

Supplement to HUD Form 50075: Plan Elements
September 1, 2015

Table of Contents

Title	Page	Revised	Not Revised
Section 6			
Eligibility, Selection and Admissions Policies, including Deconcentration and Wait list Procedures	2	X	
Financial Resources	14		X
Rent Determination	15		X
Operation and Management	20		X
Grievance Procedures	25		X
Designated Housing for Elderly and Disabled Families	26	X	
Community Services and Self-Sufficiency	29		X
Safety and Crime Prevention	34		X
Pets	37		X
Civil Rights Certification	39		X
Fiscal Year Audit	40		X
Asset Management	41		X
Violence Against Women Act Policy	42		X
Description of VAWA activities, services, or programs	50		X
Organization Chart	53		X

6.0 PHA Plan Update

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

A. Public Housing

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

(1) Eligibility

a. When does the PHA verify eligibility for admission to public housing? (select all that apply)

- When families are within a certain number of being offered a unit: (state number)
- When families are within a certain time of being offered a unit: (state time)
- Other: (describe) At the time of preliminary application as well as when the applicant nears the top of the wait list. In addition the BHA verifies eligibility for admission for proposed additions to current households' family composition, personal care attendants, and for residual tenancy applicants.

b. Which non-income (screening) factors does the PHA use to establish eligibility for admission to public housing (select all that apply)?

- Criminal or Drug-related activity
- Rental history
- Housekeeping which may include home visits when negative housekeeping history is documented
- Other (describe) behavior towards landlords, neighbors, BHA staff, treatment of property, credit history, utility payment history, and eligible immigration status In addition the BHA will comply with the HUD's Enterprise Income Verification (EIV) reporting for bad debts requirements and checking eviction history when reported through the EIV system.

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

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

e. Yes No: Does the PHA access FBI criminal records from the FBI for screening purposes? (either directly or through an NCIC-authorized source) The BHA is working on obtaining the access and will abide by all required protocol. In addition the BHA uses the Dru Sjodin –SORI- and the National Sex Offender Registry.

(2)Waiting List Organization

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

- Community-wide list

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

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

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

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

1. How many site-based waiting lists will the PHA operate in the coming year? 50 public housing; and 5 HOPE VI and 1 at Franklin Hill and Old Colony privately operated by the owners.

2. Yes No: Are any or all of the PHA's site-based waiting lists new for the upcoming year (that is, they are not part of a previously-HUD-approved site based waiting list plan)?
If yes, how many lists?

3. Yes No: May families be on more than one list simultaneously?
If yes, how many lists? All lists for which they meet the threshold eligibility criteria.

4. Where can interested persons obtain more information about and sign up to be on the site-based waiting lists (select all that apply)?

- PHA main administrative office
- All PHA development management offices (obtain information)
- Management offices at developments with site-based waiting lists
- At the development to which they would like to apply
- Other: Obtain information by visiting the BHA's website (www.bostonhousing.org), or by mail, phone, and via e-mail. HOPE VI and other mixed finance redevelopment sites – Mission Main, Orchard Gardens, Orchard Commons, Washington Beech, Maverick Landing, Franklin Hill, and Old Colony Phase I, II, III, and IV - maintain and establish their own waiting lists for public housing units. Waiting lists for all Section 8 project-based voucher and Moderate Rehabilitation units, however, are maintained by BHA. In addition, the BHA will maintain the public housing and Section 8 Project-Based waiting lists for Heritage and Lower Mills.

(3) Assignment

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

- One
- Two
- Three or More

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

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

(4) Admissions Preferences

a. Income targeting:

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

b. Transfer policies:

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

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

Other: (list below) under or over housed transfers if site is 98% occupied.
Note: Transfers in checked boxes above take precedence over new admissions in highest priority category as follows: 1) Administrative Transfers will take precedence over Emergency Transfers and all new admissions; 2) Emergency Transfers will take precedence over new admissions for every other fourth unit by development by bedroom size; 3) Under or Over housed Transfers will be offered every eighth unit by development by bedroom size if the site is at the 98% occupancy rate.

c. Preferences

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

Former Federal preferences:

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

Other preferences: (select below)

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

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

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

Former Federal preferences:

- 1 Involuntary Displacement (Natural Disaster, Condemnation, Government Action, Action of Housing Owner [No-Fault Court-Ordered Eviction Only], Inaccessibility [Disabled Applicant Only] Displacement by any low-rent housing project or by public slum, victims of reprisals or hate crimes
- 1 Victims of domestic violence
- 1 Homelessness
- 2 High rent burden (Elderly/Disabled program only)
- 2 Imminent landlord displacement (Elderly/Disabled program only)

Other preferences (select all that apply)

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

4. Relationship of preferences to income targeting requirements:

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

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

(5) Occupancy

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

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

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

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

(6) Deconcentration and Income Mixing

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

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

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

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

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

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

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

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

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

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

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

B. Section 8

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

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

(1) Eligibility

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

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

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

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

d. Yes No: Does the PHA access FBI criminal records from the FBI for screening purposes? (either directly or through an NCIC-authorized source) The BHA is working on obtaining the access and will ensure to comply with all required protocols. In addition the BHA uses the Dru Sjodin –SORI- and the National Sex Offender Registry.

e. Indicate what kinds of information you share with prospective landlords? (select all that apply)

- Criminal or drug-related activity
- Other (describe below) Former landlord name and address upon request by prospective landlord as required by federal regulation. In addition the BHA will comply with the HUD's Enterprise Income Verification (EIV) reporting for bad debts requirements and checking eviction history when reported through the EIV system.

(2) Waiting List Organization

a. With which of the following program waiting lists is the Section 8 Tenant-Based assistance waiting list merged? (select all that apply)

- None
- Federal public housing
- Federal moderate rehabilitation
- Federal project-based certificate program
- Other federal or local program (list below)

b. Where may interested persons apply for admission to section 8 tenant-based assistance? (select all that apply)

- PHA main administrative office Leased Housing Division-Occupancy Department and mail. Application information can be obtained via website (www.bostonhousing.org), phone, and e-mail. May apply by attending scheduled Applicant Informational Briefing Sessions. Applications may be mailed for those living out of state or as a reasonable accommodation.
- Other: There are several special admissions programs run by the BHA with non-profit partners which allow applications on a referral basis to eligible families.

(3) Search Time

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

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

(4) Admissions Preferences

a. Income targeting

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

b. Preferences

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

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

Former Federal preferences

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

Other preferences (select all that apply)

- Working families and those unable to work because of age or disability
 - Veterans and veterans' families
 - Residents who live and/or work in your jurisdiction
 - Those enrolled currently in educational, training, or upward mobility programs
 - Households that contribute to meeting income goals (broad range of incomes)
 - Households that contribute to meeting income requirements (targeting)
 - Those previously enrolled in educational, training, or upward mobility programs
 - Other preference(s) (list below)
1. Project-Based Voucher Residents who have completed 1 Year residency and are in good standing may opt for a tenant-based voucher when available.
 2. Condemnation
 3. Transfer from BHA public housing or Section 8 Moderate Rehabilitation Program or Project-Based Voucher programs because of health, safety, BHA rehabilitation programs, reasonable accommodation, and humanitarian reasons
 4. One or two-persons both elderly, disabled or displaced families (including persons who are displaced as a result of expiring use) over other singles.
 5. A participant in a supportive housing program for elderly or disabled persons shall be considered to be imminently in danger of homelessness and shall be eligible for Priority One status if the program participant: 1) has been a tenant in such program for not less than twelve (12) months; AND 2) has outgrown or completed the program's services; AND 3) as a result must relocate from such housing.
 6. Displaced Former Boston Resident.

7. Applicants referred by Boston Public Health Commission for participation in The Social Innovation Financing (SIF) Program
8. Applicants referred by Massachusetts Department of Housing and Community Development for Leading the Way Home Program
9. Priority one non-elderly disabled applicants who, in accordance with the BHA's Designated Housing Plan would have otherwise been called in for screening for a BHA public housing unit will be referred to Leased Housing

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

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

Former Federal preferences

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

Other preferences (select all that apply)

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

Priority	Category
PBV	Project-Based Voucher Residents who have completed 1 Year residency and are in good standing may opt for a tenant-based voucher when available.*
Special Purpose Vouchers	Special Purpose Vouchers: The BHA will admit an Applicant who qualifies for a particular category of Special Purpose Vouchers to the Section 8 program before all other Applicants on the waiting list if the BHA is not currently assisting the required number of special purpose vouchers families
Super	Transfer from BHA public housing, Section 8 Moderate Rehabilitation Program or Project-Based Voucher programs because of health, safety, BHA rehabilitation programs, reasonable accommodation, and humanitarian reasons*
1	Condemnation
1	Homeless families and individuals residing in shelters
1	A participant in a supportive housing program for elderly or disabled persons shall be considered to be imminently in danger of homelessness and shall be eligible for Priority One status if the program participant: 1) has been a tenant in such program for not less than twelve

	(12) months; <u>AND</u> 2) has outgrown or completed the program's services; <u>AND</u> 3) as a result must relocate from such housing.
Preference Points	One or two-person elderly, disabled or displaced families (including persons who are displaced as a result of expiring use) over other singles.
Preference Points	Preference Under Olmstead The BHA has an admissions preference for those qualified individuals with mental and/or physical disabilities exiting institutions or who are at serious risk of institutionalization. Applicants who receive this preference must be willing to participate in services as provided by State Money Follows the Person (MFP) entities or other support service agencies and partnering organizations. The services may include case management and personal care
Preference Points	Homeless Service Organizations Preference The BHA has an admissions preference for those applicants who are referred by a partnering homeless service organization or consortia of homeless service organizations. This preference will be applied to specific site based lists where supported housing services are offered by said organization.
Preference Points	Displaced Resident from a unit in the City of Boston Preference

*The Section 8 Tenant-Based Voucher waiting list is closed except for current BHA residents who are determined to qualify for a Super Priority One status and for current Project Based Housing Choice Voucher participants who meet the eligibility requirements as established in the Administrative Plan and are ranked above all other Section 8 Tenant-Based Housing Choice waiting list applicants. Referrals will be accepted from City of Boston Interagency Council on Housing and Ending Homelessness Programs, and Leading the Way Home and from the BHA's Public Housing Waiting List in accordance with the BHA's Designated Housing Plan and the Administrative Plan as funding permits.

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

Section 8 Admissions Point System

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

PBV w/ 1 Year residency	95 points
Super Priority Applicants	75 points
Mitigation Vouchers	60 points
City of Boston ICHH Programs Priority	50 points
Leading the Way Home	50 points

Priority One Applicants **30 points**

Standard Applicants **0 points**

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

- | | |
|---|-------------------|
| 1. Project Based Voucher Elderly | 100 Points |
| 2. Preference under Olmstead | 7 Points |
| 3. Homeless Service Organizations | 7 Points |
| 4. Single Elderly or Disabled | 5 Points |
| 5. Veterans Preference | 3 points |
| 6. Displaced Boston Resident Preference | 2 points |
| 7. Working Families, Single Disabled, Single Elderly Preference | 1 points |

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

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

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

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

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

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

(5) Special Purpose Section 8 Assistance Programs

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

- The Section 8 Administrative Plan
- Briefing sessions and written materials
- Other: Section 8 Moderate Rehabilitation Administrative Plan, ~~Leased Housing~~BHA Reasonable Accommodation Policy, BHA Limited English Proficiency Policy, Individual program mailings (i.e. Family Self-Sufficiency (FSS) program marketing), advocacy group meetings, support service groups, www.bostonhousing.org

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

Through published notices

Other: Press releases and Marketing to targeted support service groups

2. Financial Resources

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

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants		
1a. Public Housing Operating Fund	\$54,591,705	
1b. Public Housing Capital Fund	\$18,479,829	
1c. HOPE VI Revitalization	-----	
1d. HOPE VI Demolition	-----	
1e. Annual Contributions for Section 8 Tenant-Based Assistance	\$185,995,772	
1f. Public Housing Drug Elimination Program (including any Technical Assistance funds)	-----	
1g. Resident Opportunity/Self-Sufficiency Grants		
1h. Community Development Block Grant	-----	-----
1i. HOME	-----	-----
1j. Project Based Section 8	\$7,102,781	
2. Prior Year Federal Grants (unobligated funds only)		
2a. CGP/RHF	\$8,667,104	
2b. HOPE VI	\$1,322,303	
3. Public Housing Dwelling Rental Income	\$31,640,400	Operating
4. Other income, Vending /Laundry, Cell Towers	\$500,000	Operating, Social Services
4a. Investment income	\$10,000	Operating
4b. Non-dwelling rent	\$14,000	Operating
5. Non-federal sources (list below)		
CFFP (unobligated)	-----	Capital
Donations	\$20,000	Social Services
Total resources	\$308,343,894	

3. Rent Determination

A. Public Housing

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

(1) Income Based Rent Policies

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

a. Use of discretionary policies: (select one)

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

---or---

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

b. Minimum Rent

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

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

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

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

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

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

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

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

For the earned income of a previously unemployed household member

For increases in earned income (between annual recertifications)

Fixed amount (other than general rent-setting policy)

If yes, state amount/s and circumstances below:

Fixed percentage (other than general rent-setting policy)

If yes, state percentage/s and circumstances below:

For household heads

For other family members

For transportation expenses

For the non-reimbursed medical expenses of non-disabled or non-elderly families

Other (describe below)

e. Ceiling rents

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

Yes for all developments

Yes but only for some developments

No

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

For all developments (includes family and elderly/disabled developments; excludes HOPE VI and redeveloped properties)

For all general occupancy developments (not elderly or disabled or elderly only)

For specified general occupancy developments

For certain parts of developments; e.g., the high-rise portion

For certain size units; e.g., larger bedroom sizes

Other (list below)

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

Market comparability study

Fair market rents (FMR)

95th percentile rents

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

f. Rent re-determinations:

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

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

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

(2) Flat Rents

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

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

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

The Boston Housing Authority will set the flat rental amount for each public housing unit that complies with the requirement that all flat rents be set at no less than 80 percent of the applicable Fair Market Rent (FMR) adjusted, if necessary, to account for reasonable utilities costs. The new flat rental amount will apply to all new program admissions effective October 31, 2014. For current program participants that pay the flat rental

amount, the new flat rental amount will be offered, as well as the income-based rental amount, at the next annual rental option.

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

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

The Flat rent amount by bedroom size will be reviewed yearly each October and if there is a significant change the new rent will become effective by 1st of January. The BHA will maintain a current listing of its flat rent schedule as an appendix to the BHA Rent Manual and will provide this list to residents at least annually as part of the TSR process.

A. Financial Hardship: Residents who choose flat rents may request to change to an income-based rent at any time if the family is unable to pay the flat rent because of financial hardship. A financial hardship exists for these purposes when a family's income is reduced or their deductions are increased to the extent that an income-based rent is lower than the flat rent.

B. Annual Recertifications: Residents who choose flat rents will be asked to update their family information every year, but will only have to re-certify income verification once every three years.

B. Section 8 Tenant-Based Assistance

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

(1) Payment Standards

Describe the voucher payment standards and policies.

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

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

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

- FMRs are adequate to ensure success among assisted families in the PHA's segment of the FMR area
- The PHA has chosen to serve additional families by lowering the payment standard
- Reflects market or submarket
- Other (list below)

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

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

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

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

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

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

(2) Minimum Rent

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

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

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

4. Operations and Management

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

A. PHA Management Structure

Describe the PHA's management structure and organization.

(select one)

An organization chart showing the PHA's management structure and organization is on page 53.

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

DEVELOPMENT NAME	ADDRESS	BHA MANAGED	PRIVATELY MANAGED
Alice H. Taylor	71 Prentiss Street, Roxbury, MA 02120	X	
Amory Street	125 Amory Street, Jamaica Plain, 02119	X	
Annapolis	52 Summer Street, Dorchester, MA 02122	X	
Ashmont	374 Ashmont Street, Dorchester, MA 02124	X	
Ausonia	185 Fulton Street, Boston, MA 02109	X	
Barkley (Cathedral)	1472 Washington Street, Boston, MA 02118	X	
Bellflower	24 Bellflower Street, Dorchester, MA 02125	X	
Bromley Park	42 Horan Way, Jamaica Plain, MA 02130	X	
Charlestown	55 Bunker Hill Avenue, Charlestown, MA 02129	X	
Codman	784 Washington Street, Dorchester, MA 02124	X	
Commonwealth	35 Fidelis Way, Brighton, MA 02135		X
Davison	101 Davison Street, Hyde Park, MA 02136	X	
Eva White	440 Tremont Street, Boston, MA 02116		X
Foley	199 "H" Street, South Boston, MA 02127	X	
Franklin Field	91 Ames Street, Dorchester, MA 02124	X	
Franklin Hill Aptmts.	113 Shandon Road, Dorchester, MA 02124		X
Frederick Douglass	755 Tremont Street, Roxbury, MA 02118	X	
General Warren	114 Rutherford Street, Charlestown, MA 02129		X
Groveland	15 Mary Moore Beatty Circle, Mattapan, MA 02126	X	
Hampton House	155 Northampton Street, Roxbury, MA 02118	X	
Hassan	705 River Street, Mattapan, MA 02126	X	
Heath Street	42 Horan Way, Jamaica Plain, MA 02130	X	
Heritage	209 Summer Street, East Boston, MA 02128		X
Highland Park	16 Center Street, Roxbury, MA 02119		X
Holgate	125 Elm Hill Avenue, Roxbury, MA 02121	X	
J.J. Carroll	130 Chestnut Hill Street, Brighton, MA 02136		X

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

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

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

B. HUD Programs Under PHA Management

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

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

Elderly and Disabled Resident Services Program	3128	313
Supportive Housing Services Program	77	15
HOPE VI Resident Services Program	481	N/A
Section 8 Family Self-Sufficiency Program	200*****	20
Resident Employment Program	115*****	N/A
Public Housing Family Self-Sufficiency	50	N/A
Resident Services Program (ROSS funded)	650	N/A

* total federal development only anticipated occupancy on 4/1/15.

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

***These figures represent the maximum units which may be utilized under each Annual Contributions Contract.

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

*****Current enrollment has is declining due to contract completions, half of which with escrows.

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

Section 3 residents are:

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

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

C. Management and Maintenance Policies

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

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

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

(1) Public Housing Maintenance and Management:

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

(2) Section 8 Management: (list below)

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

- Section 8 Moderate Rehabilitation Administrative Plan

5. Grievance Procedure

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

A. Public Housing

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

If yes, list additions to federal requirements below:

Since the BHA has designed the grievance procedures to comply with both state and federal requirements, one additional provision required by the Department of Housing and Community Development, the state agency that regulates state-funded public housing, has been extended to residents at federal developments too. Decisions of the Grievance Panel may be appealed to a designee of the Administrator.

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

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

PHA development management offices
 Other (list below)

B. Section 8 Tenant-Based Assistance

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

If yes, list additions to federal requirements below:

Please refer to Section 8 Administrative Plan

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

PHA main administrative office
*BHA Department of Grievances and Appeals
52 Chauncy Street, 9th Floors
(617) 988-4579*

Other (list below)

6. Designated Housing for Elderly and Disabled Families

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

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

2. Activity Description

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

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

6. Number of units affected: 3128

7. Coverage of action (select one)

Part of the development

Total development (See supplemental table below)

Update to 2015 plan: The BHA continues to monitor the percentages of elderly and non-elderly disabled households living in each Elderly/Disabled Development on an ongoing basis. When the percentage of elderly households occupying a development reaches 75%, the development is flagged so that each subsequent offer of housing will be reviewed by a Manager in the Occupancy Department. When the percentage of elderly households occupying a development reaches 80%, the BHA will turn off Designated Housing preference points to elderly applicant households for this development. If the percentage of elderly households occupying a development falls below 80%, the BHA will turn on Designated Housing Preference points to elderly applicant households for this development.

Federal Elderly/Disabled Development Proposed Designation

	Development Number	Development Name	Available Units	Elderly 80%	Non-Eld. Dis. 20%	OBR	1BR	2BR
1.	MA002107119*	BROMLEY PARK ELDERLY	49	39	10	0	36	13
2.	MA002000226	POND STREET	43	34	9	0	40	3
3.	MA002000227	ANNAPOLIS STREET	55	44	11	0	49	6
4.	MA002000228	ASHMONT STREET	53	42	11	0	48	5
5.	MA002000229	HOLGATE APARTMENTS	80	64	16	0	80	0
6.	MA002000230	FOLEY APARTMENTS	89	71	18	0	89	0
7.	MA002000232	GROVELAND	46	37	9	26	19	1
8.	MA002000234	DAVISON	46	37	9	31	15	0
9.	MA002000235	WASHINGTON STREET	81	65	16	0	72	9
10.	MA002000236	WEST NINTH STREET	83	66	17	0	76	7
11.	MA002000237	J.J. CARROLL	63	50	13	0	52	11
12.	MA002000238	MEADE APARTMENTS	39	31	8	0	37	2
13.	MA002000240	MLK TOWERS	102	82	20	25	77	0
14.	MA002000241	EVA WHITE	102	82	20	34	57	11
15.	MA002000242	WALNUT PARK	157	126	31	105	48	4
16.	MA002000244	FREDERICK DOUGLAS	69	55	14	42	27	0
17.	MA002000245	AMORY STREET	160	128	32	82	70	8
18.	MA002000247	GENERAL WARREN	94	75	19	55	36	3
19.	MA002000249	TORRE UNIDAD	186	149	37	110	76	0
20.	MA002000250	ROCKLAND TOWERS	63	50	13	40	23	0
21.	MA002000251	CODMAN APARTMENTS	90	72	18	60	26	4
22.	MA002002141	HERITAGE APARTMENTS	25	20	5	20	2	3
23.	MA002000253	ST. BOTOLPH STREET	121	97	24	81	40	0
24.	MA002000254	PASCIUCCO	85	68	17	63	22	0
25.	MA002002142	LOWER MILLS	15	12	3	9	6	0

26	MA002000261	AUSONIA HOMES	95	76	19	0	89	6
27	MA002000262	HASSAN APARTMENTS	91	73	18	55	32	4
28	MA002000270	SPRING STREET	98	78	20	0	95	3
29	MA002000271	PATRICIA WHITE	203	162	41	0	200	3
30	MA002000272	ROSLYN APTS	110	88	22	0	107	3
31	MA002000277	BELLFLOWER STREET	106	85	21	0	100	6
32	MA002000283	PEABODY SQUARE	91	73	18	0	89	2
33	MA002000290	MALONE APTS	96	77	19	0	96	0
34	MA002000295	COMMONWEALTH ELDERLY	106	85	21	0	99	7
35	MA002000298	HAMPTON HOUSE	69	55	14	41	28	0
36	MA002000299	WASHINGTON MANOR	67	54	13	39	28	0
		Total	3128	2502	626	918	2086	124

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

7. Community Service and Self-Sufficiency

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

A. PHA Coordination with the Welfare (TANF) Agency

1. Cooperative agreements:

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

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

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

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

B. Services and programs offered to residents and participants

(1) General

a. Self-Sufficiency Policies

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

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

b. Economic and Social self-sufficiency programs

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

Services and Programs				
Program Name & Description (including location, if appropriate)	Estimated Size	Allocation Method (waiting list/random selection/specific criteria/other)	Access (development office / PHA main office / other provider name)	Eligibility (public housing or section 8 participants or both)
Elderly and Disabled Resident Services Program	3243	Open to all residents	Development Office; case manager’s office	Public Housing
Supportive Housing Services Program	48	Waiting list	Justice Resource Institute (13) Elders Living at Home (20) PACE (12) Ethos (3)	Public Housing
HOPE VI Resident Services Program	481	Recruited on site; wait list if necessary	Trinity Management LLC at Washington Beech, Labour Center at Old Colony	Public Housing
NAACP	400	Specific criteria	PHA Main Office	Section 8
Veterans Administration Supportive Housing	520	Specific criteria	VA Medical Center in Boston	Section 8
Section 8 Family Self-Sufficiency Program	200	Open to Section 8 participants	PHA Main Office	Section 8
Leading the Way Home Program	500	Specific Criteria	DHCD in Boston	Section 8
HomeBase Program	200	Specific Criteria	MBHP in Boston	Public Housing
Healthy Start in Housing	75	Specific Criteria	BPHC in Boston	Public Housing
Public Housing Family Self-	50	Specific	Development	Public Housing

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

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

Section 3 residents are:

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

(2) Family Self Sufficiency program/s

a. Participation Description

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

b. Yes No: If the PHA is not maintaining the minimum program size required by HUD, does the most recent FSS Action Plan address the steps

the PHA plans to take to achieve at least the minimum program size?

If no, list steps the PHA will take below:

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

C. Welfare Benefit Reductions

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

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

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

IMPLEMENTATION OF PUBLIC HOUSING

COMMUNITY SERVICE REQUIREMENTS

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

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

BHA's residential lease has been modified to include the community service requirement and a community service policy has been approved as part of the 2001 Annual BHA Plan. All residents will be informed of

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

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

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

The policy includes a description of qualifying work and self-sufficiency activities. These activities include: unsubsidized employment, subsidized private or public sector employment, on the job training, job search and job readiness assistance, vocational educational training, job skills training, education directly related to employment, attendance at a secondary school or GED program or provision of child care services to an individual participating in a community service program.

8. Safety and Crime Prevention

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

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

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

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

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

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

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

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

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

- Contracting with outside and/or resident organizations for the provision of crime- and/or drug-prevention activities
- Crime Prevention Through Environmental Design
- Activities targeted to at-risk youth, adults, or seniors
- Crime Watch
- Other (describe below)
 1. Utilization of video surveillance equipment in select developments including dissemination to other Law Enforcement Agencies aiding in judicial proceedings
 2. Regular Crime Prevention Education
 3. Institution of new key security systems
 4. Enhanced lease enforcement activity
 5. Employment of nationally-accredited police force
 6. Expanded training program and new uniforms for Safety Officers
 7. Bicycle patrol
 8. Establish "Safe Street" teams to address drug issues and violent crimes in high risk areas including follow up "action teams" to address quality of life issues cited in Emergency Transfer applications.

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

C. Coordination between PHA and the police

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

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

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

D. Additional information as required by PHDEP/PHDEP Plan

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

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

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

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

9. Pets

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

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

Definitions of Pet and Assistive Animal:

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

Types and Number of Pets Allowed:

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

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

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

Pets of vicious or aggressive disposition deemed by management to be potentially harmful to the health and safety of others are prohibited, including Doberman Pinschers, Pit Bulls and Rottweilers as well as any mixed breed dog with identifiable characteristics specific to one of the prohibited breeds.

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

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

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

Pet Ownership Rules:

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

Non-Compliance:

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

10. Civil Rights Certification Not Revised

11. Fiscal Year Audit

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

12. Asset Management

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

1. Yes No: Is the PHA engaging in any activities that will contribute to the long-term asset management of its public housing stock , including how the Agency will plan for long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs that have **not** been addressed elsewhere in this PHA Plan?

2. What types of asset management activities will the PHA undertake? (select all that apply)
 - Not applicable
 - Private management
 - Development-based accounting
 - Comprehensive stock assessment
 - Other: (list below) strategic redevelopment planning
Approach to Preservation; 5-Year Sustainability Plan

3. Yes No: Has the PHA included descriptions of asset management activities in the **optional** Public Housing Asset Management Table?

13. Violence Against Women Act

BOSTON HOUSING AUTHORITY VIOLENCE AGAINST WOMEN ACT (VAWA) POLICY

I. Purpose and Applicability

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

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

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

II. Goals and Objectives

This Policy has the following principal goals and objectives:

- A. Maintaining compliance, including training of appropriate staff managing BHA properties, with all applicable legal requirements imposed by VAWA;
- B. Participating, with others, in protecting the physical safety of victims of actual or threatened domestic violence, dating violence, **sexual assault** or stalking who are assisted by BHA;
- C. Providing and maintaining housing opportunities for victims of domestic violence, dating violence, **sexual assault** or stalking;
- D. Cooperating, with others, in formation and maintenance of collaborative arrangements between BHA, law enforcement authorities, victim service providers, and others to promote the safety and well-being of victims of actual and threatened domestic violence, dating violence sexual assault and stalking, who are assisted by BHA; and

- E. Responding in accordance with BHA policies and procedures to incidents of domestic violence, dating violence, sexual assault or stalking, affecting individuals assisted by BHA.

III. Other BHA Policies and Procedures

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

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

IV. Definitions

As used in this Policy:

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

- (B) in the course of, or as a result of, such following, pursuit, surveillance or repeatedly committed acts, to place a person in reasonable fear of the death of, or serious bodily injury to, or to cause substantial emotional harm to –
 - (i) that person;
 - (ii) a member of the immediate family of that person; or
 - (iii) the spouse or intimate partner of that person;
- D. Sexual assault – means, any nonconsensual sexual act proscribed by Federal, tribunal, or State law, including when the victim lacks capacity to consent;
- E. Affiliated individual - means, with respect to a person –
 - (A) a spouse, parent, brother, sister, or child of that person, or an individual to whom that person stands in loco parentis; or
 - (B) any person, tenant, or lawful occupant living in the household of that person .
- F. *Perpetrator* – means person who commits an act of domestic violence, dating violence, sexual assault or stalking against a victim.

V. Admissions and Screening

- A. *Denial of Assistance.* BHA will not deny admission to public housing or to the Section 8 rental assistance program to any person because that person is or has been a victim of domestic violence, dating violence, sexual assault or stalking, provided that such person is otherwise qualified for such admission.
- B. *Admissions Preference.* Applicants for Public Housing and Section 8 housing assistance from BHA will receive a priority in admission by virtue of their status as victims of domestic violence. This priority is described for Public Housing in the BHA’s ACOP and for Section 8 in its Admin Plan.
- C. *Mitigation of Disqualifying Information.* When requested by an applicant for assistance whose history includes incidents in which the applicant was a victim of domestic violence, dating violence, sexual assault and/or stalking, BHA, may take such information into account in mitigation of potentially disqualifying information, such as poor credit history or previous damage to a dwelling. If requested by an applicant to take such mitigating information into account, BHA shall be entitled to conduct such inquiries as are reasonably necessary to verify the claimed history of domestic violence, dating violence, sexual assault and/or stalking and its probable relevance to the potentially disqualifying information. BHA may disregard or mitigate potentially disqualifying information if the applicant household includes a perpetrator of a previous incident or incidents of domestic violence, dating violence, sexual assault and/or stalking.

VI. Termination of Tenancy or Assistance

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

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

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

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

B. *Removal of Perpetrator.* Further, notwithstanding anything in paragraph VI.A.2. or Federal, State or local law to the contrary, BHA or a Section 8 owner or manager, as the case may be, may bifurcate a lease, or remove a household member from a lease, without regard to whether a household member is a signatory to a lease, in order to evict, remove, terminate occupancy rights, or terminate assistance to any individual who is a tenant or lawful occupant and who engages in acts of physical violence

against an affiliated individual or other individual. Such action against the perpetrator of such physical violence may be taken without evicting, removing, terminating assistance to, or otherwise penalizing the victim of such violence who is also the tenant or an affiliated individual. Such eviction, removal, termination of occupancy rights, or termination of assistance shall be effected in accordance with the procedures prescribed by law applicable to terminations of tenancy and evictions by BHA. If such bifurcation occurs, and the removed tenant or lawful occupant was the sole tenant eligible to receive assistance the BHA will provide any remaining household member the opportunity to establish eligibility for housing.

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

VII. Verification of Domestic Violence, Dating Violence or Stalking

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

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

1. *HUD-approved form* - by providing to BHA or to the requesting Section 8 owner or manager a written certification, on a form approved by the U.S. Department of Housing and Urban Development (HUD) and available from BHA, that the individual is a victim of domestic violence, dating violence, sexual assault or stalking; that the incident or incidents in question are bona fide incidents of actual or threatened abuse meeting the requirements of the applicable definition(s) set forth in this policy. The incident or incidents in question must be described in reasonable detail as required in the HUD-approved form, and the completed certification must include the name of the perpetrator. If there is reason to believe that the certification is incomplete or inaccurate, the BHA may require

additional documentation of the incident(s). Such documentation requirement shall not place the victim in danger. As necessary, the BHA shall work with the victim to identify appropriate sources of documentation.

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

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

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

- C. *Waiver of verification requirement.* The Administrator of the BHA or her Designee, or a Section 8 owner or manager, may, with respect to any specific case, waive the above-stated requirements for verification and provide the benefits of this policy based on the victim's statement or other corroborating evidence. Such waiver may be granted in the sole discretion of the Administrator/Designee, owner or manager. Any such waiver must be in writing. Waiver in a particular instance or instances shall not operate as precedent for, or create any right to, waiver in any other case or cases, regardless of similarity in circumstances.

VIII. Confidentiality

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

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

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

IX. Transfer to New Residence

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

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

X. Court Orders/Family Break-up

A. *Court orders.* It is BHA's policy to honor orders entered by courts of competent jurisdiction affecting individuals assisted by BHA and their property. This includes cooperating with law enforcement authorities to enforce civil protection orders issued for

the protection of victims and addressing the distribution of personal property among household members in cases where a family breaks up.

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

XI. Relationships with Service Providers

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

XII. Notification

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

XIII. Relationship with Other Applicable Laws

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

XIV. Amendment

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

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

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

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

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

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

A partial listing of Violence Against Women Act Resources:

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

DOVE, Inc. (Quincy)	888 – 314 – 3683
Elder Abuse 24hr. Hotline	1-800-922-2275
Elizabeth Stone House	617 – 427 – 9801
Finding Options for Change Understanding and Safety (Lowell, MA)	978-458-6282
FINEX House	617 - 288 – 1054
Gay Mens’ Domestic Violence Project	800-832-1901
Greater Boston Legal Services	617-371-1234
Greater Boston Legal Services (alternate number)	617-603-1614
HaborCOV (Chelsea, MA)	617-884-9799x137 or 617 – 884 – 9909
HAVEN at MGH	617 -724-0054
Independence House (Hyannis, MA)	508-771-6507x243
International Institute of Boston	617-695-9990x172
Jewish Family and Children's Services (Waltham, MA)	781-647-5327
Lowell Community Health Center (Lowell, MA)	978-746-3147
Massachusetts Alliance of Portuguese Speakers (Cambridge, MA)	617-864-7600
Mass Coalition for the Deaf and Hard of Hearing	1-800-882-1155
Mass Coalition for the Deaf and Hard of Hearing TTY	617-695-7600 TTY
MGH Chelsea Health Care Center (Chelsea, MA)	617-887-4224
Massachusetts Department of Transitional Assistance (Domestic Violence Specialists)	617 – 348 - 8500
Massachusetts Immigrant and Refugee Advocacy Coalition	617-350-5480x216
Massachusetts Law Reform Institute	617-357-0700x305
Massachusetts Office for Victim Assistance	617-727-5200
Mayor’s 24hr. Housing Hotline	617-635-4500
Merrimack Valley Legal Services, Inc. (Lowell, MA)	978-888-0004
Multicultural AIDS Coalition	617-442-1622
Newton Wellesley Hospital (Newton, MA)	617-243-6521
Nigerian American Community Organization	617-424-7890
Nigerian American Community Organization (alternate number)	617-913-5684
Parental Stress 24hr. Hotline	1-800-632-8188
Passageway at Brigham & Women’s Hospital	617 – 732 – 8753
Portal to Hope (Salisbury)	781 – 306 – 6678
REACH Beyond Domestic Violence (Waltham)	800 – 899 – 4000
Refugee and Immigrant Assistance Center	617-238-2434
Renewal House	617 – 566 – 6881
RESPOND, Inc. (Somerville)	617 – 623 – 5900
“SafeLink 24hr. Statewide Domestic Violence Hotline Operated by Casa Myrna Vazquez”	1-877-785-2020
SafeLink 24hr. Statewide Domestic Violence Hotline TTY Operated by Casa Myrna Vazquez	877-521-2601 TTY

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

Boston Housing Authority

