

Brookline Housing Authority
Transfer Policy
Adopted by Board October 14, 2025

Introduction

BHA adopts this policy to provide more transparency and predictability for transfer requests. This policy seeks to balance the several interests in transfers: resident needs to address emergency situations or find larger units to accommodate increased household size, applicant needs for appropriate units, and the BHA's need to efficiently maintain high occupancy rates to fulfill its mission within its budget.

Transfer Policies

- BHA will maintain separate transfer waitlists for each program & bedroom (BR) size combination. For example, state-aided housing for families 3-BR will be a transfer waitlist.
 - BHA considers the project-based voucher (PBV) units within BHA-owned & managed properties (the LLCs) to be one program and may transfer residents within this portfolio as needed and in keeping with the other transfer policies and the [BHA Administrative Plan](#).
- BHA may transfer residents across buildings/developments within a program, but residents seeking transfer to a building operated under a different program (for example, from state-aided public housing to the LLCs) must apply and be ranked in the general waitlist according that property's tenant selection plan.
- BHA will take requests to stay in current development under consideration to extent possible and will further prioritize educational stability for K-12 students in transfer decisions. BHA cannot, however, guarantee a transfer within a development due to differing bedroom mixes by development.
- BHA maintains the following transfer priorities; see the Priorities section for more details:
 - Domestic Violence – VAWA: 50 points
 - Reasonable Accommodation – Medical: 40 Points
 - Overhoused: 30 points
 - Underhoused: 20 points
 - Administrative Transfers
- The property manager for each site, under supervision of Assistant Director of Property Management and Director of Property Management, has responsibility for maintaining the waitlist(s) and approving transfers.

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Priorities for Transfer:

1. Domestic Violence – VAWA: 50 points
2. Reasonable Accommodation – Medical: 40 Points
3. Overhoused: 30 points
4. Underhoused: 20 points
5. Administrative Transfers – outside waitlist

1. VAWA Transfers (State & Federal)

Transfers under the Violence Against Women Act (VAWA) offer protections and relocation options for residents who are survivors of domestic violence, dating violence, sexual assault, or stalking.

- **Required Forms:**
 - [State VAWA Transfer Packet](#)
 - [Federal VAWA Transfer Packet](#)

- **Documentation:**

The transfer application must include all forms and documentation outlined in the applicable packet(s).

VAWA applicants may also receive priority for other BHA-managed waitlists per the tenant selection plans for those properties.

2. Reasonable Accommodation (RA) Transfers

RA transfers are granted when a resident's medical condition or disability necessitates a move to a more suitable unit.

- **Required Documentation:**
 - A medical notice from a licensed healthcare provider, **or**
 - A completed Reasonable Accommodation (RA) Form signed by a physician.
 - If disability is readily apparent, the applicant does not need to submit medical application
- Once approved, the applicant goes onto waitlist with note for specific housing needs, i.e. wheelchair-accessible, first floor only, or corner unit.

RA applicants are prioritized just after VAWA on the transfer list. The property manager monitors RA requests closely and works to match qualified applicants to newly available units—especially rare sizes like 1-bedroom units on the first floor.

3. Overhoused Transfers

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Residents in units larger than required for their household size are considered **overhoused** and must transfer to a unit that meets occupancy standards. BHA will place overhoused families on the transfer waitlist and provide notice to the households; overhoused households do not need to submit a transfer application.

- **Resident Notification:**
 - Notification will inform resident when BHA adds them to transfer list that if they provide documentation justifying the need to remain in the current unit (e.g., disability, medical reason), the staff will evaluate it according to standard procedures for assessing reasonable accommodation requests.
- **Application to LLCs:** BHA will encourage overhoused public housing residents who qualify for elderly/non-elderly disabled housing at the LLCs to apply to those waitlists.
- **Offers for Available Units:**
 - Per 760 CMR 6.04 (1)(c) In the event the Tenant Household has been determined to be Overhoused and the Tenant has failed or refused to transfer to a unit of appropriate unit size offered by the LHA, following any such failure or refusal to transfer, the Tenant's monthly rent shall be 150% of the rent which would otherwise have been charged to Tenant.
 - BHA will assist with moving expenses for BHA-initiated overhoused transfers.
 - BHA will send a letter with this information at the time of unit offer.

Vacant 1-bedroom units are typically used to transfer overhoused residents.

4. Underhoused Transfers

Underhoused residents are occupying units too small for their household size who request a larger unit. If they are residents in state public housing, they may also apply through CHAMP online application as Priority #6: Transfer for good cause.

- **Evaluation Criteria:**
 - Household composition
 - Availability of appropriately sized units
 - Current occupancy standards

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- **Application Needed:** Yes

5. Administrative/Emergency Transfers

These are initiated by the management team, not the resident, and are instituted for internal or operational reasons. They will be used rarely, primarily in emergency situations.

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- **Managed by:** Designated staff (Executive Director, Assistant Executive Director, Director of Property Management). For internal controls, at least two of designated staff must agree to administrative transfer, and document in note to file.
- **Use Cases:** Emergency relocations, significant and urgent unit maintenance needs.
- **Application Needed?:** No

Transfer Ratios

HA sets target ratios of transfers vs. applicants for filling vacancies to appropriately balance the needs of existing residents and new applicants as well as manage workload of maintenance and admissions departments. Except for 1 BR and 4 & 5 BR units, approximately **one in four** available vacant units will go to internal transfers. BHA will prioritize 1BRs in the public housing portfolio for overhoused transfers at a ratio of **one in two** and prioritize 4 & 5 BR BRs for Walnut-High townhouse transfers and internal under-housed transfers through 2027.

Review of Transfers

BHA tracks all transfers through PHAweb and will report to the board annually on transfers, including number of transfers for each priority and transfer demographics to extent sharing data does not identify individual households.