

**Boston Housing Authority  
Designated Housing Plan  
June 15, 2007**

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## **Introduction**

It is the goal of the Boston Housing Authority ("BHA") to make rental subsidies accessible so interested and eligible families can afford safe, decent, and sanitary housing; to provide these housing services with integrity and mutual accountability; and create housing situations which will serve as catalysts for the transformation from dependence to economic self-sufficiency.

This Designated Housing Plan ("the Plan") describes the policies by which the BHA will designate up to 70 % of units to elderly households and 30% of units to non-elderly disabled households in its Federal Elderly/Disabled Program. The Designated Housing Plan is necessary to meet the housing needs of the low-income elderly and non-elderly disabled population of the jurisdiction. The Plan has been created to preserve housing opportunities for the elderly, one of the fastest growing age groups in America today, while maintaining a significant number of housing units for younger disabled applicants in pressing need of affordable housing. The Plan was also created to reduce problems arising from the differing lifestyles of the elderly and non-elderly disabled populations currently housed together in the Authority's Elderly/Disabled developments.

This Plan is in accordance with Section 10 (a) of the "Housing Opportunity Program Extension Act of 1996" and with the HUD Notice PIH 97-12, issued March 12, 1997 and HUD Notice PIH 2005-2 issued January 5, 2005.

### **Designated Housing Plan (DHP) Public Process**

The Plan has been subject to a full public process with notice to Local Tenant Organizations, the Resident Advisory Board, the Monitoring Committee, advocates for the elderly, advocates for non-elderly disabled families, as well as a public hearing.

A detailed outline of the Public Process is as follows:

- Meetings with Local Tenant Organization's – On Monday, November 13, 2006 BHA staff met with task forces from elderly/disabled developments regarding the Designated Housing Plan. Some advocates also attended this meeting.
- Meeting with Resident Advisory Board – BHA staff presented the Designated Housing Plan as an amendment to the 2006 Agency Plan at the Thursday, November 9, 2006 RAB meeting. Staff from Greater Boston Legal Services was present at this meeting.
- 504 Voluntary Compliance Agreement Meeting with Disability Advocates – As part of the 504 VCA, BHA staff meet with Disability Advocates and Greater Boston Legal Services on a regular quarterly basis. BHA staff met with advocates and staff from GBLS on October 13, 2006 to discuss the Designated Housing Plan.
- Public Notice of DHP – BHA published notice of intent to amend the 2006 Agency Plan to propose a new DHP in the Boston Globe announcing a 45 day review and comment period beginning October 23 through December 6, 2006. The DHP was available in the BHA Planning Department, on the BHA website: [www.bostonhousing.org](http://www.bostonhousing.org) and available in the Government Documents section of the Boston Public Library Copley Square branch.

- Letters to Disability, Elderly and Housing Advocates – BHA sent letters to Disabled Advocates (approximately 85), Elderly Advocates (approximately 25), and Housing Advocates (approximately 70) on October 23, 2006 notifying them of the proposed DHP, the opportunity to comment, as well as the date of the public hearing. Numbers are approximate because there is some overlap among the lists.
- Public Hearing – BHA held a public hearing for the DHP on Wednesday, December 6, 2006 at the Boston Public Library.
- Meeting with Advocates – BHA staff held an additional meeting with interested Advocates, including staff from Greater Boston Legal Services, AIDS Housing Corporation, and others to discuss the DHP on Friday, December 8, 2006.
- Comments – As a result of the public process, the BHA received comments from a number of residents as well as advocacy groups both in favor of and opposed to the DHP. ( See Attached)
- Support Letters – In addition to comments received, BHA received several letters of support for the DHP from the City of Boston Commission on Affairs of the Elderly, Boston Partnership for Older Adults, as well as several local tenant organizations at the following developments: Patricia White Apartments, Rockland Apartments, Frederick Douglass Apartments, St. Botolph Apartments, Codman Apartments, and Foley Apartments. (See Attached)

## **I. Justification for Designation**

The Housing Needs Analysis of the City of Boston's Consolidated Plan (July 1, 2003 to June 30, 2007) documents that there is great need for affordable housing for the elderly and the non-elderly disabled. The BHA's Designated Housing Plan is consistent with the goals and priorities of the City's Consolidated Plan as it will secure resources for the identified needs of the elderly and non-elderly disabled populations.

An assessment of the needs of these households is outlined as follows:

### **a) Housing Needs Assessment of Elderly Population**

As documented in the Comprehensive Housing Affordability Strategy Data Housing Problems Output for all Households as of 2000, many of the elderly households in the City of Boston experience housing problems that include, but are not limited to, overcrowded units, a household payment of at least 30 percent of income for housing or physical deficiency of the unit (e.g., lacking complete plumbing). More than 17,000 elderly Boston households had a housing cost burden in excess of 30% of income or lived in substandard and/or overcrowded housing. (See Data Table 1.)

In addition, the current City of Boston Consolidated Plan (July 2003 – June 2007, page 11) based on 2000 Census data identified a total of 7893 elderly renter and owner households of low-income (less than 80% of Median Family Income) as confronting Severe Housing Cost Burden (paying over 50% of income for housing) and having high-priority needs for affordable housing. This represents a

37% increase of elderly households facing a severe housing cost burden in Boston since the 1990 Census.

Over the past ten years, both the City of Boston and the BHA have not focused on creating new housing opportunities for the elderly. Since 1998, the BHA has not created a single new unit which is designated solely for use by elderly households. During this same time period, the City of Boston utilized its limited resources to focus on creating new affordable housing units for disabled households and not for new housing opportunities available exclusively to elderly households.

The elderly population (60+) in Boston is forecast to grow by more than 30% from 2000 – 2020 (Executive Office of Elder Affairs “Aging of Massachusetts” 12/2002). As the elderly population also continues to live longer, the need for affordable housing for this population continues to increase. The time has come for both the BHA and the City of Boston to focus their attention on creating new housing opportunities which meet the needs of elderly households.

**b) Housing Needs Assessment of Non-elderly disabled Population**

Over the past ten years, both the City of Boston and the BHA have focused on creating new housing opportunities for non-elderly disabled households. (See Table 16 Attached) Since 1998, the BHA has created 1507 new units which are designated solely for use by non-elderly disabled households. In addition to these new units, non-elderly disabled households were also provided with increased housing opportunities in both the BHA’s Public and HCVP Programs as demonstrated by the increase in the percentages of non-elderly households being assisted over the past ten years. During this same time period, the City of Boston utilized its limited resources to focus on creating 992 new affordable housing units for non-elderly disabled households and not for new housing opportunities available exclusively to elderly households.

The Consolidated Plan discusses housing needs of the disabled in need of supported services in housing or physical adaptations. The table below compares information from the 1998 and 2003 Consolidated Plans and identifies the unmet housing need/gap for homeless disabled individuals in sub-categories as follows:

Population Sub-category	1998 unmet need / gap	2003 unmet need / gap	% change
Seriously Mentally Ill	735	111	-85%
Dually Diagnosed	1003	624	-38%
Persons with HIV/AIDS	327	150	-54%

TOTAL	2065	885	-57%
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As the table clearly shows, the unmet housing need for these homeless disabled individuals has decreased significantly from 1998 to 2003. It is clear that the targeted resources of both the City of Boston and the BHA have aided greatly in reducing the needs of these households.. The 2499 new units of housing created by the City and the BHA will continue to assist existing non-elderly disabled households and will be made available to new non-elderly disabled households upon turnover of a unit.

The State of the Cities Data Systems: Comprehensive Housing Affordability Strategy (SOCDS: CHAS), current as of 2000, in the Housing Problems Output for Mobility and Self Care Limitation table for Boston identifies 8843 non-elderly households, renters and owners, with household incomes less than or equal to 80% Median Family Income that have a housing problem. (See Data Table 2.)

Although the Consolidated Plan still shows an unmet housing need/gap for homeless disabled individuals, it is clear that significant progress in developing affordable housing resources for disabled individuals has been made.

### **c) Narrowing the Gap between Federal and State-Assisted Housing Policy**

The BHA's Designated Housing Plan helps to align more closely the designated housing policies that govern federal and state-assisted elderly/disabled developments. Massachusetts state statute authorizes a preference for 13.5% of all state-assisted elderly/disabled apartments to the non-elderly disabled and 86.5% to the elderly. The BHA manages 3 state elderly/disabled developments (Basilica, Franklin Field Elderly and Monsignor Powers) which must comply with this regulation.

Currently, a higher percentage of elderly households apply for the BHA's State-assisted Elderly/Disabled Housing Program than for the Federal Elderly/Disabled Program. The designation of state-assisted apartments as 86.5% elderly is definitely a factor in an elderly applicant's choice of where they want to live. Implementing this Plan in the Federal Elderly/Disabled Program will increase the number of elderly households that apply to federal elderly/disabled developments.

### **d.) Elderly and Non-elderly disabled Applicants on the BHA Waiting Lists**

#### **1. Waiting List Data:**

Tables 3 and 4, which are attached to this Plan, provide summary data of the total number of applicants as well as the number and percentage of elderly and/or non-elderly disabled applicants to each of the BHA's Housing Programs. In Tables 3 and 4, each applicant is only counted once to prevent double-counting. These tables also list the number and percentage of elderly/and or non-elderly disabled applicants to the BHA's

Housing Programs, who are requesting Uniform Federal Accessibility Standards (UFAS) units. This data reflects households on the BHA's waiting lists as of June 8, 2007.

The BHA operates site based waiting lists for all of its Federal Elderly/Disabled developments. The BHA has attached Table 12 which provides a breakdown of applicants by development as well as the number and percentage of elderly and/or non-elderly disabled applicants to each. It is important to note that the total number of applicants for all developments in Table 12 will not match the Summary of Applicants in Table 3. This is because applicants to the federal elderly/disabled program may apply to any or all developments and therefore are on more than one list.

The BHA's three HOPE VI sites (Maverick Gardens, Orchard Gardens and Mission Main) each have their own ACOP and manage their own site-based waiting lists. The BHA is not including data on the waiting lists for these sites as they are neither part of the Designated Housing Plan nor are they being considered as an alternate resource.

## 2. Other Factors

A number of factors influence the number and types of households applying for the BHA's Housing Programs. Some of these factors include:

- a. Shelter Programs – The City of Boston operates one of the most successful shelter programs in the country. Currently, a total of 2166 beds (1085 emergency shelter and 1081 transitional housing) beds are available at shelters within the City for individuals. According to the Boston's annual homeless census conducted in December of 2006, almost all of the beds for individuals were occupied by disabled persons suffering from severe mental illness, chronic substance abuse and Persons with HIV/AIDS. In addition, nearly half of the beds for individuals were being used by households that met HUD's chronically homeless definition. The census also identified an additional 329 disabled households that were unsheltered. ( See Attached Tables 17 and 18) Shelter staff estimate that at least 40% of the households occupying Boston shelters originate from outside of the City.

The BHA receives a constant flow of applications from individuals staying at local shelters. This is due to the fact that persons in shelter must prove that they are conducting housing search in order to remain in the shelter. As most of the persons served by these shelters are non-elderly disabled, the BHA has seen an increase to the number of non-elderly disabled

households on its waiting lists.

- b. Marketing UFAS units – In compliance with the VCA with HUD, the BHA will create 360 new UFAS units in its Public Housing portfolio by December 2007. Since 2002, the BHA has been conducting continual outreach and marketing of its housing programs to disability advocates, medical providers and the general public for these new units. As non-elderly disabled households apply for these UFAS units they also apply for all other available BHA housing programs. This has caused an increase to the number of non-elderly disabled households on all of the BHA's waiting lists.
- c. PBV and Section 8 Moderate Rehabilitation Programs- In the past ten years, the BHA has created a number of supported housing programs for persons with disabilities in both its PBV and Section 8 Moderate Rehabilitation Programs. As non-elderly disabled households apply for these programs they also apply for all other available BHA housing programs. This has caused an increase to the number of non-elderly disabled households on all of the BHA's waiting lists.
- d. One Common Application- The BHA utilizes one common application for all of its housing programs. Elderly applicants are more targeted in their housing preferences. In contrast, non-elderly disabled households are more likely to apply for any and all open waiting lists. This has caused an increase to the number of non-elderly disabled households on all of the BHA's waiting lists.

#### Conclusion:

Over the past ten years, both the City of Boston and the BHA have not focused on creating new housing opportunities for the elderly. Since 1998, the BHA has not created a single new unit which is designated solely for use by elderly households. Conversely, during this same time period, the City of Boston and the BHA utilized their limited resources to focus on creating 2499 new affordable housing units for disabled households and not for new housing opportunities available exclusively to elderly households.

There is clearly a substantial unmet need for affordable housing for the elderly in the City of Boston This is documented by the number of elderly applicants on the waiting lists, the knowledge that more than 4000 elderly renter one and two person Boston households with incomes less than 30% of Median Family Income confront a severe housing cost burden and the fact that more than 17,000

elderly Boston households had a housing cost burden in excess of 30% of income or lived in substandard and/or overcrowded housing. Given demographic trends (the aging of the baby boom generation and extended life spans) the need for affordable elderly housing, especially for the very old, is expected to continue to increase.

## **II. Project Description**

### **a. Overview**

It is the intention of the BHA to continue to designate all of its Federal Elderly/Disabled Developments as mixed population developments with units serving both elderly and non-elderly disabled households. The BHA's Plan designates a percentage of units at each site for occupancy by each household classification. The plan does not call for designating specific units for occupancy by either household classification; rather it looks at the percentage of households on the site to determine which household type should receive preference for an available unit. The goal of the Plan is to have 70% of the units at each site occupied by elderly households and 30% of the units at each site occupied by non-elderly disabled households.

The plan also establishes new preferences for non-elderly disabled applicants to the BHA's State and Federal Family Public Housing Programs as well as to both the HVCP and Section 8 Moderate Rehabilitation Programs. These new preferences provide more than sufficient alternative housing units to non-elderly households disadvantaged by the change in designation in the BHA's Federal Elderly/Disabled Developments.

### **b. Designated Developments**

The BHA is including all of the units at its Federal Elderly/Disabled developments to be a part of this Designated Housing Plan as well as a portion of Bromley Park known as Bromley Park Elderly. However, BHA is excluding 20 units at Heritage Clippership that serve families. See Table 5 for a list of all developments to be designated.

### **c. Units with Accessible and Adapted Features**

The BHA has a number of units with accessible features in both its Federal Family and Federal Elderly/Disabled portfolio. Some of these units are UFAS-compliant, some are ANSI units and others are classified as special features units (units with some adapted features). See Tables 6 and 7 for a description of the location, number, and bedroom size of UFAS, ANSI and special feature units in the BHA's Federal and State Elderly/Disabled and Family portfolios.

It is the intention of the BHA to include all UFAS units in its Federal Elderly/Disabled Developments as part of its Designated Housing Plan. No UFAS units in the BHA's Federal Family Developments are included as part of the

Designated Housing Plan. Occupancy of these units is further outlined in Section 6.3 of the BHA's Admissions and Continued Occupancy Policy for the Public Housing Programs (ACOP). As stated in the ACOP, it is the BHA's goal to occupy all of its Accessible Apartments and Apartments with adapted features with a person or persons who has/have a disability that requires the adapted features of the apartment. All UFAS units in the BHA federal portfolio will be available to persons with disabilities regardless of age who require the features of these units.

#### **d. Assignment of Preference Points**

The BHA has created three new preference categories as a result of this Plan. These preference categories are as follows:

**Designated Housing Preference:** Elderly applicants to a federal elderly/disabled public housing development where the percentage of elderly residents is less than 70% will receive additional preference points. The implementation of this preference will increase housing opportunities for elderly households in the federal elderly/disabled program.

**Non-Elderly Disabled Preference:** Non-elderly disabled applicants to a state or federal family public housing development will receive additional preference points when applying to any bedroom size unit. . The implementation of this preference will increase housing opportunities for non-elderly disabled households in both the state and federal family program.

**Chronically Homeless Preference:** Households qualifying as chronically homeless, as defined by HUD, will receive additional preference points when applying to the HCVP and Section 8 Moderate Rehabilitation Programs. The implementation of this preference will increase housing opportunities for non-elderly disabled households in the HCVP and Section 8 Moderate Rehabilitation Programs

The BHA will also continue to offer Priority Status for transfer for non-elderly disabled residents living in the Elderly/Disabled Program who wish to voluntarily transfer to the Family Program as a result of this. Non-Elderly disabled residents who wish to voluntarily transfer under this category will be relocated at the expense of the BHA as outlined in Section X of this Plan.

The BHA has attached three tables to this plan which outline priority categories and preferences, assigned point values and examples of the assignment of points. Table 13 lists priority categories and preferences as well as the points assigned to each applicant, to all BHA federal housing programs, under the BHA's previous Designated Housing Plan. Table 14 lists priority categories and preferences as well as the points assigned to each applicant, to all BHA federal

housing programs, under the new Designated Housing Plan. Table 15 provides examples of the application of priority and preference points under the new Designated Housing Plan for all BHA federal housing programs.

The BHA's Admissions and Continued Occupancy Policy for the Public Housing Program (ACOP) establishes categories and points for preferences and priorities available to all applicants to its Elderly/Disabled Program. The BHA's Administrative Plans for the Housing Choice Voucher Program and the Section 8 Moderate Rehabilitation Program establish categories and points for preferences and priorities available to all applicants. The Administrative Plan for HCVP was updated in August of 2006 to include the addition of the chronically homeless preference. The ACOP and the Administrative Plan for the Section 8 Moderate Rehabilitation Program will be updated to reflect the new preferences and priority category created by this Plan once the plan is approved by HUD.

## **e. Implementation of the Plan**

### **1. Marketing**

In order to most effectively implement this plan, the BHA will perform marketing activities directed towards the elderly in an attempt to attract more elderly households to its waiting lists. The marketing activities may include the following: creating brochures for Elderly/Disabled developments, holding open houses, and outreach to senior centers and churches for prospective residents, advertisements in local newspapers, and other activities. This marketing plan will be implemented for those developments that have short waiting lists of elderly applicants. Some additional factors that will influence whether or not to do marketing include unit turnover, the number of elderly applicants in relation to the size of the development, and bedroom sizes available. The BHA will review these factors annually at the end of March to determine marketing efforts for the coming year. The BHA will report on marketing activities associated with this Plan as part of its annual Agency Plan process.

### **2) Transition**

Upon approval of this plan, the BHA shall take the following steps based on March 31, 2007 occupancy information:

- Elderly and Non-elderly disabled applicants in screening as of the effective date of this plan will remain in screening and will be eligible to be housed if found eligible. These households will maintain the position held on all waiting lists previous to the effective date of this Plan.
- Develop and implement marketing plan.

- Notify all applicants on the waiting lists, in writing, of the impending change including information on the assignment of new preference points.
- Provide applicants on the Elderly and Disabled site-based waiting lists with information on all elderly/disabled developments and estimated lengths of waiting lists. Applicants will be given the option of remaining on the waiting lists of the developments they have previously chosen or making a change to select different development waiting lists.
- Provide non-elderly disabled applicants with an opportunity to apply for and receive preference points for BHA's Family Developments. During the first year implementation process, the BHA will grandfather the non-elderly disabled applicants for Family developments current application date for all their new family development choices made for a time period specified to in a written notice to each applicant. In subsequent years, new developments selected will be dated as of the date the selection choice reaches the BHA.
- Following these notifications and the resulting selections by the applicants, preference points will be applied and the waiting lists will be re-ranked. At that time an analysis of new waiting periods for elderly and non-elderly disabled applicants will be undertaken and applicants will receive notice of the new estimated waiting periods.
- Notify current non-elderly disabled residents of elderly/disabled buildings of their option to request a transfer to a family development.

### **3) Monitoring**

The BHA will monitor the percentages of elderly and disabled households living in each Elderly/Disabled Development on a monthly basis. When the percentage of elderly households occupying a development reaches 65%, the development will be 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 70%, 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 70%, the BHA will turn on Designated Housing Preference points to elderly applicant households for this development.

#### **f. Services and Facilities of Designated Housing Plan Developments**

In recent years, the Boston Housing Authority has paid special attention to the

variety of service needs of residents in the Elderly and Disabled Housing Program. These needs have become increasingly complex and urgent due to the aging of the elderly population, as well as the mixing of the elderly and non-elderly disabled populations together in the same developments.

The BHA offers services to the residents in its Elderly/Disabled portfolio through a number of different means. Services offered at all sites are available to both elderly and non-elderly disabled residents. The provision of services is coordinated through staff employed by the BHA, private management companies and/or community service agencies.

The BHA employs eight full time Service Coordinators who are assigned to all federal Elderly/Disabled developments managed by the BHA. Elderly/Disabled developments managed by Private Management Companies, including JJ Carroll, Patricia White, Heritage, Ausonia, St. Botolph, Walnut Park, Eva White, and General Warren receive social services from either private management staff or a community service agency. State-assisted Elderly/Disabled developments Monsignor Powers and Franklin Field Elderly are serviced by community agencies.

Service Coordinators working at BHA's Elderly/Disabled Developments may have a Master's or Bachelors Degree in Social Work or a related field with several years of related experience. In addition, they have been trained in the aging process, elder services, disability services, eligibility for and procedures of federal and state entitlement programs, and other issues. Their role is to assist residents to maintain themselves in their own apartments by ensuring that appropriate and adequate services are available to tenants and utilized by all eligible persons.

The Service Coordinators work within developments to inform residents of upcoming activities and encourage them to plan and participate in outings, coffee hours, holiday celebrations, and other events. The Service Coordinators also assist residents in accessing a wide variety of agencies and programs including Social Security, the Massachusetts Department of Mental Health, the Massachusetts Rehabilitation Commission, Medicare, Medicaid and other private health insurance providers, food stamps, transportation, translation and language services, home care services and health care providers. They read and interpret mail, complete forms, advocate for needed services and assist families and/or residents with nursing home placement or other alternative housing when continued tenancy with the housing authority is no longer appropriate.

All Elderly/Disabled buildings have community rooms and kitchens, and many have additional activity areas. These facilities serve as meeting space for tenants, management, and Service Coordinators, as well as for social events and health care screenings. In addition, Meals on Wheels or a daily meals program provided by Kit Clark, Ethos, or other vendors is offered at each site.

The Boston Housing Authority also contracts with private service agencies which operate a variety of Supported Housing Programs at its Elderly/Disabled Developments. These programs are set aside to serve specific populations including Persons with AIDS, frail elders and persons with mental health issues. Private service agencies offer on site staff, counseling services, job placement and medical care to residents in these programs. Currently, 72 families/individuals are being assisted through the BHA's Supported Housing Programs with 55 of these units set aside for persons with disabilities.

The BHA's Elderly/Disabled Developments contain a number of common area features that make them more accessible to residents. High-rise buildings are equipped with elevators, ramps are located at main entryways and parking spaces near entryways have been designated for handicapped parking. Community rooms, laundry facilities and bathrooms have been modified to allow access to persons in wheelchairs, scooters or using walkers.

In addition, the BHA has made a number of modifications to apartments at Elderly/Disabled Developments which make them more accessible to residents with disabilities or impairments. Most apartments in the Elderly/Disabled Developments are equipped with a pull cord emergency system that is intended to assist a resident should they suffer a physical emergency. The federal Elderly/Disabled portfolio also currently has 153 UFAS/ANSI units which offer wheelchair accessibility for residents (plus 4 additional such units in State-assisted Elderly-Disabled portfolio) and an additional 173 units which have been modified for tenants with hearing, sight, and/or mobility impairments. (See Data Table 4)

### **III. Need/Demand for Housing**

As part of the process of designing this Plan, the BHA performed an analysis of its current waiting lists and the impact the Plan would have on admission of households to the BHA's Federal Housing Programs. In addition, the BHA analyzed information contained in both its Annual Plan as well as the City of Boston's Consolidated Plan.

Tables 3 and 4 (See Attached) indicate the total number of applicants as well as the number and percentage of elderly and/or non-elderly disabled applicants to each of the BHA's Housing Programs. Also listed are the number and percentage of elderly/and or non-elderly disabled applicants to the BHA's Housing Programs, who are requesting UFAS units. This data reflects households on the BHA's waiting lists as of June 8, 2007.

#### **A. Analysis of Waiting List Data for Federal Programs**

1. The number of non-elderly disabled households applying for studio and one-

bedroom units in both public housing programs is almost equal (1848 Elderly/Disabled and 1767 Family). The number of elderly households applying for studio and one-bedroom units in both federal public housing programs is not, with two times the amount of elderly households applying for the Elderly/Disabled Program (1075) than for the Family Program (574). It is clear that more elderly households seek housing within the elderly/disabled program only, while non-elderly disabled households seek housing in both programs equally. Under this Plan, non-elderly disabled applicants seeking studio and one-bedroom units in the family program also receive preference points that are not available to elderly applicants.

2. The number of non-elderly disabled households applying for two-bedroom units is 34% higher in the family program (537) than non-elderly disabled applicants to the elderly/disabled program(354).The number of elderly households applying for two-bedroom units is 24% higher in the family program (199) than to the elderly/disabled program(153. It is clear that both elderly and non-elderly disabled households who require two bedroom units prefer to seek housing in the family program. Reasons for the preference of both applicant types for the family program include the increased number of available units, lifestyle differences and presence of minors in the household. Under this Plan, non-elderly disabled applicants seeking two bedroom units in the family program will receive preference points that are not available to elderly applicants.
3. The number of non-elderly disabled households (1421) applying for both the Section 8 Moderate Rehabilitation and HCVP Project Based Program is six times higher than the number of elderly households (236). Data also shows that while non-elderly disabled applicants apply to both these programs and public housing programs equally, five times the number of elderly applicants choose the public housing elderly/disabled housing program over these programs. In accordance with the BHA's Administrative Plans for both of these programs, non-elderly disabled applicants receive higher preference points than elderly applicants to these programs.
4. The number of non-elderly disabled households (1406) applying for the Housing Choice Voucher Program is eight times higher than the number of elderly households (169). Data also shows that while non-elderly disabled applicants apply to both this program and public housing programs equally, seven times the number of elderly applicants choose the public housing elderly/disabled housing program over this program. In accordance with the BHA's Administrative Plan for this program, non-elderly disabled applicants receive higher preference points than elderly applicants to this program.

## **B. Estimated Impact on Admissions**

### **1. Elderly/Disabled Public Housing**

The BHA expects the number of non-elderly disabled move-ins to decrease over

the next five years following the implementation of its Plan. Fewer younger non-elderly disabled families will move into elderly developments in part given the high numbers of non-elderly disabled already living in these buildings. In the past two (2) years, from July 1, 2004 to June 30, 2006, 362 persons with disabilities under age 62, moved into the BHA's Elderly and Disabled housing or approximately 181 annually. Over the same 2-year time span there were 141 non-elderly disabled moving out or approximately 71 annually. Over the same time period there were 445 elderly move-ins (223 annually) and 483 elderly move-outs (242 annually).

**Age of Head of Households Who Moved-In to Federal Elderly/Disabled developments from 7/1/04 to 6/30/06**

	<b>Non-elderly disabled</b>	<b>Elderly</b>	<b>Total</b>
<b>Age</b>	<b>18-61</b>	<b>62 +</b>	
	362 (45%)	445 (55%)	807

Over time units will become available to non-elderly disabled applicants as non-elderly disabled residents move out (either through normal attrition or as a result of transfers to family housing units by existing tenants) and through the aging of the existing resident population. The BHA estimates that over the next 5 years approximately 28% of the resident non-elderly disabled population between the ages of 57-61, who are already housed in the developments, will turn 62 and therefore be considered elderly, rather than non-elderly disabled (total of 329 people).

It is difficult to accurately predict the number of non-elderly disabled applicants who will not be housed over the next five (5) years. However, the BHA does expect to achieve the 70% elderly households to 30% non-elderly disabled households proportion in the next 5 years. There are a number of mitigating factors which drive the BHA's assumption. These include :

- The higher percentage of elderly moving out in comparison with non-elderly disabled due in part to an elderly resident's death or a move to nursing home;
- Elderly applicants may find some sites less desirable than others so more non-elderly disabled applicants will be placed. This may change with increased marketing.; and
- The significant number of new UFAS units that are being brought on-line to serve the physically disabled population. (See Data Tables 6 and 7.)

If the forecast is accurate, the BHA would expect to house 2471 elderly and 1051 non-elderly disabled. This means that there would be 110 fewer non-elderly disabled

housed in the federal elderly /disabled program at the end of 5 years. The BHA considered a number of factors in coming up with this forecasting model including, the number of available units, the number and age of existing applicants, turnover rates, pull ratio (# of applicants screened to fill a vacancy), residents aging in place, and the current and proposed Designated Housing Plan point systems and their effect on which developments would be designated.

Population	1999 # / %	2007* # / %	2012 Current DHP extended	2012 New DHP adopted
Elderly	2249 / 65.70%	2308/ 66.30%	2361 /67.04%	2471/ 70
Non-elderly disabled	1174 / 34.30%	1149 / 33.01%	1161 /32.96%	1051 / 30

\*Please Note: There are 24 households (.69%) as of June 8, 2007, that are neither elderly non non-elderly disabled. They are residuals awaiting transfer.

## 2. Other BHA Housing Programs

The BHA expects the number of non-elderly disabled households assisted to increase over the next five years in its Family Public Housing, Section 8 Moderate Rehabilitation and Housing Choice Voucher Programs due to the new preference categories established as part of this Plan.. Fewer elderly households will be assisted as the BHA implements preference points for non-elderly disabled households in all of these programs.

The preferences available to non-elderly disabled households in the programs above will allow these households to rise to the top of the waiting lists faster than elderly households. In example, in September 2006 the BHA implemented the new preference for chronically homeless in its HCVP .In the first nine months since the new preference was implemented, 196 new chronically homeless households under the age of 62 have been housed in the HCVP. As 99.5% of total applicants who qualify for the chronically homeless preference are under the age of 62,the numbers of non-elderly disabled households assisted in this program will continue to increase dramatically. Implementation of the new preferences available in the family public housing program to non-elderly disabled households will have a similar impact.

The BHA's analysis shows that the estimated 110 fewer available units over the next five years for non-elderly disabled households in the Federal Elderly/Disabled Public Housing Program will be more than mitigated by the preferences offered to non-elderly disabled households in these programs. This is due to the number of units/vouchers that become available in these programs on an annual basis.

Based upon current and historical turnover data, the following table illustrates the number of units/vouchers estimated to be available for non-elderly disabled applicants to these programs on an annual basis:

Program	Studio	One Bedroom	Two Bedroom	Voucher	Total Resources
Family Public Housing	12	171	263		446
Section 8 Mod Rehab				150	150
HCVP Project Based				150	150
HCVP Tenant Based				600	600
<b>Totals</b>	<b>12</b>	<b>171</b>	<b>263</b>	<b>900</b>	<b>1346</b>

#### IV. Occupancy Data

In developing this Plan, the BHA analyzed occupancy data for all of its Housing Programs. The BHA has listed a summary of each Data Table below. These Data Tables are attached to this Plan.

Table 5 -- Provides information on the number of elderly and non-elderly disabled families who live in the elderly/disabled developments to be designated.

Table 8 -- Provides information on the number of elderly and non-elderly disabled families who live in the BHA's Family Public Housing developments.

Table 9 -- Provides information on the number of elderly and non-elderly disabled families who live in the BHA's Leased Housing Programs.

The chart below provides information on the BHA's Public Housing units that are available and currently occupied. This chart also offers an explanation for any current vacant units. See Table 10 for Occupied Units by Bedroom Size and Program and Table 11 for Available Units by Bedroom Size and Program.

Program	Available Units as of June 11, 2007	Occupied Units as of May 31, 2007
Federal Family	6384	5960
Federal Elderly/Disabled	3781	3475
HOPE VI	1324	1052
<b>Total</b>	<b>11489</b>	<b>10487</b>

Please Note: There are approximately 1000 units which are vacant for a variety of reasons. Approximately 150 vacant units are funded for construction as part of the BHA's 504 compliance program and BHA anticipates having these units back on line over the next 5 years. Many of the 375 units at Franklin Hill are being vacated for redevelopment and the remaining vacant units are a mix of relocation for the 504 project, unavailable due to casualty loss, and approximately 250 in routine turnover. For HOPE VI the table reflects regular vacants as well as 228 market units which are included in PIC as available for occupancy but the residency information is not captured in PIC so they show up

as vacant.

## V. Site Based Waiting Lists

In January 2005, the Boston Housing Authority implemented its HUD-approved ACOP which included a site-based waiting list system for all of its public housing developments. The Elderly and Disabled housing developments have used site-based waiting lists for many years prior to 2005. The creation of the site-based waiting lists has made it possible to offer vacant units to applicants who chose the development as the place in which they prefer to reside which allows for a more efficient system of offering and occupying vacancies.

## VI. Preferences for Non-Elderly Disabled Families in BHA Housing Programs

The BHA has created three new preference categories as a result of this Plan. These preference categories are as follows:

**Designated Housing Preference:** Elderly applicants to a federal elderly/disabled public housing development where the percentage of elderly residents is less than 70% will receive additional preference points. The implementation of this preference will increase housing opportunities for elderly households in the federal elderly/disabled program.

**Non-Elderly Disabled Preference:** Non-elderly disabled applicants to a state or federal family public housing development will receive additional preference points when applying to any bedroom size unit. . The implementation of this preference will increase housing opportunities for non-elderly disabled households in both the state and federal family program.

**Chronically Homeless Preference:** Households qualifying as chronically homeless, as defined by HUD, will receive additional preference points when applying to the HCVP and Section 8 Moderate Rehabilitation Programs. The implementation of this preference will increase housing opportunities for non-elderly disabled households in the HCVP and Section 8 Moderate Rehabilitation Programs

In addition to the new preferences listed above, the BHA offers a number of other preferences/priorities to Non-Elderly Disabled Families in its Public Housing Program, Section 8 Housing Choice Voucher Program, Section 8 Moderate Rehabilitation Program and the Massachusetts Rental Voucher Program. A complete listing of the new and existing preferences are as follows:

### A. Public Housing Program

1. Priority status for admission and transfer to any disabled

- applicant/resident living in an inaccessible dwelling unit.
2. Priority status for admission to any disabled applicant having an Excessive Rent Burden.
3. Priority status for admission to any disabled applicant in danger of Imminent Landlord Displacement.
4. Preference points for disabled Veterans.
5. Preference points for disabled applicants to the Family Program.
6. Priority Status for transfer for disabled residents living in the Elderly/Disabled Program who wish to voluntarily transfer to the Family Program.

**B. Section 8 Housing Choice Voucher Program**

1. Priority status for admission to any disabled applicant living in an inaccessible dwelling unit.
2. Priority status for admission to any disabled applicant living in Project-Based units who have fulfilled Supportive Housing Goals.
3. Preference points for disabled Veterans.
4. Preference points for Chronically Homeless.
5. Preference points for Single Disabled Person.
6. Preference points for working families.

**C. Section 8 Moderate Rehabilitation Program**

1. Priority status for admission to any disabled applicant living in an inaccessible dwelling unit.
2. Priority status for admission to any disabled applicant living in Project-Based units who have fulfilled Supportive Housing Goals.
3. Preference points for disabled Veterans.
4. Preference points for Chronically Homeless.
5. Preference points for Single Disabled Person.
6. Preference points for working families.

**D. Massachusetts Rental Voucher Program**

1. Priority status for admission to any disabled applicant living in an inaccessible dwelling unit.
2. Priority status for admission to any disabled applicant having an Excessive Rent Burden.
3. Priority status for admission to any disabled applicant in danger of Imminent Landlord Displacement.
4. Priority status for admission to any disabled applicant living in AHVP units who have fulfilled Supportive Housing Goals.
5. Preference points for disabled Veterans.

**VII. Alternative Resources**

The most significant alternative resource for non-elderly disabled households that will be created as part of this Plan is increased access to all HCVP, Section 8 Moderate

Rehabilitation and Family Housing Programs through the implementation of the new preferences in this Plan. These new preferences will cause non-elderly disabled households to receive extra preference points in all of these programs.

As part of the development of this Plan, the BHA has identified a number of alternative resources for non-elderly disabled households. These affordable housing resources are located in the BHA's Housing Programs as well as in privately owned developments. The BHA has also performed an analysis of designated and undesignated units to determine the number of units which may not be available to non-elderly disabled households under this Plan. The BHA has compared the number of potential units to be lost to non-elderly disabled households as a result of this Plan to the alternative resources available to these households. The BHA has determined that there are sufficient alternate resources available to non-elderly disabled households which offset any potential loss of units under this Plan. The BHA's analysis and descriptions of alternative resources identified are further outlined in this Section.

**A. Analysis of Designated and Undesignated Federal Public Housing Units**

The BHA has 11489 total available federal public housing units on June 11, 2007. The total number of available units in each public housing program is as follows: 6384 family; 3781 elderly/disabled; and 1324 units at the HOPE VI sites (not including the 35 units at Orchard Long Glen which are still to be added to PIC as of June 11, 2007.). Table 11, attached, provides a detailed listing of total available public housing units by program type and bedroom size.

This Plan designates a maximum of 70% of available units at each federal elderly/disabled site for occupancy by elderly households. The total number of available federal elderly/disabled units is 3781, therefore the maximum amount of units to be designated for the elderly is 2647., and the maximum amount of units to be designated for the non-elderly disabled is 1134.

The number of units to be designated for the elderly (2647) represents 23% of the total number of units available (11,489) in both the federal family and elderly/disabled public housing programs.

This Plan provides a preference for occupancy by elderly households of 70% of available studio, one bedroom and two bedroom units within the federal elderly/disabled program. The following chart lists the total number of studio, one bedroom and two bedroom units in the federal public housing program, as well as the total number of units across all bedroom sizes to be designated and non-designated. Thirty (30%) percent of the units in the federal elderly/disabled program are designated for the non-elderly disabled, however, the units in the federal family and HOPE VI programs are open to family, elderly, and non-elderly disabled applicants.:

Federal	Bedroom Size	Designated	Non-	Total Units
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Program		Units	Designated Units	
Elderly Disabled	Studio	803	344	1147
	One	1714	735	2449
	Two	130	55	185
Family & H6	Studio	0	43	43
	One	0	2215	2215
	Two	0	2949	2949
	Three		1907	1907
	Four		510	510
	Five		75	75
	Six		7	7
	Seven		2	2
Total		2647	8842	11489

As demonstrated by this chart, this Plan will provide a preference for occupancy by elderly households in 29.45% of the total number of available units in studios, one bedroom, and two bedroom units. The BHA will not provide this preference in 70.55% of the units available.

This chart also demonstrates that the percentage of units designated or non-designated varies by bedroom size. As more studio units are in the elderly/disabled program, 803 out of 1190 studio units will be designated (67.5%). Designated vs. non-designated one bedroom units show 1714 designated (37.0%) and 2950 non-designated (63.0%). Finally, as most two-bedroom units are in the family program, only 130 of 3134 two bedroom units will be designated (4.1%) with the balance, 95.9% being non-designated.

It bears pointing out that if the state-assisted family portfolio is added to these totals that the percentage of designated units for these bedroom sizes decreases.

## **B. City of Boston Supportive Housing for Persons with Disabilities**

The City of Boston has made significant progress in developing special needs housing since the adoption of the BHA Designated Housing Plan in 1999. The City's 2003 – 2007 Consolidated Plan provides a partial inventory of the City's Transitional and Permanent Housing portfolio.

Population Sub-category	1998 inventory	2003 inventory	% change
Transitional Housing for Individuals	1564	1408	-10%
Permanent Supportive Housing for Individuals	1561	2022	+30%
Persons with	648	613	-5%

HIV/AIDS			
Persons with Disabilities	840	1371	+63%
Totals	4613	5414	+17%

Overall the total number of units serving these populations has increased just over 800 units (17%) since 1998. The number of transitional housing units has declined along with a decline in units for persons with HIV/AIDS. However, there has been a significant increase in the number of Permanent Supportive Housing units for Individuals as well as for Persons with Disabilities.

### **C. BHA Public Housing Programs**

#### **1. UFAS Units and Units with Special Features**

The BHA federal family, federal elderly/disabled, state family, and state elderly/disabled portfolios combined have 627 UFAS units and units with special features as of February 28, 2007. (See Data Tables 6 and 7.) Occupancy of these units is further outlined in Section 6.3 of the BHA's Admissions and Continued Occupancy Policy for the Public Housing Programs (ACOP). As stated in the ACOP, it is the BHA's goal to occupy its Accessible Apartments and Apartments with adapted features with a person or persons who has/have a disability that requires the adapted features of the apartment.

In the Spring of 2002, the BHA signed a Voluntary Compliance Agreement with HUD to make 5% of available units handicap accessible resulting in a total of 667 UFAS compliant units, with 360 of them newly created to serve the disabled population. Approximately 85% of these new accessible units had been brought online/funded by December 2006. Most of the remainder will be available for occupancy by December 2007.

#### **2. Supported Housing Programs**

The BHA offers 72 supported housing units (55 of which are targeted to people with disabilities) in its Elderly/Disabled portfolio. The BHA has also partnered with the Department of Neighborhood Development to create 15 units of permanent housing for Persons with AIDS/HIV at the federal family Cathedral development. BHA has also created another 14 units for persons with severe and persistent mental illness as part of the Orchard Park Off-site development.

#### **3. Family Public Housing Option for Persons with Disabilities**

The BHA offers a number of preferences to non-elderly disabled applicants to its Family Public Housing Program. These preferences are listed in Section VI (A) of this Plan.

As part of the implementation of this Plan, the BHA will assign preferences to non-elderly disabled households to all bedroom sizes in its Family portfolio. At the same time, preferences previously available to elderly households to the

Family Program will be removed. This will result in non-elderly disabled applicants moving ahead of elderly applicants on the Family Waiting lists for all bedroom sizes. The BHA will also work with the Owners of the HOPE VI sites to institute this preference for non-elderly disabled households in their ACOPs

In addition, as part of this Plan, the Authority offers the option of Emergency Transfer status to current non-elderly disabled residents living in an Elderly/Disabled development who wish to transfer to BHA Family Housing Developments. This enables non-elderly disabled resident's priority placement on the waiting lists for the Family Program developments. Non-elderly disabled families who request to be relocated due to this Plan will receive payment for actual, reasonable moving expenses. BHA staff will provide an explanation of available relocation benefits to the tenant/family.

#### **D. Leased Housing Programs**

The BHA's Leased Housing Programs offer many alternative resources for non-elderly disabled households. As of February 28, 2007, 2774 non-elderly disabled households were receiving assistance through one of the BHA's Leased Housing Programs. (See Table 9.)

In August 2006, the BHA adopted a new Administrative Plan for its HCVP which increased preferences available for non-elderly disabled applicants to these programs. The preferences currently offered to non-elderly disabled applicants are outlined in Section VI of this Plan.

The BHA also actively seeks additional vouchers targeted for persons with disabilities whenever they become available. When the last Designated Housing Plan was adopted HUD released a NOFA making vouchers available to housing authorities to support the transition. The BHA applied for and received 100 additional vouchers set aside for persons with disabilities.

The BHA commits to apply for Alternative Housing Voucher Program/Section 8 vouchers for non-elderly disabled based on funding availability. Additional vouchers could be used, in collaboration with the City's Department of Neighborhood Development, to encourage the development of new housing stock for low-income non-elderly disabled residents

Listed below are descriptions of the BHA's Leased Housing Programs which act as alternative resources for disabled households. The BHA administers 11,947 vouchers in this HCVP tenant based program, including certificates and vouchers, but not including the Moderate Rehabilitation Program or state-assisted vouchers:

##### **1. Mainstream Housing Program**

The BHA administers 300 Mainstream Housing Vouchers in its Housing Choice Voucher Program. These vouchers are set aside specifically for persons with

disabilities. The BHA employs a full time Coordinator, who assists disabled households participating in this program

## **2. Designated Housing Vouchers**

The BHA administers 200 Designated Housing Vouchers in its Housing Choice Voucher Program. These vouchers are set aside specifically for persons with disabilities. The BHA employs a full time Coordinator, who assists disabled households participating in this program

## **3. HCVP Project Based Program**

The BHA has partnered with private developers to create over 600 units of project based assistance under this Program. Over 400 of these units are newly created since 1999. Many of the sites in this program contain on site supported service programs including programs for persons in recovery, persons with AIDS and persons with mental health needs. As of February 28, 2007, the BHA has 567 participants with an active Housing Assistance Payment in this program. Of these, 32.10% of households participating in this program are disabled. The BHA has an additional 184 new units in its pipeline for 2007, many of which will serve non-elderly disabled households.

## **4. HCVP Tenant Based Program**

The BHA as of February 28, 2007 had 10,145 participants with active Housing Assistance Payments in this program. BHA has additional persons who are just off the waiting list and those participants who are not currently under a HAP contract, including those currently shopping for a unit. As of February 28, 2007, 20.63% of participants in this program under lease are disabled. In September 2006 the BHA implemented the new preference for chronically homeless in its HCVP. In the first nine months since the new preference was implemented, 196 new chronically homeless households under the age of 62 have been housed in the HCVP. As 99.5% of total applicants who qualify for the chronically homeless preference are under the age of 62, the numbers of non-elderly disabled households assisted in this program will continue to increase dramatically. These preferences are outlined in Section VI of this Plan.

## **5. Section 8 Project Based Certificate Program**

The BHA has partnered with private developers to create 155 units of project based assistance under this Program. Of the total units, 101 are targeted for persons with disabilities. Many of the sites in this program contain on site supported service programs including programs for persons in recovery, Persons with AIDS and persons with mental health needs.

## **6. Section 8 Moderate Rehabilitation Program**

The BHA currently has 662 subsidized households participating in the Section 8 Moderate Rehabilitation Program. The BHA has additional Moderate Rehabilitation units in its portfolio under contract and a substantial portion of these units are targeted for the disabled. As of February 28, 2007 we have 303

units occupied by the disabled. Many of the sites in this program contain on site supported service programs including programs for persons in recovery, Persons with AIDS and persons with mental health needs.

#### **7. Massachusetts Rental Voucher Program**

The BHA currently administers 636 vouchers in this program. As of February 28, 2007, 22.01% of participants in this program are disabled. This Program offers a number of preferences for disabled households outlined in Section VI of this Plan. There is also a set aside of 18 units in this Program for Persons with AIDS.

#### **8. Massachusetts 707 Program**

The BHA currently administers 145 vouchers in this program. Of these units, 114 are set aside for persons with mental illness.

As stated in Section III B (2) of this Plan, the BHA estimates that 1346 units of housing will be available on an annual basis due to turnover to disabled households from the alternative resources identified in this Section VI.C and D. Over the five-year term of this Plan, 6730 units of housing should be available from these alternative resources.

### **VIII. Comparison of Services, Amenities and Community Facilities at Designated, Non-Designated and Alternative Resource Properties.**

1. **Services-** All Designated, Non-Designated and Alternate Resource Properties offer residents access to the same basic services including professional property management, on site maintenance and referral/coordination of services to assist with daily living tasks. Some sites also offer Supported Housing Programs with services targeted to the needs of a specific population such as Persons with Aids, frail elders or persons with mental health disabilities.

BHA provides a variety of social services at its family developments. At four family developments, the BHA's Community Services Department operates Resource and Development Centers which assist residents in finding employment and other services. As part of this program the BHA has partnered with the University of Massachusetts to provide employment services especially for persons with disabilities. In addition through a partnership with community organizations and Boston University, the BHA has had trained Resident Health Advocates (RHAs) working at up to ten (10) family developments each year for the past four years.

2. **Amenities-** Units at Designated, Non-Designated and Alternate Resource Properties offer residents the same basic amenities. In addition, at most sites a percentage of units meet the accessibility requirements of the Uniform Federal Accessibility Standards(UFAS).

3. **Community Facilities-** All Designated, Non-Designated and Alternate Resource Properties offer residents access to the same basic facilities including community rooms, on site laundry facilities and parking.

#### **IX. No Eviction or Lease Termination Due to Designation**

The Designated Housing Plan will not result in the mandatory displacement of any current resident. There will be no eviction or lease termination of lawful tenants of public housing dwelling units due to designation. The BHA will offer non-elderly disabled residents the option of transferring to family developments, in order to reduce concentrations of non-elderly disabled in some buildings; although, no resident will be required to move as a result of this Plan.

#### **X. Voluntary Relocation Due to Designation**

Under the BHA's HUD approved ACOP, current non-elderly disabled residents living in Elderly/Disabled developments are offered the option to voluntarily transfer to BHA Family Public Housing Developments. The ACOP provides interested non-elderly disabled residents with priority placement on the waiting lists for the Family Program developments.

As part of the implementation of this Plan, non-elderly disabled residents will again be notified of their right to request a transfer to a development in the Family Program. Non-elderly disabled families who request to be relocated due to this Plan will receive payment for actual, reasonable moving expenses in accordance with the BHA's Residential Relocation and Re-Housing Policy. BHA staff will provide an explanation of available relocation benefits to the tenant/family.

In addition, any non-elderly disabled family who voluntarily transfers to the Family Program will be assigned to a unit that is both appropriate for their household size and that contains accessibility features required for their household as approved under the BHA's Reasonable Accommodation Policy. These households will also have access to the same services they had in the Elderly/Disabled Program and will pay the same rent level within the federal portfolio.

#### **XI. Court Orders, Lawsuits, Investigations, VCAs and Section 504 Actions**

The BHA has a Voluntary Compliance Agreement (VCA) with HUD to make 5% of our federal public housing units wheelchair accessible. BHA is in full compliance with our VCA and it does not conflict with the Plan. The BHA's creation of more units with accessible features increases the resources available to all households with a disabled member who need the features of the unit.

The BHA has no other outstanding court orders, lawsuits, investigations, VCAs or Section 504 Actions that would conflict with the Plan. In addition, the Plan offers

no impediments to Fair Housing.

