousing.org)
	PHA plans to operate one or more site-based waiting lists in the coming year, each of the following questions; if not, skip to subsection (3) <b>Assignment</b>
publ	many site-based waiting lists will the PHA operate in the coming year? 50 lic housing; and 5 HOPE VI and 1 at Franklin Hill and Old Colony privately rated 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.
	ere can interested persons obtain more information about and sign up to be on 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), 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 - 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

<ul> <li>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)</li> <li>One</li> <li>Two</li> </ul>
Three or More
b. \( \subseteq \text{ Yes } \subseteq \text{ No: Is this policy consistent across all waiting list types?} \)
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%.
<ul> <li>b. Transfer policies:</li> <li>In what circumstances will transfers take precedence over new admissions? (list below)</li> <li>Emergencies (Every other fourth unit by Bedroom Size by Development will be offered to Emergency Transfers)</li> <li>Overhoused: (by 2 or more bedrooms are considered as Administrative Transfers)</li> <li>Underhoused: (by 3 or more bedrooms are considered Emergency Transfers)</li> <li>Medical justification: (in a life threatening situation)</li> <li>Administrative reasons determined by the PHA (e.g., to permit modernization work, address severe overhousing, make apartments with special features available to persons with disabilities, address safety needs due to domestic violence related matters, etc.)</li> </ul>
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 Emergency Transfers and all new admissions; 2) Emergency Transfers 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 <b>Occupancy</b> )
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)
For	rmer 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
$\mathbb{H}$	Substandard housing Homelessness
	High rent burden (rent is > 50 percent of income) (for Elderly/Disabled Program
	only)
$\boxtimes$	
$\overline{}$	ner preferences: (select below)
	Working families and those unable to work because of age or disability
	Veterans and veterans' families
$\forall$	Residents who live and/or work in the jurisdiction  Those enrolled currently in educational, training, or upward mobility programs
H	Households that contribute to meeting income goals (broad range of incomes)
Ħ	Households that contribute to meeting income requirements (targeting)
	Those previously enrolled in educational, training, or upward mobility
	programs
$\boxtimes$	Other preference(s) (list below)
•	Disabled head or co-head (family housing program only)
•	Designated Housing Preference (for Elderly/Disabled housing program only)
•	Displaced Resident from a Unit in the City of Boston Preference

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.

• Supported Housing Programs made housing offers before Priority One Applicants.

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

Former Federal preferences:  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  Victims of domestic violence  Homelessness  High rent burden (Elderly/Disabled program only)  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)  Designated Housing Preference (for Elderly/Disabled housing program only)  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)

PHA briefing seminars or written materials

The PHA's Admissions and Continued Occupancy policy

The PHA-resident lease

Policie	Other source (list): BHA website ( <a href="www.bostonhousing.org">www.bostonhousing.org</a> ), BHA Reasonable amodation in Housing Policy, Limited English Proficiency (LEP) Policy, BHA Petes, Transfer Guide, Violence Against Women Act (VAWA) Policy, Rent Manual – ble at management offices.
	v often must residents notify the PHA of changes in family composition? (select apply)  At an annual reexamination and lease renewal  Any time family composition changes  At family request for revision
	Other (list)  concentration and Income Mixing
	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 <b>admissions policies</b> based on the results of the required analysis of the need to promote deconcentration of poverty or to assure income mixing?
c. If th	e 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 <b>other</b> policies based on the results of the required analysis of the need for deconcentration of poverty and income mixing?
e. If the app	ne answer to d was yes, how would you describe these changes? (select all that ly)
	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 incomemixing Other (list below)
	sed on the results of the required analysis, in which developments will the PHA 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:
_	sed on the results of the required analysis, in which developments will the PHA 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. Se	ection 8
compo Unles based	ptions: PHAs that do not administer section 8 are not required to complete this sub- onent. s otherwise specified, all questions in this section apply only to the tenant- section 8 assistance program (vouchers, and until completely merged into the ner program, certificates).
(1) T:U	2.21.2124
(1) EI	<u>igibility</u>
a. Wh	nat 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)
b. 🖂	Yes No: Does the PHA request criminal records from local law enforcement agencies for screening purposes?
	Yes No: Does the PHA request criminal records from State law enforcement
c. 🔀	agencies for screening purposes?

<ul> <li>e. Indicate what kinds of information you share with prospective landlords? (select all that apply)</li> <li>Criminal or drug-related activity</li> <li>Other (describe below) Former landlord name and address upon request by prospective landlord as required by federal regulation. 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.</li> </ul>
(2) Waiting List Organization
<ul> <li>a. With which of the following program waiting lists is the Section 8 Tenant-Based assistance waiting list merged? (select all that apply)</li> <li>None</li> <li>Federal public housing</li> <li>Federal moderate rehabilitation</li> <li>Federal project-based certificate program</li> <li>Other federal or local program (list below)</li> </ul>
<ul> <li>b. Where may interested persons apply for admission to section 8 tenant-based assistance? (select all that apply)</li> <li>PHA main administrative office Leased Housing Division-Occupancy Department and mail. Application information can be obtained via website (www.bostonhousing.org), phone, and e-mail.</li> <li>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.</li> </ul>
(3) Search Time
a. X 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)

Forme	er Federal preferences
$\boxtimes$	Involuntary Displacement (Disaster, Government Action, Action of Housing
	Owner through no fault of your own, Inaccessibility, Property Disposition),
	victims of reprisals or hate crimes
$\boxtimes$	Victims of domestic violence
Ħ	Substandard housing
$\overline{\boxtimes}$	Homelessness
	High rent burden (rent is > 50 percent of income)
Other	preferences (select all that apply)
$\boxtimes$	Working families and those unable to work because of age or disability
$\overline{\square}$	Veterans and veterans' families
	Residents who live and/or work in your jurisdiction
	Those enrolled currently in educational, training, or upward mobility programs
Ħ	Households that contribute to meeting income goals (broad range of incomes)
Ħ	Households that contribute to meeting income requirements (targeting)
Ħ	Those previously enrolled in educational, training, or upward mobility programs
$\overline{\boxtimes}$	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; <u>AND</u> 2) has outgrown or completed the program's services; <u>AND</u> 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 High Utilizers of Emergency Services
- 8. Applicants referred by Massachusetts Department of Housing and Community Development for Leading the Way Home Program
- 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

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

Other p	preferences (select all that apply)
	Working families and those unable to work because of age or disability
$\overline{\boxtimes}$	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
$\boxtimes$	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	Special Purpose Vouchers: The BHA will admit an Applicant who qualifies for a				
Purpose	particular category of Special Purpose Vouchers to the Section 8 program before all				
Voucher	other Applicants on the waiting list if the BHA is not currently assisting the required				
S	number of special purpose vouchers families				
Super	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*				
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.				
Preferen	One or two-person elderly, disabled or displaced families (including persons who are				
ce	displaced as a result of expiring use) over other singles.				
Points					
Preferen	Displaced Resident from a unit in the City of Boston Preference				
ce					
Points					

<sup>\*</sup>The Section 8 Tenant-Based Voucher waiting list is closed except for current BHA residents who are determined to qualify for a Super Priority One status and for current 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. Referrals will be accepted from City of Boston Interagency Council on Housing and Ending Homelessness Programs, 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

Sectio	on 8 Admissions Point System		
(a)	The <b>Priority point system</b> used by BHA to process waiting lists is as follows:	ss new Admission	s on all
	PBV w/ 1 Year residency	95 points	
	Super Priority Applicants	75 points	
	City of Boston ICHH Programs Priority	50 points	
	Leading the Way Home	50 points	
	Priority One Applicants	30 points	
	Standard Applicants	0 points	
(b)	<b>Preference points</b> will be added to Priority points Admission only:	as follows for Ap	plicants for
	<ol> <li>Project Based Voucher Elderly</li> <li>Preference under Olmstead</li> <li>Homeless Service Organizations</li> <li>Single Elderly or Disabled</li> <li>Veterans Preference</li> <li>Displaced Boston Resident Preference</li> <li>Working Families, Single Disabled, Single Elder</li> </ol>	7 7 5 3 2	00 Points Points Points Points points points points
app ⊠ tenant-¹	ong applicants on the waiting list with equal prefere dicants selected? (select one) Date and time of application (after lottery for Housbased) Drawing (lottery) or other random choice technique the PHA plans to employ preferences for "residents was application."	ing Choice Vouch	er Program
	diction" (select one)  This preference has previously been reviewed and a		
VV	This preference has previously been reviewed and a	ւրըւսνեն նչ ւ100	101

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
<u>(5)</u>	Special Purpose Section 8 Assistance Programs
t	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, Leased Housing asonable Accommodation Policy, BHA Limited English Proficiency Policy, Individual gram mailings (i.e. Family Self-Sufficiency (FSS) program marketing), advocacy up meetings, support service groups, www.bostonhousing.org
	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

#### 2. 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.

Financial Resources: Planned Sources and Uses			
Sources	Planned \$	Planned Uses	
1. Federal Grants			
1a. Public Housing Operating Fund	\$54,591,705		
1b. Public Housing Capital Fund	\$18,479,829		
1c. HOPE VI Revitalization			
1d. HOPE VI Demolition			
1e. Annual Contributions for Section 8 Tenant-	\$185,995,772		
Based Assistance			
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	\$7,102,781		
Prior Year Federal Grants (unobligated funds only)			
2a. CGP/RHF	\$8,667,104		
2b. HOPE VI	\$1,322,303		
3. Public Housing Dwelling Rental Income	\$31,640,400	Operating	
4. Other income, Vending /Laundry, Cell Towers	\$500,000	Operating, Social Services	
4a. Investment income	\$10,000	Operating	
4b. Non-dwelling rent	\$14,000	Operating	
5. Non-federal sources (list below)			
CFFP (unobligated)		Capital	
Donations	\$20,000	Social Services	
Total resources	\$308,343,824		

#### 3. 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. Min	imum Rent
	t 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 ye	s to question 2, list these policies below:
c. Rer	nts 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?
_	es to above, list the amounts or percentages charged and the circumstances under ich these will be used below:

	A 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. Ceili	ing rents
	you have ceiling rents? (rents set at a level lower than 30% of adjusted income) lect 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)
exclude	For all developments (includes family and elderly/disabled developments; es 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)
	ect the space or spaces that best describe how you arrive at ceiling rents (select all tapply)
	Market comparability study Fair market rents (FMR) 95 <sup>th</sup> percentile rents

<ul> <li>75 percent of operating costs</li> <li>100 percent of operating costs for general occupancy (family) developments</li> <li>Operating costs plus debt service</li> <li>The "rental value" of the unit</li> <li>Other (list below) Set at Flat Rent levels for each bedroom size (80% of Fair Market Rent)</li> </ul>
f. Rent re-determinations:
<ol> <li>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)</li> <li>Never</li> </ol>
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) Flat Rents for HOPE VI developments at Orchard Commons and Orchard Gardens have been approved by the BHA and were implemented in April 2001. Flat Rents for Mission Main have been approved by the BHA and were implemented in January 2002. HOPE VI sites set their flat rents at the Tax Credit Maximum Rents. For updated flat rent information, contact the respective management offices.

The Boston Housing Authority hereby amends its flat rent policies to comply with the statutory changes contained within, Public Law 113-76, the Fiscal Year 2014 Appropriation Act.

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. The new flat rental amount will apply to all new program admissions effective October 31, 2014. 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 if there is a significant change the new rent 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 recertify 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.

	at is the PHA's payment standard? (select the category that best describes your
standa	,
H	At or above 90% but below100% of FMR
$\square$	100% of FMR
Ä	Above 100% but at or below 110% of FMR
Ш	Above 110% of FMR (if HUD approved; describe circumstances below)
h If 4	he perment standard is lever than EMD, why has the DIIA selected this standard?
	he payment standard is lower than FMR, why has the PHA selected this standard? lect all that apply)
(SC)	FMRs are adequate to ensure success among assisted families in the PHA's
Ш	1
	segment of the FMR area The PHA has chosen to serve additional families by lowering the payment
Ш	standard
	Reflects market or submarket
H	
Ш	Other (list below)
c If t	he payment standard is higher than FMR, why has the PHA chosen this level?
	lect 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
H	To increase housing options for families
H	Other (list below)
Ш	Other (list below)
d Ho	www often are payment standards reevaluated for adequacy? (select one)
	Annually
$\square$	Other (list below) As needed, but at minimum annually.
	Other (list below) his needed, but at imminum amulany.
e. Wł	nat factors will the PHA consider in its assessment of the adequacy of its payment
	ndard? (select all that apply)
	Success rates of assisted families
Ħ	Rent burdens of assisted families
Ħ	Other (list below) Market Conditions
	C 1110 C (-110 C 110 C 1
(2) M	inimum Rent
a. Wł	nat amount best reflects the PHA's minimum rent? (select one)
$\boxtimes$	\$0
П	\$1-\$25
	\$26-\$50
b.	☐ Yes ☒ No: Has the PHA adopted any discretionary minimum rent hardship
ex	emption policies? (if yes, list below)

# **4.**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

Descri	be the PHA's management structure and organization.
(select	,
	An organization chart showing the PHA's management structure and organization is on page 53.
	A brief description of the management structure and organization of the PHA follows:

Tollows.		ВНА	PRIVATELY
DEVELOPMENT NAME	ADDRESS	MANAGED	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	
Bromley Park	42 Horan Way, Jamaica Plain, MA 02130	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	114 Rutherford Street, Charlestown, MA 02129		X
Groveland	15 Mary Moore Beatty Circle, Mattapan, MA 02126	X	
Hampton House	155 Northampton Street, Roxbury, MA 02118	X	
Hassan	705 River Street, Mattapan, MA 02126	X	
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	354 Old Colony Avenue, South Boston, MA	X	
McCormack	02127		
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, and 2B	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 Street, 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. 9th 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**

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.)

Program Name	Units or Families	Expected
0	Served at Year	Turnover
	Beginning	
Public Housing	8257*	825
Section 8 Vouchers	14,234**	608
Section 8 Certificates	0	
Section 8 Project Based	1516****	96
voucher Program		
Section 8 Mod Rehab	746	44
Section 8 New	0	0
Construction /		
Substantial Rehab		
Program		
Special Purpose Section		
8 Certificates/Vouchers		
(list individually)		
Veterans	520***	70
Administration		
Supportive Housing		
(VASH)		
Mainstream Housing	300***	10
Program		
Designated Housing	200***	2
Program vouchers for		
non-elderly disabled		
currently on BHA's		
Elderly/Disabled Public		
Housing Program		
waiting list		
Family Unification	155***	10
Program		
NAACP	400***	10
Public Housing Drug	N/A	N/A
Elimination Program		
(PHDEP)		
Other Federal		N/A
Programs(list		
individually)		

Elderly and Disabled	3243	325
Resident Services		
Program		
Supportive Housing	77	15
Services Program		
HOPE VI Resident	481	N/A
Services Program		
Section 8 Family Self-	200****	N/A
Sufficiency Program		
Resident Employment	115*****	N/A
Program		
Public Housing Family	50	N/A
Self-Sufficiency		
Resident Services	650	N/A
Program (ROSS		
funded)		

<sup>\*</sup> total federal development only anticipated occupancy on 4/1/15.

\*\*\*\*\*\*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.

<sup>\*\*</sup>This figure includes all HCVP and VASH baseline units. The number of units under lease will vary based on Annual Appropriations.

<sup>\*\*\*</sup>These figures represent the maximum units which may be utilized under each Annual Contributions Contract

<sup>\*\*\*\*</sup>Includes all units currently under contract and new units to be leased in BHA FY 2016(starts April 2015).

<sup>\*\*\*\*\*\*</sup>Current enrollment has is declining due to contract completions, half of which with escrows.

- (1) Agency-wide policies (govern both Public Housing and Section 8): (list below)
  - Cash Management and Investment Policy
  - Civil Rights Protection Plan
  - Confidentiality & Confidentiality Agreement Policy
  - Drug Free Workplace Policy
  - EIV Security Manual
  - Limited English Proficiency Policy
  - Minority Participation Policy
  - Procurement Policy
  - Resident Employment Provision
  - Section 3 Policy
  - Sexual Harassment Policy
  - Social Media Participation Policy
  - Storm Policy for Staff Attendance
  - Technology Resources Usage Policy (E-mail)
  - Tenant Grievance Procedures
  - 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
- Reasonable Accommodation Policy for Public Housing
- Rent Manual
- Resident Relocation and Rehousing Policy
- Site Based Purchasing System Policy
- Standard Operating Procedures for Maintenance
- Tenant Participation (LTO) Policy

### (2) Section 8 Management: (list below)

- Section 8 Administrative Plan
- Reasonable Accommodations in Rental Assistance Policies and Procedures
- Section 8 Moderate Rehabilitation Administrative Plan

## 5. 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: Since the BHA has designed the grievance procedures to comply with both state and federal requirements, one additional provision required by the Department of Housing and Community Development, the state agency that regulates state-funded public housing, has been extended to residents at federal developments too. Decisions of the Grievance Panel may be appealed to a designee of the Administrator.
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
<ul><li>PHA development management offices</li><li>Other (list below)</li></ul>
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
<ul> <li>Which PHA office should applicants or assisted families contact to initiate the informal review and informal hearing processes? (select all that apply)</li> <li>PHA main administrative office         <ul> <li>BHA Department of Grievances and Appeals</li> <li>52 Chauncy Street, 9th Floors</li> </ul> </li> </ul>
(617) 988-4579  Other (list below)

## 6. Designated Housing for Elderly and Disabled Families

Exemptions from this Co.	mponent; 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	on
Yes No:	Has the PHA provided all required activity description information for this component in the <b>optional</b> Public Housing Asset Management Table? If "yes", skip to the next component. If "No", complete the Activity Description table below.
Des	signation of Public Housing Activity Description
1a. Development nan	signation of Public Housing Activity Description ne: All Elderly/Disabled Program Developments (See supplemental
1a. Development nan table below)	ne: All Elderly/Disabled Program Developments (See supplemental
1a. Development nan table below) 1b. Development (pro	ne: All Elderly/Disabled Program Developments (See supplemental pject) number: All Elderly/Disabled Program Developments (See
1a. Development nan table below) 1b. Development (pro supplemental table be	ne: All Elderly/Disabled Program Developments (See supplemental pject) number: All Elderly/Disabled Program Developments (See
1a. Development nantable below) 1b. Development (prosupplemental table be 2. Designation type:	ne: All Elderly/Disabled Program Developments (See supplemental pject) number: All Elderly/Disabled Program Developments (See
1a. Development nantable below) 1b. Development (prosupplemental table be 2. Designation type: Occupancy by Occupancy by	ne: All Elderly/Disabled Program Developments (See supplemental oject) number: All Elderly/Disabled Program Developments (See elow)  y only the elderly  y families with disabilities
1a. Development nantable below) 1b. Development (prosupplemental table because) 2. Designation type: Occupancy by Occupancy by Occupancy by	ne: All Elderly/Disabled Program Developments (See supplemental oject) number: All Elderly/Disabled Program Developments (See elow)  y only the elderly  y families with disabilities  y only elderly families and families with disabilities  in ratio of
1a. Development nantable below) 1b. Development (prosupplemental table because) 2. Designation type: Occupancy by Occupancy by Occupancy by 80% elderly, 2	ne: All Elderly/Disabled Program Developments (See supplemental Dject) number: All Elderly/Disabled Program Developments (See Blow)  y only the elderly  y families with disabilities  y only elderly families and families with disabilities  (in ratio of 20% disabled at each site)
1a. Development nantable below) 1b. Development (prosupplemental table becompanied) 2. Designation type: Occupancy by Occupancy by Occupancy by Occupancy by 80% elderly, 23. Application status	ne: All Elderly/Disabled Program Developments (See supplemental oject) number: All Elderly/Disabled Program Developments (See blow)  y only the elderly  y families with disabilities  y only elderly families and families with disabilities  (in ratio of 20% disabled at each site) (select one)
1a. Development nantable below) 1b. Development (prosupplemental table below) 2. Designation type: Occupancy by Occupancy by Occupancy by 80% elderly, 2 3. Application status Approved; incomparison of the status and	ne: All Elderly/Disabled Program Developments (See supplemental Dject) number: All Elderly/Disabled Program Developments (See Blow)  y only the elderly  y families with disabilities  y only elderly families and families with disabilities  (in ratio of 20% disabled at each site)
1a. Development nantable below) 1b. Development (prosupplemental table below) 2. Designation type: Occupancy by Occupancy by Occupancy by 80% elderly, 2 3. Application status Approved; incomparison of the status and	ne: All Elderly/Disabled Program Developments (See supplemental Diject) number: All Elderly/Disabled Program Developments (See Blow)  y only the elderly
1a. Development nantable below) 1b. Development (prosupplemental table because) 2. Designation type: Occupancy by Occupancy by Occupancy by 80% elderly, 23. Application status Approved; incurs Submitted, per Planned appli	ne: All Elderly/Disabled Program Developments (See supplemental Diject) number: All Elderly/Disabled Program Developments (See Blow)  y only the elderly
1a. Development nantable below) 1b. Development (prosupplemental table becompanies) 2. Designation type: Occupancy by Occupancy by Occupancy by Occupancy by 80% elderly, 2 3. Application status Approved; incompanies applies. 4. Date this designate	ne: All Elderly/Disabled Program Developments (See supplemental Diject) number: All Elderly/Disabled Program Developments (See Blow)  y only the elderly
1a. Development nantable below) 1b. Development (prosupplemental table becompanies) 2. Designation type: Occupancy by Occupancy by Occupancy by Occupancy by 80% elderly, 2 3. Application status Approved; incompanies applies. 4. Date this designate	ne: All Elderly/Disabled Program Developments (See supplemental oject) number: All Elderly/Disabled Program Developments (See below)  y only the elderly
1a. Development nantable below) 1b. Development (prosupplemental table becompanied table becompanied) 2. Designation type: Occupancy by Occupancy by Occupancy by Occupancy by 80% elderly, 23. Application status Approved; in Submitted, per Planned application of a present of the provision of a present able to the provision a	ne: All Elderly/Disabled Program Developments (See supplemental Diject) number: All Elderly/Disabled Program Developments (See Below)  y only the elderly
1a. Development nantable below) 1b. Development (prosupplemental table below) 2. Designation type: Occupancy by Occupancy by Occupancy by 80% elderly, 2 3. Application status Approved; incurrent Submitted, per Planned appli 4. Date this designation 5. If approved, will to New Designation	ne: All Elderly/Disabled Program Developments (See supplemental Diject) number: All Elderly/Disabled Program Developments (See Below)  y only the elderly

	Part	of the	deve	lopment
--	------	--------	------	---------

Total development (See supplemental table below)

Update to 2014 Plan Amendment 4: The 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. 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.

# Designation of Public Housing: Supplemental Table Federal Elderly/Disabled Development Proposed Designation

	Development	Development	Elderly		Elderly	Non-Elderly
	Number	Name	Preference*	Available	80%	Disabled
				Units		20%
1	MA002107119	BROMLEY PARK		49	39	10
		ELDERLY**				
2	MA002000226	POND STREET		43	34	9
3	MA002000227	ANNAPOLIS STREET		55	44	11
4	MA002000228	ASHMONT STREET		53	42	11
5	MA002000229	HOLGATE APARTMENTS	Υ	80	64	16
6	MA002000230	FOLEY APARTMENTS		95	76	19
7	MA002000232	GROVELAND	Y	46	37	9
8	MA002000234	DAVISON	Y	46	37	9
9	MA002000235	WASHINGTON STREET		81	65	16
10	MA002000236	WEST NINTH STREET		83	66	17
11	MA002000237	J.J. CARROLL	Y	63	50	13
12	MA002000238	MEADE APARTMENTS		39	31	8
13	MA002000240	MLK TOWERS		102	82	20
14	MA002000241	EVA WHITE		102	82	20
15	MA002000242	WALNUT PARK	Y	161	129	32
16	MA002000244	FREDERICK DOUGLAS	Y	76	61	15
17	MA002000245	AMORY STREET		183	146	37
18	MA002000247	GENERAL WARREN		94	75	19
19	MA002000249	TORRE UNIDAD	Y	193	154	39
20	MA002000250	ROCKLAND TOWERS	Y	67	54	13
21	MA002000251	CODMAN APARTMENTS	Y	99	79	20
22	MA002002141	HERITAGE APARTMENTS	Y	27	22	5
23	MA002000253	ST. BOTOLPH STREET		130	104	26
24	MA002000254	PASCIUCCO		90	72	18
25	MA002002142	LOWER MILLS	Y	16	13	3
26	MA002000261	AUSONIA HOMES	Y	99	79	20
27	MA002000262	HASSAN APARTMENTS		99	79	20

28	MA002000270	SPRING STREET		103	82	21
29	MA002000271	PATRICIA WHITE		223	178	45
30	MA002000272	ROSLYN APTS	Υ	118	94	24
31	MA002000277	BELLFLOWER STREET		113	90	23
32	MA002000283	PEABODY SQUARE		100	80	20
33	MA002000290	MALONE APTS	Υ	100	80	20
34	MA002000295	COMMONWEALTH		115	92	23
		ELDERLY				
35	MA002000298	HAMPTON HOUSE		76	61	15
36	MA002000299	WASHINGTON MANOR		74	59	15
		Total	14	3293	2634	659

\*Elderly Preference as of September 30, 2014

<sup>\*\*</sup>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.

# 7. 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 subcomponent C.

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

	perative agreements:  No: Has the PHA has 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? <u>DD/MM/YY</u> (Memorandum of Agreement pending.)
	r 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 cointly administer programs Partner to administer a HUD Welfare-to-Work voucher program coint administration of other demonstration program Other (describe)
	vices and programs offered to residents and participants
<u>(</u>	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.)

Services and Programs				
Program Name & Description (including location, if appropriate)	Estimate d Size	Allocation Method (waiting list/random selection/speci fic 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	3243	Open to all residents	Development Office; case manager's office	Public Housing
Supportive Housing Services Program	48	Waiting list	Justice Resource Institute (13) Elders Living at Home (20) PACE (12) Ethos (3)	Public Housing
HOPE VI Resident Services Program	481	Recruited on site; wait list if necessary	Trinity Management LLC at Washington Beech, Laboure Center at Old Colony	Public Housing
NAACP	400	Specific criteria	PHA Main Office	Section 8
Veterans Administration Supportive Housing	520	Specific criteria	VA Medical Center in Boston	Section 8
Section 8 Family Self- Sufficiency Program	200	Open to Section 8 participants	PHA Main Office	Section 8
Leading the Way Home Program	500	Specific Criteria	DHCD in Boston	Section 8
HomeBase Program	200	Specific Criteria	MBHP in Boston	Public Housing
Healthy Start in Housing	75	Specific Criteria	BPHC in Boston	Public Housing

Public Housing Family Self-	50	Specific	Development	Public Housing
Sufficiency Program		Criteria	Offices, PHA Main	
			Office, Amory St.	
			CSD office	
Resident Services Program	650	Specific	Alice Taylor,	Public Housing
(ROSS Program)		Criteria	Bromley Heath,	
			Barkley	
			(Cathedral),	
			Franklin Field,	
			Lenox, Whittier St,	
			& W. Newton	
			Developments	
			primarily	
Resident Employment	115*	Specific	PHA Main Office	Public Housing
Program		criteria	Development	
			Offices	

<sup>\*</sup>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

Family Self Sufficiency (FSS) Participation				
Program	Required Number of	Actual Number of		
	Participants	Participants		
	(start of FY 2013 Estimate)	(As of: DD/MM/YY)		
Public Housing	36	41 as of 9/29/14; anticipate		
		expanding the program to		
		50 in late 2013		
Section 8	0	Approximately 200 as of		
		10/01/14		

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. T	he PHA is complying with the statutory requirements of section 12(d) of the U.S.
H	ousing Act of 1937 (relating to the treatment of income changes resulting from
W	elfare program requirements) by: (select all that apply)
$\boxtimes$	Adopting appropriate changes to the PHA's public housing rent determination
	policies and train staff to carry out those policies
$\boxtimes$	Informing residents of new policy on admission and reexamination
$\overline{\boxtimes}$	Actively notifying residents of new policy at times in addition to admission and
	reexamination. Post changes / 45 day notice
$\boxtimes$	Establishing or pursuing a cooperative agreement with all appropriate TANF
	agencies regarding the exchange of information and coordination of services
$\boxtimes$	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** 

## IMPLEMENTATION OF 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 implement the resident community service requirement. This policy describes the way the BHA will implement 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 a 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 has been modified to include the community service requirement and a community service policy has been approved as part of the 2001 Annual BHA Plan. All residents will be informed of

the implementation of the community service requirement. Those residents who appear to be required to perform community service will be sent an information sheet that provides a description of the requirement, qualifying activities, the exemptions and how the exemptions will be verified.

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: 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.

#### 8. 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

	Describe the need for measures to ensure the safety of public housing residents (selec-
	all that apply)
	High incidence of violent and/or drug-related crime in some or all of the PHA's developments
$\boxtimes$	Residents fearful for their safety and/or the safety of their children
$\square$	Observed lower-level crime, vandalism and/or graffiti
$\boxtimes$	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
$\boxtimes$	
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
$\boxtimes$	Analysis of crime statistics over time for crimes committed "in and around" public housing authority
$\bowtie$	Resident reports
	PHA employee reports
	Police reports
$\overline{\boxtimes}$	Demonstrable, quantifiable success with previous or ongoing anticrime/anti drug
	programs
$\boxtimes$	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

	the crime prevention activities the PHA has undertaken or plans to undertake: 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. Institution of new key security systems  4. Enhanced lease enforcement activity  5. Employment of nationally-accredited police force  6. Expanded training program and new uniforms for Safety Officers  7. Bicycle patrol  8. Establish "Safe Street" teams to address drug issues and violent crimes in high risk areas including follow up "action teams" to address quality of life issues cited in Emergency Transfer applications.
2. Wh	ich developments are most affected? (list below) All developments
C. Co	ordination between PHA and the police
	cribe the coordination between the PHA and the appropriate police precincts for g out crime prevention measures and activities: (select all that apply)
<ul><li>⋈</li><li>⋈</li><li>⋈</li><li>⋈</li><li>⋈</li><li>⋈</li><li></li><li>2. Wh:</li></ul>	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.

Bromley Heath, Charlestown, Mission Main, Alice Taylor, Franklin Field, Lenox

Camden, Mary Ellen McCormack, Fairmount, and Cathedral (Barkley

Apartments).]

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.
<ul> <li>Yes ⋈ No: Is the PHA eligible to participate in the PHDEP in the fiscal year covered by this PHA Plan?</li> <li>Yes ⋈ No: Has the PHA included the PHDEP Plan for FY 2005 in this PHA Plan?</li> <li>Yes ⋈ No: This PHDEP Plan is an Attachment. (Attachment Filename:)</li> </ul>

9. Pets Not Revised

10. Civil Rights Certification Not Revised

# 11. Fiscal Year Audit

1.	Yes 🗌	No:	Is the PHA required to have an audit conducted under section
		5(h)(	(2) of the U.S. Housing Act of 1937 (42 U S.C. 1437c(h))?
		(If no	o, skip to the next component.)
2.	Yes 🗌	No:	Was the most recent fiscal audit submitted to HUD?
3.	Yes 🔀	No:	Were there any findings as the result of that audit?
4.	Yes 🗌	No:	If there were any findings, do any remain unresolved?
			If yes, how many unresolved findings remain?
5.	Yes	No:	Have responses to any unresolved findings been submitted to
			HUD?
			If not, when are they due (state below)?

# 9. 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.
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 <b>not</b> been addressed elsewhere in this PHA Plan?
2. What types of asset management activities will the PHA undertake? (select all that apply)
Private management
<ul> <li>Not applicable</li> <li>Private management</li> <li>Development-based accounting</li> <li>Comprehensive stock assessment</li> <li>Other: (list below) strategic redevelopment planning</li> </ul>
Comprehensive stock assessment
Other: (list below) strategic redevelopment planning
Approach to Preservation; 5-Year Sustainability Plan  8. Yes No: Has the PHA included descriptions of asset management activities in the <b>optional</b> Public Housing Asset Management Table?

### 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, tribunal, 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:
  - 2. 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.
- 3. 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 manage 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 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 emergency 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	617-667-8141				
Deaconess Medical Center					
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					
Hospital	617 -243 - 6521				

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
Multicultual 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	617-742-4911 TTY:
transgender communities)	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

# Boston Housing Authority

