

**Designated Housing Plan For the Boston Housing Authority**

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**Submitted To:**

U.S. Department of Housing and Urban Development

Office of Public and Indian Housing

Public Housing Management and Occupancy Division

Room 4208

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## Introduction

“Designated Housing” refers to public housing designated for occupancy by elderly and/or disabled individuals and families. Public Housing Authorities like the Boston Housing Authority (“BHA”) are required to submit a formal plan every five years, and as otherwise required by HUD, in order to designate units for these populations.

The BHA, like many housing authorities, chooses to pursue designation for its elderly/disabled properties because of the unique barriers to housing and housing stability faced by seniors and persons with disabilities. Designation enhances the ability of the BHA and its nonprofit partners, such as Aging Senior Access Point organizations, to provide resident services to elderly and/or disabled residents at a given property.

The BHA last submitted a Designated Housing Plan (“DHP” or “Plan”) to the U.S. Department of Housing and Urban Development (“HUD”) in 2015. HUD approved BHA’s DHP in June 2015, and subsequently approved a two-year renewal of the Plan, extending the DHP to June 2022.

On June 25, 2020, HUD also approved an amendment to BHA’s DHP which removed certain units from the DHP. HUD advised BHA in its approval letter that “changes to the elderly/disabled portfolio which amount to more than 10% of the units will require submission of a new Designated Housing Plan” pursuant to federal regulation.

Plan	Available Units	Elderly 80%	Non-Eld. Dis. 20%	OBR	1BR	2BR
2015 DHP	3128	2502	626	918	2086	124
2020 Amendment	2968	2374	594	836	2016	116
<b>2021 / 2022 Proposal (Corrected)</b>	<b>2562</b>	<b>1986</b>	<b>496</b>	<b>773</b>	<b>1699</b>	<b>90</b>

The BHA has since moved forward with several disposition or subsidy conversion projects. These actions necessitate the submission of a new DHP. Notably, the *primary* activity of the BHA that has triggered and will continue to trigger the ten percent DHP submittal threshold is the conversion of projects from the Public Housing program to Project Based Vouchers under the Section 8 and Rental Assistance Demonstration (RAD) programs.

In other words, with the exception of the repositioned J. J. Carroll and Eva White properties, the BHA intends to own and control its elderly/disabled housing moving forward, as it has done with the Patricia White, Lower Mills and Heritage properties, even as these properties undergo subsidy conversion. The subsidy conversion is essential for generating financial resources to conduct capital improvements and enhance quality of life for elderly/disabled residents.

The DHP is a public housing program regulation and does not encompass properties restricted through Project Based Section 8 Vouchers, even if such housing is owned and controlled by the BHA or an affiliate entity. BHA inquired in February 2021 as to whether BHA could include these properties under

the DHP. HUD indicated that current regulation does not provide for the inclusion of properties outside of the Public Housing program in a Designated Housing Plan.

The BHA's DHP submission does not add new Designated Housing sites or alter the ratio of elderly residents to non-elderly disabled residents. The DHP submission merely removes developments that are no longer in BHA ownership or control, are subject to disposition or otherwise are imminently slated for RAD conversion.

BHA is submitting this request for (continued) designation of the units in the Plan to address the same housing needs identified through prior HUD-approved Plans, including the 2015 Plan. BHA's review of demographic data the Massachusetts suggests that the BHA's 80% elderly: 20% disabled ratio is consistent with the ratio of elders to non-elderly disabled residents, and that demand for senior housing is growing in Boston and Massachusetts with the large aging near-elderly population. Massachusetts ranks high in the nation among measures of elder economy insecurity, and data from the Elder Index shows Massachusetts costs of living are well above national averages.<sup>1</sup> BHA also noted in its approved 2015 Plan submission that the 80%/20% Designation ratio was consistent with ratios used by housing authorities in the region and nation.

The BHA finds that the City of Boston, which has excelled at working with housing developers to accelerate overall housing production, has needed to redouble efforts to stimulate senior housing production and to incent and require accessibility standards in new housing. Preserving availability of housing for seniors and persons with disabilities in Boston is crucial even as the public and private sectors work to increase adequate affordable and accessible supply.

In its 2015 DHP, BHA applied for and received approval to adopt a designation of 80% elderly, 20% disabled for its elderly/disabled properties. The BHA opted for this designation based on population statistics as well as other data it collected regarding barriers to housing and housing search. In the 2020 amendment, the BHA retained this designation and ratio while removing certain properties. The new DHP submission mirrors the 2020 amendment in that BHA will retain the ratio of elderly to non-elderly disabled while removing only select properties.

#### **Request for Renewed Designation:**

BHA's current and proposed Designation is consistent with the City of Boston's Consolidated Plan,<sup>2</sup> which HUD approved in August 2018, as well as the city's internal "Housing A Changing City: Boston 2030" plan.<sup>3</sup>

Seniors and persons with disabilities face barriers in accessing affordable housing in the Boston housing market. Seniors in Boston, particularly Black and non-White Hispanic residents, are cost-burdened, and elder people of color are more likely to be cost-burdened renters.<sup>4</sup> A 2019 report from UMass Boston notes that "single older people in Massachusetts are more likely to face economic insecurity than are single older people in any other state" and that the cost of living for seniors in Massachusetts outstrips

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<sup>1</sup> <https://blogs.umb.edu/gerontologyinstitute/2021/03/12/new-report-ranks-elder-economic-insecurity-in-100-largest-u-s-metro-areas/>

<sup>2</sup> [https://www.boston.gov/sites/default/files/embed/c/consolidated\\_plan\\_part\\_i\\_narratives\\_190708.pdf](https://www.boston.gov/sites/default/files/embed/c/consolidated_plan_part_i_narratives_190708.pdf)

<sup>3</sup> [https://docs.google.com/document/d/1WRWTkVld7\\_hAKiKz-\\_F8-J\\_HCq5mCrWKxBUeFOVgwaM/edit?usp=sharing](https://docs.google.com/document/d/1WRWTkVld7_hAKiKz-_F8-J_HCq5mCrWKxBUeFOVgwaM/edit?usp=sharing)

<sup>4</sup> <https://scholarworks.umb.edu/demographyofaging/49/>

nearly all other states.<sup>5</sup> Persons with disabilities, for their part, also face physical and economic challenges in securing affordable, accessible housing. Close to 50,000 Boston residents are persons with disabilities, half of whom have ambulatory disabilities that may require housing with appropriate physical accommodations.<sup>6</sup>

The City has recognized difficulties in building new senior housing and in ensure an adequate supply of accessible housing. To this end, Boston, has dedicated land and resources to support the production of senior housing and the rehabilitation of BHA’s elderly/disabled portfolio, and increased requirements on new developments to promote accessible and universal design standards. Notably, the City of Boston has increased its low-income senior housing production goals in response to population projects that show disproportionate share of population increase in elderly residents.

The elderly population in Massachusetts and the Metropolitan Boston region is growing at significant levels. In its 2018 amendment to “Housing a Changing City,” the City of Boston references population projections from the Metropolitan Area Planning Council (MAPC):

[S]enior households will represent 56% of the *projected growth* in all households as increasing numbers of baby-boomers age past 65. MAPC projects that 43% of all new growth in households will be in the low-income demographic group; eighty percent of these new low-income households will be senior households, whose low to moderate income will decrease with the transition to living on a fixed income.

Age Group of householder	Share of 2010-2030 Growth
Workforce (Age <65)	44%
Senior (Age 65+)	56%

Income Group	Share of 2010-2030 Growth
Low (<\$49,000 household of 3)	43%
Middle (\$49,000 - \$116,000 household of 3)	29%
Upper (Over \$116,000 household of 3)	27%

Boston also has recognized housing challenges for persons with disabilities and the Disability Housing Task Force recommended a broad set of strategies.<sup>7</sup> The city has implemented a disability checklist<sup>8</sup> for projects in development review, and attached guidelines for city-funded projects.<sup>9</sup> A fair housing overlay to the development review process in Boston also encourages accessible housing and the addition of “Group 2” accessible units.<sup>10</sup> BHA, whose projects sometimes receive city funding and typically go

<sup>5</sup>

<https://scholarworks.umb.edu/demographyofaging/40/#:~:text=New%20estimates%20from%20the%202019,to%20pay%20for%20basic%20needs>.

<sup>6</sup> [https://www.boston.gov/sites/default/files/embed/d/dhtf\\_2017\\_final\\_170719\\_904.pdf](https://www.boston.gov/sites/default/files/embed/d/dhtf_2017_final_170719_904.pdf)

<sup>7</sup> [https://www.boston.gov/sites/default/files/embed/d/dhtf\\_2017\\_final\\_170719\\_904.pdf](https://www.boston.gov/sites/default/files/embed/d/dhtf_2017_final_170719_904.pdf)

<sup>8</sup> <http://www.bostonplans.org/planning/planning-initiatives/accessibility-guidelines-and-checklist>

<sup>9</sup>

[https://www.boston.gov/sites/default/files/file/2020/08/DND%20Design%20Standards\\_Checklists\\_Provision\\_0810\\_2020.pdf](https://www.boston.gov/sites/default/files/file/2020/08/DND%20Design%20Standards_Checklists_Provision_0810_2020.pdf)

<sup>10</sup> <http://www.bostonplans.org/housing/affirmatively-furthering-fair-housing-article-80>

through development review, has also moved to adopt accessible design standards and is working to integrate similar concepts into standards it applies to third-party developers.

BHA has worked to improve physical accessibility through both requirements for new construction, for private developers with whom it partners, and for rehabilitation projects. The BHA also addresses the need for accessible and affordable housing through the Section 8 Voucher program. Disability remains a Priority 1 ranking for Section 8 Vouchers. The BHA also issues Mainstream vouchers to specifically serve persons with disabilities. Outside of its federal programs, BHA works with state entities like the Massachusetts Department of Development Services to support non-elderly individuals with mental disabilities.

These measures by the BHA, City of Boston, and other entities support multiple agencies’ goals in furthering fair housing and addressing barriers to it for seniors and persons with disabilities. Yet given the extraordinary need to house these populations, and the focus on increasing supply of units to serve those purposes, BHA’s Designated Housing Plan remains an important component of the City’s housing stock. Preserving these the role of these units to house special subsectors of the populations with high housing need and specific barriers to housing is critical.

The designation today is appropriately structured to face the coming years and housing need. Data from the most recent American Community Survey shows that the elderly population in Massachusetts is roughly four times of that for the Non-Elderly Disabled. The current population ratio in the state aligns with BHA’s current and proposed designation ratio for portions of its overall housing portfolio.

<b>Massachusetts</b>	<b>ACS Estimate (2019)</b>	<b>Percent of Total</b>
Total Population	6,892,503	-
Total Elderly (61+)	1,539,449	22.3%
Total Disabled Population	837,206	12.1%
Elderly Disabled (61+)	447,399	6.5%
Non-Elderly Disabled	389,807	5.7%

Within Boston, 81,028 Boston households, 29.5% of total households, include one or more older residents age 60 and older. The median income for households with one or more persons age 60 and older is \$59,785, meaning that the median household income for households including seniors would be public housing eligible. (Source: <https://www.bostonplans.org/getattachment/51f1c894-4e5f-45e4-aca2-0ec3d0be80d6>).

According to the Harvard Joint Center for Housing Studies, in the Boston-Cambridge-Newton MA-NH statistical area, over 52% of renter households ages 65 and over are cost-burdened, and the median renter household income for households over 65 is \$20,400.<sup>11</sup>

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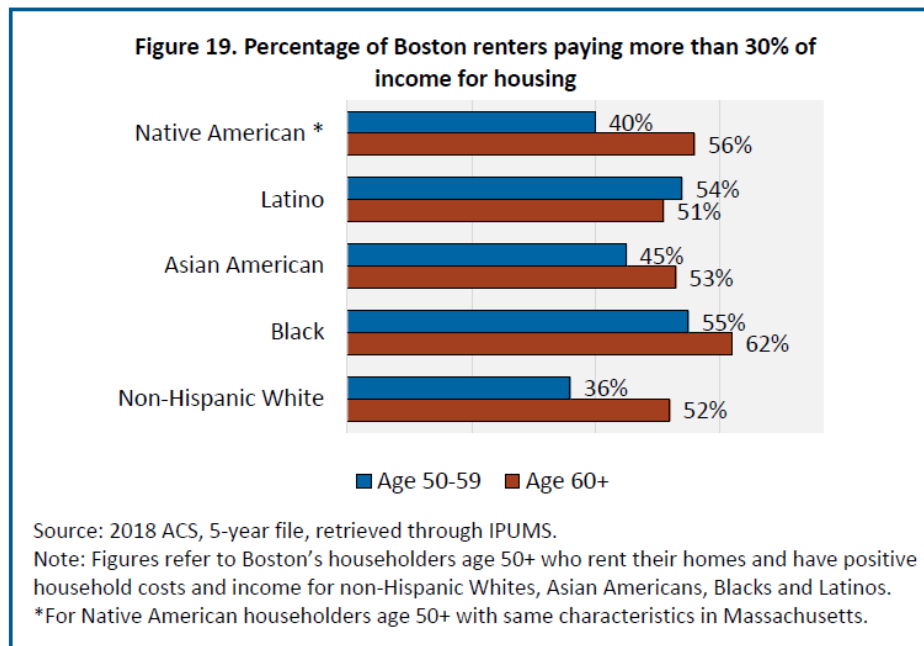
<sup>11</sup> See Housing America’s Older Adults Report: <https://www.jchs.harvard.edu/housing-americas-older-adults-2019>

Metro Name	Cost-Burdened Households Age 65 and Over (%)	Renter Cost-Burdened Households Age 65 and Over (%)	Owner Cost-Burdened Households Age 65 and Over (%)
Boston-Cambridge-Newton, MA-NH	40.06	52.36	35.18

In the city of Boston, 53% of senior-headed households are renters.

Senior (Age 65+) Households in Boston		
Renters	27,985	53%
Owners	24,748	47%
<b>Total</b>	<b>52,733</b>	<b>100%</b>
Source: ACS 2019 5-yr Estimates, PUMS		

The UMass Boston Gerontology Institute researched housing challenges for older adults in Boston and released in report in 2020. Notably, UMass Boston finds that over half of renters over 60 pay at least 30% of their income on housing. A high percentage of Black elderly and near-elderly households in Boston are rent-burdened.<sup>12</sup>



<sup>12</sup> Jan Mutchler, Caitlin Coyle, Nidya Velasco Roldán, Paul Watanabe, Cedric Woods, Lorna Rivera, Quito Swan, Elena Stone, and Laurie Nsiah-Jefferson. UMass Boston Gerontology Institute, *Aging Strong for All: Examining Aging Equity in the City of Boston*. December 2020. <https://scholarworks.umb.edu/demographyofaging/49/>.

BHA’s elderly/disabled development support unique needs of the elderly/disabled population with physical features, staffing and service partnerships. Multi-story elderly/disabled sites have elevators and BHA prioritizes such buildings and developments for security staffing. Resident services are provided through Aging Senior Access Point organizations, such as Ethos and Boston Senior Home Care.

To address food security among elders, elderly/disabled sites host congregate meal sites. (During COVID-19, BHA’s elderly/disabled sites have provided grab-and-go meals and, during the worst parts of the pandemic, home delivery meals. Thanks to funding from the city and federal government, BHA is currently distributing groceries to seniors and persons with disabilities at these sites.) BHA works with Boston’s Age Strong Commission to provide in person or remote social programming, including for language-isolated populations.

During the pandemic, BHA launched public health and vaccination campaigns at its elderly/disabled properties. Due to the structure of these developments, BHA was quickly able to provide vaccination to vulnerable populations in a short time, running over 54 clinics as well as subsequent booster shot efforts.

**Project Description:**

BHA is proposing the following properties for inclusion in its Designated Housing Plan. These properties are all currently Designated Housing and are Designated at the ratio proposed, and no changes are being made to the ratio for elderly to non-elderly disabled residents. Near-Elderly families have once again not been included in the designation because there are more than sufficient elderly residents to fill BHA housing and because elderly residents currently occupy the elderly-designated units.

Uniform Federal Accessibility Standards (UFAS) wheelchair units are excluded from the totals below. Wheelchair accessible units are offered to clients who require the wheelchair accessible unit features. Clients who require wheelchair accessible units are ranked on the waiting lists with clients who also require wheelchair accessible units.

Each development in the Plan is Designated 80% elderly, 20% Non-Elderly Disabled.

Development Number	Development Name	Units	Elderly (80%)	Non-Elderly Disabled (20%)	OBR	1BR	2BR
MA002107119	MILDRED HAILEY	51	41	10	0	37	14
MA002000226	POND STREET	43	34	9	0	40	3
MA002000227	ANNAPOLIS STREET	55	44	11	0	49	6
MA002000228	ASHMONT STREET	53	42	11	0	48	5
MA002000229	HOLGATE APARTMENTS	80	64	16	0	80	0
MA002000230	FOLEY APARTMENTS	89	71	18	0	89	0
MA002000232	GROVELAND	46	37	9	26	19	1

MA002000234	DAVISON	46	37	9	31	15	0
MA002000235	WASHINGTON STREET	81	65	16	0	72	9
MA002000236	WEST NINTH STREET	83	66	17	0	76	7
MA002000238	MEADE APARTMENTS	39	31	8	0	37	2
MA002000240	MLK TOWERS	102	82	20	25	77	0
MA002000242	DORIS BUNTE	157	126	31	105	48	4
MA002000244	FREDERICK DOUGLAS	69	55	14	42	27	0
MA002000247	GENERAL WARREN	94	75	19	55	36	3
MA002000249	TORRE UNIDAD	185	148	37	110	75	0
MA002000250	ROCKLAND TOWERS	63	50	13	40	23	0
MA002000251	CODMAN APARTMENTS	90	72	18	60	26	4
MA002000253	ST. BOTOLPH STREET	121	97	24	81	40	0
MA002000254	PASCIUCCO	85	68	17	63	22	0
MA002000261	AUSONIA HOMES	94	75	19	0	88	6
MA002000262	HASSAN APARTMENTS	91	73	18	55	32	4
MA002000270	SPRING STREET	98	78	20	0	95	3
MA002000272	ROSLYN APTS	110	88	22	0	107	3
MA002000277	BELLFLOWER STREET	107	86	21	0	100	7
MA002000283	PEABODY SQUARE	92	74	18	0	90	2
MA002000290	MALONE APTS	96	77	19	0	96	0
MA002000295	COMMONWEALTH ELDERLY	106	85	21	0	99	7
MA002000298	HAMPTON HOUSE	69	22	6	41	28	0
MA002000299	WASHINGTON MANOR	67	22	6	39	28	0
	<b>Total</b>	<b>2562</b>	<b>1986</b>	<b>496</b>	<b>773</b>	<b>1699</b>	<b>90</b>



### Properties Removed from 2020 Plan Amendment

Development Number	Development Name	Available Units	Elderly	Non-Elderly Disabled	OBR	1BR	2BR
MA002000237	J.J. CARROLL	63	50	13	0	52	11
MA002000241	EVA WHITE	102	82	20	34	57	11
MA002000271	PATRICIA WHITE	203	162	41	0	200	3
MA002002141	HERITAGE APARTMENTS	25	20	5	20	2	3
MA002002142	LOWER MILLS	15	12	3	9	6	0
	Total	<b>408</b>	<b>326</b>	<b>82</b>	<b>63</b>	<b>317</b>	<b>28</b>

The BHA has been working on strategies to ensure quality housing for its residents and to reposition properties to secure resources to make necessary improvements. As noted, the majority of BHA's repositioning efforts are shifting public housing to the Section 8 voucher program. This is the case at Patricia White, Heritage and Lower Mills, where an entity fully controlled by BHA will own and manage the units. J.J Carroll has been disposed of and demolished and is being redeveloped as new affordable housing. Eva White is subject to disposition.

### Mitigation and Alternative Resources

Re-designation of BHA's elderly/disabled properties will enable the Authority to support populations with extraordinary need for housing. Notably, the Boston Housing Authority is not seeking to modify the ratios of its current designation, merely seeking an extension for its elderly/disabled public housing properties.

The BHA will continue to serve to all residents and applicants. With regard to the non-elderly disabled population specifically, BHA will build on its current efforts as follows:

- Continued applying for Mainstream vouchers which are intended for families with a non-elderly disabled member. The BHA currently increased its portfolio and now has 410 Mainstream vouchers to serve this population and actively works with the Continuum of Care and other service providers to assist this population.
- The BHA is exploring referral pathways that would improve access to Mainstream Vouchers for eligible, formerly incarcerated residents with disabilities
- The BHA has sought to use its Project Based Voucher (PBV) program to assist Non-Elderly Disabled resident population. The BHA expects two developments with PBVs to come online in the next two years with Pine Street Inn as the Service Provider and the Continuum of Care as the referring partner.
- In the currently designated properties that will be removed from the DHP, BHA is continuing to work through the conversion process by allocating PBV units in a similar ratio. The BHA will

allocate units by utilizing preferences for units within the converted properties as has been recommended by HUD and only as is permitted by regulations.

- BHA is increasingly working with the City of Boston, Boston Planning and Development Agency, and Disabilities Commission to incorporate standards for accessibility.

BHA's state-funded public housing is principally family developments. State family developments include:

- [Archdale](#) 281 apartments
- [Fairmount](#): 199 apartments
- [Faneuil Gardens](#): 256 apartments
- [Franklin Field Family](#) (adjacent to FF Elderly federal housing) 386 apartments
- [Gallivan Boulevard](#): 247 units
- [South Street](#): 131 units
- [West Broadway](#): 486 units

For populations that are neither elderly nor disabled, BHA will continue to offer a variety of resources, including its undesignated public housing properties, other federal voucher programs, state MRVP vouchers and a nascent City of Boston-funded voucher program. BHA continues to focus significant attention on other high-need populations, including homeless residents, through its priority and preference structure, through the recent Emergency Housing Voucher program, and through other partnerships.

### **Procedures, Protections and Protocols Regarding Designation**

The Boston Housing Authority has managed Designated housing for over two decades. As in the past, BHA will ensure that, as in previously DHPs, no negative impacts will occur due to the designation. No properties are being newly designated.

In properties being removed from designation due to a RAD conversion, BHA has worked and will continue to work with residents throughout the process, with notification of subsidy conversion well in advance. This includes properties such as Heritage and Lower Mills where a final segment of public housing units are being converted to BHA-controlled project base vouchers, as well as properties undergoing disposition and redevelopment. Although COVID-19 has led to evolving protocols for public meetings, BHA has communicated with residents through multiple channels, including written letters, virtual meetings, and in-person meetings, each served by interpretation and translation services.

Re-designation with a modified portfolio is critical to continue BHA's work to serve tenants in Boston. Conversely, neither renewal of Designation, nor removal of Designation for properties exiting the public housing program and moving to Section 8 vouchers, will negatively impact residents or applicants. In fact, the combination of renewed designation for the submitted DHP properties with subsidy conversion for properties in former Plans will allow for stewardship and investment that protects residents' quality of life and wellbeing.

### **Capital Construction and Repairs:**

BHA is committed to address the needs of individuals and families who are residents and/or applicants for BHA housing or rental-assistance programs. BHA has provided HUD with information concerning its federal capital plan.

In addition to its regular capital plan program of maintenance and improvements, the BHA is taking several steps to meet the housing needs of individuals and families. For example:

- The BHA has accelerated maintenance at the Mildred C. Hailey apartments to address deferred capital repairs. The Mayor of Boston has committed an additional \$50 million to the preservation of housing at the Mildred C. Hailey apartments.
- The BHA is soliciting redevelopment partners for its Faneuil Gardens state public housing property. This project seeks to improve housing quality for individual and families at Faneuil Gardens in the Brighton neighborhood of Boston. The redevelopment effort includes a requirement for units to remain within or otherwise return to BHA ownership at the end of a tax credit compliance period. The BHA qualified for the first of two phases of state support for this project, and will be submitting a comprehensive proposal to the Massachusetts Department of Housing and Community Development.
- The BHA also notes that, although the question does not seek information on repositioning, certain federal public housing disposition efforts will create replacement units affordable at public housing rent levels, new housing supply for individuals and families in Boston, with residents guaranteed the right to return to renovated or newly constructed units.

As noted, BHA's state-funded public housing is principally family developments. State family developments include [Archdale](#), [Fairmount](#), [Faneuil Gardens](#), [Franklin Field Family](#) (adjacent to FF Elderly federal housing), [Gallivan Boulevard](#), [South Street](#) and [West Broadway](#).

### **BHA Applications, Priority and Preference Information**

The BHA has two application systems. The Commonwealth of Massachusetts uses a system called "CHAMP" for all state public housing. BHA recently launched a new admissions portal for its federal programs. BHA's waitlists are site-based. Public housing waitlists are open. The HCV tenant based waiting list is only open for special purpose referral programs. All Project based voucher site based waiting lists are open for Priority 1 categories.<sup>13</sup> Chapters 4 and 10 of the BHA's Admissions and Continued Occupancy Plan (ACOP) also provide insight on the BHA's admissions system.

The BHA has 15,333 vouchers in its baseline allocation. The BHA is currently 100% utilized and projects to be over 98% utilized in 2022.

Other than special purpose vouchers, FUP, NEDs, EHV, etc., the BHA provides housing based on the priority and preference structure set forth in the ACOP and Administrative Plans.

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<sup>13</sup> Further explanations for BHA's application system, federal, and state waitlists may be found here:  
<https://www.bostonhousing.org/en/For-Applicants/How-Do-I-Apply-for-BHA-Housing.aspx>  
<https://boston.myhousing.com/?abandon=False>  
<https://publichousingapplication.ocd.state.ma.us/>

**BHA PRIORITY CATEGORIES**

**Federal Housing Programs**

**Administrative Transfers**

**Supported Housing Programs**

**Priority One:**

Displaced Due to Disaster  
Displaced Due to Domestic Violence/Dating  
Violence/Sexual Assault/or Stalking  
Victim of Hate Crime  
Avoidance of Reprisal/Witness Protection  
Court Ordered no Fault Eviction  
Condemnation  
Urban Renewal  
Other Government Action  
Inaccessibility of Dwelling Unit  
Homelessness

**Priority Two:  
(Elderly/Disabled Program Only)**

Excessive Rent Burden  
Imminent Landlord Displacement

**Standard Applicants**

**Special Circumstances Transfers**

**State Housing Programs**

**Administrative Transfers**

**Supported Housing Programs**

**Priority One:**

Displaced Due to Natural Disaster

**Priority Two:  
Urban Renewal  
Condemnation**

**Priority Three:**

Displaced Due to Domestic Violence/Dating Violence/  
Sexual Assault/or Stalking  
Victim of Hate Crime  
Avoidance of Reprisal/Witness Protection  
Court Ordered No Fault Eviction  
Inaccessibility of Dwelling Unit  
Homelessness  
BHA Resident in Federal Program  
“Termination of Assistance” due to Lack  
any household member with eligible  
immigration status.

**Priority Five:**

AHVP (Alternative Housing Voucher Program)

**Priority Six: (Elderly/Disabled Program Only)**

Excessive Rent Burden  
Imminent Landlord Displacement

**Standard Applicants**

**Special Circumstances Transfers**

### **HUD DHP Review Checklist Items**

The following information is provided to answer questions in the HUD Review of Designated Housing Plans checklist not addressed elsewhere in this Plan or to reaffirm such items.

1. No persons will be evicted or otherwise displaced as a result of Designation. This is BHA policy and is self-evident, as no units not currently Designated are proposed for Designation.
2. The BHA does not have any outstanding court orders, Voluntary Compliance Agreements, or Section 504 Letters of Findings at this time.
3. Regarding fair housing, the proposed designation in this Plan will not increase minority concentrations as the elderly/non-elderly disabled population percentages apply at all of BHA's elderly/disabled developments.

### **Policy Regarding Relocation and Designation**

No household will need to be relocated as a result of this designation. However, the BHA acknowledges a PHA must provide the following to persons and families who agree to be relocated in connection with a designation:

1. A notice of the designation and an explanation of available relocation benefits, as soon as is practicable for the agency and the person or family.
2. Access to comparable housing (including appropriate services and design features), which may include tenant-based rental assistance under the Housing Choice Voucher Program, at a rental rate paid by the tenant that is comparable to that applicable to the unit from which the person or family has vacated.
3. Payment of actual, reasonable moving expenses.

The proposed Plan would retain the current Designation and not cause or incent any household to relocate. Regardless, the BHA agrees to provide the above notice, accommodations and moving expenses in the event a relocation occurred due to Designation.

### **Request for Approval**

The BHA requests that HUD approve this application for its Designated Housing Plan as follows:

1. BHA will provide 80% of units to elderly applicants and 20% to non-elderly disabled applicants in all developments included in this Plan. These developments are **currently** designated. Wheelchair units in the elderly/disabled portfolio will remain undesignated.
2. BHA will retain preference points for persons with disabilities in state and federal family public housing and for single non-elderly disabled in the Housing Choice Voucher and Moderate Rehabilitation Voucher Programs.
3. BHA will continue to administer other vouchers related to this plan, including Mainstream vouchers. BHA will, through its priority and preference categories, allocate units in formerly Designated, Project Based Voucher properties, to maintain housing opportunities for the elderly

and non-elderly disabled populations formerly served by Designated public housing and now served through BHA-controlled Projected Based Vouchers.