

Designated Housing Plan For the Boston Housing Authority

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Introduction

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

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

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

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

Plan	Available Units	Elderly 80%	Non-Eld. Dis. 20%	0BR	1BR	2BR
2015 DHP	3128	2502	626	918	2086	124
2020 Amendment	2968	2374	594	836	2016	116
2021 Proposal	2166	1690	476	454	1560	152

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

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

The DHP is a public housing program regulation and does not encompass properties restricted through Project Based Section 8 Vouchers, even if such housing is owned and controlled by the BHA or an affiliate entity. BHA inquired in February 2021 as to whether BHA could include these properties under the DHP. HUD indicated that current regulation does not provide for the inclusion of properties outside of the Public Housing program in a Designated Housing Plan.

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

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

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

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

Request for Renewed Designation:

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

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

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

² https://www.boston.gov/sites/default/files/embed/c/consolidated_plan_part_i_narratives_190708.pdf

³ https://docs.google.com/document/d/1WRWTkvd7_hAKiKz-_F8-J_HCq5mCrWKxBUeFOVgwaM/edit?usp=sharing

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

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

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

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

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

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

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

Boston also has recognized housing challenges for persons with disabilities and the Disability Housing Task Force recommended a broad set of strategies.⁷ The city has implemented a disability checklist⁸ for projects in development review, and attached guidelines for city-funded projects.⁹ A fair housing overlay to the development review process in Boston also encourages accessible housing and the addition of “Group 2” accessible units.¹⁰ BHA, whose projects sometimes receive city funding and typically go

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

⁶ https://www.boston.gov/sites/default/files/embed/d/dhtf_2017_final_170719_904.pdf

⁷ https://www.boston.gov/sites/default/files/embed/d/dhtf_2017_final_170719_904.pdf

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

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https://www.boston.gov/sites/default/files/file/2020/08/DND%20Design%20Standards_Checklists_Provision_0810_2020.pdf

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

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

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

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

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

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

Project Description:

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

Development #	Development Name	Occupied Units	Elder Occupied	Non-Eld Disabled Occupied	OBR	1BR	2BR
All Designated	All Designated Housing	2166	1690	476	454	1560	152
191	Mildred C. Hailey Elderly	50	37	13	0	36	14
226	Pond Street	43	35	8	0	40	3
227	Annapolis	53	41	12	0	47	6
228	Ashmont	53	39	14	0	48	5
229	Holgate Apartments	76	59	17	0	76	0
230	Foley Apartments	86	69	17	0	86	0
232	Groveland	43	33	10	26	17	0
234	Davison	46	35	11	31	15	0
235	Washington Street	76	56	20	0	67	9
236	West Ninth Street	80	63	17	0	73	7
238	J J Meade	37	27	10	0	36	1
240	Martin Luther King Towers	97	78	19	23	74	0
244	Frederick Douglass	67	51	16	40	27	0
247	General Warren	88	70	18	49	36	3
249	Torre Unidad	177	139	38	0	105	72
250	Rockland Towers	60	47	13	39	21	0
251	Codman Apartments	88	65	23	59	25	4
254	Pasciucco	84	69	15	62	22	0
261	Ausonia Apartments	88	66	22	0	83	5
262	Hassan Apartments	85	68	17	49	31	5
270	Spring Street	97	78	19	0	94	3
272	Roslyn Apartments	106	89	17	0	103	3
277	Bellflower	88	65	23	0	83	5
283	Peabody Apartments	87	65	22	0	85	2
290	Malone Apartments	90	71	19	0	90	0
295	Commonwealth Elderly	96	72	24	0	91	5
298	Hampton House	61	51	10	38	23	0
299	Washington Manor	64	52	12	38	26	0
226	Pond Street	43	35	8	0	40	3
227	Annapolis	53	41	12	0	47	6
228	Ashmont	53	39	14	0	48	5
229	Holgate Apartments	76	59	17	0	76	0

Mitigation and Alternative Resources

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

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

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

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

Procedures, Protections and Protocols Regarding Designation

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

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

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

HUD DHP Review Checklist Items

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

1. The BHA does not have any outstanding court orders, Voluntary Compliance Agreements, or Section 504 Letters of Findings at this time.
2. Regarding fair housing, the proposed designation in this Plan will not increase minority concentrations as the elderly/non-elderly disabled population percentages apply at all of BHA's elderly/disabled developments.

Policy Regarding Relocation and Designation

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

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

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

Request for Approval

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

1. BHA will provide 80% of units to elderly applicants and 20% to non-elderly disabled applicants in all developments included in this Plan. These developments are **currently** designated. Wheelchair units in the elderly/disabled portfolio will remain undesignated.

2. BHA will retain preference points for persons with disabilities in state and federal family public housing and for single non-elderly disabled in the Housing Choice Voucher and Moderate Rehabilitation Voucher Programs.
3. BHA will continue to administer other vouchers related to this plan, including Mainstream vouchers. BHA will, through its priority and preference categories, allocate units in formerly Designated, Project Based Voucher properties, to maintain housing opportunities for the elderly and non-elderly disabled populations formerly served by Designated public housing and now served through BHA-controlled Projected Based Vouchers.