

Brookline Housing Authority

Criminal Offender Record Information (CORI) Policy

Approved by Board December 9, 2025

This policy outlines the procedures and standards for obtaining, handling, and using Criminal Offender Record Information (CORI) in the screening and evaluation of applicants, residents, and others associated with housing or employment through the Brookline Housing Authority (hereinafter, the "BHA"). The policy ensures compliance with state and federal law, promotes equitable access to housing, and protects the safety and confidentiality of all parties.

CORI checks will only be conducted as authorized by the Department of Criminal Justice Information Services (DCJIS) and [MGL c. 6, §. 172](#), and [760 CMR 5.12\(3\)](#). This policy is in accordance with the BHA Housing Choice Voucher Administrative Plan. All applicants or when applicable current residents will be notified that a CORI check will be conducted.

I. Applicability

This policy applies to CORI checks for Adults 18+ among the following households:

- Applicants for federal and state public housing programs
- Applicants for the Housing Choice Voucher (HCV/Section 8) program
- Current participants undergoing annual or interim reexamination due to cause
 - Such cause will be documented in writing by the BHA and approved in writing by the Executive Director.
 - BHA will only CORI check current participants in limited circumstances where the authority has reason to believe based on a police report or public reporting that there is a risk to the safety of residents or staff or the safe enjoyment of the premises by residents.
- Adults (17 or 18+, depending on program) being added to a household
- Authority employees, interns, volunteers, contractors, and vendors (if applicable)

II. Authorization, Consent & Notification

1. Consent Requirement

- The subject must sign a CORI Acknowledgement Form prior to any CORI request.
- The BHA must verify the identity of the individual via:
 - Government-issued photo ID (e.g., driver's license, passport), or
 - Alternative ID (e.g., birth certificate, SSN card) with staff approval.
- The BHA must record the type of documentation used to verify the individual's identity.

2. Notification

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- BHA will inform applicants at the time of application that a CORI check may be conducted.
- For additional or subsequent checks (e.g., annual reviews, incident investigations), BHA will provide written notice at least 72 hours in advance.

III. CORI Access, Confidentiality & Storage

1. Access is restricted to trained and authorized personnel only, including:
 - Director of Leased Housing
 - Director of Admissions
 - Leased Housing Managers or Occupancy Specialists involved in screening applicants
 - Human Resources staff processing applications, including Assistant Director
2. All personnel must complete DCJIS CORI Training annually.
3. The Authority shall maintain a current list of staff authorized to access CORI, updated every 6 months and available for DCJIS inspection.
4. CORI records will be:
 - Stored securely (locked physical files or encrypted digital systems)
 - Retained for 1–5 years, or per program requirements, or per Massachusetts records retention schedule, whichever is longest.
 - Destroyed securely once no longer needed (e.g., post-decision or appeal)
5. All CORI obtained from the DCJIS is confidential and can only be disseminated as authorized by law and regulation. A central secondary dissemination log shall be used to record any dissemination of CORI outside this organization, including dissemination at the request of the subject.
6. Unauthorized access or disclosure is strictly prohibited and subject to disciplinary action.

IV. Conducting CORI Checks

1. CORI checks will be conducted only for individuals who have signed a valid acknowledgment form.
2. CORI checks for housing or employment applicants will only be used after initial eligibility criteria are met, generally as the last step before housing or employment offer.
3. When necessary, per 760 CMR 5.12 BHA will make reasonable efforts to check out-of-state criminal convictions for state public housing applicants.

V. Verifying and Evaluating CORI

1. Verification

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- The reviewer will compare CORI to the subject's identification to confirm accuracy.
- Any discrepancies will be reviewed by a trained staff member or referred to DCJIS for clarification.

2. Individualized Assessment

Criminal history alone will not automatically disqualify an applicant. The following factors will be considered:

- Relevance to tenancy or program compliance
- Time elapsed since offense, conviction, or release
- Nature and seriousness of the offense
- Circumstances of the offense (e.g., domestic violence survivor)
- Evidence of rehabilitation or treatment
- Pattern or frequency of offenses
- Pending charges or active warrants
- Age at the time of offense
- Any other mitigating or supporting documentation provided

VI. Lookback Periods

- Felonies: 10 years from conviction or release (whichever is later)
- Misdemeanors: 5 years from conviction or release (whichever is later)
- Active Warrants: Applicants with open criminal cases may have their application placed on hold for up to 18 months pending resolution

Note: Lifetime sex offender registration and specific federal prohibitions may result in mandatory denial (see Section VIII).

VII. Adverse Action Procedures

Before taking any adverse action based on CORI, the following steps will be followed:

1. Pre-Adverse Action Notice
 - Applicant will receive:
 - A copy of their CORI
 - This CORI Policy
 - The source(s) of the CORI
 - Information on how to correct or challenge the record with DCJIS
2. Opportunity to Respond

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- Applicants will be given 10 business days to dispute the accuracy or provide mitigating evidence.
 - The Authority will consider all timely responses before final determination.
3. Final Adverse Action
- A written notice of decision will include:
 - Reason(s) for denial
 - Right to appeal under the ACOP or Administrative Plan and in accordance with [803 CMR 5.14](#)
 - Instructions on how to submit additional documentation

VIII. Mandatory Denial – Lifetime Sex Offender Registration and Drug-Related Offenses

In accordance with **federal law** ([24 CFR §§ 960.204, 982.553](#)) and **Massachusetts law** (M.G.L. [c. 121B § 40](#); c. 6 § 178C et seq.):

Lifetime Sex Offenders:

- **Federal and State Units:** The Authority must deny or terminate assistance to any household member subject to **lifetime sex offender registration in Massachusetts**, as indicated by CORI or other official state records. Individuals registered for non-lifetime terms will be evaluated individually using the factors in Section VI.

Drug-Related Offenses:

- **Federal and State Units:** The Authority will deny admission to any household member convicted of **manufacturing or producing methamphetamine on the premises of publicly assisted housing** in Massachusetts, as reflected in CORI

IX. CORI for Employees, Interns, Volunteers, and Contractors

1. CORI will only be requested from individuals who are otherwise qualified.
2. A criminal record will not automatically disqualify a candidate.
3. Relevance to job duties and risk exposure will be considered.
4. All procedural rights (copy of CORI, notice, and opportunity to respond) will be extended.

X. Tracking and Reporting

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BHA will maintain de-identified records of CORI checks and decisions, including demographic data, and report results at an aggregate level to the board.

Appendix A: Applicable Laws and Regulations

Applicable Laws and Regulations:

- **803 CMR 5.00** – Criminal Offender Record Information (CORI) for Housing
- **803 CMR 5.14** – Adverse Housing Decisions Based on CORI
- **24 CFR § 960.204** – Public Housing Admission and Occupancy
- **24 CFR § 982.553** – Section 8 Housing Choice Voucher Program: Denial and Termination
- **M.G.L. c. 6, § 178C et seq.** – Sex Offender Registry Board: Registration, Classification, and Dissemination
- **M.G.L. c. 121B, § 40** – Eligibility restrictions related to illegal use of controlled substances
- **760 CMR 5** – Eligibility and Selection Criteria, State Public Housing