

Department of Mental Health Rental Subsidy (DMHRSP) FY24 Guidance Updates Training January 2024



Let's Get Started

- This session will be recorded
- Please type questions into Q&A box
- Live closed captioning available
- FY24 Guidance materials at [FY24 Guidance Email 1/3/2024](#)
- Slides and recording on [State Programs Training Webpage](#) afterwards

Let's Get Started

- Where to Find Materials:
 - [EOHLC](#) (DHCD) and [DMH](#) Regulations on Mass.gov
 - EOHLC Guidance, Program Documents, Training
 - [HAFIS for LHAs](#), [RAA Portal for RAAs](#) (documents)
 - [State Programs Training Webpage](#) (guidance and training)
 - DMH Guidelines, DMH Documents
 - Email your DMH Area Housing Coordinator (slide 7)

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Slide #

*Refers to section numbers in EOHLC's FY19 Guidance (9/1/2018),
FY24 Guidance (1/3/2024) & FY19 Regulations*

Section 1. a. i.

EOHLC

Beginning FY24 (July 2023), the Dept of Housing and Community Development (DHCD) became an independent secretariat named the Executive Office of Housing and Livable Communities (EOHLC).

Guidance, documents, etc. with “DHCD” remain valid and synonymous with “EOHLC.”

EOHLC (DHCD) Contact

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Contacts II. A. (p6);
Introduction IV. B. (p11)

DMH Contacts

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Western MA – TBD (coverage by Susan Fortin, susan.fortin@mass.gov)

FY24 Program Updates

- Positive Identification & Vital Documents
 - Tenant-based – Matching all state rental vouchers
 - Sponsor-based – Reduced requirements & increased flexibilities
- Income & Asset Verifications
 - Reduced requirements & increased flexibilities
- New Forms
 - Certifications, referral form
- Non-Suspension of Payments for Failure to Recertify
- Permanent Holding Payment Policy

FY24 Program Updates

Effective 2/1/2024 – Hard Date for Actions

For any action run on or after 2/1
(regardless of effective date of action)

✓ January recert completed in February

No retroactively applying guidance to any action already completed before 2/1

(regardless of effective date of action)

✗ March recert completed in January

Sponsor-Based vs Tenant-Based



Sponsor-Based vs Tenant-Based

Sponsor-Based

- All Vouchers Prior to July 2018
- Service Provider (DMH Case Management if no SP)
- SP is Sponsor, Tenant, & Voucher Holder
- SP chooses Unit and matches Client
- Clients can share units

Tenant-Based

- Began July 2018 (FY19)
- DMH Case Management only
- Client is Tenant & Voucher Holder
- SP/CM refers Client
- Client chooses Unit; more mobility
- 1 Household per Unit

Sponsor-Based vs Tenant-Based

Sponsor-Based

- Minimal Eligibility Requirements
- SP Responsible for Ensuring Completion & Compliance
 - Referral/Eligibility
 - Lease Up, Rent Guarantee, Tenancy Issues
 - Recert/Interim

Tenant-Based

- More Eligibility Requirements
- More Independence;
 - With CM assistance, Client responsible for Completion & Compliance

Sponsor-Based vs Tenant-Based Questions



Positive Identification & Vital Documents



Positive Identification

- Effective 2/1/2024, *different standards* for Sponsor-based vs Tenant-based
- All FY19 Guidance for both Sponsor and Tenant-based is *replaced* by their respective sections in FY24 Guidance
- FY24 Guidance incorporates and makes permanent many flexibilities and therefore, also replaces Special Circumstances section of FY19 Guidance
- All DMHRSP must adhere to this new FY24 Guidance

Tenant-Based Positive Identification

- FY24 Guidance (p2-5) *replaces* FY19 Guidance (p13-24) as it applies to Tenant-Based
- Matches across all tenant-based state programs (MRVP, AHVP, tenant-based DMHRSP)

Tenant-Based Positive Identification

- Effective 2/1/2024, applies to:
 - All new tenant-based entries, including new household members
 - All existing tenant-based minors becoming adults
 - All sponsor-based conversions to tenant-based
 - Any cases still in progress as of 2/1/2024 (limited exception)
- Does not apply to:
 - Any existing household that is already fully in compliance with prior requirements

Tenant-Based Positive Identification

Where possible, all adult household members must provide each of the following:

- Government-issued photo ID;
- Verification of date of birth; and
- Social Security number verification

Household members who are not able to provide all documents must, at a minimum, provide at least one of the following:

- Government-issued photo ID;
- Birth certificate; or
- Social Security card.

Tenant-Based Positive Identification

Government-Issued Photo ID

- Required for all household members 18+
- If unable to obtain, may self-attest

Birth Certificate

- May be submitted in lieu of government-issued photo ID for minors
- May be submitted for adults if unable to obtain government-issued photo ID
- If unable to obtain, may submit a government-issued photo ID

Social Security Card

- May be submitted for adults if unable to obtain government-issued photo ID
- Ideal, but not required, verification of Social Security number

Government-Issued Photo ID

- Required for Client/Head of Household and adults 18 years old and older, unless self-attest that they cannot obtain one
- Photo ID issued by the state or federal government or by a foreign government

Government-Issued Photo ID

- Acceptable:
 - Driver's license (any state and/or country)
 - State ID card (any state)
 - Passport (U.S. or foreign)
 - Permanent resident immigration card
 - U.S. military ID
 - Foreign national identification card
 - Massachusetts Commission for the Blind Blindness Identification Card

Government-Issued Photo ID

- Not Acceptable:
 - Blind Access and Senior CharlieCards, Transportation Access Pass, and any other MBTA transportation ID card (no longer acceptable)
 - Library cards
 - Student ID cards
 - Employee ID cards (except for military IDs)
 - Photo IDs issued by cities and shelters
 - All other photo IDs where date of birth and Social Security number, if applicable, are not verified

Government-Issued Photo ID

- Can Self-Attest if:
 - Requested, but not receive in a timely manner
 - Does not have documents required to obtain it
 - Lost, stolen, and/or destroyed (and not yet replaced)
 - Should attempt to obtain (as feasible)
 - Provide what you have in meantime
 - Must provide once/if received

Government-Issued Photo ID

- Examples – Can Self-Attest if:
 - *Have everything needed to submit request except money to pay fees. Will submit request next month when receive funds.*
 - *Documents stolen that are needed in order to request the necessary documents. Started process of replacing initial documents first, so will take a while to get the final documents needed.*
 - *Requested online, but SSA/RMV/etc. is delayed for months.*
 - *Fled due to political strife/natural disaster/DV without documents and unable to obtain replacements or will take long time*

Government-Issued Photo ID

- If cannot provide photo ID, then must do All:
 - Provide whatever photo ID available, even if not government-issued
 - Provide birth certificate and/or Social Security card (SSN verification must be provided if SSN exists)
 - Complete Government-Issued Photo ID Self-Attestation form
 - Provide the documents to the AA if/when they receive it later

Government-Issued Photo ID

Questions?

Date of Birth

- Required for all household members
- If cannot provide a birth certificate, accept any documentation that confirms the household member's date of birth (including photo ID)
- If neither possible, can self-attest

Date of Birth

Ideal

- Birth Certificate

Alternative

- Government-Issued Photo ID
- For very young children, mother's/hospital letter

Last Resort

- Government-Issued Photo ID Self-Attestation Form

*This chart only shows preferred verification,
not everything that is required if verification is not available

FY24 Guidance Updates (p2-5)

Date of Birth

- If cannot provide birth certificate or photo ID, then must do All:
 - Provide whatever photo ID available, even if not government-issued
 - Complete Government-Issued Photo ID Self-Attestation form (to also attest to DOB)
 - Provide the documents to the AA if/when they receive it later
 - Provide SSN verification
 - If SSN exist, must provide verification
 - If no SSN, then cannot self-attest to both DOB and photo ID and is *ineligible*

Date of Birth

Questions?

Social Security Number

- Verification required for All Household Members that have an assigned SSN
 - Household cannot self-attest their SSN, if they have one
- Having an SSN is not an eligibility requirement
 - No verification needed if household does not have an SSN
- Adults must authorize use of SSN for Wage Match, CORI, and verifications

Social Security Number

- Acceptable:
 - Social Security Card
 - Official Correspondence from SSA with both SSN + name (may need 2 letters)
 - No self-attestation allowed
 - No verification needed if SSN does not exist

Social Security Number

Ideal

- Social Security Card
- None required if SSN does not exist

Alternative

- Official letter/verification with both name and SSN from SSA

Last Resort

- Cannot Self-Attest

*This chart only shows preferred verification,
not everything that is required if verification is not available

FY24 Guidance Updates (p2-5)

Social Security Number

- If SSN does not exist, must provide birth certificate or government-issued photo ID or will be ineligible
- If SSN exist but is unverified, regardless of other documents, will be ineligible

Social Security Number

Questions?

Tenant-Based Positive Identification

- All household members must provide if possess any or all of the 3 vital documents, including if subsequently obtained
- Ideally, government-issued photo ID + birth certificate + social security card

Tenant-Based Positive Identification

Ineligible, unless:

If SSN does not
exist

- At least Government-issued photo ID or birth certificate required

If SSN exist

- At least Social Security card or verification from SSA required

Tenant-Based Identification Example A

- Only has shelter ID, birth certificate, and no SSN
- Required:
 - Provide shelter ID and birth certificate
 - Start request for photo ID (as feasible)
 - Complete Government Photo ID Self-Attestation Form
 - Provide photo ID if/when received

Tenant-Based Identification Example B

- Only has state ID and SSN (no card)
- Required:
 - Provide state ID (which also verifies DOB)
 - Obtain and provide replacement SS card or official letters from SSA verifying SSN *prior to eligibility review*

Tenant-Based Identification Example C

- No documents except official letters from SSA verifying SSN
- Required:
 - Provide replacement SS card *prior to eligibility review*
 - Begin applying for photo ID and birth certificate (as feasible)
 - Provide Government-Issued Photo ID Self-Attestation Form (to verify both photo ID and DOB)
 - Provide photo ID and birth certificate if/when received

Tenant-Based Identification Example D

- No documents and no SSN
- Required:
 - SSN verification not required (does not exist)
 - Must provide either birth certificate or government-issued photo ID
- Without at least birth certificate or government-issued photo ID, cannot run CORI and will be ineligible

Tenant-Based Positive Identification

Questions?

Sponsor-Based Positive Identification

- For Sponsor-based Only, FY24 Guidance (p2 & 5) *replaces* FY19 Guidance (p13-15)
- Specific to DMHRSP and more flexible than Public Housing or MRVP

Sponsor-Based Positive Identification

- Effective 2/1/2024, applies to:
 - All new sponsor-based entries, including new household members
 - All existing sponsor-based minors becoming adults
 - Any cases still in progress as of 2/1/2024 (limited exception)
- Does not apply to:
 - Any existing household that is already fully in compliance with prior requirements
 - Sponsor-based client converting to tenant-based must meet all tenant-based requirements at conversion

Sponsor-Based Positive Identification

- Positive identification confirmed via Sponsor-Based Household Certification Form
 - Only requires full name and date of birth
 - Verified and signed by both client and SP
 - No other verification or document is required
- Social Security Number no longer required for sponsor-based clients (as Wage Match and CORI are not required)

Sponsor-Based Positive Identification

Questions?

Positive Identification & Vital Documents Questions

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Department of Mental Health Rental Subsidy (DMHRSP) FY24 Guidance Updates Training



Break

Income



Income

- FY24 Guidance applies across both Tenant & Sponsor-based
- Specific to DMHRSP, more flexible than PH or MRVP
- Income calculation unchanged from FY19 Guidance (continues to follow PH)
- New income verification flexibilities, effective 2/1/2024

FY24 Guidance Updates (p6-15)
Eligibility V. B. 2. (p15);
760 CMR 38.05 (1) (a) & (2) (a) --> 5.06 & 6.05
Rent Redetermination A-Z Manual

Income

- New Household Certification Form, Income & Assets Reference Sheet

As always, the client and service provider must report any and all income, regardless of whether verification will be required or whether the income will be counted.

FY24 Guidance Updates (p6-15)
Eligibility V. B. 2. (p15);
760 CMR 38.05 (1) (a) & (2) (a) --> 5.06 & 6.05
Rent Redetermination A-Z Manual

Social Security, Pension, Life Insurance

- For annually determined, non-varying payments, such as:
 - Federal social security (retirement, survivor benefits, dual entitlement; Not SSI, SSDI, SSP)
 - Pensions
 - Life insurance benefits (Not variable trust payments or fund releases)
- Ideally, annual benefit letters that describe benefits for next full calendar year (even if not dated within last 90days)

Social Security, Pension, Life Insurance

- Only if annual benefit letter is lost, *attempt in this order*:
 1. Request new benefit letter dated within last 90 days
 2. If unable to provide timely, then 3 consecutive deposit verifications (ex. bank statements) within last 120 days that show deposits consistent with reporting, including gross amount and deductions
 3. If neither above, then self-certify via Household Certification Form + provide verifications subsequently obtained

Social Security, Pension, Life Insurance

Ideal

- Annual Benefit Letter
- Benefit Letter dated within last 90 days

Alternative

- Three (3) consecutive deposit verifications, such as bank statements, dated within last 120 days

Last Resort

- Self Certification via Tenant-Based or Sponsor-Based DMHRSP Household Certification Form

SSI, SSDI, SSP

- Moderately varying in response to other income change or COLA, such as:
 - Federal Supplemental Security Income (SSI)
 - Federal Social Security Disability Income (SSDI)
 - State Supplemental Program (SSP)

SSI, SSDI, SSP

- Annual benefit letter, only if:
 - a) Household has no other income; or
 - b) Household's income (including any other sources and amounts) has not changed

SSI, SSDI, SSP

- If no annual benefit letter, if has other income, or if any of income sources/amount changed, *attempt in this order*:
 1. Request new benefit letter dated within last 90 days
 2. If unable to provide timely, then 3 consecutive deposit verifications (ex. bank statements) within last 120 days that show deposits consistent with reporting, including gross amount and deductions
 3. If neither above, then self-certify via Household Certification Form + provide verifications subsequently obtained

SSI, SSDI, SSP

Ideal

- Annual Benefit Letter (only when no other income or no income changes)
- Benefit Letter dated within last 90 days (when other income exists or income changes)

Alternative

- Three (3) consecutive deposit verifications, such as bank statements, dated within last 120 days

Last Resort

- Self Certification via Tenant-Based or Sponsor-Based DMHRSP Household Certification Form

COLA

- No change to Cost-of-Living Adjustment (COLA) policy, except now permanent
- Applies to:
 - Federal social security (retirement, disability, survivor benefits, dual entitlement)
 - Federal Supplemental Security Income (SSI)
 - Federal Social Security Disability Income (SSDI)
 - Not State SSP

COLA

- When SSA announces in Nov for following year, immediately apply to any action Jan 1st or later
- SSA's COLA announcement is verification of COLA only
- Still require most recent SS, SSDI, and SSI benefit letter on which the COLA will be based

Income Example A

- Client referred for entry for January
- Only income is SSDI of \$1,200, with \$170 Medicare deduction
- Annual COLA of 3% announced
- No annual benefit letter for last year or coming year
- Bank statements showing 3 consecutive deposits of \$1,030
- AA uses these in conjunction with COLA announcement to calculate SSDI of \$1,236 for January. Medicare payment of \$170 is counted as medical deduction.

Income Example B

- Only income is SSI, but no recent letter
- Requested new letter few weeks ago, but not yet received
- Family member rep payee refusing to help provide bank statement. Bank refusing to provide directly due to lack of ID
- Client self certifies income via Household Certification Form + provide SSI benefit letter once received
- Simple client/SP explanation email to file

TAFDC, EAEDC, Unemployment, Child Support, Alimony

- Frequently varying income that may be slow/difficult to obtain, such as:
 - TAFDC/TANF
 - EAEDC
 - Unemployment
 - Child Support
 - Alimony
- If any change, new verification within 90 days is required

TAFDC, EAEDC, Unemployment, Child Support, Alimony

- Only if *no change* to that amount, *attempt in this order*:
 1. Request new benefit letter dated within last 90 days
 2. If unable to provide timely, then 3 consecutive deposit verifications (ex. bank statements) within last 120 days that show deposits consistent with reporting, including gross amount and deductions
 3. If neither above, then self-certify via Household Certification Form + provide verifications subsequently obtained

TAFDC/TANF, EAEDC, Unemployment, Child Support, Alimony

Ideal

- Benefit Letter dated within last 90 days (**required** when any change in amount)

Alternative

- Three (3) consecutive deposit verifications, such as bank statements, dated within last 120 days

Last Resort

- Self Certification via Tenant-Based or Sponsor-Based DMHRSP Household Certification Form

All Other Income

- No change to current policy for all other income (earned income/wages, self-employment/gig work, other disability income, work comp, gifts, adult/foster care payment, trust, any other)
- Verification within last 90 days
- See Income and Asset Reference Sheet and Verification Chart

FY24 Guidance Updates (p11-13)
Eligibility V. B. 2. (p15);
760 CMR 38.05 (1) (a) & (2) (a) --> 5.06 & 6.05
Rent Redetermination A-Z Manual

Gig Work

- Contracted self-employment, such as Uber, Lyft, DoorDash, Instacart
- Do not count tolls, because these are reimbursements and not actual income
- If working for more than 1 year, use tax return to verify income
 - Generally, verify self-employment income using the line for *Net Profit or Loss* from Schedule D Form 1040

Gig Work

- If working for less than 1 year:
 1. Obtain the same number of payment statements as you would for pay stubs.
 2. Determine Gross Income: Average the weekly or monthly income and annualize.
 3. Determine Expenses: Average the weekly or monthly expenses and annualize. Determine if there are expenses that are not weekly or monthly that should be included (i.e., insurance).
 4. Determine Net Income: Subtract the annualized expenses from the annualized gross income (if the amount is negative, enter \$0).

Third Party Verification

- Effective 2/1/2024, across both Tenant and Sponsor-based
- If client provides 'ideal' or 'alternative' verification (see chart), AA does not need to obtain third-party verification

Clients and SPs must not rely on AA's attempt for third-party verification in lieu of directly obtaining verification themselves, as this can cause delays in eligibility decisions and recertifications.

Wage Match

- Sponsor-based only – No longer required effective 2/1/2024
- Tenant-based – Still required (no change)

FY24 Guidance Updates (p15)
Eligibility V. B. 2. (p15);
760 CMR 38.05 (1) (a) & (2) (a) --> 5.06 & 6.05
Rent Redetermination A-Z Manual

Zero Income

- No change to existing policy
- Required:
 - Signed statement from *Each* Adult
 - Every 6 months:
 - AA inquiry on income status
 - Bank Statements
 - DTA and DUA inquiry

FY24 Guidance Updates (p14)
Eligibility V. B. 2. (p15);
760 CMR 38.05 (1) (a) & (2) (a) --> 5.06 & 6.05

Income Changes

- No change to existing policy
- Must report increase/decrease of 30% or more within 30 days
 - When in doubt, REPORT!
- Must report *ANY* change at all when zero income
- Interim required when change is 30% or more
- Interim not permitted when change is less than 30%

FY24 Guidance Updates (p14-15)
Interim Reexamination (p57-58)
760 CMR 38.07 (4) (b) and (c) and (5)

Income Questions



Assets



Assets

- FY24 Guidance (p15-18) *replaces* FY19 Guidance (p15)
- Effective 2/1/2024, across Tenant & Sponsor-based
- Specific to DMHRSP, more flexible than PH or MRVP
- Only actual income from assets over \$50,000 counted
- No asset limit or real estate prohibition
- Asset verification flexibilities
- New Household Certification Form, Income & Assets Reference Sheet

Asset Types

Including, but not limited to:

- Cash, saving, checking, money market, or similar account
- Market value of equity in real property, stocks, bonds, capital investment
- Equity in personal property such as boats, recreational vehicles, luxury goods
- IRA, 401(k), pension, or similar retirement account
- Settlement of personal or property loss
- Money at interest and debts due
- Cash surrender insurance policy
- Value of any personal or business asset disposed of by any Household member (including the disposition in trust) for less than fair market value during 2yrs prior eligibility
- Interest in a trust fund benefitting any adult Household member

Asset Types

Not including:

- Automobile used for primary transportation
- Personal property for regular personal use
- Interest in a special needs trust

Asset Types

Not Asset – Regular Personal Use

- X** Family car to drive to school and work
- X** Vintage watch inherited and worn daily in memory of grandpa
- X** Luxury handbag received as gift and used on special occasions

Asset – Investment

- ✓ Historic car being restored as hobby or future sale
- ✓ Special edition collectible sneakers kept in showcase
- ✓ Luxury handbags sold online for extra spending money

Asset Eligibility

- No asset limit at any time
 - Actual income may be counted
- No outright real estate prohibition
 - Case by case review (mostly in line with PH)
 - Actual income may be counted (in line with MRVP)

As always, the client and SP are required to report any and all assets, regardless of whether verification will be required or whether the income from the assets will be counted.

Asset Value

- Market value is the asset's worth in the market, such as:
 - Current savings account balance
 - Value of an investment account
 - Market value of the equity in real property
- Use market value to calculate total assets

Assets Equal to or Less Than \$50,000

- Client/SP must self-certify on Household Certification Form
- AA does not count any income from assets
- AA does not obtain verification, like bank statements
 - Verification or bank statements may be required for other reasons, such as zero income

Assets More Than \$50,000

- Client must report on Household Certification Form
- AA must verify assets
- AA must count actual income derived from the entirety of the assets (not just the portion over \$50,000)

Asset Verification

- AA must verify assets when:
 - Total value more than \$50,000
 - Bank statement still required for zero income households
- If client provides 'ideal' or 'alternative' verification, AA does not need to obtain third-party verification

Clients and SPs must not rely on the AA's attempt for third-party verification in lieu of directly obtaining verification themselves, as this can cause delays in eligibility decisions and recertifications.

Asset Calculation

- Simplified in line with [MRVP Admin Plan](#) (rather than PH)
- AA must count actual income derived from the entirety of the assets (not just the portion over \$50,000), including:
 - Rent, dividends, and interest
 - Any realization of taxable capital gain on sale or transfer shall be included
 - Amortization and depreciation shall not be deducted

Assets Example A

- Client receives monthly social security payment of \$800 and has \$3,000 in their savings account.
- The client provides their annual social security benefit letter. They self-certify to assets under \$50,000 via the Tenant-Based or Sponsor-Based DMHRSP Household Certification Form.
- The AA does not require any further income or asset verification, including bank statements. The AA does not count any income from assets towards countable income.

Assets Example B

- The entire client household is zero income and has \$9,000 in their savings account.
- The client provides all the necessary documents and verifications for zero income per existing FY19 DMHRSP Guidance, including two recent bank statements.
- The AA does not require any further income or asset verification from the client. The AA does not need to separately verify directly with the bank but does need to inquire with DTA and DUA. The AA does not count any income from assets towards countable income.

Assets Example C

- Client has an investment account of \$70,000 but has been unable to obtain and provide two monthly statements.
- The AA submits a third-party request for verification directly with the investment company.
- Upon receipt, the AA will include any actual income from the entirety of the \$70,000 account in the client's household income.

Assets Questions



Deductions



Deductions

- No substantive changes (continue to follow PH)
- Additional details and consolidation in FY24 Guidance, including:
 - Disabled Household
 - Animal Policy
 - Heat
 - Other

Eligibility V. B. 2. (p15);
760 CMR 38.05 (1) (a) & (2) (a) --> 5.06 & 6.05
Rent Redetermination A-Z Manual
FY24 Guidance Updates (p18-20)

Deductions Questions



Department of Mental Health Rental Subsidy (DMHRSP) FY24 Guidance Updates Training



Break

New Forms



New Sponsor-Based Forms

Effective 2/1/2024, Required:

1. Sponsor-Based Household Certification Form
 - Replaces Income Eligibility Determination Form (IED) used by DMH or any other household certification form provided by AA
 - Incorporates positive ID and income/asset self-certification
 - All new referrals, recertifications, and relocations
2. Sponsor-based referrals continue through email from SP/HC (no change)

New Tenant-Based Forms

Effective 2/1/2024, Required:

1. Tenant-Based Household Certification Form

- Replaces Income Eligibility Determination Form (IED) used by DMH or any other household certification form provided by AA
- Incorporates income/asset self-certification
- For all new referrals, recertifications, and relocations

New Tenant-Based Forms

Effective 2/1/2024, Required (continued):

2. Tenant-based Referral Form

- Replaces any referral form provided by AA
- For all new referrals, in addition to:
 - Tenant-Based Household Certification Form
 - Email from SP/HC

3. Government-Issued Photo ID Self-Attestation Form

- Same form for all tenant-based state rental programs
- For photo ID and birth certificate (Not SSN), as needed

FY24 Program Updates

Effective 2/1/2024 - Hard Date for Actions

For any action run on or after 2/1
(regardless of effective date of action)

✓ January recert completed in February

No retroactively applying guidance to any action already completed before 2/1

(regardless of effective date of action)

✗ March recert completed in January

FY24 Program Updates

Effective 2/1/2024 – Very Limited Rolling Window for Forms

New forms can be used just prior to 2/1 if current criteria are still met

✓ February recert completed on 1/24 using new household certification form but otherwise following current criteria

✗ December recert completed on 1/18 using new photo ID self-attestation form and new criteria

Old forms can be used just after 2/1 if new criteria are still met

✓ January recert completed on 2/10 using old IED or AA created household certification form obtained in January but otherwise following new criteria

✗ March recert completed on 2/28 using old IED for self-certification of income (unless accompanied by separate income self-certification letter)

New Forms Questions



Failure to Recertify



Annual Recertification & Interim Reexaminations

- Uniform packet by AA:
 - To verify Income, Household Composition, & Renew Signatures/Consent
 - Clearly indicate what verifications needed, due date, & possible consequences of failure to complete timely

Annual Recertification & Interim Reexaminations

- Annual Recertification
 - At least every 12 months
 - AA provides 2-3 months notice with at least 3 weeks to complete
 - Sufficient time for AA to complete & provide at least 1 month notice of change in occupancy charge
- Interim Reexamination
 - Relocation, Household Changes, Income Changes (Required at 30%)

Annual Recertification & Interim Reexaminations

Sponsor Based

- SP/CM Responsible
- Late/Incomplete may result in:
 - Suspended payment
 - Retroactive Adjustments
 - Termination of Voucher from SP
 - Client Eligibility Unconfirmed

Tenant Based

- Client Responsible with CM
- Late/Incomplete may result in:
 - Suspended payment
 - Retroactive Adjustments
 - Termination of Voucher from Client

Failure to Recertify

- Effective 2/1/2024, subsidy payments will no longer be suspended for failure to recertify until actual termination
- All other policies and procedures apply, including proceeding to termination (at which time, payments will also end)
- Recoupment and retroactive adjustment will be necessary
- **Timely recerts avoid increased terminations and associated administrative burden on all parties!**

Terminations IX. B. (p59-61);
760 CMR 38.05 (2) & (3);
FY24 Guidance Updates (p21-22)

Failure to Recertify Questions



Holding Payment



Holding Payment

- No change to current policy and procedures
- Now permanent going forward

Holding Payment Questions



Future Offerings

- DMHRSP
 - Additional guidance updates
 - Additional trainings
 - Check in opportunities
- Fair Housing

Q&A

- Positive Identification & Vital Documents
- Income & Asset Verifications
- New Forms
- Non-Suspension of Payments for Failure to Recert
- Permanent Holding Payment Policy

Department of Mental Health Rental Subsidy (DMHRSP) FY24 Guidance Updates Training



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