

**COMMONWEALTH OF
MASSACHUSETTS**

**DEPARTMENT OF HOUSING AND
COMMUNITY DEVELOPMENT (DHCD)**

**HOUSING CHOICE VOUCHER
PROGRAM (HCVP)
ANNUAL
PUBLIC HOUSING PLAN**

MARCH 15, 2004

(Revised June 16, 2004)

Annual Plan for Fiscal Year 2004

**PHA Plan
Agency Identification**

PHA Name: Massachusetts Department of Housing and Community Development (DHCD)

PHA Number: MA901

PHA Fiscal Year Beginning: (07/2004)

Public Access to Information

Information regarding any activities outlined in this plan can be obtained by contacting: (select all that apply)

- Main administrative office of the PHA
- PHA development management offices
- PHA local offices

Display Locations for PHA Plans and Supporting Documents

The PHA Plans (including attachments) are available for public inspection at: (select all that apply)

- Main administrative office of the PHA, which is the Commonwealth's housing and community development agency
- PHA development management offices
- PHA local offices
(See Attachment A for a listing of DHCD's Regional Administering Agencies-RAAs)
- Main administrative office of the local government
- Main administrative office of the County government
- Main administrative office of the State government (See Main administrative office of the PHA above)
- Public library
- PHA website
<http://www.state.ma.us/dhcd/>
- Other (list below)

PHA Plan Supporting Documents are available for inspection at: (select all that apply)

- Main business office of the PHA
- PHA development management offices
- Other (list below)
DHCD's HCVP Administrative Plan can be found on its website at
<http://www.state.ma.us/dhcd/>

5-YEAR PLAN
PHA FISCAL YEARS 2000 - 2004
[24 CFR Part 903.5]

A. Mission

State the PHA's mission for serving the needs of low-income, very low income, and extremely low-income families in the PHA's jurisdiction. (Select one of the choices below)

The mission of the PHA is the same as that of the Department of Housing and Urban Development: To promote adequate and affordable housing, economic opportunity and a suitable living environment free from discrimination.

The PHA's mission is: (state mission here)

The mission of DHCD is to strengthen cities, towns and neighborhoods to enhance the quality of life of Massachusetts residents. To accomplish our mission, we will provide leadership, professional assistance and financial resources to promote safe, decent affordable housing opportunities, economic vitality of communities and sound municipal management. We will forge partnerships with regional and local governments, public agencies, community based organizations and the business community to achieve our common goals and objectives. In all of these efforts, we will recognize and respect the diverse needs, circumstances and characteristics of individuals and communities.

DHCD is committed to:

- Programs and funding that primarily target populations of low to moderate incomes and those with special needs.
- Coordinated, integrated and balanced agency responses to address the comprehensive needs and interests of communities.
- Programs and technical assistance designed to facilitate informed decision-making at the local level, and to encourage self-sufficiency of residents and communities.
- Sound business practices that ensure the highest standards of public accountability and responsibility.

B. Goals

The goals and objectives listed below are derived from HUD's strategic Goals and Objectives and those emphasized in recent legislation. PHAs may select any of these goals and objectives as their own, or identify other goals and/or objectives. Whether selecting the HUD-suggested objectives or their own, **PHAS ARE STRONGLY ENCOURAGED TO IDENTIFY QUANTIFIABLE MEASURES OF SUCCESS IN REACHING THEIR OBJECTIVES OVER THE COURSE OF THE 5 YEARS.** (Quantifiable measures would include targets such as: numbers of families served or PHAS scores achieved.) PHAs should identify these measures in the spaces to the right of or below the stated objectives.

HUD Strategic Goal: Increase the availability of decent, safe, and affordable housing.

PHA Goal: Expand the supply of assisted housing

Objectives:

- Apply for additional rental vouchers:
- Reduce public housing vacancies:
- Leverage private or other public funds to create additional housing opportunities:

In FY 01, DHCD launched several project-based assistance voucher (PBA) initiatives. Beginning with DHCD's Winter 2001 One Stop Affordable Housing Funding Round, we have continued to make PBA vouchers available to any applicant that successfully competes for these various private housing funds (e.g. LIHTC, HOME, the Affordable Housing Trust Fund, and other federal and state funds) and requests PBA vouchers, provided their proposal meets all PBA requirements and the units will not need assistance until DHCD has available voucher authority. See Executive Summary, Highlights, Section 3, for an up-to-date list of all PBA developments either under HAP or in the pipeline, as of March 10, 2004.

In FY 01, each of our RAAs launched a Housing Consumer Education Center (HCEC) with funds appropriated by the Massachusetts Legislature. One key objective of the HCEC is to perform outreach to owners and developers of rental housing and offer landlord and renter education and other related services. A positive outcome of the centers' outreach and marketing efforts includes increased listings of available rental property by current and new owners.

- Acquire or build units or developments
- Other (list below)

PHA Goal: Improve the quality of assisted housing

Objectives:

- Improve public housing management: (PHAS score)
- Improve voucher management: (SEMAP score)

DHCD stated in its 5-Year Plan that it would strive to achieve a "high performer" SEMAP rating. SEMAP measures multiple areas of program administration, including housing quality standard compliance. In FY '01 and '03, DHCD achieved a "high performer" rating.

2. DHCD continued to exceed the number of random unit audit inspections it performed in FY 03.

- Increase customer satisfaction:

DHCD's statewide waiting list became fully operational during FY 01. The list remains open at all times. The pre-application is a short, simple document that is widely available to prospective applicants, including as a download from DHCD's Home Page. We currently have 48,537 applicants on this list, which is designed to eliminate multiple applications. A waiting list purge was completed June 2002 and will be performed approximately once every 18-30 months.

DHCD's waitlist technology allows local housing authorities to perform HVCP selections for their own HUD-funded programs directly from our statewide list. It has been designed to protect the privacy of all applicants when multiple agencies use our list for their respective regional or local selections. Several local housing authorities on Cape Cod are currently using DHCD's waiting list to make selections for their HCVPs. Use of our list eliminates the necessity for applicants to apply to multiple Cape Cod agency lists. It is an excellent vehicle for customer satisfaction. Other housing authorities, through MassNAHRO's Leased Housing Committee, asked us to assist them with the development of their own statewide list. DHCD agreed to adapt its waiting list technology for use by local housing authorities and committed \$15,000 to provide MassNAHRO with start-up funds to support the first year of WEB hosting. MassNAHRO's list became active this past year.

- Concentrate on efforts to improve specific management functions: (list; e.g., public housing finance; voucher unit inspections)

Data Management

DHCD will continue to work with its contractors on a number of different management information systems (MIS)-related initiatives, including: advising contractors on hardware and software standards that are compatible with DHCD's systems; tracking and analyzing program data to make informed and supportable policy determinations; and using available technologies to enhance the overall delivery of various program services to all constituencies, reduce paperwork and speed up various tasks.

Exceeding HQS Audit Requirements

DHCD will continue to exceed the HUD-required threshold for units that must be audited for housing quality standard compliance. Approximately 3% of each region's initially leased or re-leased units will be randomly audited each year. This goal exceeds the HUD standard by 50%.

- Renovate or modernize public housing units:
- Demolish or dispose of obsolete public housing:
- Provide replacement public housing:
- Provide replacement vouchers:
- Other: (list below)

PHA Goal: Increase assisted housing choices

Objectives:

- Provide voucher mobility counseling:

The HCECs provide several different kinds of supports for voucher holders searching for housing including: on-site computers for use by voucher holders who want to screen listings; special housing search training sessions to supplement information provided at the voucher briefing sessions, a variety of different written materials, assistance with following-up on potential discrimination complaints and on-site staff available without an appointment to answer questions.

- Conduct outreach efforts to potential voucher landlords
- Increase voucher payment standards

DHCD will carefully monitor our APS for effectiveness and appropriateness, and make adjustments, as warranted. We will monitor the percentage of participant contribution to rent and utility costs to determine its relationship to the 30% of income standard generally considered by the industry to be a reasonable tenant contribution. We will also monitor data to determine the impact of the HUD requirement that limits tenant contribution to rent and utility costs to 40% for all initial leases.

Where our data suggests that the payment standards may be too high, DHCD will make appropriate adjustments.

DHCD will seek HUD permission for exception payment standards beyond the maximum 110% allowed where our monitoring data, supported by rental market data, suggests that HUD's FMR basis is too low to provide a reasonable number of affordable housing choices.

- Implement voucher homeownership program:
- Implement public housing or other homeownership programs:
- Implement public housing site-based waiting lists:
- Convert public housing to vouchers:
- Other: (list below)

DHCD will implement measures toward deconcentration of poverty by encouraging voucher participation by owners with properties located outside areas of high poverty and high minority concentrations. These measures will include: (1) requesting HUD permission for exception payment standards where the rental market data can support such requests, and (2) undertaking targeted, focused outreach to rental property owners and managers in these communities.

HUD Strategic Goal: Improve community quality of life and economic vitality

This Section not applicable for Section 8 only agencies.

- PHA Goal: Provide an improved living environment
Objectives:
- Implement measures to deconcentrate poverty by bringing higher income public housing households into lower income developments:
 - Implement measures to promote income mixing in public housing by assuring access for lower income families into higher income developments:
 - Implement public housing security improvements:
 - Designate developments or buildings for particular resident groups (elderly, persons with disabilities)
 - Other: (list below)

HUD Strategic Goal: Promote self-sufficiency and asset development of families and individuals

- PHA Goal: Promote self-sufficiency and asset development of assisted households
- Objectives:
- Increase the number and percentage of employed persons in assisted families:

JOBLink: DHCD's Welfare-to-Work Housing Voucher Program, called JOBLink, currently serves 2011 families. It provides rental assistance and case management to support employment, with a participant employment rate of over 75%. When DTA was no longer able to provide support to this program this past fiscal year, DHCD elected to use its own funds to continue its operation.

FSS: Our successful FSS Program continues to enroll participants and assist families to establish and meet their goals through case management, information and referral, events, and peer group support. Our current FSS Program size of over 700 families exceeds our minimum program size of 383 families and our HUD-approved program size of 679 families.

MTW: The MTW Program has proven very successful in the Southern Worcester component, but had been under-enrolled in the Boston component, chiefly due to rent levels that had risen dramatically. In 2002 we addressed this issue by re-evaluating and subsequently increasing the subsidy amount for the Boston component. Participation in the Boston component reached full enrollment in August 2003. Worcester participants have maintained both employment and housing, and have participated in budgeting and homebuyer workshops. Worcester participants have been graduating from MTW since mid-2003, with several becoming successful first time homebuyers.

- Provide or attract supportive services to improve assistance recipients' employability:

Employment-Related Advisory Groups: Our existing advisory groups continue to function well (JOBLink, MTW and FSS all have advisory groups), and we have begun conversations within these groups toward the goal of establishing an umbrella group which will allow all programs easy access to resources and input, while recognizing the variations between the several programs.

Cooperative Agreements: Existing cooperative agreements have been maintained among all parties and continue to be an important foundation for our successful programs.

- Provide or attract supportive services to increase independence for the elderly or families with disabilities.
- Other: (list below)

MOVING TO WORK (MTW): Operate a Moving to Work (MTW) Demonstration Project that will serve 183 current or former (past 24 months) families making the transition to work. Using existing Section 8 funds, MTW will provide an annual stipend to each participant that has three targeted uses: (1) a shallow rent subsidy; (2) an automatic contribution to a monthly escrow account; and (3) a supports-budget for work-related expenses. The dual goals of DHCD's MTW program are to promote long term success in

the labor force and to promote and support housing choice for its target population.

SEEK NEW RESOURCES: Seek additional resources to enhance existing programs and create new programs to promote self-sufficiency and asset development for assisted individuals and families. _

HUD Strategic Goal: Ensure Equal Opportunity in Housing for all Americans

- PHA Goal: Ensure equal opportunity and affirmatively further fair housing Objectives:
 - Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion national origin, sex, familial status, and disability:
 - Undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion national origin, sex, familial status, and disability:
 - Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required:
 - Other: (list below)

DHCD's consistent advocacy for higher FMR/payment standards, its willingness to spend its own administrative funds on programs to encourage owner participation in higher cost rental markets, the implementation of the Housing Consumer Education Centers and its on-going referral process to MCAD and HUD's fair housing office when allegations of discrimination are brought to the RAAs attention, demonstrate that DHCD continues to take pro-active steps to ensure equal opportunity in housing for all its voucher clients.

Other PHA Goals and Objectives: (list below)

REASONABLE ACCOMMODATION TRAINING

DHCD regional contractors have participated in a number of reasonable accommodation training programs over the past several years. DHCD will continue to assure that all of its contractors are made aware of additional reasonable accommodation training programs and will require that all newly hired appropriate staff attend at least one of these sessions.

FAIR HOUSING TRAINING

DHCD regional contractors have participated in a number of fair housing training programs over the past several years. DHCD will continue to assure that all regional contractors are made aware of additional fair housing training opportunities and will require that that all newly hired appropriate staff attend at least one of these sessions

Annual PHA Plan
PHA Fiscal Year 2004

[24 CFR Part 903.7]

i. Annual Plan Type:

Select which type of Annual Plan the PHA will submit.

Standard Plan

Streamlined Plan:

- High Performing PHA**
- Small Agency (<250 Public Housing Units)**
- Administering Section 8 Only**

Troubled Agency Plan

ii. Executive Summary of the Annual PHA Plan

[24 CFR Part 903.7 9 (r)]

Provide a brief overview of the information in the Annual Plan, including highlights of major initiatives and discretionary policies the PHA has included in the Annual Plan.

As a result of receiving late [verbal] notice of the voucher renewal provisions of the FY 2004 omnibus appropriations act (public Law 108-199) DHCD has determined that it will be necessary to reopen its PHA Plan public hearing (on April 16, 2004) to discuss possible approaches for dealing with a large and unexpected funding shortfall in its current fiscal year ending June 30, 2004. This shortfall was wholly unanticipated at the time this PHA Plan was drafted; therefore, the impact on DHCD's Section 8 program was not able to be discussed at the initial public hearing held on March 26, 2004.

DHCD will be submitting an amendment to this PHA plan, including the complete public hearing comments and proposed changes to DHCD's Administrative Plan as soon as possible following the close of the public hearing.

Since February 2003, when DHCD's regional administering agencies (RAAs) were instructed by DHCD to stop waiting list selections because of unanticipated over-leasing, DHCD's Section 8 Housing Choice Voucher Program (HCVP) has been in an unprecedented holding pattern. Leasing peaked at 109% in June 2003 and attrition is expected to return the program to a 100% leasing rate in early 2005. Meanwhile, the need for rental assistance in MA has continued unabated from all sectors. Across the Commonwealth, the homeless, extremely low-income families, and special needs households continue to languish on our waiting list, with no chance to be selected for a DHCD voucher for several years.

For the second year in a row, Congress has failed to fund new vouchers. Threatened HCVP cuts for both federal fiscal year (FFY) 2003 and 2004 propelled program constituents, advocates, national industry groups and others to work ceaselessly to persuade both Congress and the Administration to appropriate funds to maintain vouchers currently authorized. These efforts did result in maintaining adequate funding for current vouchers in FFY 03, but there appears to be no possibility that either the Administration or Congress will soon return to expanding the program, even marginally, to meet the continued nationwide growing demand for vouchers. The prospects for FFY 05 are the bleakest yet. The Administration proposes to reduce funding by \$1.6 billion dollars, the consequences of which could result in an estimated 250,000 participants being terminated from the program. In MA, this could mean 8,200 participants would lose their vouchers, approximately 2,100 of whom would be DHCD participants.

The appropriations act also mandated administrative fee cuts. As of March 10, 2004, HUD has not published information on the extent of these fee cuts, but it is expected that they will be retroactive to October 1, 2003, in spite of the budget being signed five months late. Further, in a notice published in September 2003, HUD implemented a provision disallowing over-leased PHAs from collecting administrative fees for all over-leased units. DHCD and other agencies throughout the country appealed this requirement, but to date, HUD has not indicated that these fees will be forthcoming. In light of these current and anticipated fee cuts, DHCD has actively encouraged its eight regional administering agencies (RAA) to streamline their program operations and reduce expenses that can no longer be supported.

HUD's requirement that public housing agencies (PHA) must achieve a Section 8 Management Assessment Program (SEMAP) leasing utilization score of 98% (in order to attain high-performer status and to ensure that the PHA is eligible to compete for new vouchers "should" they become available) combined with new and strict limits on over-leasing *and* Congressional restrictions on using any pre-FFY 2003 program reserve funds to support any unintended over-leasing, eliminates a large measure of flexibility in program administration previously enjoyed by DHCD. Under HUD and Congress's strict over-leasing rules, each PHA that is at or near 100% leasing faces a very difficult balancing act maintaining full utilization in tandem with planning for natural program attrition. This situation makes determining how many additional vouchers to issue at any one time very challenging in order to avoid over-leasing.

Over the years, DHCD has taken considerable pride in our ability to compete successfully for all HUD set-aside programs for special needs populations and to creatively use our own HCVP portfolio to create other similar initiatives for needy populations. We currently administer 12 special HCVP program components, in addition to managing the conventional vouchers. These programs are exclusive of our 2151 unit JOBLink program and our 183 Moving to Work (MTW) program. A list of all DHCD Section 8 program components is included in Section 5 – Operations and Management.

The primary challenge facing DHCD this year is to restore balance to its multiple HCVP components, all of which will continue to attrit until we reach our baseline in early 2005. We must begin by assessing the policies and operations for each of these program components to ensure that each is effective, can achieve its goals, maintain required performance standards and generate the fees necessary to support program staff.

HIGHLIGHTS OF MAJOR INITIATIVES

Chief among our initiatives will be:

1. To develop a fair and balanced plan to resume issuance of vouchers once we reach baseline.

DHCD expects to be back at baseline in early 2005.

When RAAs are able to enter into new leases, priority will be given to:

- 1) All previously committed project-based vouchers for “development” PBA projects ready for occupancy beginning in early 2005. These PBA vouchers will come on-line slowly, as the various project to which they were committed will be completed during calendar year 2005 into 2006 (See Section 3 on page 5 of this Executive Summary for a list of these projects); and
- 2) The 1900 selected applicants returned to the waiting list in March 2003.

DHCD will not be able to resume consideration for any automatic preference (described in Section 3.2.3.1 in DHCD’s current Administrative Plan) until we reach our baseline and Congress and the Administration make additional vouchers available.

2. To Improve Management of its Special Needs Programs

DHCD will seek to improve program management of its special needs programs by facilitating communication and coordination among the RAAs and provider agencies where they exist. Currently, the regional administering agencies (RAA) administer 12 separate HCVP programs on DHCD’s behalf. Collectively, they represent 15% of our entire 18,432 unit voucher portfolio. Many of them are targeted to households where one or more members have a disability. The balance are directed to other special needs households, such as grandparents raising their grandchildren (Raising the Next Generation [RNG]/50 vouchers) or DSS families whose children have either been removed from their household, or are at risk of removal, where the lack of adequate and affordable housing is the sole factor contributing to this circumstance (Family Unification Program [FUP]/693 vouchers).

With the exception of the FUP program, DHCD is not obligated to continue to maintain any of the congressionally authorized set-aside programs listed below, beyond the expiration of their initial annual contributions contract (ACC) term. In each instance, these terms have long expired.

1. Housing Options Program (HOP/345 vouchers);
2. Veterans Assistance Supported Housing Program (VASH/62);
3. Mainstream (MS/275 vouchers);
4. Designated Housing (DSG/600 vouchers)

All of the set-asides listed below are the result of DHCD's *voluntary* commitment of vouchers from its conventional portfolio to each program's respective targeted population:

5. Raising the Next Generation (RNG);
6. Department of Mental Health Voucher Program (DMHVP/118 vouchers);
7. Department of Mental Retardation Voucher Program (DMRVP/144 vouchers);
8. Independent Living Center Program (ILP/130 vouchers);
9. Tenant-based AIDS Program (TBRA-AIDS/229 vouchers);
10. Project-based AIDS (PBRA-AIDS/38 vouchers) program;
11. Greater Plymouth Area Supportive Housing Program (GPASHP/10 vouchers)

Because of our over-leasing situation and our obligation to re-issue any attrited vouchers both to applicants put back on the waiting list last year and to households who will reside in one of the newly developed PBA units, DHCD does not expect to have available vouchers to re-issue to any of these special set-aside programs through FFY 2005. With the exception of the applicants that will be called back for a voucher who were selected for one of the programs noted above, DHCD's special needs initiatives will continue to operate as programs of attrition until such time as we do have adequate voucher authority to replace the lost vouchers committed to these populations.

It is in this context that DHCD will look to its RAAs and our special needs stakeholders to work with us to determine how we can effectively improve the management of these programs.

3. To secure long term affordable housing units for extremely low -income and very low-income households through "development" project-based assistance (PBA) vouchers.

DHCD continues to aggressively support the linkage of a percentage of its PBA vouchers to the new development of affordable housing. In each public announcement of a new development initiative, DHCD clearly states that no voucher will be available

for use until DHCD returns to baseline (projected to be early 2005), and that all vouchers are subject to the availability of HUD funding.

To date, DHCD has committed 205 PBA “development” vouchers in the 19 projects listed below. See Attachment F (MA901f01.xls).

Three of these projects were well into development before our over-leasing situation became apparent and are under HAP.

Project Name	Location	No. of PBA Vouchers Under HAP
Pittsfield YMCA	Pittsfield	30
12 Summer St.	Manchester-by-Sea	4
Westfield Hotel	Westfield	5

The balance (16 projects) will not be able to go under HAP until DHCD is at or below baseline. However, the vast majority of these units will not be ready for occupancy until early 2005, and they will come on line slowly throughout the calendar year and into 2006. As previously noted, by this time we fully expect to have PBA vouchers available to support these projects.

Project Name	Location	No. of PBA Vouchers Not yet Under HAP
Memorial Hall	Ipswich	7
203-205 Haverhill Street	Lawrence	7
Salem Point Rentals	Salem	8
63 Washington Ave.	Chelsea	24
Acushnet Commons	New Bedford	3
Earle Street	Northampton	15
Lawton’s Corner	New Bedford	3
704 Main Street	Falmouth	8
Marshall Place Apts.	Watertown	8
Paradise Pond Apts.	Northampton	12
Pelham House	Newton	3
Pine Woods	Stockbridge	5
Village At Hospital Hill	Northampton	12
1-3 N. Main St.	Northampton	5
Moltenbrey	Turners Falls	26
Boston YWCA	Boston	20

Each project was competitively selected through either a DHCD One Stop Affordable Housing funding round (done bi-annually) or through the Affordable Housing Trust Fund (AHTF) on an on-going basis.

4. To assist in rapid turnover of PBA units DHCD will develop a web-based program for vacancy tracking

Both program participants and waiting list applicants are eligible to be referred to an available PBA unit. Because we have been unable to select applicants for tenant-based vouchers for the last year, filling units from our waiting list would be desirable. However, this past year it became very apparent that the regulations and guidance currently available from HUD regarding PBA tenant selection are unworkable for a large statewide PBA voucher program like DHCD's with many projects in each region of the Commonwealth. Their requirement that applicant referrals be made from "one" PBA waiting list (even "one regional" list) becomes extraordinarily onerous, costly and administratively burdensome for a state or regional program that has PBA projects in multiple communities throughout the state. This process does make sense for a local agency Section 8 PBA program being administered in one community. However, DHCD has thousands of applicants on each regional sub-list, and, from experience, we know that applicants want to be notified about each potential housing opportunity, even if they have no intention of moving to a distant community. When selecting applicants from a waiting list to fill a vacant PBA unit each time a unit becomes available:

- 1) the RAA must do a mailing to many applicants, in chronological order, from their regional list to find a reasonable number of referrals for the owner to screen;
- 2) the RAA must allow time for the applicants to respond to the mailing and express interest in the unit;
- 3) the RAA must give the applicants a chance to see the unit;
- 4) the RAA must give the owner an opportunity to screen each referral for suitability;
- 5) the RAA must determine if the applicant the owner selected for occupancy is otherwise Section 8 eligible;
- 6) if the owner's selected applicant is not Section 8 eligible, the owner must select another RAA referral and then the RAA must be screen for Section 8 eligibility.

The time involved in completing each of these steps invariably leads to lengthy vacancies while a suitable household is identified. Then, the whole process recycles with *each* newly available unit, starting back at the beginning of the waiting list!

Because HUD has repeatedly informed DHCD that they will not entertain broad-based PBA waiver requests (we've tried obtaining them for other requirements), DHCD does not believe that it is worth pursuing a waiver of this PBA waiting list requirement. Rather, we will comply with HUD requirements by notifying **current program participants** whose leases are about to expire of potential new leasing opportunities in these newly developed projects. We are currently in discussion with our MIS staff regarding the development of a web-based PBA vacancy-tracking site to which we

would like to be able to refer our program participants. We envision this site will have a picture of the development and relevant information about the apartment, its size and amenities and some useful information about the community, including schools, shopping and transportation availability. Participants without computer access would be referred to their respective Housing Consumer Education Center (HCEC) or their local library. Because the units are developed under DHCD's One Stop Affordable Housing funding rounds and the Affordable Housing Trust Fund (AHTF) they will be in excellent condition, and we expect that they will be extremely attractive to current DHCD HCVP program participants.

Once we have implemented this web-based PBA vacancy tracking and referral program for program participants and determined it's efficacy, if we believe that it is both achievable and manageable, we will consider making this site available to applicants on our waiting list.

Nevertheless, if we do not find adequate participant interest in filling a vacant PBA unit, we acknowledge our obligation to outreach to applicants on our waiting list, and will do so to applicants on our regional lists (as we have currently been doing), in spite of the unwieldiness of the process.

Filling Vacant PBA SRO Units

The one exception to filling vacant PBA units with program participants involves filling vacant SRO units.

DHCD has committed 143 SRO PBA vouchers to various projects, both "development" and "existing" PBA. We have experienced difficulty finding an adequate number of referrals from our current waiting list to fill these units. The owners of these developments refer single persons to our master waiting list, but they are placed at the bottom of the appropriate regional list and must wait until all other single persons have been given the opportunity to express an interest in the available SRO unit. Again, this requirement is an example of how HUD's one-size PBA requirements do not suit a statewide program, as we have to keep recycling the notification of each vacant SRO unit to the top of the appropriate single person regional list.

Currently, there are 15,016 single persons on our statewide list. DHCD intends to establish a separate PBA SRO waiting list, giving all single persons the opportunity to be placed on this master list and indicating which of our SRO projects they choose to be notified about. We will mail them a complete list of all current SRO PBA sites and let them know that they can express an interest in as many sites as possible. These lists will stay open at all times, and owners and advocates can refer interested applicants both to our regular waiting list and the SRO list. We believe that this effort should hasten the filling of vacant PBA SRO units.

DISCRETIONARY POLICIES

I. POLICIES ON ELIGIBILITY, SELECTION AND ADMISSIONS

A. Automatic Preferences –As noted above, until DHCD reaches baseline and Congress and HUD should make available new increments of vouchers, DHCD has suspended all automatic preference selections. See Section 3.2.3.1 of the current administrative plan for a description of these particular preferences.

B. Preferences for the PBA programs– with the exception of the PBA HIV/AIDS program as described in Section 21 of our administrative plan, the preferences for the PBA program are currently the same as they are for the HCVP. DHCD will continue to maintain the suspension of federal preferences when selecting tenants for these units for any applicant with an income of 30% or less than area median income (AMI). Any applicant with an income between 31% and 50% of AMI must meet one of the former federal preferences found in DHCD’s administrative plan.

C. Elimination of singles preference for Single Room Occupancy Project-Based Voucher Programs

DHCD has always had a ‘singles preference’, as permitted by HUD regulation. A singles preference prohibits the admission of single individuals to the program unless they are either elderly or disabled. The rationale is that singles generally have more housing options than larger households; e.g., it is easier to get a roommate and share an apartment. Also, the singles preference has effectively addressed the problem of students, which is of particular concern in Massachusetts, with its proliferation of colleges. Clearly, young college students, although generally income-eligible, are not considered a priority to receive section 8 voucher assistance.

An unintended consequence of the singles preference is that it narrows the applicant pool, and severely limits the ability of owners to fill and keep occupied SRO units. Elimination of the singles preference for SRO PBA units would permit occupancy by a more diverse population. It would make vacant SRO PBA units available to youth placing out of foster care or other disadvantaged single young(er) people that are not necessarily disabled.

DHCD proposes to eliminate the single preference for SRO PBA units only. A provision would be added to the administrative plan to address the student issue. This will help to increase and maintain the occupancy rate in DHCD’s SRO PBA programs.

DHCD proposes to adopt the following language, which is consistent with that of the Low Income Housing Tax Credit Program (LIHTC):

“A full time student is defined by the IRS as taking 12 credit hours a semester or attending school full-time 5 months per year at an educational institution with regular facilities, other than a correspondence or night school.

Student status is to be monitored on a tax year basis; thus an applicant would not be eligible if the person had been a full-time student for 5 months of the year, even if they had graduated prior to applying for a PBA unit. RAAs should adjust tenant certification procedures to consider student status according to this interpretation. In addition, there is no grandfathering of eligibility because the tenant was not a student when s/he moved in and later became one. For this reason, tenant student status must be re-verified at annual certifications to confirm continuing eligibility of the household. Failure to verify student status is non-compliance.”

Consistent with the LIHTC ruling, an SRO PBA unit may be occupied by:

- 1) A student who is also receiving assistance under title IV of the Social Security Act enrolled in a job training program receiving assistance under the Job Training Partnership Act or under other similar Federal, State, or local laws; or
- 2) Entirely by full-time students if such students are: a) single parents and they and their children are not dependents of another individual; or b) married and file a joint return.”

D. to further the creation of permanent affordable housing, establish a limited local residency preference, up to 50%, if required as a condition of local permitting for certain PBA development initiatives

This past year we have been made aware of a few potential PBA development initiatives wherein the local community indicated a desire to build (or rehabilitate) affordable units targeted to households with incomes below 50% or 30% of area median income, *provided* some percentage of these PBA units were targeted to local residents. In one instance, a local housing authority that does not administer its own increment of Section 8 vouchers is in discussion with DHCD about developing affordable units on housing authority-owned land under the Mass Housing Partnership’s Perm Plus program. They have inquired about obtaining DHCD PBA vouchers but indicated that the town will only consider developing units if some percentage is made available to their town residents.

DHCD has never before considered utilizing a local residency preference on its Section 8 program. We are seeking comments from our stakeholders on how they would respond to a limited local residency preference of up to 50% of all PBA units in a particular development, *if* it were **required** by the city or town as a **condition** for **issuing local permits**, in order to develop new units of affordable housing.

As a result of comments received at the public hearing, DHCD will reconsider the above item and consider alternate approaches to the problem.

E. Elimination of the former federal preferences for all applicants with incomes 30% or less than area median income (AMI) and maintenance of these preferences for applicants with incomes over 30% of AMI

Although DHCD does not expect to begin issuing vouchers until early 2005, this policy is germane for this annual PHA Plan period. The 1900 applicants returned to the waiting list who will be given the priority for all newly available vouchers were selected during the time that DHCD had suspended the former federal preferences. The inability to extend this suspension would present inequities for these applicants who were selected under the preference suspension rules unless they are addressed at this time. We believe that the permanent elimination of these preferences is a strong and effective homelessness prevention tool for the Commonwealth's poorest residents. These are households that are often one check away from homelessness. However, DHCD continues to support the utilization of the former federal preferences for all applicants with incomes between 31% -50% of AMI, except for applicants that reside in public or other subsidized housing as currently articulated in Amendment 2002-02.

As a result of comments received at the public hearing, DHCD will agree to keep the current suspension of federal preferences for those applicants with incomes of 30% or less than the area median income temporary, and will revisit this issue in its Annual PHA Plan for FY2005. DHCD strongly believes that it has demonstrated that the same population can be served without the administrative burden of using the discretionary federal preference.

II. RENT DETERMINATION POLICIES

A. Relationship of Utility Allowance to Payment Standard

In areas where the payment standard is not established at the maximum 110% of FMR, the payment standard will increase proportionately when the utility allowances are increased to avoid reduced housing choices due to the 40% cap on the family share of gross rent.

Despite the support expressed for this initiative at the public hearing, it has been withdrawn as a result of the program's current financial situation.

B. Deduction of Childcare expenses as part of medical expenses

Necessary childcare expenses may be considered as part of a participant's medical expenses, if it is documented that the participant or an incapacitated household member, who otherwise would have provided such care, is unable to do so as a result of a documented medical condition. The medical condition needs to be documented

with a physician's letter that must indicate that due to a specific medical reason childcare is necessary. Appropriate documentation from the childcare provider must also be received.

III. OPERATIONS AND MANAGEMENT POLICIES

A. Change in Repayment Policy

DHCD revised its Repayment Policy, effective March 1, 2004, to strengthen DHCD's policy relative to repayment agreements for fraud and other reasons and to ensure consistency in its application among its 8 RAAs. See amendment posted on DHCD's website at: www.state.ma.us/dhcd/.

B. Remaining Family Members in Supported Housing Programs

(This policy is applicable to DHCD's Project Based Assistance Program for Persons Living with HIV/Aids only. See Chapter 21 of the administrative plan. DHCD does not currently administer special needs PBA programs under the new PBA requirements authorized by Congress in 2000.)

Remaining family members in **project based** HIV/AIDS program units who no longer require the special services provided by that program will be given four months to vacate the unit. They will be referred to the local HCEC and the service provider for help relocating. Whenever possible, they will be given the option to move to a suitably sized PBA or Mod Rehab unit if one is scheduled to become available. If the participant declines the offer of an available PBA or Mod Rehab unit, or, if no unit was available to offer, HAP payments will stop being paid to the owner of the PBA unit after the four-month grace period expires. This policy frees up a project-based unit linked with services for the next eligible special needs household on the waiting list. Because PBA units have long-term contracts already in place, DHCD is able to select tenants for these vacated units from the appropriate waiting list, in spite of the over-leasing restriction on the tenant-based program.

Remaining family members in a **tenant-based** special program who no longer require the special services provided by that program will be allowed to retain the voucher. Unlike the project-based units, which have a long-term contract and can be occupied by the next eligible special needs household, DHCD cannot re-issue a tenant-based voucher until it returns to baseline. DHCD believes that in this instance, the remaining family members should be treated like remaining members on the conventional program and be allowed to retain the voucher. However, if there has been a change in the household composition, at the next annual re-certification, the payment standard will be adjusted to reflect the household's new composition.

C. Denial of owner participation for threatened abusive or violent behavior toward RAA personnel.

In October 1, 2003 DHCD amended its administrative plan to allow an RAA to deny owner participation if the owner or agent has engaged in or threatened abusive or violent behavior toward RAA personnel. See amendment 2003-03 posted on DHCD's website noted in Section III (A) above.

IV. GRIEVANCE PROCEDURES

A. Informal review for denial of admission to special programs

The sections of the current administrative plan pertaining to the FUP, HOP and JOBLink programs incorrectly state that an applicant denied admission to the program is entitled to an informal hearing. Where the term "informal hearing" now appears the wording will be changed to reference Section 9 of the administrative plan. This makes it consistent with the HCVP. It was never DHCD's intention to have a different procedure for its special programs and an informal hearing is *not* required by HUD regulations for admissions decisions.

On July 3, 1995 HUD clarified the distinction between "informal review" and "informal hearing" with the promulgation of the conforming rule. At that time, DHCD's administrative plan was revised to reflect this important distinction. It was an oversight that the change was not made to the special program administrative plans at that time.

B. Clarification of appeal procedure after reinstatement with conditions

The administrative plan will be revised to clarify that if a participant has been terminated but is reinstated with conditions and then breaches those same conditions within one year, the termination will be effective and the applicant's appeal is made directly to DHCD. The RAA must make a determination that the participant did not meet the conditions of their reinstatement and instruct the applicant in writing to appeal to DHCD within 14 days of the notice. If more than one year has passed or if the participant is being terminated for a different reason, the RAA must conduct a new hearing.

iii. Annual Plan Table of Contents

[24 CFR Part 903.7 9 (r)]

Provide a table of contents for the Annual Plan, including attachments, and a list of supporting documents available for public inspection.

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Attachments

Indicate which attachments are provided by selecting all that apply. Provide the attachment's name (A, B, etc.) in the space to the left of the name of the attachment. Note: If the attachment is provided as a **SEPARATE** file submission from the PHA Plans file, provide the file name in parentheses in the space to the right of the title.

Required Attachments:

- Admissions Policy for Deconcentration
- FY 2000 Capital Fund Program Annual Statement
- Most recent board-approved operating budget (Required Attachment for PHAs that are troubled or at risk of being designated troubled ONLY)

Optional Attachments:

- PHA Management Organizational Chart (MA901b01.pdf)
- FY 2000 Capital Fund Program 5 Year Action Plan
- Public Housing Drug Elimination Program (PHDEP) Plan

- Comments of Resident Advisory Board or Boards (included in PHA Plan text)
- Other (List below, providing each attachment name)
 - Attachment A: List of DHCD's regional administering agencies and regional allocations (MA901a01.doc)
 - Attachment B: DHCD Table of Organization (MA901b01.pdf)
 - Attachment C: List of DHCD federal housing and community development programs (MA901c01.xls)
 - Attachment D: Public Hearing Comment Summary (MA901d02.doc)
 - Attachment E: List of Existing PBA Units (MA901e01.xls)
 - Attachment F: List of Development PBA Units (MA901f01.xls)

Supporting Documents Available for Review

Indicate which documents are available for public review by placing a mark in the "Applicable & on Display" column in the appropriate rows. All listed documents must be on display if applicable to the program activities conducted by the PHA.

List of Supporting Documents Available for Review		
Applicable & On Display	Supporting Document	Applicable Plan Component
X	PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations	5 Year and Annual Plans
X	State/Local Government Certification of Consistency with the Consolidated Plan	5 Year and Annual Plans
X	Fair Housing Documentation: Records reflecting that the PHA has examined its programs or proposed programs, identified any impediments to fair housing choice in those programs, addressed or is addressing those impediments in a reasonable fashion in view of the resources available, and worked or is working with local jurisdictions to implement any of the jurisdictions' initiatives to affirmatively further fair housing that require the PHA's involvement.	5 Year and Annual Plans
X	Consolidated Plan for the jurisdiction/s in which the PHA is located (which includes the Analysis of Impediments to Fair Housing Choice (AI)) and any additional backup data to support statement of housing needs in the jurisdiction	Annual Plan: Housing Needs
	Most recent board-approved operating budget for the public housing program	Annual Plan: Financial Resources;
	Public Housing Admissions and (Continued) Occupancy Policy (A&O), which includes the Tenant Selection and Assignment Plan [TSAP]	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Section 8 Administrative Plan DHCD's Administrative Plan dated August 8, 2002, as amended, is posted on DHCD's website http://www.state.ma.us/dhcd/	Annual Plan: Eligibility, Selection, and Admissions Policies
	Public Housing Deconcentration and Income Mixing Documentation: 1. PHA board certifications of compliance with	Annual Plan: Eligibility, Selection, and Admissions Policies

List of Supporting Documents Available for Review		
Applicable & On Display	Supporting Document	Applicable Plan Component
	deconcentration requirements (section 16(a) of the US Housing Act of 1937, as implemented in the 2/18/99 <i>Quality Housing and Work Responsibility Act Initial Guidance; Notice</i> and any further HUD guidance) and 2. Documentation of the required deconcentration and income mixing analysis	
	Public housing rent determination policies, including the methodology for setting public housing flat rents <input type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Rent Determination
	Schedule of flat rents offered at each public housing development <input type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Rent Determination
X	Section 8 rent determination (payment standard) policies <input checked="" type="checkbox"/> check here if included in Section 8 Administrative Plan	Annual Plan: Rent Determination
	Public housing management and maintenance policy documents, including policies for the prevention or eradication of pest infestation (including cockroach infestation)	Annual Plan: Operations and Maintenance
	Public housing grievance procedures <input type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Grievance Procedures
X	Section 8 informal review and hearing procedures <input checked="" type="checkbox"/> check here if included in Section 8 Administrative Plan	Annual Plan: Grievance Procedures
	The HUD-approved Capital Fund/Comprehensive Grant Program Annual Statement (HUD 52837) for the active grant year	Annual Plan: Capital Needs
	Most recent CIAP Budget/Progress Report (HUD 52825) for any active CIAP grant	Annual Plan: Capital Needs
	Most recent, approved 5 Year Action Plan for the Capital Fund/Comprehensive Grant Program, if not included as an attachment (provided at PHA option)	Annual Plan: Capital Needs
	Approved HOPE VI applications or, if more recent, approved or submitted HOPE VI Revitalization Plans or any other approved proposal for development of public housing	Annual Plan: Capital Needs
	Approved or submitted applications for demolition and/or disposition of public housing	Annual Plan: Demolition and Disposition
	Approved or submitted applications for designation of public housing (Designated Housing Plans)	Annual Plan: Designation of Public Housing
	Approved or submitted assessments of reasonable revitalization of public housing and approved or submitted conversion plans prepared pursuant to section 202 of the 1996 HUD Appropriations Act	Annual Plan: Conversion of Public Housing
	Approved or submitted public housing homeownership programs/plans	Annual Plan: Homeownership

List of Supporting Documents Available for Review		
Applicable & On Display	Supporting Document	Applicable Plan Component
	Policies governing any Section 8 Homeownership program <input type="checkbox"/> check here if included in the Section 8 Administrative Plan	Annual Plan: Homeownership
X	Any cooperative agreement between the PHA and the TANF agency	Annual Plan: Community Service & Self-Sufficiency
X	FSS Action Plan/s for public housing and/or Section 8	Annual Plan: Community Service & Self-Sufficiency
	Most recent self-sufficiency (ED/SS, TOP or ROSS or other resident services grant) grant program reports	Annual Plan: Community Service & Self-Sufficiency
	The most recent Public Housing Drug Elimination Program (PHEDEP) semi-annual performance report for any open grant and most recently submitted PHDEP application (PHDEP Plan)	Annual Plan: Safety and Crime Prevention
X	The most recent fiscal year audit of the PHA conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c(h)), the results of that audit and the PHA's response to any findings. DHCD's audit is part of the Commonwealth's audit under the Single Audit Act. It is posted on the Commonwealth's website as follows: http://www.state.ma.us/osc Go to financial reporting and audit Go to the single audit	Annual Plan: Annual Audit
	Troubled PHAs: MOA/Recovery Plan	Troubled PHAs
	Other supporting documents (optional) (list individually; use as many lines as necessary)	(specify as needed)

1. Statement of Housing Needs

[24 CFR Part 903.7 9 (a)]

A. Housing Needs of Families in the Jurisdiction/s Served by the PHA

Based upon the information contained in the Consolidated Plan/s applicable to the jurisdiction, and/or other data available to the PHA, provide a statement of the housing needs in the jurisdiction by completing the following table. In the "Overall" Needs column, provide the estimated number of renter families that have housing needs. For the remaining characteristics, rate the impact of that factor on the housing needs for each family type, from 1 to 5, with 1 being "no impact" and 5 being "severe impact." Use N/A to indicate that no information is available upon which the PHA can make this assessment.

Housing Needs of Families in the Jurisdiction by Family Type							
Family Type	Overall	Afford- ability	Supply	Quality	Access- ibility	Size	Loca- tion
Income <= 30% of AMI	253475*	5	N/A	N/A	N/A	N/A	N/A
Income >30% but <=50% of AMI	150588*	5	"	"	"	"	"
Income >50% but <80% of AMI	<i>144431</i>	3	"	"	"	"	"
Elderly	<i>142698</i>	5	"	"	"	"	"
Families with Disabilities	<i>19552 individuals</i> <i>3962 families w/ children</i>	5	"	"	"	"	"
Race/Ethnicity White Non-Hispanic 0-50%	<i>268856</i>	N/A	"	"	"	"	"
Race/Ethnicity Black Non-Hispanic 0-50%	<i>32101</i>	N/A	"	"	"	"	"
Race/Ethnicity Hispanic 0-50%	<i>39084</i>	N/A	"	"	"	"	"

What sources of information did the PHA use to conduct this analysis? (Check all that apply; all materials must be made available for public inspection.)

*indicates that information was obtained from the National Low-Income Housing Coalition Site and is "aggregated from the Census blocks using special "CHAS" tabulation Census 2000 data provided by HUD". Information in italics was unable to be updated this year and was obtained from the sources listed below.

- Consolidated Plan of the Jurisdiction/s
Indicate year: September 2000

Update: The Housing Needs Data presented above was taken from the 1993 CHAS Housing Needs Data Table 1(C) based on 1990 Census data. This data is used in the Commonwealth's September 2000 Five Year Consolidated Plan. Data for "Families with Disabilities" was taken from the Massachusetts Continuum of Care: Gaps Analysis June 1999. Next update will occur when DHCD publishes its 2005 Five Year Consolidated Plan.

DHCD's Five Year Consolidated Plan is posted on our website at:
<http://www.state.ma.us/dhcd/>

- U.S. Census data: the Comprehensive Housing Affordability Strategy ("CHAS") dataset
- American Housing Survey data
Indicate year:
- Other housing market study
Indicate year:
- Other sources: (list and indicate year of information)

Housing Needs of Families on the Public Housing and Section 8 Tenant- Based Assistance Waiting Lists

State the housing needs of the families on the PHA's waiting list/s. **Complete one table for each type of PHA-wide waiting list administered by the PHA.** PHAs may provide separate tables for site-based or sub-jurisdictional public housing waiting lists at their option.

Housing Needs of Families on the Waiting List			
Data as of March 8, 2004			
Waiting list type: (select one)			
<input checked="" type="checkbox"/> Section 8 tenant-based assistance			
<input type="checkbox"/> Public Housing			
<input type="checkbox"/> Combined Section 8 and Public Housing			
<input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional)			
If used, identify which development/sub jurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	48537		1501 (8.1%) for calendar year ending 3/31/04
Extremely low income <=30% AMI	41896 ¹	86	
Very low income (>30% but <=50% AMI)	4949	10	
Low income (>50% but <80% AMI)	504	<1	
Families with children	33534 ²	69	
Elderly families	1986	4	
Families with Disabilities	14977	31	
White/Hispanic	5998	12	
White/Non-Hispanic	10715	22	
White/No ethnicity provided	1041	2	
Black/Hispanic	388	<1	
Black/Non-Hispanic	5505	11	
Black/no ethnicity provided	1410	3	
Am. Indian/Hispanic	99	<1	

¹ Does not include income of out-of-state applicants. Based on HUD's Income Limits effective 1/28/04.

² This number represents households with more than one member.

Housing Needs of Families on the Waiting List			
Data as of March 8, 2004			
Am. Indian /Non-Hispanic	273	<1	
Am. Indian /no ethnicity provided	59	<1	
Asian/Hispanic	208	<1	
Asian/Non-Hispanic	696	1	
Asian/no ethnicity provided	190	<1	
Hawaiian/Hispanic	6	<1	
Hawaiian/Non-Hispanic	38	<1	
Hawaiian/no ethnicity provided	11	<1	
No race provided/Hispanic	9676	20	
No race provided/Non-Hispanic	9444	19	
No race provided/no ethnicity provided	2780	6	
<p>Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes</p> <p>If yes:</p> <p>How long has it been closed (# of months)?</p> <p>Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input type="checkbox"/> Yes</p> <p>Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input type="checkbox"/> Yes</p>			

C. Strategy for Addressing Needs

Provide a brief description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list **IN THE UPCOMING YEAR**, and the Agency's reasons for choosing this strategy.

(1) Strategies

Need: Shortage of affordable housing for all eligible populations

Strategy 1. Maximize the number of affordable units available to the PHA within its current resources by:

Select all that apply

- Employ effective maintenance and management policies to minimize the number of public housing units off-line
- Reduce turnover time for vacated public housing units
- Reduce time to renovate public housing units
- Seek replacement of public housing units lost to the inventory through mixed finance development
- Seek replacement of public housing units lost to the inventory through section 8 replacement housing resources
- Maintain or increase section 8 lease-up rates by establishing payment standards that will enable families to rent throughout the jurisdiction
- Undertake measures to ensure access to affordable housing among families assisted by the PHA, regardless of unit size required
- Maintain or increase section 8 lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration
- Maintain or increase section 8 lease-up rates by effectively screening Section 8 applicants to increase owner acceptance of program
- Participate in the Consolidated Plan development process to ensure coordination with broader community strategies
- Other (list below)

Strategy 2: Increase the number of affordable housing units by:

Select all that apply

- Apply for additional section 8 units should they become available
- Leverage affordable housing resources in the community through the creation of mixed - finance housing.
DHCD will continue to make HCVP PBV commitments for any proposal selected through DHCD's competitive One Stop Affordable Housing Funding Round process and the Affordable Housing Trust Fund, provided DHCD has reached its baseline allocation and has adequate voucher authority to support these commitments.
- Pursue housing resources other than public housing or Section 8 tenant-based assistance.
DHCD administers a variety of other federal and state housing and community development programs, including the HOME, CDBG, and McKinney programs. A complete list of federal programs administered by DHCD is included as Attachment C.
- Other: (list below)

Need: Specific Family Types: Families at or below 30% of median

Strategy 1: Target available assistance to families at or below 30 % of AMI

Select all that apply

- Exceed HUD federal targeting requirements for families at or below 30% of AMI in public housing
DHCD expects that it will continue to exceed the targeting requirements, as both the homeless and disability advocacy communities have been very aggressive in referring applicants to our waiting list, and several of our set-aside programs over the years have been directed at these extremely low-income households.
- Exceed HUD federal targeting requirements for families at or below 30% of AMI in tenant-based section 8 assistance
- Employ admissions preferences aimed at families with economic hardships
- Adopt rent policies to support and encourage work
- Other: (list below)

Need: Specific Family Types: Families at or below 50% of median

Strategy 1: Target available assistance to families at or below 50% of AMI

Select all that apply

- Employ admissions preferences aimed at families who are working
- Adopt rent policies to support and encourage work
- Other: (list below)

Need: Specific Family Types: The Elderly

Strategy 1: Target available assistance to the elderly:

Select all that apply

- Seek designation of public housing for the elderly
- Apply for special-purpose vouchers targeted to the elderly, should they become available
- Other: (list below)

Need: Specific Family Types: Families with Disabilities

Strategy 1: Target available assistance to Families with Disabilities:

Select all that apply

- Seek designation of public housing for families with disabilities
- Carry out the modifications needed in public housing based on the section 504 Needs Assessment for Public Housing
- Apply for special-purpose vouchers targeted to families with disabilities, should they become available.

See Executive Summary, Highlights, and Section 2, for a list of all DHCD programs targeted to persons with disabilities.

- Affirmatively market to local non-profit agencies that assist families with disabilities
- Other: (list below)

Need: Specific Family Types: Races or ethnicities with disproportionate housing needs

Strategy 1: Increase awareness of PHA resources among families of races and ethnicities with disproportionate needs:

Select if applicable

- Affirmatively market to races/ethnicities shown to have disproportionate housing needs
- Other: (list below)

Strategy 2: Conduct activities to affirmatively further fair housing

Select all that apply

- Counsel section 8 tenants as to location of units outside of areas of poverty or minority concentration and assist them to locate those units
- Market the section 8 program to owners outside of areas of poverty /minority concentrations
- Other: (list below)

Other Housing Needs & Strategies: (list needs and strategies below)

(2) Reasons for Selecting Strategies

Of the factors listed below, select all that influenced the PHA's selection of the strategies it will pursue:

- Funding constraints
- Staffing constraints
- Limited availability of sites for assisted housing
- Extent to which particular housing needs are met by other organizations in the community
- Evidence of housing needs as demonstrated in the Consolidated Plan and other information available to the PHA
- Influence of the housing market on PHA programs
- Community priorities regarding housing assistance
- For certain PBV initiatives only. See Executive Summary, Discretionary Policies, Section D. DHCD is soliciting comments.**
- Results of consultation with local or state government

- Results of consultation with residents and the Resident Advisory Board
- Results of consultation with advocacy groups
- Other: (list below)

Results of consultation with DHCD Section 8 regional administering agencies.

DHCD’s Section 8 strategies are influenced by its relationship with those state agencies that serve Section 8 eligible households. DHCD works closely with the Commonwealth’s human service departments, its TANF agency and, with the receipt of 2000 welfare-to-work vouchers (our JOBLink program) in FY 2000 (151 additional JOBLink vouchers in FY 2002, awarded as re-allocations from under-performing W2W voucher agencies), has forged new relationships with the state’s workforce development agencies. These state relationships complement DHCD’s extensive relationship with numerous other stakeholders in the public, private and nonprofit sectors, most especially those in the homeless and disability advocacy communities.

As noted in the Executive Summary, DHCD does not expect to perform any waiting list selections until early 2005. However, to the extent that DHCD should be successful in obtaining additional voucher allocations, above and beyond those needed to support DHCD’s over-leasing, it will continue to use its Section 8 portfolio to assist the Commonwealth’s neediest households and to secure long-term affordable quality housing with PBA vouchers.

2. Statement of Financial Resources

[24 CFR Part 903.7 9 (b)]

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 (FY 2000 grants)		
a) Public Housing Operating Fund		
b) Public Housing Capital Fund		
c) HOPE VI Revitalization		
d) HOPE VI Demolition		

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
e) Annual Contributions for Section 8 Tenant-Based Assistance	\$196,000,000	
f) Public Housing Drug Elimination Program (including any Technical Assistance funds)		
g) Resident Opportunity and Self-Sufficiency Grants		
h) Community Development Block Grant		
i) HOME		
Other Federal Grants (list below)		
2. Prior Year Federal Grants (unobligated funds only) (list below)		
3. Public Housing Dwelling Rental Income		
4. Other income (list below)		
5. Non-federal sources (list below)		
Total resources	\$196,000,000	

3. PHA Policies Governing Eligibility, Selection, and Admissions

[24 CFR Part 903.7 9 (c)]

A. Public Housing

Exemptions: PHAs that do not administer public housing are not required to complete subcomponent 3A.

(DHCD does not administer public housing therefore subcomponent 3A has been deleted.)

B. Section 8

Exemptions: PHAs that do not administer section 8 are not required to complete sub-component 3B.

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?
DHCD requires its regional administering agencies to perform a Criminal Offender Records Information (CORI) check on each applicant selected for the program and all new household members 18 years and older.
- d. Yes No: Does the PHA access FBI criminal records from the FBI for screening purposes? (Either directly or through an NCIC-authorized source)
- e. Indicate what kinds of information you share with prospective landlords? (Select all that apply)
- Criminal or drug-related activity
 - Other (describe below)
As required by regulation, DHCD will provide an owner with the names of tenants' current and former landlords, if known, and if requested by an owner.

(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

Other (list below)

DHCD, through its eight regional administering agencies (see attachment A), accepts applications on an on-going basis. Applications can be obtained at each regional agency, at DHCD's offices, or by telephone. They are also available on DHCD's web-site, at shelters, community-based organizations, and other similar agencies. Only one application is necessary to be placed on the waiting list. The waiting list will not accept multiple applications. Applications can be mailed to any DHCD regional contractor at any time. Because DHCD's statewide waiting list provides excellent, up-to-date housing needs data for the Commonwealth, DHCD will continue to accept applications during the period of time in which it has stopped selecting applicants. It is DHCD's intention to purge this list every 18-30 months

(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:

All applicants and participants may receive a 60-day extension up to 120 days, upon request. Each RAA may require evidence of housing search before granting a second 60-day extension. Applicants with documented need for a reasonable accommodation may receive an additional time.

(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?

However, DHCD expects that it will exceed the targeting requirements, as both the homeless and disability advocacy communities have been very aggressive in referring applicants to our waiting list, and several of our set-aside programs over the years have been directed at these extremely low income households.

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**)

With the exception of filling vacated PBA units currently under HAP, DHCD does not expect to perform on-going applicant selections until early 2005. When either instance should occur, preference criteria for applicants with incomes at 30% or less than AMI will be based solely on income verification and any other HUD requirement for eligibility. Any applicant with an income between 31%-50% of AMI must not only be otherwise Section 8 eligible, but must meet one of the former federal preferences.

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, Inaccessibility, Property Disposition)
- 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
Regional residency preference only. (See discussion in Executive Summary, Discretionary Policies, Section I(D) re: comments solicited by DHCD for establishing a limited local residency preference for certain PBA development projects).
- 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
- Victims of reprisals or hate crimes
- Other preference(s) (list below)

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.

1 Date and Time

Former Federal preferences

For applicants with incomes between 31%-50% of median income.

- 1 Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
Victims of domestic violence
- 1 Substandard housing
- 1 Homelessness
- 1 High rent burden

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 (DHCD has 8 regional residency preference areas that cover the entire Commonwealth)
- 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
- Victims of reprisals or hate crimes
- Other preference(s) (list below)

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

- Date and time of application
- 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
- 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 (list below)

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

- Through published notices
- Other (list below)

Through targeted outreach to a variety of public and private organizations who serve potentially eligible applicants, such as various Commonwealth human service commissions, TANF agency, disability agencies, homeless shelters, advocacy groups, CAP agencies, and workforce training and employment programs.

4. PHA Rent Determination Policies

[24 CFR Part 903.7 9 (d)]

A. Public Housing

Exemptions: PHAs that do not administer public housing are not required to complete sub-component 4A.

DHCD does not administer public housing therefore section 4A has been eliminated.

B. Section 8 Tenant-Based Assistance

Exemptions: PHAs that do not administer Section 8 tenant-based assistance are not required to complete sub-component 4B. **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 – **see below**
- Above 100% but at or below 110% of FMR – **see below**
- Above 110% of FMR (if HUD approved; describe circumstances below)

In response to current and ongoing budgetary constraints, DHCD has further reduced its payment standards effective July 1, 2004. With the exception of the following areas, the APS will be set at 100% of the FMR.

HAC (Cape & Islands) – 105% throughout region

HAP: Westfield 1BR only 110%

SSHDC: 105% in Fall River area: Attleboro, Fall River, Rehoboth, Seekonk, Somerset, Swansea and Westport.

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)
To enhance employment options for clients; to help clients locate housing in areas outside high concentrations of poverty and minority populations; to enhance choice of schools and other community options, as desired by participants.

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
Especially with regard to meeting the 40% cap on tenant contribution at initial lease-up and to support increased utility costs.
- Reflects market or submarket
- To increase housing options for families
- Other (list below)
To enhance employment options for clients; to help clients locate housing

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

- Annually
- Other (list below)

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)

(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)

DHCD will waive the minimum tenant payment for up to three months in cases of financial hardship including, but not limited to: job loss, death of a family member, not at fault loss of benefits under state, local or federal assistance programs, or to avoid eviction. Further extensions of time may also be granted considering the circumstances of each particular family. The maximum extension period will be until the participant's next annual reexamination. With regard to the QHWRA requirement that no family pay more than 40% of their income toward rent at the time of new admission or when moving to a new unit, DHCD will grant a hardship waiver to any family that demonstrates zero (or other exceptionally low) income, in order that they not be denied access to the program due to the maximum tenant rent burden of 40% of income in all newly leased units.

5. Operations and Management

[24 CFR Part 903.7 9 (e)]

Exemptions from Component 5: 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 attached. **See Attachment B.**
- A brief description of the management structure and organization of the PHA follows:

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	N/A	N/A
Section 8 Vouchers	Approx. 19,000 as of 6/30/04	Approx. 8%
Section 8 Certificates	N/A	N/A
Section 8 Mod Rehab	1,345	Approx. 3%
Special Purpose Section 8 Certificates/Vouchers (list individually)	Reflects Leasing As Of March 31, 2004 Mainstream: 288 Designated H: 1146 FUP: 537 VASH: 42 HOP: 293 Raising the Next Generation: N/A TBRA AIDS: 179 PBA AIDS: 32 DMRV: 71 DMHVP: 74 ILP: 27 GPASHP: N/A	Quarterly turnover in units for quarter ending 3/31/04 Mainstream: 8 Designated H: 30 FUP: 18 VASH: 0 HOP: 7 Raising the Next Generation: N/A TBRA AIDS: 1 PBA AIDS: 0 DMRV: 1 DMHVP: 0 ILP: 1 GPASHP: N/A
Public Housing Drug Elimination Program (PHDEP)	N/A	N/A
Other Federal Programs(list individually)	See Attachment C. (Many of these are not housing programs.)	Turnover for all housing programs is expected to be approx. 5-7%.

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) Public Housing Maintenance and Management: (list below)

(2) Section 8 Management: (list below)

Section 8 Administrative Plan and all attachments and referenced memoranda, guidelines and correspondence; SEMAP compliance documents

6. PHA Grievance Procedures

[24 CFR Part 903.7 9 (f)]

Exemptions from component 6: 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:

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
- 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:

Program participants (not applicants) who receive a termination notice are afforded an extra appeal. They are able to file appeal of the regional contractor's determination to terminate to DHCD's legal office within 14 days from the date of the termination notice issued by the regional contractor.

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
 Other (list below)

Appropriate DHCD regional contractor office that made the eligibility determination.

7. Capital Improvement Needs

[24 CFR Part 903.7 9 (g)]

Exemptions from Component 7: Section 8 only PHAs are not required to complete this component and may skip to Component 8.

DHCD is a Section 8 only PHA therefore this section has been removed.

8. Demolition and Disposition

[24 CFR Part 903.7 9 (h)]

Applicability of component 8: Section 8 only PHAs are not required to complete this section.

DHCD is a Section 8 only PHA therefore this section has been removed.

9. Designation of Public Housing for Occupancy by Elderly Families or Families with Disabilities or Elderly Families and Families with Disabilities

[24 CFR Part 903.7 9 (i)]

Exemptions from Component 9; Section 8 only PHAs are not required to complete this section.

DHCD is a Section 8 only PHA therefore this section has been removed.

10. Conversion of Public Housing to Tenant-Based Assistance

[24 CFR Part 903.7 9 (j)]

Exemptions from Component 10; Section 8 only PHAs are not required to complete this section.

DHCD is a Section 8 only PHA therefore this section has been removed.

11. Homeownership Programs Administered by the PHA

[24 CFR Part 903.7 9 (k)]

A. Public Housing

Exemptions from Component 11A: Section 8 only PHAs are not required to complete 11A.
DHCD is a Section 8 only PHA therefore this section has been removed.

B. Section 8 Tenant Based Assistance

1. Yes No: Does the PHA plan to administer a Section 8 Homeownership program pursuant to Section 8(y) of the U.S.H.A. of 1937, as implemented by 24 CFR part 982. (If "No", skip to component 12; if "yes", describe each program using the table below (copy and complete questions for each program identified), unless the PHA is eligible to complete a streamlined submission due to high performer status. High performing PHAs may skip to component 12.)

2. Program Description:

DHCD continues to work with its RAAs to complete the development of its Section 8 HCVP homeownership administrative plan amendment. DHCD intends to implement a homeownership program *if* it determines it has adequate funds to support its operation. Prior to implementing its homeownership program, DHCD will amend this FY 2004 annual PHA Plan.

See Section 5 of the FY 2002 annual PHA Plan that includes DHCD's Section 8 Homeownership Capacity Statement.

Program Size and Eligibility Criteria are not yet defined

- a. Size of Program

- Yes No: Will the PHA limit the number of families participating in the section 8 homeownership option?

If the answer to the question above was yes, which statement best describes the number of participants? (Select one)

- 25 or fewer participants
 26 - 50 participants
 51 to 100 participants
 More than 100 participants

- b. PHA-established eligibility criteria

- Yes No: Will the PHA's program have eligibility criteria for participation in its Section 8 Homeownership Option program in addition to HUD criteria?

If yes, list criteria below:

12. PHA Community Service and Self-sufficiency Programs

[24 CFR Part 903.7 9 (l)]

Exemptions from Component 12: 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 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)?

For the 2151 unit Welfare-to-Work JOBLink program

If yes, what was the date that agreement was signed? 27/04/99

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...**DHCD is lead JOBLink agency**
- Partner to administer a HUD Welfare-to-Work voucher program
- Joint administration of other demonstration program **DHCD is lead MTW agency**
- 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)
JOBLink...Case management by Program Coordinators	2151	Vacant JOBLink vouchers are filled with targeted referrals from local DTA and other related offices.	Each DHCD regional contractor	Section 8
Moving to Work Demonstration Program...Case management by MTW Advisory	183	Targeted referrals from local DTA and Employment Training Offices in Southern Worcester County and from Transition to Work Collaborative in Boston.	Rural Housing Improvement, Inc. for the Southern Worcester County component (122 units) and Metropolitan Boston Housing Partnership (61 units) for the Boston component.	Section 8

(2) Family Self Sufficiency program/s

a. Participation Description

Family Self Sufficiency (FSS) Participation		
Program	Required Number of Participants (start of FY 2000 Estimate)	Actual Number of Participants (As of: DD/MM/YY)
Public Housing		
Section 8	383...minimum size required as of 12/31/02; 679...approved per DHCD request	752 as of December 31, 2003

- 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:

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.
 - 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

13. PHA Safety and Crime Prevention Measures

[24 CFR Part 903.7 9 (m)]

Exemptions from Component 13: High performing and small PHAs not participating in PHDEP and Section 8 Only PHAs may skip to component 15. 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.

DHCD is a Section 8 only PHA therefore this section has been removed.

14. RESERVED FOR PET POLICY

[24 CFR Part 903.7 9 (n)]

DHCD is a Section 8 only PHA therefore this section has been removed.

15. Civil Rights Certifications

[24 CFR Part 903.7 9 (o)]

DHCD has submitted the Civil rights certifications to the Boston HUD Field Office as part of the PHA Plan submission process.

16. Fiscal Audit

[24 CFR Part 903.7 9 (p)]

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 component 17.)
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)?

17. PHA Asset Management

[24 CFR Part 903.7 9 (q)]

Exemptions from component 17: Section 8 Only PHAs are not required to complete this component. High performing and small PHAs are not required to complete this component.

DHCD is a Section 8 only PHA therefore this section has been removed.

18. Other Information

[24 CFR Part 903.7 9 (r)]

A. Resident Advisory Board Recommendations

NB: Because DHCD does not administer federal public housing, DHCD changed the name of the “Resident Advisory Board” to the “Participant Advisory Board (PAB).”

Three regional PAB meetings were held in accessible locations throughout the state on Saturdays: March 13, 20 and 27, 2004 respectively. Fifty-four (54) participants from twenty-two (22) communities across the state provided feedback on the HCVP program, generally, and the Family Self-Sufficiency and JOBLink Welfare to Work Programs, specifically, during these half-day meetings. Input was solicited in large group forums, over lunch, and on a written questionnaire in order to gather a wide range of comments and recommendations as part of DHCD's annual PHA Plan process. Comments and discussion tended to be more generally program-related than specific to the draft PHA Plan. A list of participants is available upon request. PAB participant comments are summarized below.

1. Yes No: Did the PHA receive any comments on the PHA Plan from the Resident Advisory Board/s?
2. If yes, the comments are: (if comments were received, the PHA **MUST** select one)
 - Attached at Attachment (File name)
 - Provided below:

Positive Aspects of Voucher Programs

- Makes housing affordable and increases and housing stability
- Self-sufficiency programs (FSS, JOBLink) and opportunities to set and achieve goals (education, better jobs, homeownership)
- Professionalism and compassion of staff
- Increases options for safe, secure housing in more desirable areas
- Prevents homelessness for those with lower incomes

Negative Aspects of Voucher Programs

- Inspections—scheduling sometimes conflicts with other obligations, and could be more consistent—year-to-year and among inspectors
- Issues around annual re- examinations and privacy--consider ways to make it easier and more confidential for participants to provide required information (by mail, alternatives to employer income verifications)
- It's still difficult to find decent, affordable units—issues around stigma, discrimination, owners don't understand program, etc.

Suggestions for Improvement

- Look at income and rent calculations—consider additional expenses as adjustments (health insurance, child care (including after school for children over 12), transportation). Consider bi-annual re-examinations and inspections.
- Simpler, more realistic (net, not gross income) calculations for things like rent portion, FSS escrow, etc. and for annual processes like inspections and re-certifications.

- Continue and increase information and education about the voucher program/s and self-sufficiency resources; also more education for landlords.
- Offer even more opportunities and incentives for self sufficiency—especially homeownership.
- Increase funding for more vouchers and more staff.

3. In what manner did the PHA address those comments? (Select all that apply)

- Considered comments, but determined that no changes to the PHA Plan were necessary.
- The PHA changed portions of the PHA Plan in response to comments
List changes below:
- Other: (list below)

During the course of each meeting, DHCD and subcontractor agency staff addressed many of the participants' questions and concerns. DHCD contact names and numbers were provided to facilitate feedback throughout the year. With the fiscal and regulatory challenges facing the program in the coming year, DHCD is committed to operating the highest quality program possible, and ensuring that all program stakeholders have as much accurate information as possible.

B. Description of Election process for Residents on the PHA Board

1. Yes No: Does the PHA meet the exemption criteria provided section 2(b) (2) of the U.S. Housing Act of 1937? (If no, continue to question 2; if yes, skip to sub-component C.)
2. Yes No: Was the resident who serves on the PHA Board elected by the residents? (If yes, continue to question 3; if no, skip to sub-component C.) **Not Applicable**

3. Description of Resident Election Process Not **Applicable**

a. Nomination of candidates for place on the ballot: (select all that apply)

- Candidates were nominated by resident and assisted family organizations
- Candidates could be nominated by any adult recipient of PHA assistance
- Self-nomination: Candidates registered with the PHA and requested a place on ballot
- Other: (describe)

b. Eligible candidates: (select one)

- Any recipient of PHA assistance
- Any head of household receiving PHA assistance
- Any adult recipient of PHA assistance
- Any adult member of a resident or assisted family organization

Other (list)

c. Eligible voters: (select all that apply)

- All adult recipients of PHA assistance (public housing and section 8 tenant-based assistance)
- Representatives of all PHA resident and assisted family organizations
- Other (list)

C. Statement of Consistency with the Consolidated Plan

For each applicable Consolidated Plan, make the following statement (copy questions as many times as necessary).

1. Consolidated Plan jurisdiction:

Commonwealth of Massachusetts

2. The PHA has taken the following steps to ensure consistency of this PHA Plan with the Consolidated Plan for the jurisdiction: (select all that apply)

- The PHA has based its statement of needs of families in the jurisdiction on the needs expressed in the Consolidated Plan/s.
- The PHA has participated in any consultation process organized and offered by the Consolidated Plan agency in the development of the Consolidated Plan.
- The PHA has consulted with the Consolidated Plan agency during the development of this PHA Plan.
- Activities to be undertaken by the PHA in the coming year are consistent with the initiatives contained in the Consolidated Plan. (List below)

Other: (list below)

4. The Consolidated Plan of the jurisdiction supports the PHA Plan with the following actions and commitments: (describe below)

The housing priorities of DHCD's FY 2000 Consolidated Plan support DHCD's PHA Plan as follows:

1. Consolidated Plan Priority: Maintain a system of public housing and rental assistance that serves the homeless and those at risk of homelessness.

The 1998 federal statute that requires at least 75% of all new admissions to the HCVP to have incomes at or below 30% of the area median results in DHCD serving those most at risk of homelessness.

2. Consolidated Plan Priority: Promote homeless prevention.
See No. 1 above. Also, DHCD provides significant fiscal support to each RAA's Housing Consumer Education Center (HCEC), established by the MA legislature in FY 2001. These HCECs provide information and referral, workshops and in-person counseling to address a wide variety of housing related issues, with the specific intent of preventing housing instability and homelessness.

3. Consolidated Plan Priority: Maintain a system of public housing and rental assistance that serves the elderly and people with disabilities.
In addition to several other state-funded efforts targeted to elderly and disabled populations, by successfully applying for all Section 8 (and McKinney) set-asides targeted to this population and voluntarily contributing additional vouchers from its own resources. DHCD's willingness and ability to undertake an array of special needs Section 8 programs demonstrates commitment to and consistency with this priority, even as it considers consolidating some of these programs into easier to manage components.

4. Consolidated Plan Priority: Provide affordable homeownership opportunities.
By preparing to launch a Section 8 homeownership program in 2004 if administrative funds permit, DHCD demonstrates commitment to and consistency with this priority.

5. Consolidated Plan Priority: Develop and implement both human service and economic development activities designed to assist economically disadvantaged persons become more self-sufficient, paying particular attention to the needs of current and former TAFDC clients making the transition from welfare-to-work.

- By successfully competing for the maximum 2000 Section 8 W2W vouchers awarded by HUD in November 1999 and being selected to receive an additional 151 W2W vouchers in FY 2002 because of our high performance;
- By voluntarily electing to continue the administration of the Family Self Sufficiency Program (no longer required by HUD for new increments of funding); and
- By administering the demonstration Moving to Work Program, DHCD demonstrates commitment to and consistency with this priority.

6. Consolidated Plan Priority: Continue DHCD's extensive efforts, using state and federal resources, to preserve the physical and financial viability of assisted and unassisted affordable housing.

All units that DHCD leases on its Section 8 programs must comply with both HUD's housing quality standards and DHCD's enhanced housing quality standards and be rent reasonable. In this regard, DHCD's entire Section 8 portfolio demonstrates commitment to and consistency with this priority.

D. Other Information Required by HUD

Use this section to provide any additional information requested by HUD.

Attachments

Use this section to provide any additional attachments referenced in the Plans.

**PHA Plan
Table Library**

**Component 7
Capital Fund Program Annual Statement
Parts I, II, and II**

DHCD is a Section 8 only PHA therefore this section/tables is not applicable and has been removed.

Optional Table for 5-Year Action Plan for Capital Fund (Component 7)

Complete one table for each development in which work is planned in the next 5 PHA fiscal years. Complete a table for any PHA-wide physical or management improvements planned in the next 5 PHA fiscal year. Copy this table as many times as necessary. Note: PHAs need not include information from Year One of the 5-Year cycle, because this information is included in the Capital Fund Program Annual Statement.

DHCD is a Section 8 only PHA therefore this section/tables is not applicable and has been removed.

DHCD FY 2004 Annual PHA Plan
March 26 and April 16, 2004 Public Hearing Comments
Summary of Recommendations and Decisions

Comments were submitted by:

Mass Law Reform Institute
Massachusetts Coalition for the Homeless
Greater Boston Legal Services
South Shore Housing Development Corporation
Mass Housing
Metropolitan Boston Housing Partnership (MBHP)
Over 1000 stakeholders and participants

The public hearing was continued to Friday, April 16, 2004. This public hearing was held at the Gardner Auditorium in the Massachusetts State House and was attended by hundreds of stakeholders and participants. There were 2 agenda items: 1) the proposed reduction in the APS; and 2) the need for proposed terminations due to an impending budgetary shortfall. Verbal testimony was received from 44 attendees regarding the importance of the housing assistance provided by the Section 8 program. Written testimony was received from over 1200 stakeholders and participants. A transcript of the hearing is available upon request.

I. DHCD changed portions of the PHA plan in response to comments received. Those comments and changes are as follows:

To consolidate certain small set-aside programs but continue to serve the target population.

Comment: DHCD should convene advocates and agencies connected with the existing programs before any action is taken.

Comment: Commenter supports streamlining program administration while continuing to support special populations.

DHCD Response: DHCD convened a meeting of advocates and agencies connected with the existing special programs and determined that program management could be improved by facilitating communication and coordination among DHCD's RAAs and provider agencies where they exist.

Establish a limited local residency preference, up to 50%, if required as a condition of local permitting for certain PBA development initiatives.

Comment: This proposal may have a disparate impact on minority applicants in violation of fair housing laws. The proposal is at odds with two other residency preference schemes; i.e., DHCD's public housing affirmative actions regulations and DHCD's Guidelines for Housing Programs in Which Funding is Provided through a Non-Governmental Entity.

DHCD response: DHCD will take this under advisement and will consider alternative approaches to the problem.

Permanently eliminate the former federal preferences for all applicants with incomes 30% or less than the area median income and retain the former federal preferences for applicants with incomes over 30% of the area median income.

Comment: Priority should be given to those who are homeless or at risk of homelessness to ensure consistency with the Consolidated Plan as well as with HUD's goals to eliminate chronic homelessness. Extremely low-income applicants, such as those in public housing, may have adequate affordable housing.

Comment: Elimination of the former federal preferences for all applicants with incomes 30% or less than the area median income should remain temporary due to possibility that other factors may have contributed to apparent lack of adverse consequences for homeless families. Some of these factors include a statewide purging of the wait list, the increased FMRs and the softening rental housing market.

Comment: The suspension of the federal preferences does not exclude those who are currently homeless from obtaining a voucher and allows DHCD to prevent many families and individuals who are doubled up, in overcrowded or other unstable housing situations from becoming homeless.

DHCD Response: Although DHCD strongly believes that it has demonstrated that the same population can be served without the administrative burden of using the discretionary federal preference, it will agree to keep the current suspension of federal preferences for those applicants with incomes of 30% or less than the area median income temporary, and will revisit this issue in its Annual PHAPlan for FY 2005.

Relationship of Utility Allowance to Payment Standard

Comments: All comments indicated widespread support for this proposal.

DHCD Response: Despite the support expressed for this initiative at the public hearing, it has been withdrawn as a result of the program's current financial situation.

Housing Needs

Comments: More current data is necessary to adequately determine housing need.

DHCD Response: DHCD agrees that current data should be provided.

Reduction in Payment Standards to 100% of FMR

Comment: It was suggested that DHCD have a flexible system to quickly restore any decreased payment standards that could need to be adjusted because of increased utility costs. Concerned that waiting to make payment standard changes via a public hearing process could be detrimental to the tenants.

DHCD Response: DHCD does not require a public hearing process to make changes to the payment standard. DHCD will again reduce its applicable payment standard in several regions. New APS will be effective July 1, 2004. With the exception of the following areas, the APS will be set at 100% of FMR.

HAC (Cape & Islands): 105% in region

HAP: Westfield 1BR only 110%

SSHDC: 105% in Fall River area: Attleboro, Fall River, Rehoboth, Seekonk, Somerset, Swansea, and Westport

II. DHCD has considered the following comments but has determined that no changes to the PHA plan were necessary.

To develop a fair and balanced plan to resume issuance of vouchers once we reach baseline.

Comment: Comments received questioned the meaning of “baseline” and suggested that homeless applicants and applicants at risk of homelessness be given priority for selection to prevent and alleviate homelessness. Other comments suggested that DHCD should remain flexible in its prioritization when reissuance begins.

DHCD Response: DHCD does not anticipate reaching baseline, the number of HUD authorized vouchers, until early 2005. It is in the process of determining a plan for resuming issuance and will take these comments under advisement

Comment: Comments suggested that the current regional allocations of DHCD vouchers do not consider regional need and that need should be established based on the number of applicants on the statewide waiting list.

DHCD Response: Because DHCD’s RAAs do not perform upfront verification before placing applicants on the waiting list, many applicants on the waiting list are found to be ineligible to receive Section 8 assistance. Therefore, the number of applicants on the waiting list is not an appropriate indicator of need and without further analysis should not be the sole indicator on which regional allocations are based.

To secure long term affordable housing units for extremely low-income and very low-income households through development project-based assistance vouchers.

Comment: Concern was expressed with the loss of affordable housing units in new developments if the Section 8 vouchers cannot be utilized by the expected start-up dates.

Comment: A request was made that project-based vouchers be reserved on both a new construction and existing basis for developments utilizing 4% tax credits in association with tax exempt financing from Mass Housing and/or Priority Development Funds.

DHCD Response: DHCD does not have the authority to make the suggested changes.

To assist in rapid turnover of PBA units DHCD will develop a web-based program for vacancy tracking

Comment: Ultimately priority should be given to families and individuals that are homeless or at risk of homelessness. Units should be targeted to income-eligible families already in Mass Housing mixed-income developments who can no longer afford their existing units having shallow or no subsidy.

DHCD Response: These suggestions are beyond the scope of DHCD's plan to develop a program for vacancy tracking, but will be taken under advisement.

Elimination of Singles Preference for SRO Project-Based Units

Comment: The preference should be for single persons who are elderly, disabled, homeless, or at risk of homelessness. The proposed approach may allow singles who do not have a relatively higher housing need. Other commenters supported this proposal.

DHCD Response: The elimination of the singles preference for SRO PBA only is necessary to increase and maintain the occupancy rate in these programs. Single applicants that are not elderly or disabled must meet HUD's income limits to be eligible. HUD's requirement that 75% of applicants meet the extremely low income limit virtually ensures that most program participants are at risk of homelessness.

Discussion of policy and procedure for terminating program participants due to funding shortfall.

Over a thousand Section 8 participants and stakeholders gathered at the Gardner Auditorium of the Massachusetts State House on April 16, 2004 to speak to the critical need for Section 8 housing assistance in Massachusetts.

Because sufficient funding to support DHCD's program was restored in the weeks following this hearing, DHCD did not have to act on this item.

Change in Repayment Policy

Comments: The repayment policy is too severe.

DHCD Response: The purpose of this revision is to strengthen DHCD's policy relative to repayment agreements for fraud and to ensure consistency in its application among its regional administering agencies. In developing its repayment policy, DHCD received input from each of its regional administering agencies and carefully considered the ability of its participant families to repay. A three year repayment window is believed to be generous.

Clarification of appeal procedure after reinstatement with conditions.

Comment: The proposal should be incorporated into DHCD's administrative plan.

DHCD response: DHCD intends to amend or update its administrative plan to reflect changes adopted following the PHA plan process.

Chron_Existing_PBA_3_12_04

Name	Type	Community	Total Units	PBA	DHCD OK	HAP Date
20 & 22 Cherry St	Existing	Pittsfield	4	2	10/16/2002	10/23/2002
885C State Highway	Existing	Eastham	1	1	8/22/2002	9/1/2002
32 Kent Street	Existing	Somerville	40	8	10/10/2002	11/1/2002
1129 Dorchester Ave	Existing	Dorchester	15	8	11/19/2002	11/19/2002
14 Roach St	Existing	Dorchester	3	1	11/19/2002	11/19/2002
20 Roach St	Existing	Dorchester	3	1	11/19/2002	11/19/2002
16 Roach St	Existing	Dorchester	3	2	11/19/2002	11/19/2002
24 Roach St	Existing	Dorchester	3	2	11/19/2002	11/19/2002
22 Roach St	Existing	Dorchester	3	1	11/19/2002	11/19/2002
1285#1, 1287#2, 1291#2&3 Mass	Existing	Dorchester	12	4	11/19/2002	11/19/2002
46 Cottage St	Existing	Taunton	3	1	11/8/2002	11/1/2002
35 Bay St	Existing	Hull	4	1	11/6/2002	7/1/2002
224 Centre St #6	Existing	Middleboro	3	1	11/6/2002	7/1/2002
1202 Commonwealth Ave	Existing/SPO	Allston	61	6	5/27/2003	8/1/2003
28 Mount Pleasant St	Existing/SPO	Roxbury	20	2	5/27/2003	8/1/2003
430-436 Dudley St	Existing/SPO	Roxbury	68	3	5/27/2003	8/1/2003
1740 Washington St	Existing/SPO	Boston	34	8	8/6/2003	10/10/2003
48 Water St	Existing	Wakefield	26	6	10/22/2002	4/1/2003
33 Granite St. #5	Existing	Taunton	8	1	12/9/2002	11/1/2002
Brook School Apts	Existing/Local Bond	Weston	75	19	12/1/2003	
The Preserve	Existing/AHTF	Walpole	300	30	10/21/2003	
12 Russell Terrace	Existing/SPO	Arlington	20	2	5/27/2003	10/1/2003
4-6 Ashland St	Existing/SPO	Medford	16	3	5/27/2003	10/1/2003
82 Green St	Existing/SPO	Jamaica Pl	50	10	8/6/2003	10/15/2003
19 Hancock St	Existing/SPO	Everett	35	3	5/27/2003	10/1/2003
12 Maple St. #2	Existing	Taunton	6	1	12/9/2002	11/1/2002
2088 Phillips Rd. #29	Existing	New Bedfo	14	1	11/25/2002	7/1/2002
2108 Phillips Rd. #18	Existing	New Bedfo	14	1	12/13/2002	7/1/2002
2110 Phillips Rd. #30	Existing	New Bedfo	14	1	12/13/2002	7/1/2002
53 Wilson St.	Existing	Pittsfield	2	1	12/13/2002	5/1/2003
220 Orchard Hill Dr	Existing	Oxford	215	25	12/16/2002	1/1/2003
9 Kindergarten Ct.	Existing	North Dartr	2	1	1/15/2003	2/1/2003
44 School St	Existing	Weston	33	1	2/7/2003	3/1/2003
Conant Village	Existing	Danvers	60	12	2/21/2003	
140 East St	Existing	Great Barri	9	2	4/8/2003	5/1/2003
979 Falmouth Rd	Existing	Hyannis	32	4	4/18/2003	4/18/2003

Chron_Existing_PBA_3_12_04

Salem Heights	Existing	Salem	283	72	6/5/2003	8/1/2003
58 Harry Kemp Way	Existing/Withdrawn	Provincetown	4	4	6/2/2003	
32 Conwell St	Existing	Provincetown	18	2	6/2/2003	9/1/2003
40A Nelson Ave	Existing/ In Litigation	Provincetown	6	3	11/13/2003	
Reviviendo	Existing	Lawrence	13	3	6/4/2002	12/30/2003
Hillside Village	Existing	Ware	80	16	9/5/2003	

DevelopmentPBAMarch04

Name	Type	Community	Total Units	PBA	DHCD OK	AHAP Date	HAP Date
YMCA	LIHTC, HOME, HIF Rehab SPO	Pittsfield	44	30	10/12/2001	12/21/2001	12/16/2002
Twelve Summer St	HOME/HIF Rehab	Manchester by the Sea	21	4	10/29/2002	10/29/2002	5/1/2003
Westfield Hotel	HOME/AHTF/HIF Rehab	Westfield	26	5	10/18/2001	9/1/2002	9/1/2003
Memorial Hall	AHTF, HSF Rehab	Ipswich	7	7	10/1/2002	8/6/2003	
203-205 Haverhill Street	LIHTC/HOME/HIF	Lawrence	20	10	11/1/2003		
Salem Point Rentals	LIHTC/HSF	Salem	61	12	11/1/2003		
63 Washington Ave.	McKinney	Chelsea	24	24	1/7/2002		
Acushnet Commons	LIHTC, HOME	New Bedford	12	3	1/15/2004		
Earle Street	HIF	Northampton	15	15	1/15/2004		
Lawton's Corner	HOME, AHTF	New Bedford	17	3	1/15/2004		
704 Main Project	LIHTC, HOME, AHTF	Falmouth	44	8	1/15/2004		
Marshall Place Apts	HIF, HSF	Watertown	11	8	1/15/2004		
Paradise Pond Apts	HOME, HIF, AHTF	Northampton	12	12	1/15/2004		
Pelham House	HIF	Newton	10	3	1/15/2004	2/25/2004	
Pine Woods	LIHTC, HOME, AHTF	Stockbridge	30	5	1/15/2004		
Village at Hospital Hill	LIHTC, HOME	Northampton	33	12	1/15/2004		
1-3 North Main St	HIF/HSF/FCF	Northampton	20	5	9/5/2003		
The Moltenbrey	LIHTC/HOME/HIF	Montague	26	26	9/5/2003		
Boston YWCA	LIHTC/HOME/HIF	Boston	188	20	9/5/2003	12/1/2003	
		Totals	621	212			