



U.S. Department of Housing and Urban Development

Office of Fair Housing & Equal Opportunity
Thomas P. O'Neill, Jr. Federal Building
10 Causeway Street
Boston, Massachusetts 02222-1092

NOV 21 2012

New England

(617) 994-8300
(617) 565-7313 (FAX)

November 9, 2012

Crystal P. Watler
Winn Residential
193 Talbot Avenue
Dorchester, MA 02124

SUBJECT: Talbot Bernard Senior Housing
Location: Dorchester, MA
Project No. 023EE120
Affirmative Fair Housing Marketing Plan (AFHMP)

Dear Ms. Watler:

This is to inform you that the HUD Office of Fair Housing & Equal Opportunity (FHEO) has approved your updated AFHMP for the above-referenced property. A copy of the approved AFHMP is enclosed.

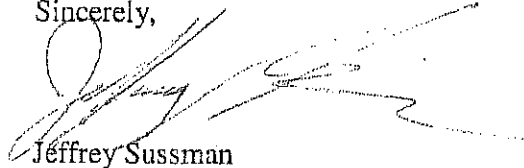
As you know, the primary purpose of the affirmative marketing program is to promote a condition in which individuals of similar income levels in the same housing market area have available to them a like range of choices in housing, regardless of the individual's race, color, religion, sex, national origin, familial status, or disability. Accordingly, the Department has identified procedures which are required to be followed pursuant to the goals of the program, the Department's regulation, and your approved Plan.

1. Copies of the approved AFHMP must be available for public inspection in your office and in the site management office.
2. The HUD Fair Housing Poster is required to be maintained and prominently displayed in all offices in which sales or rental activity takes place.
3. You must ensure that all advertising material related to this housing contains the Equal Opportunity logo, slogan, or statement, in conformance with HUD's Fair Housing advertising policy and guidance, available on the Internet at <http://www.hud.gov/offices/fheo/library/index.cfm#Guidance>. Copies of materials sent to community contacts must be submitted to this office.

4. You must collect and maintain information relating to rental activity, including documentation connected with the outreach program, and data by race, ethnicity and gender for both occupants and applicants [Executive Order 11063 and 24 CFR 1.4(b), 121 and 108].

We encourage you to make every possible good faith effort to carry out the provisions and fulfill the objectives of your AFHMP. If you have any questions or need further assistance, please contact, Equal Opportunity Assistant, Myrta Hernandez of my staff by telephone at 860-240-9740 or by e-mail at Myrta.M.Hernandez@hud.gov.

Sincerely,



Jeffrey Sussman
Program Compliance Branch Chief
Office of Fair Housing & Equal Opportunity

Enclosure: Approved AFHMP

cc: HUD Office of Multifamily Housing

Note to all applicants/respondents: This form was developed with Nuance, the official HUD software for the creation of HUD forms. HUD has made available instructions for downloading a free installation of a Nuance reader that allows the user to fill-in and save this form in Nuance. Please see <http://portal.hud.gov/hudportal/documents/huddoc?id=nuancereaderinstall.pdf> for the instructions. Using Nuance software is the only means of completing this form.

Affirmative Fair Housing Marketing Plan (AFHMP) - Multifamily Housing

U.S. Department of Housing and Urban Development
Office of Fair Housing and Equal Opportunity

OMB Approval No. 2529-0013
(exp. 8/31/2013)

1a. Project Name & Address (including City, County, State & Zip Code) Talbot Bernard Senior Housing, Inc. 193 Talbot Avenue Dorchester, MA 02124		1b. Project Contract Number 023-EE120	1c. No. of Units 30
		1d. Census Tract 02100	
		1e. Housing/Expanded Housing Market Area Housing Market Area: Expanded Housing Market Area: City of Boston	
1f. Managing Agent Name, Address (including City, County, State & Zip Code), Telephone Number & Email Address Winn Residential 6 Faneuil Hall Marketplace Boston, MA 02109 617-742-4500			
1g. Application/Owner/Developer Name, Address (including City, County, State & Zip Code), Telephone Number & Email Address Talbot Bernard Senior Housing 193 Talbot Avenue, Dorchester, MA 02124 617-265-3200, talbotbernard@winnco.com			
1h. Entity Responsible for Marketing (check all that apply) <input type="checkbox"/> Owner <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Other (specify) _____ Position, Name (if known), Address (including City, County, State & Zip Code), Telephone Number & Email Address Crystal P. Watler, Property Manager 193 Talbot Avenue, Dorchester, MA 02124 617-265-3200 owatler@winnco.com			
1i. To whom should approval and other correspondence concerning this AFHMP be sent? Indicate Name, Address (including City, State & Zip Code), Telephone Number & E-Mail Address. See 1h			
2a. Affirmative Fair Housing Marketing Plan Plan Type: Updated Plan Date of the First Approved AFHMP: 07/02/07 Reason(s) for current update: Expirad Plan			
2b. HUD-Approved Occupancy of the Project (check all that apply) <input checked="" type="checkbox"/> Elderly <input type="checkbox"/> Family <input type="checkbox"/> Mixed (Elderly/Disabled) <input type="checkbox"/> Disabled			
2c. Date of Initial Occupancy 12/01/2003		2d. Advertising Start Date Advertising must begin at least 90 days prior to initial or renewed occupancy for new construction and substantial rehabilitation projects. Date advertising began or will begin: 12/01/2012 For existing projects, select below the reason advertising will be used: To fill existing unit vacancies <input type="checkbox"/> To place applicants on a waiting list <input checked="" type="checkbox"/> (which currently has 60 individuals) To reopen a closed waiting list <input type="checkbox"/> (which currently has _____ individuals)	

3a. Demographics of Project and Housing Market Area
Complete and submit Worksheet 1.

3b. Targeted Marketing Activity

Based on your completed Worksheet 1, indicate which demographic group(s) in the housing market area is/are least likely to apply for the housing without special outreach efforts. (check all that apply)

- White American Indian or Alaska Native Asian Black or African American
 Native Hawaiian or Other Pacific Islander Hispanic or Latino Persons with Disabilities

Families with Children Other ethnic group, religion, etc. (specify) _____

4a. Residency Preference

Is the owner requesting a residency preference? If yes, complete questions 1 through 5.
If no, proceed to Block 4b.

(1) Type

- (2) Is the residency preference area:
The same as the AFHMP housing/expanded housing market area as identified in Block 1a?
The same as the residency preference area of the local PHA in whose jurisdiction the project is located?

(3) What is the geographic area for the residency preference?

(4) What is the reason for having a residency preference?

(5) How do you plan to periodically evaluate your residency preference to ensure that it is in accordance with the non-discrimination and equal opportunity requirements in 24 CFR 5.105(a)?

Complete and submit Worksheet 2 when requesting a residency preference (see also 24 CFR 5.866(a)(1)) for residency preference requirements. The requirements in 24 CFR 5.866(a)(1) will be used by HUD as guidelines for evaluating residency preferences consistent with the applicable HUD program requirements. See also HUD Occupancy Handbook (4350.3) Chapter 4, Section 4.8 for additional guidance on preferences.

4b. Proposed Marketing Activities: Community Contacts
Complete and submit Worksheet 3 to describe your use of community contacts to market the project to those least likely to apply.

4c. Proposed Marketing Activities: Methods of Advertising
Complete and submit Worksheet 4 to describe your proposed methods of advertising that will be used to market to those least likely to apply. Attach copies of advertisements, radio and television scripts, internet advertisements, websites, and brochures, etc.

5a. Fair Housing Poster

The Fair Housing Poster must be prominently displayed in all offices in which sale or rental activity takes place (24 CFR 200.820(e)). Check below all locations where the Poster will be displayed.

Rental Office Real Estate Office Model Unit Other (specify)

5b. Affirmative Fair Housing Marketing Plan

The AFHMP must be available for public inspection at the sales or rental office (24 CFR 200.825). Check below all locations where the AFHMP will be made available.

Rental Office Real Estate Office Model Unit Other (specify)

5c. Project Site Sign

Project Site Signs, if any, must display in a conspicuous position the HUD approved Equal Housing Opportunity logo, slogan, or statement (24 CFR 200.820(f)). Check below all locations where the Project Site Sign will be displayed. Please submit photos of Project signs.

Rental Office Real Estate Office Model Unit Entrance to Project Other (specify)

The size of the Project Site Sign will be " x "

The Equal Housing Opportunity logo or slogan or statement will be " x "

8. Evaluation of Marketing Activities

Explain the evaluation process you will use to determine whether your marketing activities have been successful in attracting individuals least likely to apply, how often you will make this determination, and how you will make decisions about future marketing based on the evaluation process.

The initial evaluation of the marketing program will occur after a 60 day period. Thereafter, the program will be evaluated annually.

7a. Marketing Staff

What staff positions are/will be responsible for affirmative marketing?

Property Manager

7b. Staff Training and Assessment: AFHMP

(1) Has staff been trained on the AFHMP? Yes

(2) Has staff been instructed in writing and orally on non-discrimination and fair housing policies as required by 24 CFR 200.620(a)? Yes

(3) If yes, who provides instruction on the AFHMP and Fair Housing Act, and how frequently?

Grace Hill, annually

(4) Do you periodically assess staff skills on the use of the AFHMP and the application of the Fair Housing Act? Yes

(5) If yes, how and how often?

Annually through continuing education and evaluation

7c. Tenant Selection Training/Staff

(1) Has staff been trained on tenant selection in accordance with the project's occupancy policy, including any residency preferences?

Yes

(2) What staff positions are/will be responsible for tenant selection?

Property Manager in consultation with direct supervisor

7d. Staff Instruction/Training:

Describe AFHM/Fair Housing Act staff training, already provided or to be provided, to whom it was/will be provided, content of training, and the dates of past and anticipated training. Please include copies of any AFHM/Fair Housing staff training materials.

See attached Grace Hill Inc. course listing

8. Additional Considerations Is there anything else you would like to tell us about your AFHMP to help ensure that your program is marketed to those least likely to apply for housing in your project? Please attach additional sheets, as needed.

NO

9. Review and Update

By signing this form, the applicant/respondent agrees to implement its AFHMP, and to review and update its AFHMP in accordance with the instructions to item 9 of this form in order to ensure continued compliance with HUD's Affirmative Fair Housing Marketing Regulations (see 24 CFR Part 200, Subpart M). I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (See 18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Signature of person submitting this Plan & Date of Submission (mm/dd/yyyy) *[Signature]* 8/13/2013

Name (type or print)

Hector Cruz

Title & Name of Company

Regional Vice President, Winn Management Company, LLC

For HUD-Office of Housing Use Only
Reviewing Official:

For HUD-Office of Fair Housing and Equal Opportunity Use Only

Approval

Disapproval

[Signature]
Signature & Date (mm/dd/yyyy)

[Signature] 11/9/12
Signature & Date (mm/dd/yyyy)

Name (type or print)

Yaniel J. Rojas

Title

Special Rep Man

Name (type or print)

Jeffrey Sussman

Title

FHEO PROGRAM COMPLIANCE BRANCH CHIEF

Worksheet 1: Determining Demographic Groups Least Likely to Apply for Housing Opportunities
(See AFHMP, Block 3b)

In the respective columns below, indicate the percentage of demographic groups among the project's residents, current project applicant data, census tract, housing market area, and expanded housing market area (See Instructions to Block 1a). If you are a new construction or substantial rehabilitation project and do not have residents or project applicant data, only report information for census tract, housing market area, and expanded housing market area. The purpose of this information is to identify any under-representation of certain demographic groups in terms of race, color, national origin, religion, sex, familial status, or disability. If there is significant under-representation of any demographic group among project residents or current applicants in relation to the housing/expanded housing market area, then targeted outreach and marketing should be directed towards these individuals least likely to apply. Please indicate under-represented groups in Block 3b of the AFHMP. Please attach maps showing both the housing market area and the expanded housing market area.

Instructions: For demographic data from the 2010 Census, please see <http://factfinder2.census.gov/main.html>. To find data by Census Tract, County, Metropolitan Statistical Area (MSA), or other level:

1. Click "Geographies" on the left.
2. Click the "Address" Tab and enter the address of the project and then click "GO".
(*To create a map of the area click the "Maps" tab*)
3. Select the level of interest (Census Tract, County, MSA, or other) and then close the "Select Geographies" box.
(Do NOT select more than one level at a time)
4. Click the first "Profile of General Population and Housing Characteristics: 2010" also known as DP-1.
(Refer to the "Race" section "Total Population" subsection for breakdown of demographic characteristics)
5. Record the information in Worksheet 1 for that level, click "Back to Search" in the top left corner, then click "Clear all Selections" in the "Selections" Box in the top left corner.
6. Start process again to retrieve the next level of data (County, MSA, or other).

To collect information about the percentage of persons with disabilities repeat above steps 1 through 3 to select your level of interest (Census Tract, County, MSA, etc.) then:

1. Click "Topics" on the left.
2. Click "People".
3. Click "Disability" and then click the "Disability" link directly beneath it.
4. **For Census Tract-** Select the first "Disability Status by Sex: 2000" or QT-P21. Please note that the most recent information for census tract is from 2000. In this section report percent with a disability for both sexes for population 5 years and over.
For County or MSA- Select the first "Selected Social Characteristics in the United States" or DP02 and report the percent of the total civilian noninstitutionalized population with a disability.
5. Record the information in Worksheet 1 and then click "Back to Search" in the top left corner, then click the "X" next to the level in the "Your Selections" box, but KEEP "DISABILITY" as a selection.
6. Repeat for next level of data (County, MSA, or other).

Demographic Characteristics	Project's Residents	Project's Applicant Data	Census Tract	Housing Market Area	Expanded Housing Market Area
% White	0	0	15.7	64.6	66.1
% Black or African American	63	80	66.4	25.3	11.9
% Hispanic or Latino	8	0	11.6	14.4	7.3
% Asian	6	5	10.1	7.5	12
% American Indian or Alaska Native	0	0	3	4	4
% Native Hawaiian or Pacific Islander	0	0	0	.1	0
% Persons with Disabilities	0	0	14.2	20.4	13.9
% Families with Children under the age of 18	NA				
Other (specify)	36	15	0	0	0

Worksheet 2: Establishing a Residency Preference Area (See AFHMP, Block 4a)

Complete this Worksheet if you wish to continue, revise, or add a residency preference, which is a preference for admission of persons who reside or work in a specified geographic area (see 24 CFR 5.656(c)(1)(II)). If a residency preference is utilized, the preference must be in accordance with the non-discrimination and equal opportunity requirements contained in 24 CFR 5.105(a). This Worksheet will help show how the percentage of the population in the residency preference area compares to the demographics of the project's residents, applicant data, census tract, housing market area, and expanded housing market area. Please attach a map clearly delineating the residency preference geographic area.

Demographic Characteristic	Project's Residents (as determined in Worksheet 1)	Project's Applicant Data (as determined in Worksheet 1)	Census Tract (as determined in Worksheet 1)	Housing Market Area (as determined in Worksheet 1)	Expanded Housing Market Area (as determined in Worksheet 1)	Residency Preference Area (if applicable)
% White						
% Black or African American						
% Hispanic or Latino						
% Asian						
% American Indian or Alaskan Native						
% Native Hawaiian or Pacific Islander						
% Persons with Disabilities						
% Families with Children under the age of 18						
Other (specify)						

Worksheet 3: Proposed Marketing Activities -Community Contacts (See AFHMP, Block 4b)

For each targeted marketing population designated as least likely to apply in Block 3b, identify at least one community contact organization you will use to facilitate outreach to the particular population group. This could be a social service agency, religious body, advocacy group, community center, etc. State the names of contact persons, their addresses, their telephone numbers, their previous experience working with the target population, the approximate date contact was/will be initiated, and the specific role they will play in assisting with the affirmative fair housing marketing. Please attach additional pages if necessary.

Targeted Population(s)	Community Contact(s), including required information noted above.
White	Bay Cove Human Services, 60 Canal Street, Boston MA Sara Foster 617-788-1745 AAC, 76 Amory Street, Roxbury, MA 02119 Branda Rose 617-460-1255
Asian	Asian Community Development Corp, 38 Oak Street, Boston MA 02111 Alex Zhuang, Community Organizer 617-482-2380
American Indian	North American Indian Center of Boston, 106 S. Huntington Avenue, Boston MA 02130 Joanna Dunn 617-232-0343
Native Hawaiian	Cultural Survival, 215 Prospect Street, Cambridge, MA Polly Laureichild-Hartig, Director of Program Resources 617-441-5400
Hispanic	Allanza Hispana 408 Dudley Street, Roxbury, MA 02119 617-427-7175 Centro Latino 105 Windsor Street, Cambridge, MA 617-861-9408

Worksheet 4: Proposed Marketing Activities – Methods of Advertising (See AFHMP, Block 4a)

Complete the following table by identifying your targeted marketing population(s), as indicated in Block 3b, as well as the methods of advertising that will be used to market to that population. For each targeted population, state the means of advertising that you will use as applicable to that group and the reason for choosing this media. In each block, in addition to specifying the media that will be used (e.g., name of newspaper, television station, website, location of bulletin board, etc.) state any language(s) in which the material will be provided, identify any alternative format(s) to be used (e.g., Braille, large print, etc.) and specify the logo(s) (as well as size) that will appear on the various materials. Attach additional pages, if necessary, for further explanation. Please attach a copy of the advertising or marketing material.

Targeted Population(s) → Methods of Advertising ↓	Targeted Population:	Targeted Population:	Targeted Population:
Newspaper(s)	Asian	White	
Sanpan, /South Boston Tribu			
Radio Station(s)			
TV Station(s)			
Electronic Media	Hispanic	Hawaiian	
Allanza Hispana, Cultural Surv			
Bulletin Boards			
Brochures, Notices, Flyers	Indian		
North American Indian Ctr			
Other (specify)			

**AFFIRMATIVE FAIR HOUSING MARKETING PLAN (AFHMP)
EO/FH STATEMENT AND BOSTON FAIR HOUSING COMMISSION APPROVAL**

We, Gail Latimore, Executive Director of Codman Square NDC (Developer), and Brian Kean, Agent of Winn Management Company, LLC (Marketing Agent) agree not to discriminate or permit discrimination, upon the basis of race, color, religious creed, marital status, sex, age, ancestry, sexual preference, military status, disability, national origin, source of income or the presence of children in the sale and/or rental use and occupancy of the property known as:

Talbot Bernard SENIOR HOUSING, located at Dorchester, MA.

We understand that the Boston Fair Housing Commission (BFHC) administers the City of Boston's Affirmative Fair Housing Marketing Program and is responsible for review and approval of the Plan submitted in compliance with its requirements. Compliance with the AFHMP shall be determined by the BFHC for each phase outlined in the approved Plan. We agree to comply with the approved Plan; and we understand that if we do not adequately comply with the approved Plan, at each phase of the process, additional outreach and/or materials may be required by the BFHC. Furthermore, we understand that tenant/buyer selection cannot proceed without the BFHC's approval. Pursuant to the requirements stipulated in the NAACP v. HUD Consent Decree, we understand that we are required to list all vacant units with **METROLIST**, during the initial marketing period and whenever vacancies occur.

Developer's Signature
Gail Latimore,
Executive Director, CSNDC

Date

Marketing Agent's Signature
Brian Kean
Senior Vice President
Winn Management Company, LLC

Date

The BFHC has reviewed the Plan submitted by the Developer and/or its Agent. We find that the Plan complies with affirmative marketing requirements and constitutes an acceptable AFHMP. Therefore, the Developer may proceed with implementation and may continue to completion provided that it complies with the procedures approved by the BFHC. The BFHC shall be responsible for monitoring the success of the Plan and shall communicate non-compliance findings to the Boston Redevelopment Authority and/or the Department of Neighborhood Development.

Boston Fair Housing Commission, Program Director

Date

Boston Office of Civil Rights, Executive Director

Date

BRA/DND STATEMENT REGARDING
Talbot Bernard Senior Housing

Name of Development

In accordance with the City of Boston's Affirmative Marketing Policy, the Boston Redevelopment Authority (BRA) agrees to respond to BFHC notification(s) of non-compliance by imposing remedies, such as, withholding final designation and/or public funds, until the development is in compliance with the approved AFHMP.

BRA Director

Date

In accordance with the City of Boston's Affirmative Marketing Policy, the Department of Neighborhood Development (DND) agrees to respond to BFHC notification(s) of non-compliance by imposing remedies, such as, withholding final designation and/or public funds, until the development is in compliance with the approved AFHMP.

DND Director

Date

**AFFIRMATIVE FAIR HOUSING MARKETING PLAN
(AFHMP)**

I. PROJECT INFORMATION

A. Project Name: Talbot Bernard Senior Housing

Address: Talbot Avenue Codman Square, Dorchester
Street & No. Boston Neighborhood

Type – Description: Elderly Rental Housing
(Example, “Family - Rental”)

B. Developer Name: Codman Square NDC

Address: 587 Washington Street Tel: 617-825-4224
Street & No. Fax: 617-825-0893
Dorchester MA 02124
City State Zip Code

C. Owner Name: Codman Square NDC

Address: 587 Washington Street Tel: 617-825-4224
Street & No. Fax: 617-825-0893
Dorchester MA 02124
City State Zip Code

D. Sponsor Name: Codman Square NDC

Address: 628 Washington Street Tel: 617-825-4224
Street & No. Fax: 617-825-0893
Dorchester MA 02124
City State Zip Code

E. Agent/Officer authorized and responsible for carrying out the AFHMP

Name: Brian Kean, WINN Management Company, LLC Tel: 617-426-1175
Fax: 617-426-0992

Address: 484 Tremont Street
Street & No.
Boston MA 02116
City State Zip Code

F. City Project Manager: David West

PFD/DND X (or)BRA Tel: 617-635-0248

G. Number of Units and Projected Rent or Sales Price

Total Units 30

Total Affordable 30

TYPE	SRO	Studio	1 - BR	2 - BR	3 - BR	4 - BR
Project based Section 8	30					
<i>Rent/Sales</i>	Residents pay 30% of their income for rent	\$				
Tax Credit						
<i>Rent/Sales</i>	\$	\$				
HOME						
<i>Rent/Sales</i>	\$	\$				
Other Subsidy						
<i>Rent/Sales</i>	\$	\$				
Market Rate						
<i>Rent/Sales</i>	\$	\$				
UNIT TOTALS	30					
Handicap Accessible	2					

Maximum Income Limits by Household Size

HH	Income
<u>Size</u>	<u>Limit</u>
1	25,950

H. Construction Type: New x Rehabilitation Combination

I. Federal, State and Local Funding Sources:

- Federal Low Income Housing Tax Credit
- Mass DHCD HOME
- Mass DHCD HIF
- Mass DHCD Affordable Housing Trust
- Mass Development Brownfield FUND
- Federal 202 Program

J. Unit Affordability and Household Income Guidelines

- Are federal, state or local resources provided? Yes

If so, what type(s)? Federal 202 Program

K. PREFERENCE CATEGORIES

In the tenant/buyer selection process, will there be preference categories? Note all that apply.

Urban Renewal

First-Time Homebuyer

Boston Resident for
70% of units

BRA Certified Artist

X Other: All applicants must be at least 62 years old.

Handicap households have preference for 2 accessible units.

II. **MARKETING PLAN**

A. **Media Resources** (See list of recommended sources in Attachments)

- List the media to be used to advertise the availability of the units:

Name of Newspaper, Radio or TV Station	Racial/Ethnic Market
1. Boston Globe	Majority
2. South Boston Tribune	White
3. Boston Banner	African/American
4. Sampan	Asian
5. El Mundo	Latino
6. Dorchester Community News	Local

B. **Organizations and Agencies**

- Please list the organizations and agencies you will notify about the housing:

Community Agency/Organization	Racial/Ethnic Constituency(s)
8. Name: HOMESTART Address: 105 Chauncy Street Boston, MA 02111	Government
9. Name: MA Access: CHAPA Address: 18 Tremont St., Boston, MA 02108	Disabled Community

Elderly Resources

Boston Aid to the Blind
1980 Centre St. PO Box 22
West Roxbury, MA 02132
tel: 617-323-5111
fax: 617-323-6687

ABCD Parker Hill/Fenway Neighborhood Service Center
1455 Tremont St.
Boston, MA 02120
tel: 617-445-6000
fax: 617-445-6005

East Boston APAC
21 Meridian St.
East Boston, MA 02128
tel: 617-567-8857
fax: 617-567-8972

Fenway CDC*
73 Hemenway St.
Boston, MA 02115
tel: 617-267-4637
fax: 617-267-8591
www.fenwaycdc.org ; ksaccoccio@fenwaycdc.org

Mattahunt Community
100 Hebron St.
Mattapan, MA 02126
tel:617-635-5159
fax:617-635-8792

Orient Heights Community Center
86 Boardman St.
East Boston, MA 02128
tel:617-635-5120
fax:617-635-5005

United South End Settlements
566 Columbus Ave.
Boston, MA 02118
tel:617-536-8610
fax:617-536-9638

Boston Community Centers
1010 Mass Ave.
Boston, MA 02118
tel:617-635-4920
fax:617-635-4524

Boston Evening Medical Center
314 Commonwealth Ave.
Boston, MA 02115
tel:617-267-7171
fax:617-262-2608

Charlestown Golden Age Center
382 Main St.
Charlestown, MA 02129
tel:617-635-5175
fax:617-635-5647

Codman Square Senior Center
645 Washington St.
Dorchester, MA 02125
617-825-5000

Commission on Affairs of the Elderly
One City Hall Plaza Rm. 271
Boston, MA 02201
tel: 617-635-4366
fax: 617-635-3213
www.cityofboston.gov/elderly

Condon Community Center
200 D St.
South Boston, MA 02127
tel:617-635-5100

Curley Recreation Center
1663 Columbia Rd.
South Boston, MA 02127
tel:617-635-5104

Curtis Hall Senior Center
20 South St.
Jamaica Plain, MA 02130
tel:617-635-5193
fax:617-635-5010

East Boston Information Center
237 Marino St.
East Boston, MA 02128
tel:617-567-3116

East Boston Social Center
68 Central Square
East Boston, MA 02128
tel:617-569-3221
fax:617-569-9862

Freedom House
14 Crawford St.
Roxbury, MA 02119
tel:617-445-3700
fax:617-442-6201

Greater Boston Chinese Golden Age Center
5 Oak St. West
Boston, MA 02116
tel:617-423-7560
fax:617-482-8367

Kennedy Center
55 Bunker Hill St.
Charlestown, MA 02129
tel:617-241-8866
fax:617-241-5466

Kit Clark Senior Services
1500 Dorchester Ave.
Dorchester, MA 02122
tel:617-825-5000
fax:617-288-5991

Laboure Center
Karen Caputo
371 W. Fourth St.
South Boston, MA 02127
tel:617-268-9671
fax:617-268-3088

Nazzaro Center
20 North Bennett St.
Boston, MA 02114
tel:617-635-5166
fax:617-635-5053

Neighborhood Action Inc.
35 Bowdoin St.
Boston, MA 02114
tel:617-723-5800
fax:617-227-5243

Peterborough Senior Center
42 Peterborough St.
Boston, MA 02120
tel:617-536-7154

Roslindale Community Center
6 Cummins Highway
Roslindale, MA 02131
tel:617-635-5185
fax:617-635-5271

Seniority
Newsletter of Commission on Affairs of the Elderly
One City Hall Plaza Rm. 271
Boston, MA 02201
tel: 617-635-4366
fax: 617-635-3213
www.cityofboston.gov/elderly

West Ninth Street Senior Center
185 W. 9th St.
South Boston, MA 02127
tel:617-269-2112

West Roxbury/Roslindale YMCA
15 Bellevue St.
West Roxbury, MA 02132
tel:617-323-3200
fax:617-469-5255

AFFIRMATIVE MARKETING TIMELINE

Date: September 25, 2002

Project Name: Talbot Bernard Senior Housing

Contact Person: Sharon Riley

Telephone: 617-825-4224

Please complete the following timeline with projected dates:

	START	END
CONSTRUCTION:	12/02	12/03
AFFIRMATIVE MARKETING:	4/03	12/03
GENERAL MARKETING:	5/03	12/03
APPLICATION TAKING:	7/03	7/03
INITIAL SCREENING:	8/03	12/03
LOTTERY DATE	7/03	7/03
SELECTION COMPLETE:	9/03	12/03
OCCUPANCY:	10/03	12/03

NOTES: _____

RENTAL REGISTRATION FORM

METROLIST

SECTION 1 Developer/Development - Information

Contact Person: Jacqueline Hinds Henry Title: Property Manager Phone: (617) 825-888

Company's Name: Winn Management Company, LLC

Development Name (If Applicable): Talbot Bernard SENIOR HOUSING

Talbot Avenue Dorchester, MA 02124
Street Address(es) City Zip Code

Application- Taking: Dates: ESTIMATED July 2003 Hours: _____

Place: _____

Deadline Day/Date/Time: ESTIMATED LATE JULY 2003

SECTION 2 Building Information

Total Units: 30 Total Market-Rate 0 Market-Rate Rent Range _____

Building Type: _____ HUD Development _____ MHFA/Mass Housing Development
_____ 20 Units or Less X More than 20 Units

If the following categories do not adequately cover income ranges and affordability levels, please attach a separate sheet with the appropriate information.

Affordable Units

# Units	Type or BR Size	Price/Rent	Household Size	% Income	Income range
30	SRO	Section 8	1	30	At or below \$25,950

Note: Residents pay 30% of their income for rent.

Is the housing assisted by federal, state, or local financial resources/subsidies? Yes

If yes, specify program(s) Federal 202 Program

BRA/City/State Land Designation N/A

SECTION 3 HOUSING CHARACTERISTICS ----- CHECK ALL THAT APPLY

HEATING SYSTEM: Hot Water X Warm Air _____ Heat Pump _____
AMENITIES: Off-Street Parking _____ Garage _____ Porch/Deck _____
WHEELCHAIR-ACCESSIBLE: X
WHEELCHAIR-ADAPTABLE: _____
OTHER: _____

SECTION 4 DEED RESTRICTIONS/ CONTRACTUAL OBLIGATIONS/ PREFERENCES

Use & Resale Restrictions First-Time Homebuyer Urban Renewal

Boston Resident For 70% of units
Applicants must be at least 62 years old.
Handicap households have preference for 2 accessible units.

SECTION 5 Owner/Agent Certification

I do hereby certify the above information is correct to the best of my knowledge; and that the housing will be sold in a non-discriminatory and equal housing opportunity basis.

OWNER/AGENT NAME: Winn Management Company, DATE July 17, 2002

SIGNATURE _____
 Authorized Agent/Owner/Officer Date

ADDRESS c/o 702 Washington Street Dorchester, MA 02124
 STREET CITY ZIP CODE

PLEASE NOTIFY METROLIST WHEN HOUSING IS OCCUPIED
Phone: (617) 635-3321, FAX: (617) 635-3290
OR
P.O. Box 5996, Boston, MA 02114



**Equal Housing
 Opportunity**

OFFICE USE ONLY

ACTIVITY	DATE	STAFF	NOTES
RECEIVED	_____	_____	_____
ENTERED MIS	_____	_____	_____
TO COUNSELING AGENCIES	_____	_____	_____
Notes:			

BOSTON FAIR HOUSING COMMISSION - LOTTERY GUIDELINES - July 2002

1. Conduct preliminary screening to ensure that each application meets standard threshold criteria.
 - a. The application has been filled out completely.
 - b. The income indicated is within the income limits prescribed by HUD.
 - c. **Applicants must be at least 62 years old.**
2. Notify applicants who have not met threshold criteria.
3. All applicants who meet standard threshold criteria, are notified that they are eligible to participate in the lottery, and are informed of the lottery date. They may, or may not, be invited to attend.
4. The Boston Fair Housing Commission and the DND are given ten days notice, by fax or mail, of the date, time, and location of the lottery. The lottery should have at least two witnesses not connected with the developer. (Attach statement/signature.)
5. The applications, or cards bearing each applicant's name, I.D. code, or other identifier are all placed in one receptacle.
6. One manual lottery is held to determine each applicant's rank order for selection.
7. As each application/card is drawn from the receptacle, the number of the draw is announced and indicated on a master list, as well as on the application/card. For example the first application/card drawn will be indicated as #1 on the master list; and the application/card will be marked with a #1.
8. After the lottery, each applicant shall be notified of his/her place on the master list.
9. **The developer/agent will use the master list in assigning each application to its appropriate pool, e.g., the applications will be sorted by income, preference category, or other qualifier (such as, a pool for households who require wheelchair-accessible unit).**
10. **Each applicant's rank order from the master list will determine where his/her application fits in the appropriate pool.**
11. In the event that an applicant does not meet the lowest income eligibility requirements for the pool in which the applicant has been placed, his/her application is then transferred to the pool for which the applicant qualifies. The application is placed in the appropriate pool in rank order.
13. If the selected applicant does not pass final screening or decides not to purchase or rent a unit, the developer/agent shall move to the next ranked applicant for that specific pool.
14. When the developer/agent conducts final screening and rejects an applicant, the applicant should be notified of the reason and given at least five days to appeal the determination. Applicants should also be notified of their right to contact BFHC, HUD, or the MCAD, if they believe discrimination took place.

14. When the developer/agent conducts final screening and rejects an applicant, the applicant should be notified of the reason and given at least five days to appeal the determination. Applicants should also be notified of their right to contact BFHC, HUD, or the MCAD, if they believe discrimination took place.
 15. At the conclusion of the lottery, the developer/agent will send a copy of the master lottery list (overall ranking) to the BFHC which includes each applicant's name, and contains the following information:
 - Each applicant's neighborhood-city-town at time of application;
 - Selection status (obtained housing, or reason why they did not pass screening);
 - Household size;
 - Income category (maximum 50%).When City, State, or federal resources (land or funds) are involved, the list should also include the race of each applicant.
9. At the conclusion of the rent-up developer/agent will fill out and forward to BFHC an Occupancy Report detailing household data on renters in project.

SELECTION PROCESS INVOLVING PREFERENCES

Some preference categories may take precedence over all other categories. Order of preferences is as follows (unless funding source requires otherwise):

1. Wheelchair Accessible
2. Boston Residents

INCOME VERIFICATION PROCESS

Income is verified by the developer or its agent (this may be a property manager, broker, etc.) pursuant to DND income guidelines. Developer shall have applicant sign a certification stating that applicant's income will be recertified immediately prior to closing, if the initial certification by the DND took place more than three months prior. If income verification is being performed within three months of anticipated closing date, developer shall send the package of income verification to the DND for certification. Check with your Project Manager at DND for exact process.

Talbot Bernard Senior Housing

Talbot Avenue
Dorchester, MA 02124

Affordable Housing Applicants
Must be 62 years of age or older
Rents Based on 30% of Income

Maximum Income Limits

1 person - \$25,950
30 Single-Room Occupancy Units

Household Restrictions Apply

Applications must be picked up in person from Winn Management
702 Washington Street, Dorchester, MA
Between the hours of 9:00 a.m. and 4:00 p.m.

**Deadline for completed applications to be in lottery:
4:00 p.m. Monday, Estimated July 2003
Selection by lottery**

Households needing accessible units have preference for 2 units.
Boston Residents have preference for 70% of units.

**For more information call Winn Management
617-825-8888**

Sponsored by Codman Square NDC

Equal Housing Opportunity



TALBOT BERNARD SENIOR HOUSING
AFFIRMATIVE FAIR MARKETING & TENANT
SELECTION PLAN

OCTOBER, 2002

**Talbot Bernard Senior Housing
Marketing Plan and Tenant Selection**

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Overview

Talbot Bernard Senior Housing, located in Dorchester, is a 30-unit apartment project developed by the Codman Square Neighborhood Development Corp. Fronting Talbot Avenue in the Codman Square area of Dorchester, the property offers newly constructed single room occupancy (“SRO”) apartments.

Occupancy at the property is limited to those households who qualify under the HUD 202 Program— income cannot exceed 50% of the area median income. Rents are subsidized under the Section 8 program, allowing residents to pay 30% of their income to rent, with federal subsidy paying the balance. Additional restrictions are described in the Qualification for Admission section which follows.

The property’s management agent is Winn Management Company, LLC, 702 Washington Street, Dorchester, MA 02124.

FAIR HOUSING

It is the policy of Winn Management Company, LLC to promote equal opportunity and non-discrimination in compliance with, but not limited to, the following: Civil Rights Legislation (1964, 1968, 1988), Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, Executive Order 11063, MGL Chapter 151B, the Fair Housing Amendments Act of 1988, the American with Disabilities Act of 1990, and any other legislation protecting the individual rights of residents, applicant or staff which may subsequently be enacted.

In carrying out this Resident Selection Plan, **Talbot Bernard Senior Housing** and Winn Management will not discriminate on the basis of race, color, religion, national or ethnic origin, citizenship, ancestry, class, sex, sexual orientation, familial status, disability or handicap, military/veteran status, source of income, age or other basis prohibited by city, state or federal law.

Applications for housing are available during regular business hours at:

**Winn Management Company, LLC
702 Washington Street
Dorchester, MA 02125
(617) 825-8888**

Applications will be distributed in person, by mail or by facsimile.

Management may make exceptions to the procedures described herein to take into account circumstances beyond the applicant's control, for example, medical emergencies or extreme weather conditions.

For mobility-impaired persons, this document is kept at **702 Washington Street, Dorchester, MA** which is an accessible facility. The document may be examined Monday through Friday between the hours of 9:00 a.m. and 4:00 p.m. You must make advance arrangements to examine this document. Please call **(617) 825-8888**.

For Vision impaired persons, Talbot Bernard Senior Housing will provide a staff person to assist in reviewing this document. Assistance may include: describing the contents of the document, reading the document or sections of the document, or providing such other assistance as may be needed to permit the contents of the document to be communicated to the person with vision impairments.

For the hearing impaired Talbot Bernard Senior Housing will provide assistance in reviewing this document. Assistance may include the provision of a qualified interpreter at a time convenient to both the property and the individual with the hearing impairment. Please call (978) 745-4884 (TDD/TT accessible) to schedule an appointment.

For any other disability, assistance to ensure equal access to this document will be provided in a confidential manner and setting. The individual with disabilities is responsible for providing his/her own transportation to and from the location where this document is kept. If an individual with disabilities is involved, all hearings or meetings required by this document will be conducted at an accessible location with appropriate assistance provided.

The staff of Talbot Bernard Senior Housing will assist any applicants who might have difficulty completing the application form. This assistance might take the form of answering questions about the application, helping applicants who might have literacy, vision or language problems and, in general, making it possible for all interested parties to apply for housing. It is Talbot Bernard Senior Housing's policy to assist whenever possible, especially in regard to requests for accommodation made by persons with disabilities.

Every application must be signed by the applicant.

In accordance with Section 504, Talbot Bernard Senior Housing will make reasonable accommodation for individuals with handicaps or disabilities (applicants or residents).

Privacy Policy

It is the policy of Talbot Bernard Senior Housing to guard the privacy of individuals as required by the Federal Privacy Act of 1974 and to ensure the protection of such individuals' records maintained at the property.

Therefore, neither the property nor its agents shall disclose any personal information contained in its records to any person or agency unless the individual about whom information is requested shall give written consent to such disclosure.

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

Consistent with the intent of Section 504 of the Rehabilitation Act of 1973, any information obtained on handicap or disability will be treated in a confidential manner.

Qualification for Admission

Based on the eligibility requirements, Talbot Bernard Senior Housing may not admit ineligible applicants. In order to be **eligible**, applicants must meet several tests:

- The household size must be appropriate - the property is designed for single room occupancy so only one resident per SRO apartment is allowed.
- The applicant must have an annual income which is at or below the program income limits - the HUD Very Low Income limit, currently \$25,950 for a single person household. See the chart at Attachment #1.
- The applicant must be 62 years of age or older.
- The applicant must have a Social Security number; or sign a Social Security number waiver.
- The applicant must provide acceptable verification of alien status.
- The applicant must provide a birth certificate.
- The applicant must have a favorable landlord history of at least five (5) years.
- The applicant must have a favorable credit history.
- The applicant must meet the Tenant Selection criteria.
- The applicant must be assessed by the Multi-disciplinary Assessment Team.

All applicants will be **judged** on past habits and practices related to tenancy and not on any attribute or behavior which may associated with a particular group or category of persons of which an applicant may be a member. As discussed further in the Marketing section under Initial Rent-up, a lottery will be held if the number of applicants exceeds the available units. To qualify for the lottery, program eligibility for income and age will be verified. Other criteria will be applied when the applicant's name is reached on the waiting list. Note: Eligibility does not constitute acceptance for housing.

Marketing

The property's marketing plan will include written notification to community housing organizations and newspaper advertisements. All marketing efforts are intended to provide the property with a diverse tenant population. Newspaper ads will be placed in majority, African-American, Asian and Latino newspapers. Community contacts include both ethnic organizations and other groups which deal with prospective tenants of all racial and ethnic backgrounds. The community contacts to be notified and the newspaper advertising program are described in the Affirmative Fair Marketing Plan.

Initial Rent-up

The initial rent-up period will commence July, 2003 and be completed December, 2003. BFHC will be notified when marketing begins. If during the initial rent-up period the number of eligible applicants exceeds the available units, a lottery will be implemented in accordance with the BFHC Affirmative Fair Housing Marketing Manual (AFHMM). It is expected the units will be occupied beginning October, 2003.

Post Rent-up

The procedures in this Tenant Selection Plan will be applied. The project will continue to list vacancies with Metrolist and to follow the advertising program, when the property requires it.

Translations and Interpreters

All marketing information will be written in both Spanish and English. Standardized checklists provided by BFHC will be prepared.

Compliance and Reporting

BFHC's compliance requirements must be documented and reported as described in the AFHMM.

Application Intake and Processing

It is the policy of Talbot Bernard Senior Housing to accept and process applications in accordance with applicable HUD regulations and guidelines. The Marketing section addresses issues specific to the initial rent-up of the project, including a lottery if the pool of applicants exceeds the supply of available apartments.

All applications are reviewed at the property management office. All communication with applicants will be by first class mail. Failure of the applicant to respond within 7 days to any communication from Management may result in withdrawal of an application from further processing. Management may make exceptions to the procedures described herein to take into account circumstances beyond an applicant's control, for example, medical emergencies or extreme weather conditions.

Written applications will be accepted from anyone who wishes to apply. Subsequent review will eliminate applicants that do not qualify. Applications will be accepted if mailed or delivered to the management office C/O Winn Management Company, LLC, 702 Washington Street, Dorchester, MA 02125; office hours are 9:00 A.M. to 4:00 P.M. Extended office hours will be offered on three dates: two weekdays with evening hours until 8:00 P.M. and one Saturday.

Each application must be completed and signed by the applicant. The applicant must sign a release so management can conduct credit and landlord history references in accordance with this policy.

- All applications will first be reviewed for completeness; any that have not been completed in full will be returned to the applicant and will not be entered on the waiting list until all of the required information has been provided.
- Completed applications will be reviewed for income eligibility at the time of receipt. Any application with income exceeding the income limits or will be returned to the applicant with a cover letter explaining his/her ineligibility for this housing program.
- Once a fully completed application is determined by management to meet income eligibility requirements, the application will be placed on the appropriate waiting list and the applicant will be so notified by letter. The application will be placed on the waiting list by date and time of receipt. When a unit becomes available the application for the person next on the waiting list will receive final processing including review of credit, landlord references, etc., before a written offer of housing is made.

Waiting List Management

Opening and Closing Waiting Lists

If management determines a waiting list has a waiting period of one year or more the list may be closed. Should the property close a waiting list such action will be publicly posted.

Processing

All applications will be accepted. All eligible applications will be placed on the waiting list. After the initial rent-up, described in the Marketing section, eligible applicants not selected will be placed on the waiting list according to their lottery position. Subsequent applicants will be placed on the waiting list according to submission date, first come, first served. Applicants will be informed in writing of placement on the waiting list within 30 days of the receipt of the application. Applicants will be sent an annual waiting list update. It is the applicants' responsibility to inform the management office of any changes to their application throughout the year, i.e., address, phone number, priority, etc. All applicants who do not respond within 30 days of their receipt of the update form will be removed from the wait list. All ineligible applicants will be sent a letter stating the reason for the ineligibility.

NOTE: During the period when the waiting list is closed, the property will not maintain a list of individuals who wish to be notified when the waiting list is reopened.

Verification Requirements

All information required by the HUD rules and regulations and this Tenant Selection Plan will be verified.

Types of Verifications Required

All information relative to the following items must be verified:

1. Eligibility for admission (income, assets, asset income, family composition, social security number or waiver,)
2. Compliance with applicant selection criteria such as: ability to pay rent and abide by lease, criminal activity of any family member;
3. Favorable credit history (see section entitled Determination of Applicant Qualification)
4. Allowances, (age, disability/handicap, handicap expenses, medical costs).

All of the above information must be documented and appropriate verification forms or other documentation placed in the applicant/resident file.

Period of Verification

Only verified information that is less than 90 days old may be used for certification or recertification. Verifications may be extended for an additional 30 days with a telephone update. (A record of the update must be placed in the applicant's/resident's file.) Verified information not subject to change, such as date of birth, need not be re-verified.

Information previously obtained which is subject to change, and for which verification are more than 120 days old, must be re-verified.

Forms of Verification

Documentation employed as part of the verification process may include, but is not limited to, the following:

- Checklists completed as part of the interview process
- Verification forms completed and signed by third parties
- Letters
- Notes of telephone conversations with reliable sources
- Facsimile transmissions
- Reports of interviews
- Official documents issued by State or Government agencies

At a minimum, reports of interviews will indicate the date of the conversation, source of the information, name (and job title if applicable) of the individual contacted, and a written summary of the information received.

Management staff will be the final judge of the credibility of any verification submitted by an applicant. If management staff considers documentation to be doubtful, it may be reviewed by senior management which will make a ruling about its acceptability. Property staff will continue to pursue credible documentation until it is obtained or the applicant is rejected for failing to produce it.

Fraud

Any information provided by the applicant that proves to be untrue may be used to disqualify the applicant on the basis of attempted fraud. Talbot Bernard Senior Housing considers false information regarding the following to be grounds for rejecting an applicant:

Income, assets, income from assets, family composition, Social Security numbers, allowances, previous resident history, credit references, criminal history, employment status.

Unwitting errors that do not secure an advantage with regard to eligibility will not be used as a basis to reject applicants.

Sources of Information

Sources of information to be checked may include, but are not limited to:

The applicant by way of interview
Present and former landlords or housing providers
Present and former employers
Credit checks and landlord record services
Criminal checks
Banks

Preferred Forms of Verification

It is preferable to obtain written third party verification. If management is unable to obtain written third party verification, oral third party verifications are acceptable.

Should management be unable to obtain third party verifications, documents provided by the tenant can be utilized. If no other documentation is available tenant affidavits can be accepted.

Each file will be documented to show that the staff attempted to obtain third-party written documentation before relying on some less acceptable form of information. An applicant's falsification, misrepresentation, or concealment of information will be considered grounds for denying admission.

In order to obtain the necessary verifications a privacy release statement will be included in the application.

Verifying Annual Income

For both initial qualification and on an annual basis management will verify the applicant's/tenant's income and assets. Income will be projected for the subsequent 12 month period. HUD rules will be followed in this process.

Management reserves the right to contact credit reporting services and to take other steps it deems appropriate to confirm the accuracy of tenant provided information.

Determination of Applicant Qualification

All applicants for housing at Talbot Bernard Senior Housing will be screened according to the criteria set forth in this Tenant Selection Plan. The criteria:

- Rent payment history.
- A record of disturbance of neighbors, destruction of property, or housekeeping or living habits at prior residences which may adversely affect the health, safety or welfare of other residents or cause damage to the dwelling unit or development.
- Involvement in criminal activity on the part of the applicant which may adversely affect the health, safety or welfare of other residents.
- A record of eviction from current or previous housing or termination from residential programs.
- Ability and willingness to comply with the terms of the property's lease;
- Misrepresentation of any information which may be used to determine qualification.

General Principles of Screening

Based on all information received in the screening process and after applying the standards for rejection, Management will make the determination regarding an applicant's qualification for housing. Applicants can appeal management's decision - see the Appeals Procedure section.

How Applicant's History will be Checked

-- Listed below are the methods by which every applicant's compliance with the tenant selection criteria will be checked:

- Rent payment history:
- Credit bureau(s)
- Present housing provider or landlord (if a relative, additional information on the applicant's ability to comply with lease terms may be collected by the staff)
- Prior landlords or housing providers (up to five years)
- Landlord record services
- Utility suppliers (if applicable)
- Evidence of evictions or judgments against applicant as provided by any of the above
- Past performance in regard to disturbance of neighbors, destruction of property or housekeeping or living habits that would pose a threat to the safety, comfort or well-being of other residents. This will be checked by one or more or all of the following methods:
- Present housing provider or landlord (if a relative, additional information on the applicant's ability to comply with lease terms may be collected by the staff).
- Prior landlords or housing providers (up to five years).
- Landlord record services.
- Court records (evidence of evictions or judgments against applicant).

- Documentation of current use of illegal drugs on the part of the applicant will be sufficient grounds to reject the applicant.

NOTE: Applicant's behavior toward property management staff will be considered as an indication of future behavior toward neighbors. Physical or verbal abuse or threats by an applicant toward the property management staff will be noted in the file.

- Involvement in criminal activity on the part of any applicant. This will be checked by one or more or all of the following methods:
 - Present housing provider or landlord (if a relative, additional information on the applicant's ability to comply with lease terms may be collected by the staff).
 - Prior landlord or housing providers (up to five years).
 - Landlord record services.
- A record of having been evicted from housing or termination from residential programs. This will be checked by one or more or all of the following methods:
 - Property records.
 - Present and prior landlord(s) or housing provider(s).
 - Court records.

Note: date and circumstances of any past eviction will be considered in determining its relevance to occupancy at the property.

- Applicant's ability and willingness to comply with the terms of the lease at Talbot Bernard Senior Housing. This will be checked by one or more or all of the following methods:
 - Present and prior Landlord(s) and/or housing provider(s).
 - Court records.

Recommendation for Admission or Rejection

Management will consider all information received in the screening process, will apply the standards for rejection, and will consider mitigating circumstances in determining its decision to accept or reject an applicant. The following factors will not be considered in making its decision:

- Race
- Color
- Creed
- Religion
- Familial Status
- National Origin
- Age (other than compliance with the minimum age requirements)
- Sex
- Sexual Orientation
- Receipt of Public Assistance
- Handicap/disability, mental or emotional illness

If the applicant is eligible and passes the screening criteria, admission shall be authorized.

Acceptance and Move In

Rent and Security Deposit

Talbot Bernard Senior Housing will determine the monthly rent amount under HUD rules and regulations. The security deposit shall be \$500.00.

Offering a Unit

When an apartment becomes available for occupancy, it will be offered to the next qualified applicant on the waiting list. Failure to respond to an offer of housing within 5 business days will result in the rescission of the offer.

Prior to Move-In

- The applicant will sign the lease and related documents.
- The applicant and management staff will inspect the unit. Management will provide the applicant with a copy of the Apartment Condition statement/Move-In inspection form.
- The applicant will be required to pay the rent for the first month and security deposit by personal check, certified check or money order only. Cash will not be accepted under any circumstances.
- The applicant will be given a copy of the lease the Apartment Condition Statement, house rules, and a rent and security deposit receipt.

After Move-In

- The resident will be required to return the signed Apartment Condition Statement within 10 days of move-if he/she has not done so already.
- Resident must inform management of the telephone number for the residence or another phone number that management can leave a message for the resident.

Failure to Move in On Time

Failure to complete the move-in process, including signing of documents, payment of security deposit and rent within 5 business days of the offer of housing may result in the rescission of the offer of housing.

Occupancy Standards

The property has been designated by the U.S. Department of Housing and Urban Development as a single room occupancy (SRO) property. Occupancy is limited to the head of household and his/her spouse/companion. Children, (any person under 18 years of age), cannot reside in the property, temporarily or permanently.

Revised 02/01/04

Standards for Rejection

- I. An applicant shall be rejected for housing at Talbot Bernard Senior Housing, for any of the following reasons:
 1. The applicant has disturbed a neighbor or neighbors in a prior residence by behavior, which if repeated by a tenant of Talbot Bernard Senior Housing, would substantially interfere with the rights of other tenants to peaceful enjoyment of their units. Such behavior includes but is not limited to loud noises and partying, threatening behavior and other lease violations.
 2. The applicant has caused damage or destruction of property at a prior residence, and such damage or destruction of property, if repeated by a tenant of Talbot Bernard Senior Housing, would have a material adverse effect on the housing development or any unit in such development.
 3. The applicant has displayed living habits or poor housekeeping at a prior residence, and such living habits or poor housekeeping, if repeated by a tenant of Talbot Bernard Senior Housing, would pose a substantial threat to the health or safety of the tenant or other tenants or would adversely affect the decent, safe and sanitary condition of all or part of the housing.
 4. The applicant in the past has engaged in criminal activity, or activity in violation of M.G.L. chapter 151B, Section 4 and, if repeated by a tenant of Talbot Bernard Senior Housing, would interfere with or threaten the rights of other tenants to be secure in their persons or in their property or to the peaceful enjoyment of their units and the common areas of the housing development.
 5. The applicant has a history of non-payment or late payment of rent or other financial obligations. Specifically management will reject an applicant who: has been evicted from housing, for non-payment or for cause, within the past 5 years; has more than 2 late payments within any 12 month period within the past 5 years; owes rent or damages to a prior landlord. In addition, management will evaluate the applicant's ability to pay other financial obligations by reviewing credit reporting and other evidence. Specifically management will reject an applicant if the applicant's credit history shows: 2 or more charge-offs within the prior 5 years, more than 3 late payments within the prior 5 years or bankruptcy within the prior 5 years. The lack of sufficient credit history will not be grounds to reject an applicant.
 6. The applicant has a history of failure to meet material lease terms or the equivalent at one or more prior residences, and such failure, if repeated by a tenant of Talbot Bernard Senior Housing, would be detrimental to the housing development or to the health, safety, security or peaceful enjoyment of other tenants.

7. The applicant has failed to provide information reasonably necessary for Talbot Bernard Senior Housing to process the applicant's application.
 8. The applicant has misrepresented or falsified any information required to be submitted as part of the applicant's application, and the applicant fails to establish that the misrepresentation or falsification was unintentional.
 9. The applicant does not intend to occupy housing, if offered, as his/her primary residence.
 10. The applicant or household member is a current illegal user of one or more controlled substances as defined in M.G. L. Chapter 94 section 1. A person's illegal use of a controlled substance within the preceding twelve months shall create a presumption that such person is a current illegal user of a controlled substance, but the presumption may be overcome by convincingly showing evidence that the person has permanently ceased all illegal use of controlled substances.
- II. Prior to rejection, an applicant a Notification Letter, found at Attachment #2, will be sent to the applicant. The Notification Letter advises the applicant, lists the reason(s) for rejection, informs the applicant that mitigating circumstances could change the decision and explains that disabled applicants may be able to remedy the problem through reasonable accommodation. In weighing mitigating circumstances management shall consider all relevant circumstances including:
1. The severity of the disqualifying conduct
 2. The amount of time which has elapsed since the occurrence of such conduct
 3. The degree of danger, if any, to the health, safety and security of others, to the security of the property of others, or to the physical conditions of the housing development and its common areas if the conduct recurred
 4. The disruption and inconvenience which the recurrence would cause the housing provider;
and
 5. The likelihood that the applicant's behavior in the future will be substantially improved.

Credit checks may be useful when no rent payment history is available. However, the lack of a credit history (as opposed to a poor credit history) is not sufficient justification to reject an applicant.

Management will use a tiered process to screen applicants initially. It is not necessary for Management to collect all information before an applicant can be rejected. However, it is necessary for all information to be collected before an applicant can be accepted.

Appeals Procedure

1. Rejected applicants must file a written request for appeal within 14 days of the receipt of the rejection letter. The rejection letter will include language notifying the applicant of the right of appeal. The apartment will not be rented until the appeal process has been completed; see the sample Rejection letter at Attachment 2.
2. Management will schedule a conference within 5 business days of the receipt of the written appeal and will notify the applicant of the time and place of the conference.
3. A member of senior management and a representative from Codman Square Neighborhood Development Corp., both of whom were not involved in the discussion to reject the applicant, will attend the conference.
4. The applicant can bring an attorney or other representative to the conference.
5. The conference will be informal. The applicant can present any evidence relevant to the rejection, including mitigating circumstances: see the Mitigating Circumstances section for more information.
6. The Appeals Committee will notify the applicant in writing within 5 business days of the decision on the appeal. Should the Appeals Committee request additional information from the applicant or an assessment from a qualified third party, the applicant will be notified of the decision within 5 business days of the receipt of the additional information.

Mitigating Circumstances & Reasonable Accommodation

An applicant who is rejected will receive a written rejection letter which will inform the applicant of the reasons for rejection, advise the applicant of the right of appeal, and inform the applicant of his/her ability to claim mitigating circumstances which may change the rejection decision through the appeal process; see the sample Rejection letter at Attachment 2. During the application process the applicant may bring mitigating circumstances to management's attention.

The property shall have the right to request further information reasonably needed to verify the mitigating circumstances, even if such information is of a medically confidential nature. If the applicant refuses to provide or give access to such further information the property will give no consideration to the mitigating circumstance. Management must corroborate any information provided by the applicant. Information may be requested from one or more of the following: (with proper release forms):

- Letters from creditors indicating the satisfaction of balances owed
- Present and prior housing provider(s) and or landlord(s)
- Court Records, Probation Officers and law enforcement officials
- Service providers, program counselors, case workers, Doctors
- Any other sources the applicant determines will provide valuable information to determine eligibility.

If the evidence of mitigating circumstances presented by the applicant relates to a change in medical condition or course of treatment, the Property Manager shall have the right to refer such information to persons qualified to evaluate the evidence and verify the mitigating circumstance.

Alcohol and Drug Abuse

Applicants who claim that prior unsuitable behavior resulted from alcoholism or drug addiction and represent that they are not currently engaging in alcohol abuse or use of illegal drugs, must provide acceptable evidence of mitigating circumstances which would establish that:

- There is no current abuse of alcohol or use of illegal drugs (for illegal drugs, use shall constitute abuse).
- During the period for which the applicant has claimed no current use, the applicant's behavior shall be evaluated. Continued unacceptable behavior will result in the rejection of the applicants.

Note: All information which brings to light mitigating circumstances or the need for reasonable accommodation in regard to the Tenant Selection Process will be considered.

Applicants with Disabilities or Handicaps

It is illegal to reject an applicant because he or she has a handicap or disability or for reasons that could be overcome by a reasonable accommodation of the applicant's disability or handicap.

Applicants with disabilities or handicaps are entitled to consideration to accommodate their special needs in addition to those afforded to other applicants. If, even with reasonable accommodation, applicants with disabilities or handicaps cannot meet the Selection criteria they will be rejected. Such insurmountable problems might arise because of behavior or performance in past housing, inability to comply with the terms of the lease, income which does not meet qualifying criteria, bad credit, criminal activity or needed services from the property staff that would represent an alteration in the fundamental nature of the property.

Attachment #1

Income Limits

Maximum Income Limits for the property are:
One person household \$25,950.

Attachment #2

Rejection Letter

Date: _____

Dear Applicant(s):

We have reviewed your recent application for housing at Talbot Bernard Senior Housing. Please be aware that we have received a poor credit reference from The Info Center, which is reason to deny your application under our Tenant Selection Plan.

If there are mitigating circumstances relating to the decision made on your application, please file a written appeal within 14 days of your receipt of this letter.

If you have a disability and this situation is a result of the disability, you have the right to ask for a reasonable accommodation if it will remedy the situation.

If you believe you have been discriminated against in seeking housing you should contact the Boston Fair Housing Commission at (617) 635-4408 or the Massachusetts Commission Against Discrimination at (617) 635-4408 or the U.S. Department of Housing and Urban Development at (617) 565-5308.

If you have difficulty reading and/or understanding this letter, please have this letter translated or contact us with a translator.

SPANISH, PORTUGUESE, VIETNAMESE, FRENCH AND CHINESE TRANSLATION CLAUSES TO BE ADDED.

If we do not hear from you by _____ no **further action will be taken on your application.**

Sincerely,
WINN MANAGEMENT COMPANY, LLC

Management Office

BOSTON FAIR HOUSING COMMISSION - LOTTERY GUIDELINES - July 2002

1. Conduct preliminary screening to ensure that each application meets standard threshold criteria.
 - a. The application has been filled out completely.
 - b. The income indicated is within the income limits prescribed by HUD.
 - c. Any other threshold criteria established by the funding source or developer and approved by the BFHC.
2. Notify applicants who have not met threshold criteria.
3. All applicants who meet standard threshold criteria, are notified that they are eligible to participate in the lottery, and are informed of the lottery date. They may, or may not, be invited to attend.
4. The Boston Fair Housing Commission and the DND are given ten days notice, by fax or mail, of the date, time, and location of the lottery. The lottery should have at least two witnesses not connected with the developer. (Attach statement/signature.)
5. The applications, or cards bearing each applicant's name, I.D. code, or other identifier are all placed in one receptacle.
6. One manual lottery is held to determine each applicant's rank order for selection.
7. As each application/card is drawn from the receptacle, the number of the draw is announced and indicated on a master list, as well as on the application/card. For example the first application/card drawn will be indicated as #1 on the master list; and the application/card will be marked with a #1.
8. After the lottery, each applicant shall be notified of his/her place on the master list.
9. The developer/agent will use the master list in assigning each application to its appropriate pool, e.g., the applications will be sorted by income, preference category, or other qualifier (such as, a pool for households who require wheelchair-accessible unit).
10. Each applicant's rank order from the master list will determine where his/her application fits in the appropriate pool. For example, the first household that qualifies for a 2-bedroom unit at 80% of median income may be the sixth applicant pulled from the receptacle in the manual lottery, but the first applicant in the 80%, 2-bedroom pool.
11. In the event that an applicant does not meet the lowest income eligibility requirements for the pool in which the applicant has been placed, his/her application is then transferred to the pool for which the applicant qualifies. The application is placed in the appropriate pool in rank order.
13. If the selected applicant does not pass final screening or decides not to purchase or rent a unit, the developer/agent shall move to the next ranked applicant for that specific pool.

14. When the developer/agent conducts final screening and rejects an applicant, the applicant should be notified of the reason and given at least five days to appeal the determination. Applicants should also be notified of their right to contact BFHC, HUD, or the MCAD, if they believe discrimination took place.
15. At the conclusion of the lottery, the developer/agent will send a copy of the master lottery list (overall ranking) to the BFHC which includes each applicant's name, and contains the following information:
 - Each applicant's neighborhood-city-town at time of application;
 - Selection status (obtained housing, or reason why they did not pass screening);
 - Household size;
 - Income category (30%, 50%, 60%).When City, State, or federal resources (land or funds) are involved, the list should also include the race of each applicant.
10. At the conclusion of the rent-up developer/agent will fill out and forward to BFHC an Occupancy Report detailing household data on renters in project.

SELECTION PROCESS INVOLVING PREFERENCES

Some preference categories may take precedence over all other categories. Order of preferences is as follows (unless funding source requires otherwise):

3. Wheelchair Accessible
4. Boston Residents

INCOME VERIFICATION PROCESS

Income is verified by the developer or its agent (this may be a property manager, broker, etc.) pursuant to DND income guidelines. Developer shall have applicant sign a certification stating that applicant's income will be recertified immediately prior to closing, if the initial certification by the DND took place more than three months prior. If income verification is being performed within three months of anticipated closing date, developer shall send the package of income verification to the DND for certification. Check with your Project Manager at DND for exact process.