

5-Year PHA Plan (for All PHAs)	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 03/31/2024
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals, and objectives for serving the needs of low-income, very low-income, and extremely low-income families.

Applicability. The Form HUD-50075-5Y is to be completed once every 5 PHA fiscal years by all PHAs.

A.	PHA Information.								
A.1	PHA Name: Housing Authority of the City of Stamford PHA Plan for Fiscal Year Beginning: (MM/YYYY): 07/2025 The Five-Year Period of the Plan (i.e., 2019-2023): 2025-2029 Plan Submission Type ☒ 5-Year Plan Submission ☐ Revised 5-Year Plan Submission Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information on the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and the main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official websites. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. How the public can access this PHA Plan: The Plan will be available at the following locations: Charter Oak Communities, Main Office, 22 Clinton Avenue, Stamford CT 06901 Charter Oak Communities website www.charteroakcommunities.org Copies may be also be requested by calling 203 977-1400 ☐ PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below.) <table><tr><th rowspan="2">Participating PHAs</th><th rowspan="2">PHA Code</th><th rowspan="2">Program(s) in the Consortia</th><th rowspan="2">Program(s) not in the Consortia</th><th colspan="2">No. of Units in Each Program</th></tr><tr><th>PH</th><th>HCV</th></tr></table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV
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		PH	HCV						
B.	Plan Elements. Required for all PHAs completing this form.								
B.1	Mission. State the PHA's mission for serving the needs of low- income, very low- income, and extremely low- income families in the PHA's jurisdiction for the next five years. Housing Authority of the City of Stamford d/b/a Charter Oak Communities (COC) provides housing opportunities and human services to enable Stamford residents to thrive. Focused on the health, wellbeing and independence of our residents. COC works with local partners equally vested in the community's success to offer resident services, access to healthcare and wellness options, educational support and economic opportunities, and to ensure that everyone has a voice in our community. COC strives to provide Stamford residents with the ability to live in attractive, affordable housing in cohesive neighborhoods. We collaborate with local partners to provide residents with services and opportunities to unlock their full human potential. COC has set new standards for public-assisted housing by creating residences that are an asset to the Stamford community, strengthening neighborhoods, and helping our residents become more self-sufficient.								
B.2	Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low- income, very low-income, and extremely low-income families for the next five years. Refer to the attachment.								
B.3	Progress Report. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan. Refer to the attachment.								
B.4	Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA's goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking.								

	The goals and objectives of Housing Authority of the City of Stamford d/b/a (COC) VAWA Policy are as follows: A. Maintain compliance with all applicable legal requirements imposed by VAWA; B. Ensure the physical safety of victims of actual or threatened domestic violence, dating violence, sexual assault, stalking and human trafficking; C. Provide and maintain housing opportunities for victims of domestic violence, dating violence, sexual assault and stalking and human trafficking; D. Create and maintain collaborative partnerships between the COC, law enforcement authorities, victim service providers and others to promote the safety and well-being of victims of actual or threatened domestic violence, dating violence, sexual assault, stalking and human trafficking; and E. Taking appropriate action in response to an incident or incidents of domestic violence, dating violence, sexual assault, stalking, and human trafficking affecting individuals assisted by the COC.
C.	Other Document and/or Certification Requirements.
C.1	Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan. The below outlines significant amendments and/or modifications that have been carried over from prior year's plans. While they have been previously noted, except for #7, they are activities that are currently pending and will be ongoing. High priorities include conversion of LIPH Program units under the Rental Assistance Demonstration (RAD)/Section 18 Blend program during 2025 to convert the remaining units at Stamford Manor and close-out the LIPH Program and terminate the LIPH Annual Contribution Contract (ACC). 1. A decision to request a voluntary conversion of public housing to Housing Choice Vouchers. 2. Actions to reposition any remaining federal property under the Rental Assistance Demonstration (RAD)/Section 18 Blend program or through a refinancing that requires disposition under Section 18 of the 1937 Housing Act to be implemented. 3. Seeking to use Faircloth subsidies to convert a housing development to a RAD Program property. 4. Revisions to the ACOP & Admin Plan to implement new program requirements and options under the Housing Opportunities through Modernization Act (HOTMA), 5. Revisions to screening standards for both LIPH and HCV Programs considering any changes in Connecticut Law or best practices concerning criminal background screening. 6. Decisions to open a waiting list for a specific period. 7. Revisions to legal policies regarding pre-termination notices in accordance with updated federal regulations.
C.2	Resident Advisory Board (RAB) Comments. (a) Did the RAB(s) have comments to the 5-Year PHA Plan? Y ☐ N ☒ (b) If yes, comments must be submitted by the PHA as an attachment to the 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.
C.3	Certification by State or Local Officials. Form HUD-50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.
C.4	Required Submission for HUD FO Review. (a) Did the public challenge any elements of the Plan? Y ☐ N ☒ (b) If yes, include Challenged Elements.
D.	Affirmatively Furthering Fair Housing (AFFH).
D.1	Affirmatively Furthering Fair Housing. (Non-qualified PHAs are only required to complete this section on the Annual PHA Plan. All qualified PHAs must complete this section.) Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year PHA Plan. The 5-Year PHA Plan provides the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families and the progress made in meeting the goals and objectives described in the previous 5-Year Plan.

Public reporting burden for this information collection is estimated to average 1.64 hours per year per response or 8.2 hours per response every five years, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.

Form identification: CT007-Housing Authority of the City of Stamford form HUD-50075-5Y (Form ID - 3199) printed by Natalie Coard in HUD Secure Systems/Public Housing Portal at 04/17/2025 04:39PM EST

Charter Oak Communities

Major Agency Goals & Objectives

Five Year Rolling Plan

Each year the Housing Authority of the City of Stamford d/b/a Charter Oak Communities (“COC”) updates its Major Agency Goals & Objectives to maintain a current working plan for the seven (7) areas which broadly cover organizational components for a quasi-governmental affordable housing real estate operation.

A) Asset Management

“Asset Management” covers systems and organizational capacity to oversee the various owned real estate assets of the Authority as well as repositioning of the specific properties through administrative policy changes. This includes regulatory compliance, customer services, property management and related systems that support these functions such as Information Technology, staff expertise and the creation of new or revised administrative policies. In addition, portfolio strategic planning falls under this heading as well as modernization and extraordinary maintenance activities that do not use leveraged financing mechanisms.

A.1) Refine program administration in a manner that sustains full regulatory compliance and improves customer service.

Short Term (12 to 24 months)

1. Continue to develop cross function collaborations to excel in the area of asset-based budgeting and management. Use multi-year budget projection techniques and data analytics to drive operational and financial sustainability and growth.
2. Develop measurable property and program goals and objectives as part of the operating and capital budget development process to highlight and address short- and long-term sustainability opportunities and challenges.

3. Continue an internal and external benchmarking process for program compliance functions (procurement, tenant file reviews, payroll, etc.) to ensure HUD regulatory, Federal and State Laws and COC policies are maintained and achieving desired optimal results.
4. Evaluate the technological and process change options for more extensive and varied outreach to contractors and vendors through online and web-based systems. Potential reduction in costs by leveraging annual purchasing volume; reduced staff administrative time; and the provision of enhanced internal controls by each procurement step being automatically tracked will not only benefit COC operations but may become a marketing tool for 3rd party property management opportunities.
5. Initiate the conversion of documents from FileVision to Yardi's document management system to ensure better integration of documents and data, enhance accessibility, and maintain compliance with records retention policies.
6. Implement Yardi as the new enterprise-wide Management Information System (MIS). The Yardi solution encompasses all aspects of COC program operations, financial processes and reporting needs.
7. Update policies and procedures to implement the Housing Opportunity Through Modernization Act (HOTMA).
8. Prepare and plan for the transition from Housing Quality Standards inspections to the new inspection model, National Standards for the Physical Inspection of Real Estate (NSPIRE).

Medium Term (25 to 48 months)

Long Term (49+ months)

1. Continue implementation of objectives described above

A.2) Improve customer service through more effective uses of technology.

Short Term (12 to 24 months)

1. Continue to evaluate and deploy new website capabilities that include additional self-service and interactive features to enhance the customer experience. Web-enabled features may consist of on-line work orders, the ability to apply for program participation online, streamlined vendor procurement opportunities, and opportunities to engage with social media platforms.
2. Complete the end-user training and final deployment of collaboration software (Office 365) to improve cross-functional user collaboration across the organization creating a more fluid and secure environment.

3. Develop user training classes and FAQ's derived from the data retrieved from the IT Ticketing System to better educate and address recurring computer related issues which will result in reduced business downtime and improve employee productivity.
4. Continue to perform periodic Cyber Security Assessment (CSA) reviews with external vendor of all local and hosted systems and organizational processes and procedures. Ensure we remain vigilant in our Cyber-Security technology through continuing education, real-time reviews and solid organizational policies and procedures.
5. Continuously plan, evaluate, and deploy IT systems and policies to ensure they are meeting COC business needs including telecommunications, internet reliability and connectivity and remote access capabilities.
6. Expand use of technological tools, building upon practice of using systems to manage information flows, improve accuracy and integration, and to support asset management function. Fully implement Rent Cafe for applicants and residents. Additionally, we will develop and implement the legal module for more efficient tracking of lease violations and initiate the use of Rent Grow, Yardi's verification system.
7. Complete the development of the Written Information Security Program (WISP) – The WISP has been adopted by the Board of Commissioners. It includes a Business Continuity Plan to address user access during an adverse event and includes policies and procedures related to the use of technology systems. The final sections will be completed within the next year.

Medium Term (25 to 48 months)

Long Term (49+ months)

1. Continue implementation of objectives described above.

A.3) Ongoing transition to a site-based management paradigm that includes the use of full use project-based budgets, site-based waiting lists and site-based offices

Short Term (12 to 24 months)

1. As part of the Yardi system deployment, develop standardized procedures and internal controls that support the Property Management/Accounts

Receivable that will improve workflow and efficiencies, reduce debts owed, and streamline procedures between departments.

2. Implement annual review process to assess financial and operational conditions at each development. Make determination if a specific development could be candidate for refinancing/redevelopment outside of the public housing program.
3. Deploy BizView, COC's new on-line budgeting software solution, to enhance collaboration, improve data collection and analyses for operating and capital budgets.

Medium Term (25 to 48 months)

1. Prepare and develop site specific management plans for newly acquired private properties in targeted neighborhoods.

Long Term (49+ months)

1. Continue implementation of objectives described above.

A.4) Maintain security and public safety systems at the highest levels permitted by available funding

Short Term (12 to 24 months)

1. Continue to engage Stamford Police Department in comprehensive security plan. Incorporate neighbors from the commercial and market rate housing communities.
2. Continue to monitor security systems and technology options at all properties to determine safety solutions (i.e. cameras-controlled access points) and evaluate and refine COC overall security plan.

Medium Term (25 to 48 months)

1. Continue to identify and apply to grant opportunities to support security solutions.

Long Term (49+ months)

1. Continue to identify and apply to grant opportunities to support security solutions.

A.5) Improve Facilities Management Systems to support site- based Management and Property Planning

Short Term (12 to 24 months)

1. Review and update the resident charge list to reflect current cost of supplies and labor for all properties. Reviews will be conducted on a property/program basis to maximize areas of opportunity for increased potential revenue and to serve as a deterrent for unit damages and abuse.
2. Update Preventative Maintenance plans for all properties and review maintenance schedule.

Medium Term (25 to 48 months)

1. Continue implementation of objectives described above.

Long Term (49+ months)

1. Update programs as appropriate based on modernization activities.

B)Development & Redevelopment

“Development & Redevelopment” covers activities that add dwelling units to Stamford’s housing stock or activities related to the replacement, revitalization or repositioning of existing hard assets of the Authority. Activities that involve real estate finance using private sector funds which may or may not be combined with public sector grants fall under this heading.

B.1) Diversify the Housing Portfolio of the agency in terms of types of funding and financing sources; types of housing (family, elderly & supportive); and range of incomes served.

Short Term (12 to 24 months)

1. Continue development process for Vidal Court, a state-aided housing development, utilizing a wide range of public and private funding sources

to support development and operations, including federal project-based rental assistance and federal Replacement Housing Factor funds.

- a. Identify potential sites and funding sources for Phase V off-site development.
2. Complete the 61-unit first phase of the full redevelopment of Oak Park, a 166-unit State sponsored family development.
3. Close financing and commence construction of the 43-unit second phase of the Oak Park redevelopment
4. Commence predevelopment for the 63-unit final phase of the Oak Park redevelopment, including development team procurement and design and engineering.
5. Close financing, commence and complete second elevator and stair tower installation at Quintard Manor.
6. Identify, evaluate and, if appropriate, acquire existing private properties for redevelopment in targeted neighborhoods (i.e. Stamford West Side) or elsewhere within Stamford to support mixed-income, public housing redevelopment efforts or expansion of the portfolio.
7. Submit applications for conversion of Stamford Manor from federal public housing under the RAD-Section 18 Blend 90-10 program.

Medium Term (25 to 48 months)

1. Acquire a development site for Phase V of the Vidal Court redevelopment effort and commence predevelopment activities.
2. Consider the acquisition of existing multi-family housing developments suitable for rehabilitation.
3. Consider provision of development consulting services to other housing authorities or non-housing authority entities wishing to develop, acquire, or preserve affordable housing
4. Obtain final HUD approval, close financing and complete renovations at Stamford Manor under RAD-Section 18 Blend 90-10 program
5. Complete conversion of remaining federal units in mixed-income developments under the RAD-Section 18 Blend 90-10 program
6. Complete the second phase of the Oak Park Redevelopment
7. Complete predevelopment activities for third and final phase of the Oak Park redevelopment, including obtaining funding commitments. Close financing and commence construction.

Long Term (49+ months)

1. Research available expiring use properties in Stamford and/or acquire an expiring LIHTC, 221(d), Section 236 development or other expiring affordable housing development.
2. Complete construction of third and final phase of the Oak Park redevelopment.

C) Leased Housing Programs

“Leased Housing Programs” refer to the use of rental subsidies in either private owned units or in units under Authority ownership. The primary program under this heading is the Section 8 Housing Choice Voucher Program and any specialized set-asides of Section 8 used for meeting community needs such as supportive housing or geographic deconcentration of poverty. Administrative systems that support the use of rental subsidies and related quality control and program performance evaluation tools also fall under this heading.

Short Term (12 to 24 months)

1. Continue to utilize project-based Housing Choice Vouchers for supporting Authority development efforts including family, supportive and elderly facilities.
2. Continue to refine and utilize the HCVP 2 Year Model to maximize voucher utilization while remaining within budget authority levels.
3. Utilize tenant-based and/or project-based Housing Choice Vouchers to support Rental Assistance Demonstration (RAD) application.
4. Update policies and procedures to implement the Housing Opportunity Through Modernization Act (HOTMA).
5. Prepare and plan for the transition from Housing Quality Standards inspections to the new inspection model, National Standards for the Physical Inspection of Real Estate (NSPIRE).
6. Initiate Document Management conversion from FileVision to Yardi's document management system to integrate documents and data, allowing for increased accessibility and compliance with records retention.
7. Expand use of technological tools, building upon practice of using systems to manage information flows, improve accuracy and integration, and to support asset management function. Fully implement Rent Cafe for applicants, participants, and landlords. Additionally, we will develop and implement the Request for Tenancy Approval (RFTA) process for more efficient tracking of lease-ups and Housing Assistance Payments (HAP) contract execution.
8. Identify ongoing technical and operational opportunities that will support a productive hybrid work environment and the delivery of secure remote service. These opportunities will enhance the employee experience while streamlining operational effectiveness.

Medium Term (25 to 48 months)

1. Increase outreach by conducting workshops for landlords involved in failed Housing Quality Standard (HQS) inspections to streamline the inspection process and reduce the administrative burden.

Long Term (49+ months)

1. Continue implementation of objectives described above.

D) Supportive & Resident Services

“Supportive & Resident Services” covers all Authority initiatives that cover household-based economic development efforts such as the Family Self-Sufficiency Program or services targeted to specific sub-populations to assist them in maintaining their residency or ability to be program participants.

Short Term (12 to 24 months)

1. Continue to partner with multiple Stamford-area organizations to align and focus resources on COC and analogous local populations. This alignment will leverage individual (i.e. ‘siloe’d’) interventions and produce a ‘multiplier’ effect. The result will be quantifiable and have a sustained impact.
2. Continue to be a catalyst for resident-led initiatives at all properties and COC communities. This effort will increase resident participation, foster resident leadership and improve ownership of outcomes by residents.
3. Develop a monitoring and evaluation plan in collaboration with Family Centers to assess the impact of support and resident services, programming and staff. Using a variety of tools such as surveys, resident assessments, and community-level data, this information will be used to improve and refine services and programs.

Medium Term (25 to 48 months)

1. Analyze program data collected from the evaluation plan above to improve and refine services. Continue to collect quantifiable data to ensure maximum resident support and engagement.
2. Coordinate and host COC community-wide events to strengthen our resident relationship, enhance the organization's reputation, and foster sustained support from surrounding neighborhoods.

Long Term (49+ months)

1. Continue implementation of objectives described above.

E Organizational Administration

“Organizational Administration” references initiatives which deal with human capital, financial management, information technology, risk services, purchasing, risk management and any other strategic administrative functions which enhance or improve the operations and the positioning of the Authority.

Short Term (12 to 24 months)

1. Continue to adhere to the document retention policy including the disposal/archiving of historical and/or stored documents.
2. Partner with Insurance Consultant to maintain a robust, efficient insurance program that ensures proper coverage levels and reduces risk across the portfolio. Provide training and education for staff and Commissioners on insurance procedures and risk management with the best practices.
3. Provide training to all staff and residents on the “Safety First” program implemented by the COC Safety Committee. Partner with the USI Risk Management Department, the Stamford Police Department and others to implement improvements to protect our employees and residents from potential threats.
4. Implement the revised Investment Policy that allows for longer maturities for defined funds with additional oversight and added reporting of benchmarking and performance standards.
5. Continue to provide on-going cyber security protocols and formal training for staff to reduce risk and protect confidential and sensitive data.
6. In accordance with the Board’s Fiduciary Checklist, continue to perform quarterly policy reviews with the Board of Commissioners and COC Leadership. This best practice will ensure understanding and compliance with important COC adopted policies and ensure that key policies remain current and updated.
7. Prepare the fourth Annual Comprehensive Financial Report for COC. This Annual Report outlines accomplishments and future goals and initiatives and provides additional information on 10-year historical financial trends, revenue and debt capacity, demographic and economic information and detailed operating information. The report enhances financial transparency and provides valuable information for the users of our financial statements.
8. Implement Insight/Bizview software to enhance budget development process; improve data from Yardi will make all financial reporting processes more efficient, accurate, flexible and enhance collaborative across the organization.
9. Continue to implement Charter Oak Learning Exchange (COLE) that will act as a depository of our employee and board training and

development materials. Incorporating Yardi role-based learning plans to support and access employee skills and provide development opportunities. Access to on-line curriculum will improve on-boarding, training, engagement and provide self-guided professional development skill-building opportunities.

10. Continue to optimize ADP modules including the implementation of the recruitment module and the ongoing deployment of the performance modules that will standardize and enhance process efficiencies, including significant timesaving's for HR and departmental recruiting efforts.

Medium Term (25 to 48 months)

1. From a recruiting, retention and employee relations perspective, re-evaluate current and prospective employees' needs; what the competition is offering; and the promotion of our current COC "brand" to compete within the employment market.
2. Conduct the third formal Cyber Security Assessment. Create and action plan to remediate findings to reduce cyber security risk factors for the organization.

Long Term (49+ months)

1. Continue implementation of objectives described above.

F) Entrepreneurial Activities

"Entrepreneurial Activities" include income generating actions (i.e. fee-for-service) and the creation of entities to serve societal needs, leveraging the core competencies, reputation and relations of the parent entity (i.e. Charter Oak Communities).

Short Term (12 to 24 months)

1. Continuing development of the enterprise cost center for consulting with 3rd party property owners, issuing bond financing and assisting the City of Stamford to manage the marketing, leasing and servicing of below market rate (BMR) units/properties.
2. Assist the City of Stamford in implementing the Stamford Housing Affordability Study. Develop a Needs-Based Housing Study to assess true housing needs by demographic sector, align supply-side and demand-side priorities and inform policy development and funding priorities.

3. Participate and provide guidance to the regional housing initiatives and the Community Health Improvement Plan (CHIP) to advocate for favorable conditions and funding in support of housing initiatives in Stamford and surrounding communities.
4. Continue implementation of Dovetail: SIP, Inc., COC's social enterprise entity, as a platform for addressing complex socio-economic challenges of the Stamford community through support of Vita Partnership programs, Stamford Cradle to Career, Youth Mental Health Alliance, Pathways to Employment Growth, Fairgate Farm and other initiatives.
5. Implement innovative approaches to leverage the asset value and subsidy opportunities to create more affordable housing opportunities for Stamford, including Housing Choice Vouchers, State Policy Advocacy, Rental Assistance Demonstration, Streamlined Voluntary Conversion, etc.
6. Provide targeted outreach and educational initiatives to inform the community about the Below Market Rent Program, ensuring greater awareness, understanding, and participation.

Medium Term (25 to 48 months)

1. Assist City in implementation of Housing Affordability Plan and Needs-Based Housing Plan.
2. Implement innovative approaches to leverage COC's asset value and subsidy opportunities to create more affordable housing opportunities for Stamford.
3. Develop Dovetail into a partially self-sustaining entity by demonstrating impact and continuing to strengthen the social services/economic development ecosystems for Stamford and surrounding areas.

Long Term (49+ months)

1. Continue development and implementation of above activities

G) Transformational Activities

While there is an overlap between “entrepreneurial” and “transformational” activities, the difference between the two can be described as the former being about new business lines and expansion of business lines while the latter pertains to COC becoming a new kind of entity – one that in and of itself is distinct from its public housing agency roots.

Short Term (12 to 24 months)

1. Undertake a comprehensive Strategic Planning effort to ‘refresh’ COC’s 2030 *Strategic Plan*. Embed Core Objectives in key resource investments (i.e., human, financial, reputational), policy development, departmental goals, board engagement, training programs and support for continuous improvement policies.
2. Participate in initiatives to further the objectives of the City of Stamford and a broad base of local stakeholders to become a healthier, self-sufficient and resilient community with a particular focus on underserved and under-represented populations. This effort will largely be implemented through strategic partnerships under the Vita Health and Wellness Partnership and the Stamford Cradle to Career initiative.
3. Provide support and leadership for regional initiatives to expand the supply and equitable access to housing and complementary services that are accessible to a broad range of populations that are not adequately served by the existing housing market.
4. Guide and assist the City of Stamford, through the mayor’s office, elected and appointed officials and community leaders to implement the recommendations of the Stamford Housing Affordability Plan.

Medium Term (25 to 48 months)

1. Continue implementation of objectives described above.

Long Term (49+ months)

1. Continue implementation of objectives described above.

Charter Oak Communities
Strategic Goals and Outcomes FY 2025

Strategic Goal	Actions	Outcome
Finance		
Evolve the business impact of superior financial reporting and analyses by incorporating industry benchmarks and other measurements to access operational and financial indicators that support organizational sustainability and growth initiatives. Enhance organizational short-term and long-term planning for operational and capital budgets to promote and facilitate a more collaborative and engaged planning and monitoring process at all levels of the organization.	> Started the implementation of the Budgeting Software solution (BizView). > Test the budget system and process with the FY 2024 budget for selected Tax Credit Properties. > Developed the Finance Board Liaison role to be a conduit between the Board of Commissioners and the operating departments and their associated committees. The goal is to facilitate communication, and support Board-level financial information for decision-making.	Providing board and organizational staff relevant and timely information for decision making and understanding. Building a more holistic approach to budgeting and financial planning will support our need to make strategic resource-based decisions and improve the outcome of those decisions.
Mature the COC Investment Program collaborating with an Investment Consultant to improve consistent overall investment returns.	> Invested idle cash in compliance with Adopted Investment Policy, generating good results on investment returns. > Developing Board-level quarterly and annual investment reporting, reviewing the Investment Policy for possible updates and having quarterly Investment Committee meetings to review performance and returns against established benchmarks.	To earn (at least) consistent market rate investment income on a portion of our idle cash by moving to a more active investment approach using the expertise of an Investment Consultant.
Aligned with MIS goals across departments, create a strategy to evaluate, plan and deploy modernized and secure technology solution (to replace HAB) that harnesses new information delivery models and improves our business operations (with MRI or other provider).	> Established a Senior Staff Committee tasked with oversight of the enterprise-wide MIS system upgrade. > We have completed the system evaluation process and have selected Yardi as our provider. Implementation to begin in March 2024, with completion planned for 12 - 14 months.	Modernize the enterprise-wide financial system - increase staff efficiencies through automation, system integration and improve overall compliance and accuracy of financial data and transactions.
Information Technology		
Aligned with MIS goals in Property Management, to enhance Resident-Management Integration and organizational capacity, process and benefits to establish a modernized and secure IT infrastructure that harnesses new information delivery models. Assess opportunities and challenges for residents to obtain online access. Aligned with MIS goals across departments, create a strategy to evaluate, plan and deploy modernized and secure technology solution (to replace HAB) that harnesses new information delivery models and improves our business operations (with MRI or other provider(s)).	> Established a Senior Staff Committee tasked with oversight of the enterprise-wide MIS system upgrade. > We have completed the system evaluation process and have selected Yardi as our provider. Implementation to begin in March 2024, with completion planned for 12 - 14 months.	Modernize the enterprise-wide system by implementing MRI - increase staff efficiencies through automation, system integration and improve accuracy and security of data and transactions, and improve the customer experience.
Continue to develop a modernized and secure IT infrastructure that harnesses new information delivery models to enhance voice, network, data and video capabilities, providing secure platforms for communication and business critical data and IT assets.	> In collaboration with Whittlesey, we have reviewed and updated all current applicable IT policies and added several new policies that are now incorporated into the overall Written Information Security Policy (WISP). The development of the WISP was an important recommended improvement highlighted in the 2021 Cyber Security Assessment Report. The WISP was adopted via resolution by our Board of Commissioners in March 2023. > Completed the install of Nextgen firewall infrastructure from Palo Alto Networks across entire perimeter of COC's network. Engaged Board IT Liaison to review project scope and viability and provided an executive summary to Board of Commissions. > Deployed enterprise wide hardware and software inventory management and monitoring system to better control the management of COC technology assets.	Evaluation, communication and remediation of IT risk areas will lead to system or process improvements that may result in cost savings, enhanced communication channels, and will increase performance and systemwide security.
Stabilize cyber preparedness and awareness programs supporting a "Security First" culture. Use data to provide real-time awareness training and incident mitigation for high-risk employees and processes	> A new assessment was performed Q3 of 2023 with remediation efforts underway. > Completed activities and education for October 2023 Cyber Security Awareness Month. The month is packed with lots of learning activities, guest speakers and a creative and engaging culminating event at the end of Cyber Security month. > Planning for the release of the new IT policies with staff training for Q1 2024.	By establishing cyber resilience across the organization, staff will strengthen COC and be more prepared for new sophisticated cyber threats in real-time.
Risk Management		
Maintain a stable insurance program year over year, ensuring compliance with lender-regulator coverage requirements while striving for cost effective options	>Complied with several carrier preventative risk control recommendations (including cyber recommendations, emergency pull cords and water leak monitoring) with the hopeful outcome of stable renewal pricing. > Completed Policy renewal process complete - including marketing and meetings with insurance carriers to maintain our best -in-class status with our providers. > Utilized USI to market and select a new provider of workers compensation insurance, for an annual savings of \$15K and the creation of a strategic partnership with a specialized best-in-class provider in the CT housing industry.	By actively participating in the insurance renewal process with our consultants, we are better equipped to understand risks that can be managed through insurance, ensure the right coverages and understand policy limitations so we can protect COC and Rippowam Corporation from unnecessary risk.

Incorporate Internal Reviews of applicable Risk Management Policies; utilize insurance consultant and Loss Control Support Team to assist in assessment of policies and procedures to mitigate risk for COC and Ripp Corp	> Revamped and relaunched the Employee Safety Committee with guidance from our workers comp and insurance consultant.	Maintain an active and effective Safety Committee that proactively addresses and recommends activities that improve the safety and security of our residents and employees and reduces known risks to the organization.
Human Resources		
Develop new performance appraisals in the ADP Performance Management Module. Annual and new hire performance reviews are completed. Ongoing rollout and company integration with operations and others of new performance reviews in the ADP Module.	Human Resources attended some department meetings to further explain the process and encouraged collaboration with the manager and employees, as well as provided one-on-one training with managers. HR also encouraged senior management to complete Part One of the process.	Part One of this process should have been done in 22Q3; however, due to significant staffing turnover and challenges, a few areas have not been able to complete this part. Once staffing stabilizes, Human Resources will work with senior management on getting current with performance appraisals in ADP.
All audited employees' personnel files were sent to a third-party, Docufree, to scan them into ADP. Ongoing auditing of electronic files.	1) All hard copy personnel files were scanned into online personnel files in ADP 2) A process was created to ensure, on a go forward basis, that appropriate documents are scanned into employee files in a timely, accurate manner.	The employees' files support the online file initiative. Having all employees' documents in a central location expedites document retrieval when in the office as well as when working remotely. Ensuring all documents are in the files is a best practice, as well as to ensure security and compliance.
Research, recommend and update benefit options that result in cost savings for employees and COC, while not compromising the needs of the employees.	1) Researched different benefit options that resulted in cost savings 2) Ensured benefits did not compromise the employees' needs. 3) Changed short & long term disability, Life Insurance and AD&D carriers for both cost savings and efficiencies.	In addition to minimal cost savings, new carriers report and respond in a timely manner to human resources and, when applicable, employees.
Decrease the cost of the workers' compensation expense while taking into consideration claims, rates, related legal expenses and education.	1) Worked with USI to get cost comparisons on workers' compensation benefits 2) Reviewed information and determined the best fit for COC was Workers 'Compensation Trust.	In addition to cost savings, Workers' Compensation Trust has already proven to be a partner with COC. Safety training courses, at no cost, have been identified and scheduled. Under the guidance of Trust, we created a new employee safety committee that supports all areas of the organization. Trust has specialists on their staff that can proactively support and prevent. We are now shifting, with their guidance to proactive education and employee accountability.
Create and implement a Diversity, Equity and Inclusion (DE&I) Plan where everyone feels heard, included and safe. HR to focus on DEI Plan. Recruitment and retention have been our priorities.	Human Resources to continue to identify, via surveys and 1:1 meetings, initiatives (work experiences) that will continue to drive a diverse workforce so that we continue fostering feelings of inclusion for diverse talent, which is our entire workforce.	The strength of our Diversity, Equity and Inclusion (DEI) will continue to be embedded into our organization's culture. The outcome is a positive, productive, educated and competitive workplace.
Property Management		
Develop an enhanced professional development plan for employees to support programmatic growth and expertise, while also providing an enriched customer service centered environment. Create training programs to onboard new staff and familiarize them with all departments to maximize collaboration and efficiency, staff retention, and service to residents.	Developed curriculum for new employees that includes a combination of online and live training sessions. These trainings include LIPH, State, and/or LIHTC certifications, an overview of our Information System (HAB), and trainings on HUD Online systems such as PIC and EIV.	These sessions provide a strong foundation for new employees as they are introduced to COC and are provided an in-depth technical training for programs within their portfolio.
Complete a thorough review of the Admissions and Continued Occupancy Plan (ACOP) with the Property Management Team and identify policy and procedural revisions to support best practices, allow for streamlining opportunities, and enhance overall portfolio performance.	Completed ACOP update. Conducted public comment period in August 2023 and conducted two public hearings in September 2023.	Comply with the regulatory compliance process to ensure participants are well informed and are provided the opportunity to submit public comments.
Prepare for the conversion of the Low Income Public Housing (LIPH) Program to the Project Based RAD Program.	Conducted resident meetings and outreach to inform residents of the Rental Assistance Demonstration (RAD) Program and the conversion process. Prepared management documents and processes for the transition of LIPH residents to RAD residents.	Comply with the regulatory compliance process to ensure residents are well informed and are provided the opportunity to submit public comments.
Maintenance		
Update resident charge list to reflect current repair cost of supplies and labor. Review will be conducted on a by-property/program basis.	Current charges and market prices have been reviewed and scheduled a public notice period as required by federal regulation before final update.	Updating the resident charge list is necessary to ensure that maintenance charges are aligned with current pricing. Residents are provided with this document on move in and these charges are applied throughout their tenancy and upon vacating. It is important that residents have a clear understanding of all charges for which they may be liable based on damages beyond normal wear and tear. The public comment period will allowed residents to share questions and concerns.
Housing Choice Voucher		
Continue to develop an enhanced professional development plan for employees to support programmatic growth and expertise, while also providing an enriched customer service centered environment.	Members of the HCV Team attended five online webinars conducted by 3rd party vendors - HOTMA Summit, PBV RAD, HCV Portability, HCV Rent Calculation updated from HOTMA, and NSPIRE. New team members also obtained the Nan McKay certifications	Enhancing the onboarding process and supporting ongoing professional development sets the foundation for success. Well trained employees will ensure we are meeting high performance standards in the most efficient manner, and will also provide a more enriched customer service experience. By ensuring employees have the resources need to carryout their critical functions accurately and timely. This supports a positive work culture which support recruitment and retention.
Prepare for the conversion of the Low Income Public Housing (LIPH) Program to the Project Based RAD Program.	HCV Staff attended a PBV RAD Certification training in August 2023. Additionally, the HCV Team is actively working with Rippowam Corporation and Property Management to transition properties out of Low-Income Public Housing to the Project Based Rental Assistance Demonstration Program. In addition, the HCV Team conducted outreach and resident briefings to assist the LIPH residents with the conversion process, as roles and responsibilities were defined amongst the Property Management and HCV Teams.	Comply with the regulatory compliance process to ensure residents are well informed and are provided the opportunity to submit public comments. While also ensuring team members understand and comply with the RAD conversion process. By continuing to provide resident support and outreach, we strive for more successful resident outcomes.

Complete a thorough review of the Administrative Plan with the HCV Team and identify policy and procedural revisions to support best practices, allow for streamlining opportunities, and enhance overall program management.	Completed Administrative Plan update. Conducted public comment period in August 2023 and conducted two public hearings in September 2023.	Comply with the regulatory compliance process to ensure participants are well informed and are provided the opportunity to submit public comments.
Procurement		
Digitize new contracts within 30-days of execution and 15-days of contract change in shared drive for full accessibility by all for streamlined contract management and improved audit preparation.	Completed scanning and uploading all contracts within the 15 to 30-day mark.	Digitizing and storing contracts on the shared drive, will allow full accessibility and assist with contract compliance. Additionally, this process will alleviate the burden associated with contract tracking during audit periods.
Resident Services and Engagement		
Recruit a new resident board member.	Conducted resident outreach advising them of the upcoming opportunity to serve as a board member. Continued to gauge interest and host meetings until a final candidate was identified and approved.	Comply with board requirements, while also providing a voice and presentation for our residents on the COC Board.
Increase participation in Individual Needs Assessments (INA) to align resident goals with needs and to improve opportunities for self-sufficiency.	Family Centers developed goals for RSC's to conduct assessments, especially for families that have never engaged in services or had an INA evaluation.	The INA is an important tool to assist us with the development of program and services, while also accessing relevant resources.
Support and assist in the formation of active Resident Associations at various communities.	After providing Informational material to Stamford Manor and Post House residents on how to develop a resident association, it was noted that no residents were willing to take on a resident leadership role.	While residents have expressed ongoing interest for more information to strengthen their communities, increase engagement, and enhance resident and management relations, the residents did not execute a plan to develop a resident association. COC will continue to encourage resident engagement.
Business Enterprise		
Increase outreach with real estate developers and private property management companies to promote COC management of below-market rate (BMR) units, while continuing outreach with the City of Stamford for city-wide management and consolidated services.	Added 99 units to our BMR portfolio and added an additional business partner.	Continue to promote COC's entrepreneurial services to ensure management of the BMR program remains feasible and profitable.
Dovetail SIP		
Utilize the resources and reputational value of the Vita partnership as a Provider Network, Learning Exchange and Program Incubator to provide support for addressing Stamford's complex community challenges in the areas of Health and Wellness, Basic Needs and Equity and Opportunity.	Implemented Vita Forums, expert panel discussions to inform members on issues and local responses to issues of strategic interest: Housing Stability, Economic Security, Behavioral Health and Food Insecurity; Initiated structured Public Advocacy Project where entire Vita Partnership advocates for select member initiatives (legislation, policy, programs, grants) based upon key Position Statements created by Innovation Teams and vetted by members.	Provided expert-level information to Vita membership on issues of mutual interest from multiple social sectors; Organized Vita membership to provide enhanced public advocacy effort, amplified by collective impact.
Through Vita Partnership, provide backbone support and connection with community provider resources to grow and strengthen the Cradle to Career initiative.	Continued to support SC2C through innovative, community-wide initiative to address child and adolescent mental health (YMHA) and making gains in economic stability/mobility through collective action.	Mobilized multiple sectors of the community through a strength-based approach to viewing/supporting mental health as key determiner of educational achievement.
Support and strengthen key Vita initiatives - Pathways to Employment Growth, Community Health Improvement Plan and the Stamford Youth Mental Health Alliance - and assist in achieving their goals.	Assisted partner, Family Centers, in implementing Pathways to Economic Growth as an outgrowth of Equitable Economic Recovery plan; Continued to manage Stamford Youth Mental Health Alliance as a multi-partner initiative encompassing prevention, communication and improvements to clinical care; Participate as a member of Stamford Health's Governance Committee for Community Health Improvement Plan.	Provided informed, direct support in the design and implementation of cross-sector initiatives, helping to 'normalize' collaboration as an effective approach to solving complex social challenges.
While continuing to grow programming and facilities at Fairgate Farm, increase its acceptance among the broader Stamford community and establish sustainable financial footing.	Promoted Fairgate Farm Sustainability Plan to build on existing program assets and develop new programs to broaden the appeal and increase participation in Farm activities; Started identifying new board members to guide Plan and focus on fundraising; Obtained grant funding from USDA for significant expansion of production and distribution; Implemented community education project funded by CT DoAg; Increased educational and wellness programming; Installed major food waste composting facility in partnership with City of Stamford; Partnered with CT Food Rescue for community food distribution program.	Fairgate Farm increased in volunteer participation and the Market has proven profitable; Increased focus on sustainability will ensure the long-term viability of this valuable community asset.
Begin the evolution of Dovetail: SIP into a semi-autonomous social enterprise, sponsored by Charter Oak Communities but embraced by the Stamford community as a unique platform for social innovation.	Promoted Dovetail as the framework for COC's multiple social enterprises, including Fairgate Farm, Vita, Community Task Force, and other initiatives with specialization in fiscal management, fundraising, data management/analysis, communication and partnerships; Established Dovetail as fiduciary for Stamford Youth Mental Health Alliance in applying/processing more than a dozen philanthropic contributions.	Dovetail continues to gain notoriety as driving force behind COC/Vita's community initiatives; Separate "brand" provides helpful arms-length relationship to COC that preserves independence of collaborative initiatives that optimizes community-level and service provider support.
Administration		
Assist Board members in identifying the best form(s) of communication that utilizes their time more efficiently, assists with recruitment and onboarding and supports effective engagement.	Stayed up-to-date with staff members on agendas, resolutions, reports and other materials to develop monthly Board package; consulted with Board chair and ED on Board Discussion items and any special requests; Assembled, edited and prepared monthly Board meeting minutes and indexes for COC and all affiliate boards of directors	Supported Board members and staff for transparency and accountability to foster trust and keep them engaged.
Continually improve Board member capacity to be knowledgeable, accessible and prepared for Board meetings through refinements to Board Paq and other means.	Uploaded BoardPaq materials monthly and confirmed accuracy; communicated content with staff and Board members, communicated with IT for accuracy of Board information on COC website, informed town clerk of minutes, meeting information, etc.	Effectively communicated and engaged with Board members and staff to improve access to essential information.

Identify Board member interest, and help overcome challenges, in their engagement with community initiatives and building external relationships.	Proposed and scheduled meetings and special events with Board members and senior staff; Coordinated with Board members for availability of meeting dates.	Enabled the Board to fulfill its role in promoting COCs' mission and local impact and to identify opportunities and challenges related to the betterment of the community by scheduling members for Congressman Himes at LHT, Oak Park Redevelopment Project Announcement with the Mayor, COTY Dinner, B1C Breakfast.
Research and obtain/implement appropriate corporate records management system with the functionality to facilitate compliance, ready access and capacity to management corporate formalities (e.g., public notices, minutes, directorships, etc.)	Managed monthly FOIA requirements with the City on maintaining Board records, minutes, notices, board term appointments, etc.; maintained current corporate by-laws, annual reports, articles of incorporation and other permanent documents for HA entities, affiliated corporations and associated entities; managed State filings and regular reporting of corporate status, etc.; assisted Ripp Corp with implementation of practices needed to ensure compliance and good standing status.	Formalized management and handling of corporate documents, records, directorships and reporting requirements to ensure transparency of COC and Ripp Corp entities business related activities and to maintain trust in the community; regularly upload Board recordings and meeting minutes to the COC website.
Real Estate Development		
Complete predevelopment tasks for Phase 1 of the Oak Park redevelopment. Close financing, complete demolition of existing buildings and infrastructure, and commence construction.	Renovation and reoccupancy completed. Project is complete	Residents are benefitting from a safer and more comfortable building due to all new major building systems.
Submit funding applications for Phase 2 of the Oak Park redevelopment, including tax credits, Community Investment Fund, and Affordable Housing Trust Fund. Procure construction manager, preliminary selection of primary lender and syndicator	Obtained all financial commitments, obtained all land use approvals, procured construction manager and full development team, completed temporary relocation and fencing of Phase 1 area.	Seeking demolition permits and conducting pre-closing activities. Anticipate spring start.
Commence and complete at Stamford Manor, including repairs to two stairways, as well as repairs to concrete walkways at each residential floor.	Procured architect and engineer, obtained detailed cost estimates.	Anticipate start of work spring/summer 2024
Commence and complete repairs at four initial RAD conversion sites. Obtain physical needs assessments and cost estimates for extensuive repairs and improvements at Stamford Manor. Plan for RAD/Blend conversion of Stamford Manor and submit conversion application to HUD. Commence full range of predevelopment activities for comprehensive renovation funded with tax credits and other sources.	Completed on RAD conversion (Fairgate). In pre-closing phase for remaining four sites. Procured contractor to perform repairs.	Anticipate closing two sites first quarter 2024, two more second quarter. Repairs to commence shortly after closing.
Complete siding replacement and related repairs at Clinton Manor. Update appraisal and construction cost estimate for second elevator at Quintard Manor. Determine condition of existing elevator and either delay or proceed with construction of second elevator.	Completed design and procured contractor and financing for Clinton Manor siding replacement. Completed plans and specs for Quintard Manor elevator and stairs, and received initial financing commitment.	Anticipate start of Clinton Manor work April 2024. Anticipate start of Quintard Manor work third quarter of 2024.
Asset Management		
Commission and complete comprehensive physical needs assessments at all developments that have not been recently studied. Create long-term repair and maintenance schedules for each site and ensure sufficient replacement reserve deposits to fund full scope of work when called for.	Completed limited partner exits from all three sites, admitted new replacement limited partners owned by Rippowam Corp, and executed revised and simplified partnership agreements.	Fairgate, Post House and Taylor Street are now wholly owned by Rippowam Corp. No longer requied to seek outside investor approval for annual budgets, capital repairs and improvements, refinancing, etc.
Board Development		
Engaged board members to strengthen their contributions in meeting Stamford's housing challenges through participation in internal (Board/Staff) committees and community initiatives.	Board members have a high level of attendance at committee and board meetings. Several participate in strategic planning initiatives and are active in responding to other needs. Some board members serve on external boards and committees within the city of Stamford.	Board members are more informed and able to engage effectively at Committee and Board meetings. Information is readily available for incoming Advisory Board members.
Implemented roles of Board Liaison to serve as point of contact, advisor and expert resource in Finance, Information Technology and Real Estate Development.	Liaisons have become engaged in multiple priorities within their focus areas including investment management, fiduciary controls and migration to new management information system.	Liaisons have improved the connectivity between the Board and staff and have provided expertise in addressing critical operational functions.
Created a palpable sense, among Commissioners and Senior Staff, that all are part of the same team, improving interactivity, both in and out of formal meetings, and enhanced collaboration.	Staff members feel that Board members view them as professional colleagues, advisors and helpful 'sounding boards', both within and outside of formal board/committee meetings.	Integration of Board and staff members in addressing high level management, policy and strategic matters has improved members' understanding, buy-in and, perhaps, level of confidence in their respective decisions.



**Housing Authority of the City of Stamford d/b/a Charter Oak Communities (COC)
2025 PHA 5-Year Plan
Attachment to B.2 - Goals and Objectives**

Statement of Intent for Project-Based Voucher (PBV) Assistance:

COC anticipates the continued use of Project-Based Voucher (PBV) in support of its redevelopment and preservation activities without competition. Oak Park Phase 1, a COC owned property, is currently funded and under construction, and anticipates the use of 19 PBVs.

Summary of PBV Utilization:

Development	PBV Contract Units	PBV Units Leased	Comments
Clinton Manor	44	44	COC owned /supportive services/near-elderly
Quintard Manor	30	29	COC owned /supportive services/near-elderly
Post House	50	47	COC owned/supportive services
Taylor St	10	9	COC owned/supportive services
Palmer Sq	32	30	COC owned/supportive services
Westwood	35	30	COC owned/supportive services
Greenfield	15	14	COC owned/supportive services
Summer Pl	24	22	COC owned /supportive services/near-elderly
Park 215	24	19	COC owned/supportive services
Lawnhill Terrace P3	8	8	COC owned/supportive services
Lawnhill Terrace P4	13	13	COC owned/supportive services
*Oak Park	19	0	Under AHAP/HAP execution and voucher utilization is undetermined at this time. Proposed late CY2025 lease-up.
Total PBV	304	265	
Development	PBV RAD Contract Units	PBV RAD Units Leased	Comments
PBV RAD Fairgate	33	32	COC owned/supportive services (PBV RAD Contract Units included in HCV ACC below)
PBV RAD Sheridan Mews	8	7	COC owned/supportive services (Year 1 - PBV RAD Contract Units not in HCV ACC below)
PBV RAD Ursula Park TH	32	32	COC owned/supportive services (Year 1 - PBV RAD Contract Units not in HCV ACC below)
PBV RAD CT Avenue	12	12	COC owned/supportive services (Year 1 - PBV RAD Contract Units not in HCV ACC below)
PBV RAD Lawn Avenue	20	20	COC owned/supportive services (Year 1 - PBV RAD Contract Units not in HCV ACC below)
PBV RAD Stamford Manor	215	0	Streamlined Conversion/Target 2026-2027
Total PBV RAD	320	103	<i>Notice PIH 2019-23 RAD PBV: Conversion units and their associated authorized units are exempt from the authorized cap.</i>
PBV Utilization			
UMA ACC	1,632		
20% of ACC	326		
Current PBV Units under Contract (and AHAP)	304		
Current PBV Units under Contract %	19%		
UMA ACC	1,632		
*Current PBV Units Leased	265		
ACC UML vs PBV UML	16%		
<i>*Leased as of 2/2025</i>			

PART VII: VIOLENCE AGAINST WOMEN ACT (VAWA): NOTIFICATION, DOCUMENTATION, AND CONFIDENTIALITY

16-VII.A. OVERVIEW

The Violence against Women Act (VAWA) provides special protections for victims of domestic violence, dating violence, sexual assault, stalking, and human trafficking who are applying for or receiving assistance under the public housing program. If your state or local laws provide greater protection for such victims, those apply in conjunction with VAWA.

- Although the VAWA 2022 statute does not specifically include human trafficking in the list of victims protected under VAWA, in 2022 HUD began including human trafficking as part of the list of victims protected under VAWA (as seen in Notices PIH 2022-06, PIH 2022-22, and PIH 2022-24). In the absence of a final rule implementing VAWA 2022 and to mirror HUD's recent usage, this policy includes human trafficking in addition to domestic violence, dating violence, sexual assault, and stalking anywhere such a list appears.

In addition to definitions of key terms used in VAWA, this part contains general VAWA requirements and COC policies in three areas: notification, documentation, and confidentiality. Specific VAWA requirements and COC policies are located in Chapter 3, "Eligibility" (sections 3-I.C and 3-III.F); Chapter 5, "Occupancy Standards and Unit Offers" (section 5-II.D); Chapter 8, "Leasing and Inspections" (section 8-I.B); Chapter 12, "Transfer Policy" (sections 12-III.C, 12-III.F, and 12-IV.D); and Chapter 13, "Lease Terminations" (sections 13-III.F and 13-IV.D).

16-VII.B. DEFINITIONS [24 CFR 5.2003, FR Notice 8/6/13]

As used in VAWA:

- The term *affiliated individual* means, with respect to a person:
 - A spouse, parent, brother or sister, or child of that individual, or an individual to whom that person stands in the position or place of a parent; or
 - Any individual, tenant or lawful occupant living in the household of the victim of domestic violence, dating violence, sexual assault, or stalking.
- The term *bifurcate* means, with respect to a public housing or Section 8 lease, to divide a lease as a matter of law such that certain tenants can be evicted or removed while the remaining family members' lease and occupancy rights are allowed to remain intact.
- The term *dating violence* means violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim; and where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - The length of the relationship
 - The type of relationship
 - The frequency of interaction between the persons involved in the relationship
-

- The term *domestic violence* includes felony or misdemeanor crimes committed by a current or former spouse or intimate partner of the victim under the family or domestic violence laws of the jurisdiction receiving grant funding, and in the case of victim services, includes the user or attempted use of physical abuse or sexual abuse, or a pattern of any other coercive behavior committed, enabled, or solicited to gain or maintain power and control over a victim, including verbal, psychological, economic, or technological abuse that may or may not constitute criminal behavior, by a person who is:
 - The current or former spouse or intimate partner of the victim, or person similarly situated to a spouse or intimate partner of the victim
 - A person who is cohabitating or has cohabitated with the victim as a spouse or intimate partner
 - A person with whom the victim shares a child in common
 - A person who commits acts against an youth or adult victim who is protected from those acts under the domestic or family violence laws of the jurisdiction
- The term *economic abuse* means behavior that is coercive, deceptive, or unreasonably controls or restrains a person's ability to acquire, use, or maintain economic resources to which they are entitled, including using coercion, fraud, and manipulation to:
 - Restrict a person's access to money, assets, credit, or financial information
 - Unfairly use a person's personal economic resources, including money, assets, and credit, for one's own advantage
 - Exert undue influence over a person's financial and economic behavior or decisions, including forcing default on joint or other financial obligations, exploiting powers of attorney, guardianship, or conservatorship, or to whom one has a fiduciary duty
- The term *sexual assault* means:
 - Any nonconsensual sexual act proscribed by Federal, tribal, or State law, including when the victim lacks the capacity to consent
- The term *stalking* means:
 - To engage in a course of conduct directed at a specific person that would cause a reasonable person to fear for their safety or the safety of others, or suffer substantial emotional distress.
- The term *technological abuse* means an act or pattern of behavior that occurs within domestic violence, dating violence, sexual assault, or stalking and is intended to harm, threaten, intimidate, control, stalk, harass, impersonate, exploit, extort, or monitor another person, except as otherwise permitted by law, that occurs using any form of technology, including but not limited to:
 - Internet enabled devices
 - Online spaces and platforms
 - Computers

- Mobile devices
- Cameras and imaging programs
- Apps
- Location tracking devices
- Communication technologies
- Any other emergency technologies
-

16-VII.C. NOTIFICATION [24 CFR 5.2005(a)]

Notification to Public

COC adopts the following policy to help ensure that all actual and potential beneficiaries of its public housing program are aware of their rights under VAWA.

COC Policy

COC will post the following information regarding VAWA in its offices and on its website. It will also make the information readily available to anyone who requests it.

A notice of occupancy rights under VAWA to public housing program applicants and participants who are or have been victims of domestic violence, dating violence, sexual assault, or stalking (Form HUD-5380, see Exhibit 16-1)

A copy of form HUD-5382, Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking and Alternate Documentation (see Exhibit 16-2)

A copy of COC's emergency transfer plan (Exhibit 16-3)

A copy of HUD's Emergency Transfer Request for Certain Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, Form HUD-5383 (Exhibit 16-4)

The National Domestic Violence Hot Line: 1-800-799-SAFE (7233) or 1-800-787-3224 (TTY) (included in Exhibit 16-1)

Notification to Applicants and Tenants [24 CFR 5.2005(a)(1)]

COC are required to inform public housing applicants and tenants of their rights under VAWA, including their right to confidentiality and the limits thereof, when they are denied assistance, when they are admitted to the program, and when they are notified of an eviction or termination of housing benefits.

COC must distribute a notice of VAWA rights, along with the VAWA self-certification form (HUD-5382) at each of these three junctures.

COC Policy

The VAWA information provided to applicants and participants will consist of the notices in Exhibit 16-1 and 16-2.

COC will provide all applicants with information about VAWA at the time they request an application for housing assistance. COC will also include such information in all notices of denial of assistance (see section 3-III.F).

COC will provide all tenants with information about VAWA at the time of admission (see section 8-I.B) and at annual reexamination. COC will also include such information in all lease termination notices (see section 13-IV.D).

COC is not limited to providing VAWA information at the times specified in the above policy. If COC decides to provide VAWA information to a tenant following an incident of domestic violence, Notice PIH 2017-08 cautions against sending the information by mail, since the abuser may be monitoring the mail. The notice recommends that in such cases COC make alternative delivery arrangements that will not put the victim at risk.

COC Policy

Whenever COC has reason to suspect that providing information about VAWA to a public housing tenant might place a victim of domestic violence at risk, it will attempt to deliver the information by hand directly to the victim or by having the victim come to an office or other space that may be safer for the individual, making reasonable accommodations as necessary. For example, COC may decide not to send mail regarding VAWA protections to the victim's unit if COC believes the perpetrator may have access to the victim's mail, unless requested by the victim.

When discussing VAWA with the victim, COC will take reasonable precautions to ensure that no one can overhear the conversation such as having conversations in a private room.

The victim may, but is not required to, designate an attorney, advocate, or other secure contact for communications regarding VAWA protections.

16-VII.D. DOCUMENTATION [24 CFR 5.2007]

A COC presented with a claim for initial or continued assistance based on status as a victim of domestic violence, dating violence, sexual assault, stalking, human trafficking, or criminal activity related to any of these forms of abuse may—but is not required to—request that the individual making the claim document the abuse. Any request for documentation must be in writing, and the individual must be allowed at least 14 business days after receipt of the request to submit the documentation. COC may extend this time period at its discretion. [24 CFR 5.2007(a)]

The individual may satisfy COC's request by providing any one of the following three forms of documentation [24 CFR 5.2007(b)]:

- (1) A completed and signed HUD-approved certification form (HUD-5382, Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), which must include the name of the perpetrator only if the name of the perpetrator is safe to provide and is known to the victim. The form may be filled out and submitted on behalf of the victim.
- (2) A federal, state, tribal, territorial, or local police report or court record, or an administrative record
- (3) Documentation signed by a person who has assisted the victim in addressing domestic violence, dating violence, sexual assault, stalking, or human trafficking or the effects of such abuse. This person may be an employee, agent, or volunteer of a victim service provider; an attorney; a mental health professional; or a medical professional. The person signing the documentation must attest under penalty of perjury to the person's belief that the incidents in question are bona fide incidents of abuse. The victim must also sign the documentation.

COC may not require third-party documentation (forms 2 and 3) in addition to certification (form 1), except as specified below under "Conflicting Documentation," nor may it require certification in addition to third-party documentation [FR Notice 11/16/16].

COC Policy

Any request for documentation of domestic violence, dating violence, sexual assault, or stalking, or human trafficking will be in writing, will specify a deadline of 14 business days following receipt of the request, will describe the three forms of acceptable documentation, will provide explicit instructions on where and to whom the documentation must be submitted, and will state the consequences for failure to submit the documentation or request an extension in writing by the deadline.

COC may, in its discretion, extend the deadline for 10 business days. In determining whether to extend the deadline, COC will consider factors that may contribute to the victim's inability to provide documentation in a timely manner, including cognitive limitations, disabilities, limited English proficiency, absence from the unit, administrative delays, the danger of further violence, and the victim's need to address health or safety issues. Any extension granted by COC will be in writing.

Once the victim provides documentation, COC will acknowledge receipt of the documentation within 10 business days.

Conflicting Documentation [24 CFR 5.2007(e)]

In cases where COC receives conflicting certification documents from two or more members of a household, each claiming to be a victim and naming one or more of the other petitioning household members as the perpetrator, COC may determine which is the true victim by requiring each to provide acceptable third-party documentation, as described above (forms 2 and 3). COC may also request third-party documentation when submitted documentation contains information that conflicts with existing information already available to COC. COC must honor any court orders issued to protect the victim or to address the distribution of property. Individuals have 30 calendar days to return third-party verification to COC. If COC does not receive third-party documentation, and COC will deny or terminate assistance as a result, COC must hold separate hearings for the tenants [Notice PIH 2017-08].

COC Policy

If presented with conflicting certification documents from members of the same household, COC will attempt to determine which is the true victim by requiring each of them to provide third-party documentation in accordance with 24 CFR 5.2007(e) and by following any HUD guidance on how such determinations should be made. If COC does not receive third-party documentation within the required timeframe (and any extensions) COC will deny VAWA protections and will notify the applicant or tenant in writing of the denial. If, as a result, the applicant or tenant is denied or terminated from the program, for the applicants or tenants may request a hearing. COC

Discretion to Require No Formal Documentation [24 CFR 5.2007(d)]

COC has the discretion to provide benefits to an individual based solely on the individual's statement or other corroborating evidence—i.e., without requiring formal documentation of abuse in accordance with 24 CFR 5.2007(b). HUD recommends documentation in a confidential manner when a verbal statement or other evidence is accepted.

COC Policy

If COC accepts an individual's statement or other corroborating evidence (as determined by the victim) of domestic violence, dating violence, sexual assault, stalking or human trafficking, COC will document acceptance of the statement or evidence in the individual's file.

Failure to Provide Documentation [24 CFR 5.2007(c)]

In order to deny relief for protection under VAWA, a COC must provide the individual requesting relief with a written request for documentation of abuse. If the individual fails to provide the documentation within 14 business days from the date of receipt, or such longer time as COC may allow, COC may deny relief for protection under VAWA.

16-VII.E. CONFIDENTIALITY [24 CFR 5.2007(b)(4)]

All information provided to COC regarding domestic violence, dating violence, sexual assault, stalking, or human trafficking including the fact that an individual is a victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking must be retained in confidence. This means that COC (1) may not enter the information into any shared database, (2) may not allow employees or others to access the information unless they are explicitly authorized to do so and have a need to know the information for purposes of their work, and (3) may not provide the information to any other entity or individual, except to the extent that the disclosure is (a) requested or consented to by the individual in writing, (b) required for use in an eviction proceeding, or (c) otherwise required by applicable law.

COC Policy

If disclosure is required for use in an eviction proceeding or is otherwise required by applicable law, COC will inform the victim before disclosure occurs so that safety risks can be identified and addressed.

EXHIBIT 16-1: SAMPLE NOTICE OF OCCUPANCY RIGHTS UNDER THE VIOLENCE AGAINST WOMEN ACT, FORM HUD-5380
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Charter Oak Communities (COC)

Notice of Occupancy Rights under the Violence Against Women Act¹

To all Tenants and Applicants

The Violence Against Women Act (VAWA) provides protections for victims of domestic violence, dating violence, sexual assault, or stalking. VAWA protections are not only available to women, but are available equally to all individuals regardless of sex, gender identity, or sexual orientation.² The U.S. Department of Housing and Urban Development (HUD) is the Federal agency that oversees that public housing is in compliance with VAWA. This notice explains your rights under VAWA. A HUD-approved certification form is attached to this notice. You can fill out this form to show that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking, and that you wish to use your rights under VAWA.”

Protections for Applicants

If you otherwise qualify for assistance under public housing, you cannot be denied admission or denied assistance because you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

Protections for Tenants

If you are receiving assistance under public housing, you may not be denied assistance, terminated from participation, or be evicted from your rental housing because you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

Also, if you or an affiliated individual of yours is or has been the victim of domestic violence, dating violence, sexual assault, or stalking by a member of your household or any guest, you may not be denied rental assistance or occupancy rights under public housing solely on the basis of criminal activity directly relating to that domestic violence, dating violence, sexual assault, or stalking.

Affiliated individual means your spouse, parent, brother, sister, or child, or a person to whom you stand in the place of a parent or guardian (for example, the affiliated individual is in your care, custody, or control); or any individual, tenant, or lawful occupant living in your household.

¹ Despite the name of this law, VAWA protection is available regardless of sex, gender identity, or sexual orientation.

² Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.

Removing the Abuser or Perpetrator from the Household

COC may divide (bifurcate) your lease in order to evict the individual or terminate the assistance of the individual who has engaged in criminal activity (the abuser or perpetrator) directly relating to domestic violence, dating violence, sexual assault, or stalking.

If COC chooses to remove the abuser or perpetrator, COC may not take away the rights of eligible tenants to the unit or otherwise punish the remaining tenants. If the evicted abuser or perpetrator was the sole tenant to have established eligibility for assistance under the program, COC must allow the tenant who is or has been a victim and other household members to remain in the unit for 30 days, in order to establish eligibility under the program or under another HUD housing program covered by VAWA, or, find alternative housing.

In removing the abuser or perpetrator from the household, COC must follow Federal, State, and local eviction procedures. In order to divide a lease, COC may, but is not required to, ask you for documentation or certification of the incidences of domestic violence, dating violence, sexual assault, or stalking.

Moving to Another Unit

Upon your request, COC may permit you to move to another unit, subject to the availability of other units, and still keep your assistance. In order to approve a request, COC may ask you to provide documentation that you are requesting to move because of an incidence of domestic violence, dating violence, sexual assault, or stalking. If the request is a request for emergency transfer, COC may ask you to submit a written request or fill out a form where you certify that you meet the criteria for an emergency transfer under VAWA. The criteria are:

- 1. You are a victim of domestic violence, dating violence, sexual assault, or stalking.** If your COC does not already have documentation that you are a victim of domestic violence, dating violence, sexual assault, or stalking, your housing provider may ask you for such documentation, as described in the documentation section below.
- 2. You expressly request the emergency transfer.** Your COC may choose to require that you submit a form, or may accept another written or oral request.
- 3. You reasonably believe you are threatened with imminent harm from further violence if you remain in your current unit.** This means you have a reason to fear that if you do not receive a transfer you would suffer violence in the very near future.

OR

You are a victim of sexual assault and the assault occurred on the premises during the 90-calendar-day period before you request a transfer. If you are a victim of sexual assault, then in addition to qualifying for an emergency transfer because you reasonably believe you are threatened with imminent harm from further violence if you remain in your unit, you may qualify for an emergency transfer if the sexual assault occurred on the premises of the property from which you are seeking your transfer, and that assault happened within the 90-calendar-day period before you expressly request the transfer.

COC will keep confidential requests for emergency transfers by victims of domestic violence, dating violence, sexual assault, or stalking, and the location of any move by such victims and their families.

COC's emergency transfer plan provides further information on emergency transfers, and COC must make a copy of its emergency transfer plan available to you if you ask to see it.

Documenting You Are or Have Been a Victim of Domestic Violence, Dating Violence, Sexual Assault or Stalking

COC can, but is not required to, ask you to provide documentation to "certify" that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking. Such request from COC must be in writing, and COC must give you at least 14 business days (Saturdays, Sundays, and federal holidays do not count) from the day you receive the request to provide the documentation. COC may, but does not have to, extend the deadline for the submission of documentation upon your request.

You can provide one of the following to COC as documentation. It is your choice which of the following to submit if HP asks you to provide documentation that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

- A complete HUD-approved certification form given to you by COC with this notice, that documents an incident of domestic violence, dating violence, sexual assault, or stalking. The form will ask for your name, the date, time, and location of the incident of domestic violence, dating violence, sexual assault, or stalking, and a description of the incident. The certification form provides for including the name of the abuser or perpetrator if the name of the abuser or perpetrator is known and is safe to provide.
- A record of a Federal, State, tribal, territorial, or local law enforcement agency, court, or administrative agency that documents the incident of domestic violence, dating violence, sexual assault, or stalking. Examples of such records include police reports, protective orders, and restraining orders, among others.
- A statement, which you must sign, along with the signature of an employee, agent, or volunteer of a victim service provider, an attorney, a medical professional or a mental health professional (collectively, "professional") from whom you sought assistance in addressing domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse, and with the professional selected by you attesting under penalty of perjury that they believe that the incident or incidents of domestic violence, dating violence, sexual assault, or stalking are grounds for protection.
- Any other statement or evidence that COC has agreed to accept.

If you fail or refuse to provide one of these documents within the 14 business days, COC does not have to provide you with the protections contained in this notice.

If COC receives conflicting evidence that an incident of domestic violence, dating violence, sexual assault, or stalking has been committed (such as certification forms from two or more members of a household each claiming to be a victim and naming one or more of the other petitioning household members as the abuser or perpetrator), COC has the right to request that you provide third-party documentation within thirty 30 calendar days in order to resolve the conflict. If you fail or refuse to provide third-party documentation where there is conflicting evidence, COC does not have to provide you with the protections contained in this notice.

Confidentiality

COC must keep confidential any information you provide related to the exercise of your rights under VAWA, including the fact that you are exercising your rights under VAWA.

COC must not allow any individual administering assistance or other services on behalf of COC (for example, employees and contractors) to have access to confidential information unless for reasons that specifically call for these individuals to have access to this information under applicable federal, state, or local law.

COC must not enter your information into any shared database or disclose your information to any other entity or individual. COC, however, may disclose the information provided if:

- You give written permission to COC to release the information on a time limited basis.
- COC needs to use the information in an eviction or termination proceeding, such as to evict your abuser or perpetrator or terminate your abuser or perpetrator from assistance under this program.
- A law requires COC to release the information.

VAWA does not limit COC's duty to honor court orders about access to or control of the property. This includes orders issued to protect a victim and orders dividing property among household members in cases where a family breaks up.

Reasons a Tenant Eligible for Occupancy Rights under VAWA May Be Evicted or Assistance May Be Terminated

You can be evicted and your assistance can be terminated for serious or repeated lease violations that are not related to domestic violence, dating violence, sexual assault, or stalking committed against you. However, COC cannot hold tenants who have been victims of domestic violence, dating violence, sexual assault, or stalking to a more demanding set of rules than it applies to tenants who have not been victims of domestic violence, dating violence, sexual assault, or stalking.

The protections described in this notice might not apply, and you could be evicted and your assistance terminated, if COC can demonstrate that not evicting you or terminating your assistance would present a real physical danger that:

1. Would occur within an immediate time frame, and
2. Could result in death or serious bodily harm to other tenants or those who work on the property.

If COC can demonstrate the above, COC should only terminate your assistance or evict you if there are no other actions that could be taken to reduce or eliminate the threat.

Other Laws

VAWA does not replace any Federal, State, or local law that provides greater protection for victims of domestic violence, dating violence, sexual assault, or stalking. You may be entitled to additional housing protections for victims of domestic violence, dating violence, sexual assault, or stalking under other Federal laws, as well as under State and local laws.

Non-Compliance with The Requirements of This Notice

You may report COC for violations of these rights and seek additional assistance, if needed, by contacting or filing a complaint with the **U.S. Department of Housing and Urban Development (HUD), Hartford Field Office - 1 Corporate Center, Hartford, CT 06103, (800) 669-9777.**

For Additional Information

You may view a copy of HUD's final VAWA rule at: <https://www.gpo.gov/fdsys/pkg/FR-2016-11-16/pdf/2016-25888.pdf>.

Additionally, COC must make a copy of HUD's VAWA regulations available to you if you ask to see them.

For questions regarding VAWA, please contact **COCs Section 504 Coordinator at RA@CharterOakCommunities.org** or at (203) 977-1400.

For help regarding an abusive relationship, you may call the **National Domestic Violence Hotline at 1-800-799-7233 or, for persons with hearing impairments, 1-800-787-3224 (TTY).**

You may also contact **Domestic Violence Crisis Center, 1111 Summer Street, Suite 2023, Stamford, CT 06905, (203) 853-0418, <https://www.dvccct.org/>.**

For tenants who are or have been victims of stalking seeking help may visit the **National Center for Victims of Crime's Stalking Resource Center** at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

For help regarding sexual assault, you may contact **Domestic Violence Crisis Center, 1111 Summer Street, Suite 2023, Stamford, CT 06905, (203) 853-0418, <https://www.dvccct.org/>.**

Victims of stalking seeking help may contact **Domestic Violence Crisis Center, 1111 Summer Street, Suite 2023, Stamford, CT 06905, (203) 853-0418, <https://www.dvccct.org/>.**

Other organizations offering assistance to victims of domestic violence, dating violence, sexual assault, stalking and human trafficking:

The Rowan Center, Sexual Assault Center, 111 Summer Street, Suite 202, Stamford, CT 06902, (203) 329-2929, <https://therowancenter.org/>

YWCA Greenwich Harmony Project, Domestic and Sexual Violence Services, 259 East Putnam Ave, Greenwich, CT 06830, (203) 622-0003, <https://ywcagreenwich.org/what-we-do/harmony-project-of-ywca-greenwich-services-support-for-safe-relationships/>

CT Safe Connect, State-wide hotline (888) 774-2900, <https://www.ctsafeconnect.org/>

Attachment: Certification form HUD-5382 [form approved for this program to be included]

EXHIBIT 16-2: CERTIFICATION OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING AND ALTERNATE DOCUMENTATION, FORM HUD-5382
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**CERTIFICATION OF
DOMESTIC VIOLENCE,
DATING VIOLENCE,
SEXUAL ASSAULT, OR STALKING,
AND ALTERNATE DOCUMENTATION**

**U.S. Department of Housing
and Urban Development**

OMB Approval No. 2577-0286

Exp. 06/30/2017

Purpose of Form: The Violence Against Women Act (“VAWA”) protects applicants, tenants, and program participants in certain HUD programs from being evicted, denied housing assistance, or terminated from housing assistance based on acts of domestic violence, dating violence, sexual assault, or stalking against them. Despite the name of this law, VAWA protection is available to victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

Use of This Optional Form: If you are seeking VAWA protections from your housing provider, your housing provider may give you a written request that asks you to submit documentation about the incident or incidents of domestic violence, dating violence, sexual assault, or stalking.

In response to this request, you or someone on your behalf may complete this optional form and submit it to your housing provider, or you may submit one of the following types of third-party documentation:

- (1) A document signed by you and an employee, agent, or volunteer of a victim service provider, an attorney, or medical professional, or a mental health professional (collectively, “professional”) from whom you have sought assistance relating to domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse. The document must specify, under penalty of perjury, that the professional believes the incident or incidents of domestic violence, dating violence, sexual assault, or stalking occurred and meet the definition of “domestic violence,” “dating violence,” “sexual assault,” or “stalking” in HUD’s regulations at 24 CFR 5.2003.
- (2) A record of a Federal, State, tribal, territorial or local law enforcement agency, court, or administrative agency; or
- (3) At the discretion of the housing provider, a statement or other evidence provided by the applicant or tenant.

Submission of Documentation: The time period to submit documentation is 14 business days from the date that you receive a written request from your housing provider asking that you provide documentation of the occurrence of domestic violence, dating violence, sexual assault, or stalking. Your housing provider may, but is not required to, extend the time period to submit the documentation, if you request an extension of the time period. If the requested information is not received within 14 business days of when you received the request for the documentation, or any extension of the date provided by your housing provider, your housing provider does not need to grant you any of the VAWA protections. Distribution or issuance of this form does not serve as a written request for certification.

Confidentiality: All information provided to your housing provider concerning the incident(s) of domestic violence, dating violence, sexual assault, or stalking shall be kept confidential and such details shall not be entered into any shared database. Employees of your housing provider are not to have access to these details unless to grant or deny VAWA protections to you, and such employees may not disclose this information to any other entity or individual, except to the extent that disclosure is: (i) consented to by you in writing in a time-limited release; (ii) required for use in an eviction proceeding or hearing regarding termination of assistance; or (iii) otherwise required by applicable law.

**TO BE COMPLETED BY OR ON BEHALF OF THE VICTIM OF DOMESTIC VIOLENCE,
DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING**

1. Date the written request is received by victim: _____

2. Name of victim: _____

3. Your name (if different from victim's): _____

4. Name(s) of other family member(s) listed on the lease: _____

5. Residence of victim: _____

6. Name of the accused perpetrator (if known and can be safely disclosed): _____

7. Relationship of the accused perpetrator to the victim: _____

8. Date(s) and times(s) of incident(s) (if known): _____

10. Location of incident(s): _____

In your own words, briefly describe the incident(s):

This is to certify that the information provided on this form is true and correct to the best of my knowledge and recollection, and that the individual named above in Item 2 is or has been a victim of domestic violence, dating violence, sexual assault, or stalking. I acknowledge that submission of false information could jeopardize program eligibility and could be the basis for denial of admission, termination of assistance, or eviction.

Signature _____ Signed on (Date) _____

Public Reporting Burden: The public reporting burden for this collection of information is estimated to average 1 hour per response. This includes the time for collecting, reviewing, and reporting the data. The information provided is to be used by the housing provider to request certification that the applicant or tenant is a victim of domestic violence, dating violence, sexual assault, or stalking. The information is subject to the confidentiality requirements of VAWA. This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid Office of Management and Budget control number.

EXHIBIT 16-3: EMERGENCY TRANSFER PLAN FOR VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING

Attachment: Certification form HUD-5382

Charter Oak Communities

Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

Emergency Transfers

COC is concerned about the safety of its tenants, and such concern extends to tenants who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA),³ COC allows tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the tenant's current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation.⁴ The ability of COC to honor such request for tenants currently receiving assistance, however, may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether COC has another dwelling unit that is available and is safe to offer the tenant for temporary or more permanent occupancy.

This plan identifies tenants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to tenants on safety and security. This plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), the federal agency that oversees that the public housing and housing choice voucher (HCV) programs are in compliance with VAWA.

Eligibility for Emergency Transfers

A tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L, is eligible for an emergency transfer, if the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains within the same unit. If the tenant is a victim of sexual assault, the tenant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar- day period preceding a request for an emergency transfer.

³Despite the name of this law, VAWA protection is available to all victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

⁴Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.

A tenant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan.

Tenants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

Emergency Transfer Request Documentation

To request an emergency transfer, the tenant shall notify COC's management office and submit a written request for a transfer to **any COC office**. COC will provide reasonable accommodations to this policy for individuals with disabilities. The tenant's written request for an emergency transfer should include either:

1. A statement expressing that the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant were to remain in the same dwelling unit assisted under COC's program; OR
2. A statement that the tenant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the tenant's request for an emergency transfer.

Confidentiality

COC will keep confidential any information that the tenant submits in requesting an emergency transfer, and information about the emergency transfer, unless the tenant gives COC written permission to release the information on a time-limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program. This includes keeping confidential the new location of the dwelling unit of the tenant, if one is provided, from the person or persons that committed an act of domestic violence, dating violence, sexual assault, or stalking against the tenant. See the Notice of Occupancy Rights under the Violence against Women Act for All Tenants for more information about COC's responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.

Emergency Transfer Timing and Availability

COC cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. COC will, however, act as quickly as possible to move a tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. If a tenant reasonably believes a proposed transfer would not be safe, the tenant may request a transfer to a different unit. If a unit is available, the transferred tenant must agree to abide by the terms and conditions that govern occupancy in the unit to which the tenant has been transferred. COC may be unable to transfer a tenant to a particular unit if the tenant has not or cannot establish eligibility for that unit.

If COC has no safe and available units for which a tenant who needs an emergency transfer is eligible, COC will assist the tenant in identifying other housing providers who may have safe and available units to which the tenant could move. At the tenant's request, COC will also assist tenants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are attached to this plan.

Emergency Transfers: Public Housing (PH) Program

If you are a public housing resident and request an emergency transfer as described in this plan, COC will attempt to assist you in moving to a safe unit quickly. COC will make exceptions as required to policies restricting moves.

Emergency transfers for which you are not required to apply for assistance include the following:

- Public housing unit in a different development
- Public housing unit in the same development, if you determine that the unit is safe

At your request, COC will refer you to organizations that may be able to further assist you.

You may also request an emergency transfer to the following programs for which you are required to apply for assistance:

- HCV tenant-based program
- HCV project-based assistance
- Other programs administered by COC (such as state housing programs)

Emergency transfers will not take priority over waiting list admissions for these types of assistance. At your request, COC will refer you to organizations that may be able to further assist you.

Safety and Security of Tenants

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the tenant is urged to take all reasonable precautions to be safe.

Tenants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).

Tenants who have been victims of sexual assault may call the Rape, Abuse, and Incest National Network's National Sexual Assault Hotline at 1-800-656-HOPE, or visit the online hotline at <https://ohl.rainn.org/online/>.

Tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

Attachment: Local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking.

EXHIBIT 16-4: EMERGENCY TRANSFER REQUEST FOR CERTAIN VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING, FORM HUD-5383

**EMERGENCY TRANSFER
REQUEST FOR CERTAIN
VICTIMS OF DOMESTIC
VIOLENCE, DATING VIOLENCE,
SEXUAL ASSAULT, OR STALKING**

**U.S. Department of Housing
and Urban Development**

OMB Approval No. 2577-0286
Exp. 06/30/2017

Purpose of Form: If you are a victim of domestic violence, dating violence, sexual assault, or stalking, and you are seeking an emergency transfer, you may use this form to request an emergency transfer and certify that you meet the requirements of eligibility for an emergency transfer under the Violence Against Women Act (VAWA). Although the statutory name references women, VAWA rights and protections apply to all victims of domestic violence, dating violence, sexual assault or stalking. Using this form does not necessarily mean that you will receive an emergency transfer. See your housing provider's emergency transfer plan for more information about the availability of emergency transfers.

The requirements you must meet are:

(1) You are a victim of domestic violence, dating violence, sexual assault, or stalking.

If your housing provider does not already have documentation that you are a victim of domestic violence, dating violence, sexual assault, or stalking, your housing provider may ask you for such documentation. In response, you may submit Form HUD-5382, or any one of the other types of documentation listed on that Form.

(2) You expressly request the emergency transfer. Submission of this form confirms that you have expressly requested a transfer. Your housing provider may choose to require that you submit this form, or may accept another written or oral request. Please see your housing provider's emergency transfer plan for more details.

(3) You reasonably believe you are threatened with imminent harm from further violence if you remain in your current unit. This means you have a reason to fear that if you do not receive a transfer you would suffer violence in the very near future.

OR

You are a victim of sexual assault and the assault occurred on the premises during the 90-calendar-day period before you request a transfer. If you are a victim of sexual assault, then in addition to qualifying for an emergency transfer because you reasonably believe you are threatened with imminent harm from further violence if you remain in your unit, you may qualify for an emergency transfer if the sexual assault occurred on the premises of the property from which you are seeking your transfer, and that assault happened within the 90-calendar-day period before you submit this form or otherwise expressly request the transfer.

Submission of Documentation: If you have third-party documentation that demonstrates why you are eligible for an emergency transfer, you should submit that documentation to your housing provider if it is safe for you to do so. Examples of third party documentation include, but are not limited to: a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom you have sought assistance; a current restraining order; a recent court order or other court records; a law enforcement report or records; communication records from the perpetrator of the violence or family members or friends of the perpetrator of the violence, including emails, voicemails, text messages, and social media posts.

Confidentiality: All information provided to your housing provider concerning the incident(s) of domestic violence, dating violence, sexual assault, or stalking, and concerning your request for an emergency transfer shall be kept confidential. Such details shall not be entered into any shared database. Employees of your housing provider are not to have access to these details unless to grant or deny VAWA protections or an emergency transfer to you. Such employees may not disclose this information to any other entity or individual, except to the extent that disclosure is: (i) consented to by you in writing in a time-limited release; (ii) required for use in an eviction proceeding or hearing regarding termination of assistance; or (iii) otherwise required by applicable law.

TO BE COMPLETED BY OR ON BEHALF OF THE PERSON REQUESTING A TRANSFER

1. Name of victim requesting an emergency transfer: _____

2. Your name (if different from victim's) _____

3. Name(s) of other family member(s) listed on the lease: _____

4. Name(s) of other family member(s) who would transfer with the victim: _____

5. Address of location from which the victim seeks to transfer: _____

6. Address or phone number for contacting the victim: _____

7. Name of the accused perpetrator (if known and can be safely disclosed): _____

8. Relationship of the accused perpetrator to the victim: _____

9. Date(s), Time(s) and location(s) of incident(s): _____

10. Is the person requesting the transfer a victim of a sexual assault that occurred in the past 90 days on the premises of the property from which the victim is seeking a transfer? If yes, skip question 11. If no, fill out question 11. _____

11. Describe why the victim believes they are threatened with imminent harm from further violence if they remain in their current unit.

12. If voluntarily provided, list any third-party documentation you are providing along with this notice: _____

This is to certify that the information provided on this form is true and correct to the best of my knowledge, and that the individual named above in Item 1 meets the requirement laid out on this form for an emergency transfer. I acknowledge that submission of false information could jeopardize program eligibility and could be the basis for denial of admission, termination of assistance, or eviction.

Signature _____ Signed on (Date) _____