

## **Chapter 1**

### **STATEMENT OF POLICIES AND OBJECTIVES**

#### **INTRODUCTION**

The Low Rent Public Housing Program was created by the U.S. Housing Act of 1937. Administration of the Public Housing Program and the functions and responsibilities of the Housing Authority of the City of Bridgeport (BHA) staff shall be in compliance with BHA's Personnel Policy, any union agreements of the BHA, and this Admissions and Continued Occupancy Policy. The administration of BHA's housing program will also meet the requirements of the Department of Housing and Urban Development. Such requirements include any Public Housing Regulations, Handbooks, and applicable Notices. All applicable Federal, State and local laws, including Fair Housing Laws and regulations also apply. Changes in applicable federal laws or regulations shall supersede provisions in conflict with this policy. Federal regulations shall include those found in Volume 24 CFR, Parts V, VII and IX. (Code of Federal Regulations).

**A.**

#### **HOUSING AUTHORITY MISSION STATEMENT**

The Bridgeport Housing Authority is committed to providing quality, affordable housing and services in an efficient effective and creative manner. We will serve our residents by providing affordable housing opportunities in a safe environment; revitalizing and maintaining neighborhoods; and forming effective partnerships to maximize social and economic opportunities. This mission shall be accomplished by a fiscally responsible, ethical, and professional organization committed to excellence in public service.

**B.**

#### **LOCAL OBJECTIVES**

This Admissions and Continued Occupancy Plan for the Public Housing Program is designed to demonstrate that BHA is managing its program in a manner that reflects its commitment to improving the quality of housing available to its public, and its capacity to manage that housing in a manner that demonstrates its responsibility to the public trust. In addition, this Admissions and Continued Occupancy Policy is designed to achieve the following objectives:

To provide improved living conditions for very low and low income families while maintaining their rent payments at an affordable level.

To operate a socially and financially sound public housing agency that provides decent, safe, and sanitary housing within a drug free, suitable living environment for residents and their families.

To avoid concentrations of economically and socially deprived families in any one or all of the BHA's public housing developments.

To lawfully deny the admission of applicants, or the continued occupancy of residents, whose habits and practices reasonably may be expected to adversely affect the health, safety, comfort or welfare of other residents or the physical environment of the neighborhood, or create a danger to BHA employees.

To attempt to house a resident body in each development that is composed of families with a broad range of incomes and rent-paying abilities that are representative of the range of incomes of low-income families in BHA's jurisdiction.

To provide opportunities for upward mobility or families who desire to achieve self-sufficiency.

To facilitate the judicious management of the BHA inventory, and the efficient management of staff.

To comply with the Pequonnock Apartment Settlement Agreement dated November 1, 2000 that

provides the displaced Pequonnock Apartment residents the best possible housing options. To ensure compliance with Title VI of the Civil Rights Act of 1964 and all other applicable Federal laws and regulations so that the admissions and continued occupancy are conducted without regard to age, race, source of income, color, religion, creed, sex, national origin, handicap or familial status.

### **C.**

#### **PURPOSE OF THE POLICY**

The purpose of this Admissions and Continued Occupancy Policy (ACOP) is to:  
Establish guidelines for the BHA staff to follow in determining eligibility for admission and continued occupancy  
Establish a fair and equitable policy accepting applications and selecting prospective residents to occupancy housing units owned and operated by BHA  
Provide fair and reasonable procedures to govern the occupancy of those units in accordance with regulations of the U.S. Department of Housing and Urban Development (HUD)  
Establish a fair and equitable policy for granting transfers to residents  
Establish a fair and equitable policy for selecting families to occupy units at our scattered sites. Families will be selected from our housing developments.  
Memorialize guidelines and procedures in dealing with displaced Pequonnock Apartment residents

These guidelines are governed by the requirements of the Department of Housing and Urban Development (HUD) with latitude for local policies and procedures. These policies and procedures for admissions and continued occupancy are binding upon applicants, residents, and BHA.

Guidelines for the displaced Pequonnock Apartment residents are governed by the Pequonnock Apartment Settlement Agreement dated November 1, 2000.

The Executive Director accepts responsibility for BHA compliance with this policy, while delegating day-to-day responsibility to appropriate staff. The Authority's Central Resident Selection Office receives and processes all applications, maintains a waiting list, selects residents and assigns units.

Site Managers lease units, orient new residents and enforce the continued occupancy provisions of this policy. The Community Affairs office, in conjunction with the Director of Occupancy, will oversee the occupancy orientation program.

The BHA Board of Commissioners must approve the original policy and any changes. Required portions of this Plan will be provided to HUD.

### **D.**

#### **FAIR HOUSING POLICY ON NON-DISCRIMINATION**

It is the policy of the Housing Authority to comply fully with all Federal, State, and local nondiscrimination laws and with rules and regulations governing Fair Housing and Equal Opportunity in housing and employment. BHA will comply with all laws relating to Civil Rights, including:  
Title VI of the Civil Rights Act of 1964

Title VIII of the Civil Rights Act of 1968 (as amended by the Community Development Act of 1974 and the Fair Housing Amendments Act of 1988)  
Executive Order 11063  
Section 504 of the Rehabilitation Act of 1973  
The Age Discrimination Act of 1975  
Title II of the Americans with Disabilities Act (to the extent that it applies, otherwise Section 504 and the Fair Housing Amendments govern)  
Any applicable State laws or local ordinances and any legislation protecting individual rights of residents, applicants or staff that may subsequently be enacted.

The BHA shall not discriminate because of race, color, age, source of income, sex, religion, familial status, disability, national origin, marital status, or sexual orientation in the leasing, rental, or other disposition of housing or related facilities, including land, that is part of any project or projects under the BHA's jurisdiction covered by a contract for annual contributions under the United States Housing Act of 1937, as amended, or in the use or occupancy thereof. Posters and housing information are displayed in locations throughout the BHA's office in such a manner as to be easily readable from a wheelchair.

To further its commitment to full compliance with applicable Civil Rights laws, the BHA will provide Federal/State/local information to public housing residents regarding "discrimination" and any recourse available to them if they believe they are victims of discrimination. Such information will be made available to them during the resident orientation session.

All BHA offices are accessible to persons with disabilities.

The BHA shall not, on account of race, color, age, source of income, sex, religion, familial status, disability, national origin, marital status, or sexual orientation:  
Deny to any family the opportunity to apply for housing, nor deny to any qualified applicant the opportunity to lease housing suitable to its needs  
Provide housing that is different from that provided to others  
Subject a person to segregation or disparate treatment  
Restrict a person's access to any benefit enjoyed by others in connection with the housing program  
Treat a person differently in determining eligibility or other requirements for admission; or  
Deny a person access to the same level of services  
The BHA shall not automatically deny admission to a particular group or category of otherwise qualified applicants (e.g., families with children born to unmarried parents, elderly families with pets).

**E.**

## **PRIVACY RIGHTS**

It is the policy of BHA to facilitate the privacy of individuals conferred under the Privacy Act of 1974, and to ensure the protection of such individuals' records maintained under BHA's Public Housing Program. Applicants and participants, including all adults in their households, are required to sign the form HUD-9886, "Authorization for Release of Information and Privacy Act Notice." This document incorporates the Federal Privacy Act Statement and describes the conditions under which HUD will release family information.

Therefore, BHA shall not disclose any personal information contained in its records to any person or agency unless the individual about whom information is requested shall give BHA written consent to such disclosure. Any and all information which would lead one to determine the nature and/or severity of a person's disability must be kept in a separate folder and marked

"confidential." The personal information in this folder must not be released except on an "as needed" basis in cases where an accommodation is under consideration. The staff person designated by the coordinator must approve all requests for access and granting of accommodations based on this information.

BHA's practices and procedures are designed to safeguard the privacy of applicants and residents. Files will never be left unattended or placed in common areas and BHA staff will not discuss or access family information contained in files unless there is a business reason to do so. Staff will be required to disclose whether s/he has relatives living in Public Housing. Inappropriate discussion of family information, or improper disclosure of family information by staff will result in disciplinary action.

This privacy policy in no way limits BHA's ability to collect such information as it may need to determine eligibility, compute rent, or determine an applicant's suitability for tenancy.

**F.**

### **MARKETING/FAMILY OUTREACH**

BHA will conduct outreach in an effort to obtain and maintain a well-balanced application pool. Outreach efforts will take into consideration the level of vacancy in BHA's units, unit availability thorough turnover, and waiting list characteristics. BHA will periodically assess these factors in order to determine the need and scope of the marketing effort.

Marketing efforts will be designed to attract applicants from appropriate segments of the lower and very low-income population, including Bridgeport's homeless population. BHA will use its marketing program to achieve a more representative income mix of lower income families among those on the waiting list and thereby attain a broad range of income in its public housing communities as required by Federal Law.

With regards to displaced Pequonnock Apartment families, a third-party provider has been selected to provide them with mobility counseling and voucher-enabling services. The Authority will make available to the third-party provider the available non-assigned vacant units for immediate occupancy. The third-party provider will make every attempt to market these resources for temporary or permanent occupancy.

BHA will publicize and disseminate information to make known the availability of housing units and housing-related services for very low income families on a regular basis and will communicate the status of housing availability to other service providers in the community. BHA will advise them of housing eligibility factors and guidelines in order that they can make proper referrals for those who seek housing.

BHA will periodically publicize the availability and nature of housing assistance for very low-income families in a newspaper of general circulation, including local minority publications and other suitable means.

Notices will be provided in English and Spanish. To reach persons who cannot read the newspapers, the BHA will distribute fact sheets to the broadcast media and utilize public service announcements.

**G.**

### **SERVICE AND ACCOMMODATIONS POLICY**

This policy is applicable to all situations described in this Admissions and Continued Occupancy

Policy when a family initiates contact with the BHA, when the BHA initiates contact with a family including when a family applies, and when the BHA schedules or reschedules appointments of any kind.

It is the policy of BHA to be service-directed in the administration of our housing programs, and to exercise and demonstrate a high level of professionalism while providing housing services to the families within our jurisdiction.

BHA's policies and practices will be designed to provide assurances that all persons with disabilities will be provided reasonable accommodation so that they may fully access and utilize the housing program and related services. The availability of specific accommodations will be made known by including notices on BHA forms and letters to all families, and all requests will be verified so that BHA can properly accommodate the need presented by the disability.

With respect to an individual, the term "disability," as defined by the Federal Americans with Disabilities Act of 1990 means:

A physical or mental impairment that substantially limits one or more of the major life activities of an individual

A record of such impairment

Being regarded as having such impairment

Undue Hardship.

Requests for reasonable accommodation from persons with disabilities will be granted upon verification that they meet the need presented by the disability and they do not create an "undue financial and administrative burden" for the BHA, meaning an action requiring "significant difficulty or expense."

In determining whether accommodation would create an undue hardship, the following guidelines will apply:

The nature and cost of the accommodation needed

The overall financial resources of the facility or facilities involved in the provision of the reasonable accommodation

The number of persons employed at such facility, the number of families likely to need such accommodation, the effect on expenses and resources, or the likely impact on the operation of the facility as a result of the accommodation.

All requests for accommodation or modification of a unit will be verified with a reliable, knowledgeable, professional. Requests for reasonable accommodation from persons with disabilities will be granted upon verification that they meet the need presented by the disability. The BHA will require verification from a knowledgeable professional when a request for a home visit re-certification is submitted.

Reasonable accommodation will be made for persons with a disability who require an advocate or accessible offices. A designee will be allowed to provide some information, but only with the permission of the person with the disability. All BHA mailings will be made available in an accessible format upon request, as a reasonable accommodation.

The BHA will permit the family to submit annual and interim re-certification forms through the mail, when the BHA has determined that the request is necessary as a reasonable accommodation. The mail-in packet will include notice to the family of the BHA's deadline for returning the completed forms to the BHA. If there is more than one adult member in the household, but only one is disabled, re-certifications will not be processed through the mail. In such cases, the family may choose to have the BHA conduct the re-certification by a home visit or to have the able adult family members come in for the appointment and then take the necessary forms home to the

member with a disability for completion and signature.

When requested and where the need for reasonable accommodation has been established, the BHA will conduct home visits to residents to conduct annual and interim re-certifications. Requests for home visit re-certifications must be received by the BHA at least 14 days before the scheduled appointment date in order for the request to be considered. The BHA will consider home visit re-certifications that are requested after the scheduled appointment has been missed, according to the number of allowed rescheduled appointments noted in Chapter 11, Re-certifications. The BHA will not consider home visit re-certifications that are requested after the scheduled appointment has been missed.

BHA utilizes organizations that provide assistance for hearing- and sight-impaired persons when needed. Families will be offered an accessible unit, upon request by the family, when an accessible unit is available.

#### **H.**

#### **TRANSLATION OF DOCUMENTS**

The Housing Authority has bilingual staff to assist non-English speaking families in Spanish and will provide translation of BHA documents into Spanish.

#### **I.**

#### **PUBLIC HOUSING MANAGEMENT ASSESSMENT SYSTEM (PHAS) OBJECTIVES [24 CFR 901 & 902]**

The implementation of PHAS scoring began in October 1999. It is in the BHA's best interest to prepare for PHAS ratings since low performance scores will result in increased scrutiny and less flexibility for the BHA to make decisions, as well as possibly result in other punitive action.

BHA operates its public housing program with efficiency and can demonstrate to HUD or independent auditors that BHA is using its resources in a manner that reflects its commitment to quality and service. The BHA policies and practices are consistent with the new Public Housing Assessment System (PHAS) outlined in the 24 CFR Parts 901 and 902 final published regulations.

BHA is continuously assessing its program and consistently strives to make improvements, and acknowledges that its performance ratings are important to sustaining its capacity to maintain flexibility and authority. BHA intends to diligently manage its current program operations and continuously make efforts to be in full compliance with PHAS. The policies and procedures of this program are established so that the standards set forth by PHAS are demonstrated and can be objectively reviewed by an auditor whose purpose is to evaluate performance.

#### **J.**

#### **POSTING OF REQUIRED INFORMATION**

BHA will maintain a bulletin board in a conspicuous area of the lobby that will contain:  
Statement of policies and procedures governing Admission and Continued Occupancy Policy (ACOP) or a notice of where the policy is available:  
Information on application taking  
Directory of BHA's housing sites including names, address of offices and office hours at each facility

Income limits for Admission  
Current schedule of routine maintenance charges  
A copy of the lease  
BHA's grievance procedures  
A Fair Housing Poster  
An Equal Opportunity in Employment poster  
Current Resident Notices  
Required public notices  
Security Deposit Charges  
Information on preferences  
Schedule of Utility Allowances.

Site developments will maintain a bulletin board in a conspicuous place that will contain:

Resident Selection policies  
Information on application taking  
Income limits for admission  
Current schedule of maintenance charges  
Copy of lease  
BHA's grievance procedures  
Fair Housing poster  
Equal Opportunity in Employment poster  
Current Resident Notices  
Security Deposit charges  
Zero Tolerance Policy (sexual harassment)  
Fraud Hotline Information  
Mission Statement  
One Strike Policy.

**K.**

## **TERMINOLOGY**

The Housing Authority of the City of Bridgeport is referred to as "BHA" or "Housing Authority" or "HA" throughout this document.

"Family" is used interchangeably with "Applicant," "Resident" or "Participant" or and can refer to a single-person family.

"Resident" is used to refer to participants in terms of their relation as a lessee to the BHA as the landlord.

"Landlord" refers to the BHA.

"Disability" is used where "handicap" was formerly used.

"Noncitizens Rule" refers to the regulation effective June 19, 1995, restricting assistance to U.S. citizens and eligible immigrants.

See Chapter 11 Glossary for other terminology.

**L. EQUAL ACCESS OPPORTUNITY**

The Authority will comply with the HUD's final rule dated September 30, 2003 as published regarding the participation of faith-based organizations in HUD programs and its rule in equal treatment of all HUD programs. The corresponding code of federal regulations are 24 CFR Parts 92, 570, 572, 574, 576, 582, 583, and 585.

In general, organizations that are religious or faith-based are eligible to participate, on the same basis as any other organization, in HUD approved programs. The Authority will not discriminate against an organization on the basis of the organization's religious character or affiliation. Organizations that are directly funded under HUD funds, as identified in each corresponding part, may not engage in religious activities, such as worship, religious instruction or proselytization, as part of the assistance funded by HUD. If the organization conducts such activities, the activities must be offered separately, in time or location, from the assistance funded by HUD and participation must be voluntary for the beneficiaries.

Given this ruling, the Authority may permit faith-based organizations and non faith-based organizations the use of common areas, in particular open space fields, to conduct their activities provided that they meet the following criteria and procedure:

Each organization must submit a proposal to the Authority indicating their proposed activities, timelines (start and end dates, time), location, purpose, organization information, contact person and information, a copy of their insurance certificate, and any other information/documents requested by the Authority to make an informed decision

They must provide a certificate indicating that their activities do not violate any funding guidelines under 24 CFR Parts 92, 570, 572, 574, 576, 582, 583, and 58

Must comply with City ordinance

Must leave the premises clean and free from debris related to their activities

The activities do not interfere with the orderly conduct of the Authority's maintenance activities

The Authority cannot contribute funds and/or sponsorship of the activity/event beyond the incidental cost of providing space for the activity/event

The Board of Commissioners may review each request during its regularly scheduled meetings for approval or denial, including any expectations and other requirements. Upon approval, the Authority may require the firm to sign a hold harmless agreement to ensure that the Authority is not liable for any damages and/or injuries arising from the organization's activities.

Any approval by the Authority is not an official endorsement of the organization and/or its activities. The Authority and/or its staff may not encourage, solicit, or require participation of residents in the approved proposal. Such activities must be voluntary on the part of the residents and that the activities do not serve to harass or force any resident to become an unwilling participant.

Approved organizations, faith-based or not, will not be given access to the dwelling units/hallways to distribute religious, anti-religious, or non-religious literature.

The Authority reserves the right to discontinue any organization's approved activities at any time in order to defuse conflicts over content and/or is deemed unlawful.

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