May 7, 1996  
Audit Related Memorandum  
No. 96-BO-111-0801

MEMORANDUM FOR:  Nicholas P. Retsinas, Assistant Secretary for Housing, Federal Housing Commissioner, H

ATTENTION:  Chris Greer, Acting Deputy Assistant Secretary for Multifamily Housing Programs, HM

FROM:  William D. Hartnett, District Inspector General, Office of Audit, 1AGA

SUBJECT:  Boston Safe Neighborhood Action Plan  
Boston, Massachusetts

Introduction

We conducted a review of the Boston Safe Neighborhood Action Plan (SNAP) Initiative. Our objective was to assess the impact of the Boston SNAP Initiative on the tenants, developments, and surrounding neighborhood. Our assessment included determining whether components of the Boston SNAP Initiative could be adopted at other assisted multifamily housing sites.

To achieve our objectives, we:

- Determined the history of SNAP and the Boston SNAP Initiative, and identified the various stakeholders involved in the Boston SNAP Initiative.
- Interviewed the Chief of HUD's Boston Office Multifamily Real Estate Owned Branch, the official responsible for implementing SNAP.
- Interviewed officials of the Massachusetts Housing Finance Agency (MHFA) to obtain their opinion of the SNAP Initiative.
- Interviewed the presidents of the tenant associations at three multifamily developments included in the Boston SNAP Initiative and obtained their opinion on the effectiveness of the Boston SNAP Initiative.
- Evaluated the City of Boston Police Department (BPD) statistics on the number and types of calls police
responded to from the three multifamily developments involved in the Boston SNAP Initiative.

- Evaluated the City of Boston's Municipal Police Department security measures that had been taken at the three SNAP Initiative Projects.
- Determined the total cost of providing security at the three SNAP Initiative properties, Grant Manor, Camfield Gardens and Roxse Homes.

**Summary**

Our review disclosed that the Boston SNAP Initiative is a successful model in bringing diverse groups together for the purpose of implementing crime reduction strategies at HUD multifamily projects. In addition to the Boston SNAP Initiative's crime reduction goal, it may also facilitate a national goal of tenant ownership by making the neighborhood safer and more attractive to residents in the multifamily developments.

The strategy employed by the stakeholders in the Boston SNAP Initiative has resulted in a reduction in the amount of calls made by residents to the BPD and contributed to making the developments and the surrounding neighborhood safer.

While the successes of the Boston SNAP Initiative is noteworthy, it does come at a high start-up cost. This is attributable to the cost of labor for establishing control of the properties and a 27 percent increase in the Department of Labor wage rates for armed security guards in 1995. The three SNAP Initiative projects paid a combined labor cost of $1,291,094 in 1995, which equates to $1,866 per unit, per year. The high start-up costs are partially offset by an average 18 percent decrease in the projects repair expense due to vandalism.

The three SNAP Initiative properties are part of the Demonstration Disposition Program (Demo Dispo) which is administered by MHFA. Once the properties are sold, MHFA has a prototype budget allocating $760 per unit, per year, for security, with HUD providing Project Based Section 8 subsidies. The Section 8 Contract for all ten Demo Dispo properties is $132,500,532, beginning with the sale of the projects planned for 1998.

The Boston SNAP Initiative's primary goal of reducing crime at the three developments and the surrounding neighborhood is not an easy or clear-cut mission. Without the commitment exhibited by the City
of Boston, MHFA, resident groups and local HUD officials, the SNAP Initiative would not be as effective. HUD's support of the SNAP Initiative was contingent upon the City of Boston and MHFA's commitment to the Initiative.

Even though the Boston SNAP Initiative has been costly and time consuming, it is a very successful program in reducing crime. Therefore, HUD should consider using components of the Initiative as a model for other multifamily projects. Additionally, as more projects in Boston are added to the SNAP Initiative, economies of scale may be achieved in lowering the cost of security.
Background

In an effort to combat crime in inner city neighborhoods and HUD assisted housing, a new partnership was formed between HUD, the U.S. Conference of Mayors, and the National Assisted Housing Management Association (NAHMA).

As a result of this partnership the Secretary of HUD, on June 12, 1994, announced a new anti-crime initiative, SNAP, in which he stated:

"HUD is determined to reduce crime in HUD assisted housing. We are strengthening the relationship between assisted housing owners/managers, the residents, and local governments. This new partnership is a step in the right direction."

Fourteen cities across the country are currently participating in the SNAP Initiative: Atlanta, Georgia, Boston, Massachusetts, Baltimore, Maryland, Denver, Colorado, Houston, Texas, Newark, New Jersey, Philadelphia, Pennsylvania, Columbus, Ohio, Detroit, Michigan, Los Angeles, California, New Orleans, Louisiana, Richmond, Virginia, North Little Rock, Arkansas, and Washington, D.C.

The SNAP Initiative brings together government officials at the local, state and federal level, owners and management agents, residents, service providers, and law enforcement officials to develop innovative, neighborhood-based, crime-prevention strategies.

The Secretary's June, 1994 announcement indicated that the SNAP Initiative has three major goals:

- To encourage cooperative efforts among the people who have a real stake in the affected neighborhoods.
  
  - The stakeholders are governments, property owners and managers, and business and neighborhood leaders. These entities all have a stake in creating and maintaining viable, stable communities.

- To support efforts to reduce crime in and around assisted housing developments.
  
  - The SNAP Initiative will be effective if the stakeholders use a conscious and directed planning process to fully understand the nature of their problems and then agree as to what would be the most effective use of available resources.

- To identify and share effective crime prevention strategies and activities.
Effective crime prevention strategies and activities in one neighborhood may not necessarily work in another community, however actions taken and lessons learned should be shared with stakeholders from interested communities.

Separate HUD funding for the SNAP Initiative has not been enacted to implement these goals. However, the Office of Community Development has furnished guidance in using Community Development Block Grant (CDBG) and HOME funds in providing incentives for developing public safety action plans for inner-city neighborhoods. The HOME Program provides grants to states, local governments and Indian tribes to implement local housing strategies designed to increase home ownership and affordable housing opportunities for low and very low-income persons. Funds can be used for tenant-based assistance, housing rehabilitation, assistance to first-time home buyers, and new construction.

Multifamily developments provide funding for project security services through rental income and subsidy payments. Extraordinary items such as electronic surveillance equipment or other major public safety purchases for goods and services could be eligible under CDBG or HOME.

The Boston SNAP Initiative is fully functional at three HUD-owned Multifamily Projects that are currently being managed by the Massachusetts Housing Finance Authority (MHFA) under the Demonstration Disposition Program (Demo Dispo). MHFA and HUD reached an agreement on April 11, 1994 for MHFA to act as administer of the three SNAP Initiative projects, in addition to seven other HUD-owned properties, that are in the Demo Dispo Program.

The goal of the Boston SNAP Initiative is to establish a safer living environment in these three properties; Grant Manor, Camfield Garden, and Roxse Homes, and in the surrounding neighborhood. As a result of establishing a safer environment, the stakeholders have an additional goal of ultimately facilitating tenant homeownership of the properties.

The tenant associations, as key stakeholders, are involved in the decision making process affecting their projects. And will, according to the SNAP Plan be given the opportunity for home ownership once the projects are fully rehabilitated. HUD has committed $100,000 per unit in its Demo Dispo Program contract for rehabilitation of all ten properties, including the three SNAP projects.

Results of Review

The Boston SNAP Initiative is considered a success in that it is establishing a safer living environment at the subject properties and the surrounding neighborhood. As SNAP is primarily a safety initiative, the collaboration of the Boston Police Department (BPD) was essential. The expertise for formulating building security plans provided by Boston's Municipal Police...
Department (MPD) was also essential in this safety initiative.

The success of the Boston SNAP Initiative can be attributed to:

- Cooperation from the City of Boston
- The expertise of the security specialist from the Boston MPD
- Electronic surveillance equipment at Grant Manor, with additional electronic surveillance equipment to be on-line at Roxse Homes in the spring of 1996
- Fully trained Special Police Officers (SPO), with arrest authority, assigned to the projects
- Active resident councils
- Periodic meetings between the stakeholders

The Boston SNAP Initiative brings together a diverse group of stakeholders. The stakeholders are representatives of Tenant Associations, HUD, the MHFA, Management Agents, the Mayor of the City of Boston, BPD and the MPD.

Representatives from the stakeholders meet on a periodic basis to exchange information on the neighborhood, plan crime reduction strategies, and the allocation of resources.

Prior to the HUD Secretary's announcement of the SNAP Initiative, the City of Boston Public Facilities Department, Housing Division, contacted the MPD concerning the possibility of assisting HUD in developing a security strategy for HUD's distressed properties located in Boston inner-city neighborhoods.

On September 24, 1993, HUD and MPD agreed in a Memorandum of Understanding (MOU) for the MPD to provide security consulting services on a no-charge basis. Grant Manor was selected to have its security measures reviewed because of its potential for homeownership. The MPD provided an assessment of physical security at Grant Manor and made the following recommendations:
- Security Command Center for electronic interior and exterior surveillance equipment, to be manned 24 hours per day.

- Alarm systems for emergency exit doors.

- Closed Circuit Television System to efficiently monitor exterior and interior activity.

The MOU also called for the MPD to assist Management Agents to prepare solicitations for private security services, develop standards for private security guards, provide oversight and supervision of security services, arrange access for appropriate training of private security personnel and facilitate an application to the Boston Police Department for special police powers for private security personnel.

With the advent of SNAP and the three properties being part of the Demo Dispo Program, a joint presentation was made to the Boston Police Commissioner by members of HUD, MHFA, MPD and the residents councils to obtain limited arrest authority for private security personnel. The Commissioner granted arrest authority to the private security personnel, with the condition that they receive special training to support the exercise of arrest authority.

A training curriculum of 160 hours of police academy level training for the Special Police Officers (SPO) was developed by members of the MPD, MHFA and City of Boston.

The academy level training consisted of:

- Community Policing
- Diversity and Cultural Awareness
- Relevant BPD Regulations
- Court Procedures
- Domestic Violence
- Report Writing
- Criminal Law
- Constitutional Law
With the completion of the initial two classes of training for the SPOs in January/February 1995, and the granting of arrest authority, the SNAP Initiative was fully operational at the developments, with the exception of the electronic security devices being installed at Roxse Homes.

According to HUD's Data Prompt Property Management System (DPPMS), which is the source of financial information for the projects, a total of $1,343,379 was spent by the three projects for security in fiscal year 1995, which was an increase of $787,023 from 1994. Of this amount, $11,676 went to upgrade electronic surveillance equipment at Grant Manor, $22,283 was used to train the SPOs so that they could be granted arrest authority by the BPD, $1,291,094 was for direct labor charges of armed guard security services, and the balance of $18,327 went to the maintenance and monitoring of the electronic surveillance and other safety equipment.

<table>
<thead>
<tr>
<th>Fiscal Year</th>
<th>Camfield Gardens</th>
<th>Grant Manor</th>
<th>Roxse Homes</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>1995</td>
<td>$247,337</td>
<td>$616,162</td>
<td>$479,880</td>
<td>$1,343,379</td>
</tr>
<tr>
<td>1994</td>
<td>$ 84,512</td>
<td>$264,309</td>
<td>$207,536</td>
<td>$ 556,356</td>
</tr>
<tr>
<td>Total Increase</td>
<td>$162,825</td>
<td>$351,854</td>
<td>$272,344</td>
<td>$ 787,023</td>
</tr>
</tbody>
</table>

Contributing to the increase in security costs was a Department of Labor ruling on the hourly wage for armed security guards. The rate went from $16.39 per hour to
$20.75 per hour, a 27 percent increase, in 1995.

In the new contract for security (in 1996), MHFA has estimated a 30 percent reduction in the guard coverage schedule as a result of the $210,306 in electronic surveillance equipment being installed at Roxse Homes.

As previously stated the fiscal year 1995 manpower cost was $1,291,094 or $1,866 per unit. The MHFA has entered into a new security contract for 1996 in which an increase to $1,933 in the per year, per unit cost is stipulated. This increase will be reduced, however, to $1,352 per year once the installation of the electronic surveillance equipment at Roxse Homes is accomplished, in the late spring of 1996. Finally, the projected budget by MHFA after disposition of the projects shows a security cost of $760 per year, per unit.

With the exception of the initial electronic surveillance equipment installed at no cost to Grant Manor, all costs incurred came from either the project revenues or the FHA insurance fund. The City of Boston provided the original electronic surveillance equipment through its CDBG program, at a cost of $31,158.

According to the Management Agent for Grant Manor, the electronic surveillance equipment has resulted in reduced repairs to costly door hardware and intercoms as well as other costs related to vandalism, such as graffiti on painted and masonry surfaces.

As a result of the improved security measures taken at the SNAP projects there has been a reduction in the amount of repair expense incurred at the projects.

<table>
<thead>
<tr>
<th>Fiscal Year</th>
<th>Total Repair Expense</th>
<th>% Of Yearly Decrease</th>
</tr>
</thead>
<tbody>
<tr>
<td>Camfield Gardens</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1994</td>
<td>$350,894</td>
<td></td>
</tr>
<tr>
<td>1995</td>
<td>$260,332</td>
<td></td>
</tr>
<tr>
<td>Total Difference</td>
<td>$ 90,562</td>
<td>-25.8%</td>
</tr>
</tbody>
</table>
As the above chart illustrates, there has been an average of 18 percent, or $288,551, decrease in repair costs once enhanced security was installed in the projects. We recognize that the SNAP Initiative does not account for all the decrease in repairs expense. However, according to the Maintenance Manager for Grant Manor, he now can do preventative maintenance, as a result of not having to spend man hours repairing damage caused by vandalism and graffiti.

To provide support for the Demo Dispo Program at these projects, HUD has authorized Section 8 project based assistance for the following units according to the Annual Contributions Contract:

<table>
<thead>
<tr>
<th>Project</th>
<th>Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Camfield Gardens</td>
<td>136</td>
</tr>
<tr>
<td>Grant Manor</td>
<td>185</td>
</tr>
<tr>
<td>Roxse Homes</td>
<td>371</td>
</tr>
<tr>
<td>Total</td>
<td>692</td>
</tr>
</tbody>
</table>

The total budget authority for all ten Demo Dispo Program projects is $132,500,532 and expires September, 2012. The Section 8 assistance does not begin until after the
planned rehabilitation and sale of the projects, expected in 1998.

HUD has contracted with MHFA for the rehabilitation of all ten Demo Dispo Program projects, at a sum of $100,000 per unit. After rehabilitation, the number of units will decrease from 1,878 to 1,662, as a result of changing the configuration of each project.

These projects were selected for participation in SNAP by HUD and MHFA because the tenants had formed resident councils and expressed serious interest in homeownership in the form of limited equity cooperatives. Both Grant Manor and Camfield Gardens have received Homeownership and Opportunity for People Everywhere (HOPE 2) planning grants of $93,000 each. Roxes Homes's source of funding for tenant homeownership will come from the FHA insurance fund.

While the projects are physically very close to each other, the resident groups had not collaborated to address common problems prior to the SNAP initiative. The level of commitment and cooperation by the stakeholders since SNAP has led to a reduction in the amount of police calls from the SNAP sites and a general sense of success in having made their neighborhood safer.

With the overall sense of success expressed to us by the Presidents of the Residents Associations we requested information from the Boston Police Department to confirm whether in fact there was less crime then in previous years at the SNAP Projects.

The Lieutenant for Detectives from the Commissioner's Office of the Boston Police Department (BPD) stated the BPD has the capability of determining how many calls are made from a specific street addresses in the city. In the chart below the statistics provided by the BPD's Office of Research and Analysis, show a reduction in the amount of overall calls from the SNAP developments. (Calls are all calls for service to the Police Department, which could be for anything from trespassing to homicide.)
From 1993 to 1994 at Grant Manor the number of calls dropped from 365 to 274. As of the end of May 1995, the latest period the BPD have statistics on, the number of calls was 77. If the trend of calls established from January through May 1995 continued to December 1995, the number of calls would be approximately 185. This represents an approximate drop of 50 percent from 1993, in the amount of calls made to the BPD.

Calls made from Roxse Homes and Camfield Gardens match the trend established at Grant Manor. In 1993 the total was 556 and in 1994 was 407. By May 1995 the total of calls was 122 for both projects. If we again follow the trend of the calls made as of May, 1995, this number would be approximately 293 calls, or approximately half of the calls made in 1993.

The BPD's Office of Research and Analysis also maintains statistics on all reported crimes in the city. The statistics are reported to the Federal Bureau of Investigation (FBI) to be used in determining national crime statistics. (The BPD provided statistics for the local Reporting Area, which includes the street addresses of the individual developments. For the reporting of Part I and Part II crimes, the BPD provided statistics for all of 1994, however, because of software problems, the BPD only had

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statistics up to May, 1995. For comparative purposes, we compared the same time frame for 1994 and 1995.)

Reported Part I and Part II crimes have risen in the reporting areas surrounding the projects. According to officials at the BPD, the SNAP Initiative has had a positive effect on the surrounding area. In the opinion of the Lieutenant of Detectives, BPD Commissioners Office, this is attributed to tenants reporting more criminal activity to the police. Also, according to the Lieutenant, tenants are not as afraid to report criminal activity because they know some action will be taken to remove the criminal element from the neighborhood. Also, because of the high visibility of the same officers (City and private) in the neighborhood, a level of trust is built upon to reduce the fear of crime.

Reported Part I and Part II crimes in the development neighborhoods are as follows:

<table>
<thead>
<tr>
<th>Crime Category</th>
<th>1994</th>
<th>1995</th>
<th>% Change</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Camfield Gardens Area</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>January - May</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Part I</td>
<td>48</td>
<td>82</td>
<td>71%</td>
</tr>
<tr>
<td>Part II</td>
<td>74</td>
<td>105</td>
<td>42%</td>
</tr>
<tr>
<td>Total</td>
<td>122</td>
<td>187</td>
<td>53%</td>
</tr>
<tr>
<td><strong>Grant Manor Area</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>January - May</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Part I</td>
<td>255</td>
<td>296</td>
<td>16%</td>
</tr>
<tr>
<td>Part II</td>
<td>433</td>
<td>429</td>
<td>-1%</td>
</tr>
<tr>
<td>Total</td>
<td>688</td>
<td>725</td>
<td>5%</td>
</tr>
<tr>
<td><strong>Roxse Homes Area</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>January - May</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Part I</td>
<td>189</td>
<td>216</td>
<td>14%</td>
</tr>
<tr>
<td>Part II</td>
<td>332</td>
<td>336</td>
<td>1%</td>
</tr>
<tr>
<td>Total</td>
<td>521</td>
<td>552</td>
<td>6%</td>
</tr>
</tbody>
</table>
The SNAP Initiative shares the same operational goal as Operation Safe Home (OSH), the HUD program designed to rid public housing projects of violent crime. The overall strategy of both SNAP and OSH is to collaborate/facilitate efforts by local and federal officials in combating crime.

Some methods of operation are also similar in that both use covert means of preventing criminal activity. OSH uses informants and undercover agents, while the Boston SNAP Initiative uses electronic surveillance equipment and networking between the SPO’s, BPD and local residents interested in reducing crime.

Both also outreach to local law enforcement. SNAP does this by using the neighborhood policing concept and coordinating efforts between SPOs and BPD.

Each group of stakeholders has something to gain from ensuring the success of SNAP, especially the tenants.

The presidents of the tenants association stated that the tenants gain a sense of living in a safe neighborhood from an actual reduction in crime at the projects. They also have a more reasonable expectation of a safe neighborhood, where parents are no longer afraid to have their children playing outside.

HUD, MHFA and the City of Boston will gain safer neighborhoods, lower costs for security and maintenance, tenant ownership of the SNAP projects and a positive relationship with the tenants based on trust.
While the SNAP Initiative deals primarily with safety concerns, the participants have taken a more broad based approach to neighborhood crime by offering alternatives to gangs, drugs and violence.

The Boston SNAP Initiative has also incorporated several community service programs in its plan. There is a significant scholastic and athletic portion of the Boston SNAP Initiative that is being used to generate positive alternatives for the youngsters residing at the SNAP projects.

From the scholastic standpoint, there are college volunteers from Northeastern University who donate their time to tutor school age children at the projects. In addition, qualified residents from the SNAP Projects are designing a computer training program.

Also, the Boston SNAP Initiative is in the process of placing VISTA Volunteers at the SNAP projects to solidify and expand the role of resident groups.

Finally, there are numerous athletic activities for the residents to include, martial arts training for children and adult women, basketball leagues, softball leagues and trips to various local sites such as museums, Fenway Park and Franklin Park Zoo.

The Boston SNAP Initiative represents a degree of governmental/private cooperation that is unique. Stakeholders have made a generous commitment of time and resources to ensure a success. SNAP has resulted in a lowering of the crime rate at the participating properties, with the potential to expand similar techniques to other Boston neighborhoods and beyond.

The Boston SNAP Initiative has been successful in meeting its primary goal of providing a safer living environment for residents in HUD assisted multifamily housing. To this end, HUD has provided $1.3 Million in expenditures for security at the three SNAP Initiative projects in 1995 for professionally trained SPOs and enhancements to electronic surveillance equipment.
The cooperation between all the stakeholders is one of the key elements to the success of the Boston SNAP Initiative. The fact that the residents feel safer in their homes, crime at the projects being reduced, and lower repair costs from less vandalism illustrates the success of the Boston SNAP Initiative. With residents more willing to assist in their own safety and alternative social programs offered, in addition to the heightened security measures installed, the opportunity for committing crime is greatly reduced. In the long run, this should translate into a safer environment for the whole neighborhood.

HUD should consider adopting the components of the Boston SNAP initiative for other HUD assisted multifamily projects. Although the success in Boston has been initially costly and time consuming, HUD should also consider the risk to its investments in these projects before reducing the security costs too far. It is far more important to maintain safe developments to protect the $200 Million in planned rehabilitation and $132 Million in future Section 8 Project Based subsidy.
Distribution

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