



Commonwealth of Massachusetts

DEPARTMENT OF HOUSING & COMMUNITY DEVELOPMENT

Maura T. Healey, Governor ◆ Kimberley Driscoll, Lieutenant Governor ◆ Jennifer D. Maddox, Undersecretary

To: Regional RAFT Administering Agencies
From: Amy Mullen, Program Director, DHCD
Date: February 1, 2023
Subject: Updated RAFT Conflict of Interest Policy in End-to-End (E2E) System

Summary

This memo updates the Conflict of Interest policy for RAFT applications as laid out in the FY23 RAFT Administrative Plan for RAFT Regional Administering Agencies (RAAs). As of the launch of the new End-to-End (E2E) RAFT application processing software in November and December 2022, RAAs may process RAFT applications for their own members, officers, directors, or employees and are not required to re-route the application to a different RAA.

Background

The original conflict of interest policy in the FY23 Administrative Plan was as follows:

Before an Administering Agency makes a payment on behalf of a RAFT participant residing in or moving to a unit that is owned or operated by the RAFT Agency or its subsidiary, the RAFT Agency must disclose this conflict of interest to DHCD.

As outlined in Attachment A, if a member, officer, director, or employee of the RAFT Agency seeks to apply for RAFT, they must apply at the RAFT Agency that is closest to their residence and that is not the same RAFT Agency that they are affiliated with. If they are approved for funds, the RAFT Agency that completed the application should process the funds.

The E2E software system allows DHCD much more visibility into applications and the steps taken to process them by RAA staff. With this increased visibility, DHCD no longer requires a separate disclosure and will not require RAAs to transfer the application to a different RAA. E2E allows staff to receive applications based on certain “skills” they are assigned by their RAA’s Business Administrators. One of the skills is the ability to process conflict of interest cases, bundled with the fraud skill and labeled “Fraud_or_COI.” RAA leadership should review the list of staff who have been given the “Fraud_or_COI” skill to ensure they are comfortable with those staff having access to these more sensitive cases.

New Policy

Under the new policy, RAA staff with the “Fraud_or_COI” skill may process applications for other staff at the same RAA. RAA staff may not process an application for themselves, for a family member, or for a person in their direct chain of command. In these cases, the application must be re-routed to another staff person with the “Fraud_or_COI” skill. In addition, staff will have the ability to recuse themselves from processing a fellow staff person’s case for any reason. If the RAA leadership feels that no one at the RAA with the “Fraud_or_COI” skill can

impartially process the application, then a Business Administrator at that RAA may transfer it to the RAA who serves the geography nearest to the transferring RAA. The Business Administrator should make contact with the receiving RAA to explain that an out-of-region case is coming their way so that the receiving RAA staff person can log on and accept the case in their Omni-Channel in E2E.

RAA staff applying for RAFT, regardless of which program they work for, must self-identify as an RAA staff person by truthfully answering the question that asks whether they work for an RAA. If an RAA receives an application for a staff person who has not self-identified, the RAA should send the application back to draft and request the person self-identify as an RAA staff person before transferring the case to another RAA.

Please contact amy.mullen2@mass.gov with questions about this memo.