Sub-Indicator #5: Security

I. Definition:

This sub-indicator evaluates a PHA's performance in tracking crime-related problems in its developments; reporting incidences of crime to local law enforcement agencies; the adoption and implementation, consistent with section 9 of the of the Housing Opportunity Program Extension Act of 1996, (42 U.S.C. 1437 d (r)), of applicant screening and resident eviction policies and procedures and other anticrime strategies. This sub-indicator measures a PHA's performance under any HUD drug prevention and/or crime reduction grants. PHAs may get credit for their performance under non-HUD funded programs, if they choose to be assessed for these programs.

Maximum Point(s):

II. Statutes, Regulations and Notices:

- Quality Housing and Work Responsibility Act of 1998
- > Section 9 of the of the Housing Opportunity Program Extension Act of 1996
- > 24 CFR Part 902, Subpart D
- ➤ 24 CFR Part 960 Admission to and Occupancy
- ➤ 24 CFR Part 966 Lease Requirements
- ➤ 24 CFR Part 982 Denial of Admission
- > 24 CFR Parts 5, 200, 247, 880, 882, 884, 891
- ➤ Notice PIH 96-16 Guidelines
- ➤ Notice PIH 96-52 Clarification and Guidance
- ➤ Notice PIH 97-56 Sample Lease
- ➤ Notice PIH 2001-8 Termination of Tenancy

III. Process Workflow:

Measures how a PHA tracks, reports, screens applicants, enforces leases and attempts to prevent crime and drug use.



Reporting



Lease Enforcement



Screening



Drug & Crime Prevention

IV. Components:

Component #1: Tracking and Reporting Crime-Related Problems (1 point)

Component #2: Screening of Applicants (1 point) Component #3: Lease Enforcement (1 point)

Component #4: Drug Prevention and/or Crime Reduction Program Goals (1 point)

V. Suggested Data Sources:

- 1. A log of 911 calls made and the number of crimes reported to local authorities.
- 2. Board adopted policy for a cooperative system to share information with local law enforcement agencies.
- 3. PHA Board of Commissioner approved policies to track crime-related problems.
- 4. PHA Board of Commissioner adopted policy for applicant screening policies and criteria.
- 5. Documentation including applicant ineligibility letters where admission has been denied to applicants meeting the screening criteria.
- 6. Documentation of court judgments, eviction notices of "for cause" and eviction records of residents who violate the lease for the reasons cited in the eviction policy.
- 7. Goals and implementation plans for the various drug and crime programs.
- 8. Board minutes and resolutions.
- 9. Listing of criminal activity or problems identified by site manager.
- 10. Admission and Continued Occupancy Policy and implementing procedures.
- 11. PHA Housing Application includes the screening questions.
- 12. Goals, implementation plans and tracking systems for the various drug and crime programs.
- 13. Implementation plan(s) for drug prevention and/or crime-related program(s).

VI. Things to Remember:

- ✓ PHAs must select either to be assessed for all or none of the non-HUD funded programs.
- ✓ Keep a narrative explanation and any applicable calculations in the file for PHAS documentation for a minimum of three years.

VII. Best Practices:

✓ PHAs should have systems in place for each of the four components to track activity.

Component #1: Tracking and Reporting Crime-Related Problems

I. Definition:

This component examines a PHA's performance in tracking crime and crime-related problems in its developments and reporting the incidents of crime to local police authorities. The PHA has a cooperative system with the local police authorities for tracking and reporting incidents of crime to local police authorities to improve law enforcement and crime prevention.

Maximum Point(s):

1

II. Suggested Data Sources:

- 1. A log of 911 calls made and the number of crimes reported to local authorities.
- 2. Board adopted policy for a cooperative system to share information with local law enforcement agencies and coordinates with local government officials and its residents on the implementation of anti-crime strategies.
- 3. PHA Board of Commissioner approved policies to track crime-related problems.
- 4. Board minutes and resolutions.
- 5. Listing of criminal activity or problems identified by site manager.

Element Number	Element Description	Instructions for Completing Element Submission
S10000	The date that the PHA Board adopted current policies to track crime and crime-related problems.	Enter the date that the PHA Board adopted current policies to track crime and crime-related problems. Please refer to the Board- approved crime tracking policies and other suggested data sources for information for this element.
S10100	The date that the PHA implemented the current procedures to track crime and crime-related problems.	Enter the date that the PHA implemented the current procedures to track crime and crime-related problems. Please refer to the Board minutes/resolutions and other suggested data sources for information requirements for this element.
S10200	The date that the PHA implemented a current cooperative system for tracking and reporting crime to local police authorities and coordinates with local government officials and its residents on the implementation of anti-crime strategies.	Enter the date that the PHA implemented a current cooperative system for tracking and reporting crime to local police authorities. Please refer to the Board of Commissioner approved cooperation policy and other suggested data sources for information requirements for this element.

III. Elements	III. Elements Continued:		
S10300	The number of crimes that the PHA reported to local police authorities during the fiscal year being assessed.	Enter the total number of crimes that the PHA reported to local police authorities during the fiscal year being assessed. Please refer to the log of crimes reported to the local police authorities and other suggested data sources for information requirements for this element.	
S10400	Percentage of developments where PHA can document it tracks crime and crime related problems.	Enter the percentage of developments where the PHA can document it tracks crime and crime-related problems. Please note the percentage is not based on the number of crimes, but relates to the number of developments where the PHA can document it tracks crime. Please refer to the mapping information and other suggested data sources for information requirements for this element.	

IV. Things to Remember:

- ✓ The date that the PHA Board adopted policies to track crime and crime-related problems must be prior to the PHA's fiscal year end date.
- ✓ The date that the PHA implemented the current procedures to track crime and crime-related problems must be prior to the PHA's fiscal year end date.
- ✓ The date that the PHA implemented the current cooperative system for tracking and reporting crime to local police authorities and coordinates with local government officials and its residents on the implementation of anti-crime strategies must be prior to the PHA's fiscal year end date.

V. Best Practices:

- ✓ Listing of criminal activity or problems identified by site manager.
- ✓ Keep tracking and reporting current.

VI. Criteria for Scoring:

Grade	Tracking and Reporting Crime-Related Problems
A	The Board, by resolution, has adopted policies and the PHA has implemented procedures and can document that it: A) Tracks crime and crime-related problems in at least 90% of its developments; B) Has a cooperative system for tracking and reporting incidents of crime to local police authorities to improve law enforcement and crime prevention; and C) Coordinates with local government officials and its residents on the implementation of anticrime strategies.

VI. Criteria for Scoring Continued:

Grade	Tracking and Reporting Crime-Related Problems		
С	The Board, by resolution, has adopted policies and the PHA has implemented procedures and can document that it: A) Tracks crime and crime-related problems in at least 60% of its developments; and B) Has a cooperative system for tracking and reporting incidents of crime to local police authorities to improve law enforcement and crime prevention.		
F	The Board, by resolution, has not adopted policies and the PHA has not implemented procedures or cannot document that it: A) Tracks crime and crime-related problems in at least 60% of its developments; or B) Has a cooperative system for tracking and reporting incidents of crime to local police authorities to improve law enforcement and crime prevention.		

VII. Calculation by System:

Note: There is no system calculation for this component. The score is based on information provided by a PHA in its certification, and the grade is based on the Criteria for Scoring.

Component #2: Screening of Applicants

I. Definition:

This component measures whether a PHA has formally adopted applicant screening policies and procedures and can document that it denies admission to an applicant who:

- Has a recent history of criminal activity involving crime to persons or property;
- ➤ Was evicted because of drug-related activity from assisted housing within the last three years, unless the applicant has successfully completed a rehabilitation program approved by the PHA;

Maximum Point(s):

- ➤ The PHA has reason to believe is illegally using a controlled substance, or engages in any drug-related activity on or off PHA property; or
- > The PHA has reason to believe is abusing alcohol, which interferes with the health, safety or right to peaceful enjoyment of the premises by other residents.

Each PHA must develop and implement its own screening policies and procedures. Each PHA must document that it appropriately screens applicants based on the above criteria.

1

II. Suggested Data Sources:

- 1. PHA Board of Commissioner adopted policy for applicant screening policies and criteria.
- 2. Documentation including applicant ineligibility letters where admission has been denied to applicants meeting the screening criteria.
- 3. Board minutes and resolutions.
- 4. Admission and Continued Occupancy Policy and implementing procedures.
- 5. PHA housing application, including the screening questions.

Element Number	Element Description	Instructions for Completing Element Submission
S10500	The date the PHA Board adopted current screening policies that reflect the applicable criteria.	Enter the date the PHA Board adopted current screening policies that reflect the applicable criteria. Please refer to the Board of Commissioner minutes/resolutions and other suggested data sources for information requirements for this element.

III. Elements Continued:

Element Number	Element Description	Instructions for Completing Element Submission
S10600	The date the PHA implemented the current screening procedures that reflect the applicable criteria.	Enter the date the PHA implemented the current screening procedures that reflect the applicable criteria. Please refer to the Board of Commissioner minutes/resolutions and other suggested data sources for information requirements for this element.
S10700	PHA can document that current screening procedures result in successfully denying admission to applicants who meet the applicable criteria, Yes or No.	Enter yes or no whether or not the PHA can document that current screening procedures result in successfully denying admission to applicants who meet the applicable criteria. Please refer to housing applications and other suggested data sources for information requirements for this element.
S10800	The total number of applicants denied who met the applicable criteria.	Enter the total number of applicants denied who met the applicable criteria. Please refer to ineligibility letters and other suggested data sources for information requirements for this element.

IV. Things to Remember:

- ✓ The date that the PHA Board adopted the current screening policies that reflect the applicable criteria must be prior to the PHA's fiscal year end date.
- ✓ The date that the PHA Board implemented the current screening procedures that reflect the applicable criteria must be prior to the PHA's fiscal year end date.
- ✓ If a PHA has adopted screening policies and implemented screening procedures that reflect the applicable criteria prior to the PHA's fiscal year end date, but the PHA did not deny admissions to applicants because none of the applicants met the applicable criteria, then the PHA should answer "Yes" to Element S10700. A PHA should not be penalized because none of its applicants met the applicable criteria.
- ✓ PHAs are scored for this component based on the formal adoption and implementation of applicant screening policies and procedures and has incorporated the applicable criteria in the screening of applicants.

V. Best Practices:

- ✓ Keep screening policies current.
- ✓ Keep Admission and Continued Occupancy Policy current.
- ✓ PHAs should have a system that tracks activity under this component.

VI. Criteria for Scoring:

Grade	Screening of Applicants		
A	 The PHA Board, by resolution, has adopted policies and the PHA has implemented procedures and can document that it successfully screens out and denies admission to a public housing applicant who: A) Has a recent history of criminal activity involving crime to persons or property; B) Was evicted because of drug-related activity from assisted housing within the last three years, unless the applicant has successfully completed a rehabilitation program approved by the PHA; C) The PHA has reason to believe is illegally using a controlled substance, or engages in any drug-related activity on or off PHA property; or D) The PHA has reason to believe is abusing alcohol, which interferes with the health, safety or right to peaceful enjoyment of the premises by other residents. 		
С	The PHA Board, by resolution, has adopted policies and the PHA has implemented procedures, but cannot document results in successfully screening out and denying admission to a public housing applicant who meets the criteria as described in grade A, above.		
F	The PHA has not adopted policies or has not implemented procedures that result in screening out and denying admission to a public housing applicant who meets the criteria as described in grade A, above, or the screening procedures do not result in the denial of admission to a public housing applicant who meets the criteria as described in grade A, above.		

VII. Calculation by System:

Note: There is no system calculation for this component. The score is based on information provided by a PHA in its certification, and the grade is based on the Criteria for Scoring.

Component #3: Lease Enforcement

I. Definition:

This component measures whether a PHA has formally adopted policies and implemented procedures to evict residents who the PHA has reasonable cause to believe:

- Engage in criminal activity that threatens the health, safety, or right to peaceful enjoyment of the premises by other residents or PHA personnel;
- Engage in any drug related criminal activity on or off of the PHA property; or
- Abuse alcohol in a way that interferes with the health, safety, and peaceful enjoyment of the premises by other residents or PHA personnel.

The PHA must develop and implement its own eviction policies and procedures. Each PHA must document that it appropriately evicts residents based on the above criteria.

Maximum Point(s):

1

II. Suggested Data Sources:

- 1. Documentation of court judgments, eviction notices of "for cause" and eviction records of residents who violate the lease for the reasons cited in the eviction policy.
- 2. Board minutes and resolutions.
- 3. Listing of criminal activity or problems identified by site manager.
- 4. Admission and Continued Occupancy Policy and implementing procedures.

Element Number	Element Description	Instructions for Completing Element Submission
S10900	The date the PHA Board adopted the current eviction policies that reflect the applicable criteria.	Enter the date the PHA Board adopted the current eviction policies that reflect the applicable criteria. Please refer to the Board of Commissioner minutes/resolutions and other suggested data sources for information requirements for this element.
S11000	The date the PHA implemented the current eviction procedures that reflect the applicable criteria.	Enter the date the PHA implemented the current eviction procedures that reflect the applicable criteria. Please refer to the Board of Commissioner minutes/resolutions and other suggested data sources for information requirements for this element.

III. Elements Continued:

Element Number	Element Description	Instructions for Completing Element Submission
S11100	PHA can document that the current eviction procedures resulted in the eviction of residents who meet the applicable criteria, Yes or No.	Enter yes or no whether or not the PHA can document that the current eviction screening procedures resulted in the eviction of residents who meet the applicable criteria. Please refer to eviction notices for cause evictions and other suggested data sources for information requirements for this element.
S11200	The total number of evictions as a result of the applicable criteria.	Enter the total number of evictions as a result of the applicable criteria. Please refer to eviction notices for cause evictions and other suggested data sources for information requirements for this element.

IV. Things to Remember:

- ✓ The date that the PHA Board adopted the current eviction policies that reflect the applicable criteria must be prior to the PHA's fiscal year end date.
- ✓ The date that the PHA Board implemented the current eviction procedures that reflect the applicable criteria must be prior to the PHA's fiscal year end date.
- ✓ If a PHA has adopted eviction policies and implemented eviction procedures that reflect the applicable criteria prior to the PHA's fiscal year end date, but the PHA did not evict residents because none of the residents met the applicable criteria, then the PHA should answer, "Yes" to Element S11100. A PHA should not be penalized because none of its residents met the applicable criteria.
- ✓ PHAs are scored for this component based on the formal adoption and implementation of eviction policies and procedures and has incorporated the applicable criteria in the eviction of residents.

V. Best Practices:

- ✓ Keep eviction policies current.
- ✓ Keep the Admissions and Continued Occupancy Policy current.
- ✓ PHAs should have a system that tracks activity under this component.

VI. Criteria for Scoring:

Grade	Lease Enforcement		
A	 The PHA Board, by resolution, has adopted policies and the PHA has implemented procedures and can document that it appropriately evicts any public housing resident who: A) Engage in criminal activity that threatens the health, safety, or right to peaceful enjoyment of the premises by other residents or PHA personnel; B) Engage in any drug related criminal activity on or off of the PHA property; or C) Abuse alcohol in a way that interferes with the health, safety, and peaceful enjoyment of the premises by other residents or PHA personnel. 		
С	The PHA Board, by resolution, has adopted policies and the PHA has implemented procedures, but cannot document results in appropriately evicting any public housing resident who meets the criteria as described in grade A, above.		
F	The PHA Board has not adopted policies or has not implemented procedures that document results in the eviction of any public housing resident who meets the criteria as described in grade A, above, or the eviction procedures do not result in the eviction of public housing residents who meet the criteria as described in grade A, above.		

VII. Calculation by System:

Note: There is no system calculation for this component. The score is based on information provided by a PHA in its certification, and the grade is based on the Criteria for Scoring.

Component #4: Drug Prevention and/or Crime Reduction Program Goals

I. Definition:

This component examines the PHA's management of HUD-funded programs. The PHA may self-certify to HUD-funded and non-HUD funded programs, or only to the HUD-funded programs. This component measures whether or not the PHA has ESTABLISHED a drug prevention and/or crime reduction program, identified and set GOALS and CAN DOCUMENT that it is meeting its goals under the requisite plan(s). Please remember to include only the number of goals to be accomplished in the year being assessed.

Maximum Point(s):

1

II. Suggested Data Sources:

- 1. Goals and implementation plans for the various drug and crime programs.
- 2. Board minutes and resolutions.
- 3. Implementation plan(s) for drug prevention and/or crime-related program(s).

Element Number	Element Description	Instructions for Completing Element Submission
S11350	The number of HUD- funded drug prevention and/or crime reduction programs that the PHA requests to be assessed.	Enter the number of HUD-funded drug prevention and/or crime reduction programs that the PHA requests to be assessed. Please refer to the Board of Commissioner minutes/ resolutions and other suggested data sources for information requirements for this element.
S11450	The number of non HUD- funded drug prevention and/or crime reduction programs.	Enter the number of non HUD-funded drug prevention and/or crime reduction programs. Please refer to the Board of Commissioner minutes/resolutions and other suggested data sources for information requirements for this element.
S11550	The number of documented program goals that are related to drug prevention and/or crime reduction.	Enter the number of documented program goals that are related to drug prevention and/or crime reduction for the fiscal year being assessed. Please refer to the implementation plans and other suggested data sources for information requirements for this element.
S11600	The number of goals the PHA can document it met under the implementation plan(s) for any and all of these programs.	Enter the number of goals the PHA can document it met under the implementation plan(s) for any and all of these programs for the fiscal year being assessed. Please refer to the implementation plans and other suggested data sources for information requirements for this element.

III. Elements Continued:

Element Number	Element Description	Instructions for Completing Element Submission
S11700	Percentage of goals that the PHA can document it met under implementation plan(s) for any and all of these programs.	Read only. System generated.

IV. Things to Remember:

- ✓ Non HUD-funded program reporting is voluntary; the PHA does NOT have to be assessed on non HUD-funded programs. There is no penalty for opting not to be assessed on these programs. If the PHA does not have any non HUD-funded programs, there is no penalty.
- ✓ The number of documented program goals that are related to drug prevention and/or crime reduction are the number of goals that are scheduled for completion in the fiscal year being assessed. The number of program goals should not include goals accomplished in the prior fiscal year or scheduled for completion in the next fiscal year.
- ✓ The number of goals that the PHA can document it met under the implementation plan(s) for all programs should only be the number of goals met that were scheduled to be met in the fiscal year being assessed. The number of program goals should not include goals accomplished in the prior fiscal year or scheduled for completion in the next fiscal year.
- PHAs must have and maintain several years of comparative drug prevention and/or crime reduction statistics. Using these statistics against the baseline can show how the program goals are directly related. Ultimately, there should be some correlation between the decline in the drug and crime rates AND the successful achievement of the program goals.

V. Best Practices:

- ✓ Identify the HUD-funded programs and the goals separately.
- ✓ Identify non-HUD funded programs and the goals separately.
- ✓ Maintain drug prevention and/or crime reduction statistics.
- ✓ Maintain separate records for HUD-funded and non HUD-funded programs.
- ✓ PHAs should have a system that tracks activity under this component.
- ✓ Identify the number of goals for the implementation plans.
- ✓ Maintain records to show how the program goals are directly related.

VI. Criteria for Scoring:

Grade	Drug Prevention and/or Crime Reduction Program Goals
A	If the PHA has any special drug prevention program or crime reduction program that is HUD-funded or non-HUD funded, the PHA can document that the goals are related to drug and crime rates, and it is meeting at least 90% of its goals under the implementation plan for any and all of these programs.
С	If the PHA has any special drug prevention program or crime reduction program that is HUD-funded or non-HUD funded, the PHA can document that the goals are related to drug and crime rates, and it is meeting at least 60% of its goals under the implementation plan for any and all of these programs.
F	If the PHA has any special drug prevention program or crime reduction program that is HUD-funded or non-HUD funded, the PHA does not have a system for documenting or cannot document that the goals are related to drug and crime rates, or cannot document that it is meeting 60% or more of its goals under the implementation plan for any and all of these programs.

Note: This component will be excluded from the score calculation if the sum of the number of HUD-funded drug prevention and/or crime reduction programs and the number of non-HUD funded programs that the PHA requests to be assessed equals zero.

VII. Calculation by System:

[S11700] Percent of goals the PHA can document it met under the implementation plan (s) for any and all of these programs = [S11600] The number of goals that the PHA can document it met under the implementation plan (s) for any and all of these programs / [S11500] The number of documented program goal that are related to drug prevention and/or crime reduction.