

THE COMMONWEALTH OF MASSACHUSETTS

**Five Year Consolidated Plan**

**Federal Fiscal Years 2025-2029**

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**DRAFT**

**For Public Review and Comment**  
**April 2025**

# Executive Summary

## ES-05 Executive Summary - 91.300(c), 91.320(b)

### 1. Introduction

The U.S. Department of Housing and Urban Development (HUD) requires states and localities to prepare a Consolidated Plan (Con Plan) to receive federal housing and community development funding. HUD has established three fundamental goals for the programs it funds under the Consolidated Plan: 1) provide decent housing, 2) provide a suitable living environment and 3) provide expanded economic opportunities, especially for low-income people.

The 2025 – 2029 Consolidated Plan identifies the housing and community development needs of Massachusetts and provides the framework for how Massachusetts intends to address and prioritize those needs over the next five years. The five-year plan and the 2025 Action Plan pertain to the activities of the following programs:

- Community Development Block Grant Program (CDBG)
- Emergency Solutions Grant (ESG)
- HOME Investment Partnerships Program (HOME)
- Housing Opportunities for Persons with AIDS (HOPWA)
- National Housing Trust Fund (HTF)

These programs are called formula programs because HUD distributes the funds to each state based on a statutory formula that considers population, poverty, incidence of overcrowded housing, and age of housing stock. Consolidated Plans must be submitted to HUD every five years; more detailed action plans are required annually.

By design a collaborative process, preparation of the Consolidated Plan creates the opportunity for strategic planning and citizen participation in a comprehensive context, and to reduce duplication of effort at the state level. It also serves as a management tool that helps the state, local governments, and citizens assess performance and track results. The Executive Office of Housing and Livable Communities (EOHLC), as the administering agency for the Commonwealth of Massachusetts, encourages broad citizen and stakeholder participation, especially from those low-income residents most affected by its programs.

Massachusetts expects to receive approximately \$60 million per year over the next five years for these programs, beginning with federal fiscal year 2025 that started on 10/01/24. The CDBG funds, which

represent over half of that amount (approximately \$34 million annually) may only be expended in the state’s “non-entitlement” communities. These are the 313 cities and towns that are not eligible to apply for CDBG funding directly from HUD. (Thirty-eight other communities – mostly larger cities – receive more than \$60 million in CDBG funds annually, directly from HUD, for which they submit their own consolidated plans.) Funding under the other four programs may be allocated statewide, although EOHLC gives priority to requests from non-entitlement communities if they have priority needs and can demonstrate the ability to address them in a manner consistent with the state’s strategy.

## **2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview**

The 2025-2029 Consolidated Plan provides the framework for the Commonwealth’s continuing investment to help meet the housing and community development needs of its residents and the communities in which they live and work. It lays out the state’s long-term objectives and the strategies by which it will achieve these objectives, using funds received from HUD under the five programs covered by the plan as well as other sources the state expects to have available. The plan identifies the state’s housing and community development needs and priorities, and establishes the criteria by which projects will be selected for funding. The state’s housing and community development needs were identified by citizens and other stakeholders in a variety of public forums, a formal public hearing, and an analysis of socioeconomic and housing market conditions.

Four objectives have been established for this Consolidated Plan. These objectives support the Commonwealth’s overarching goal for all its housing and community and development efforts: to provide broad economic opportunity and a high quality of life for all Massachusetts residents. They also support HUD’s complementary goals of providing decent housing, a suitable living environment and expanded economic opportunities. The objectives of the 2025-2029 Massachusetts plan are:

- Promote strong communities throughout the Commonwealth and address local priorities
- Preserve and create affordable rental housing options for low- and moderate-income residents
- Reduce chronic and family homelessness through a housing-based approach, with a long-term goal of ending homelessness
- Ensure access to housing for all residents of the Commonwealth

## **3. Evaluation of past performance**

Massachusetts has long been a leader in providing affordable subsidized housing for its residents. Using state and federal resources, the Executive Office of Housing and Livable Communities, its affiliated quasi-public agencies, more than 240 local and regional housing authorities, and a wide array of private for-profit and nonprofit housing developers engage in an exceptionally high level of publicly assisted housing activity. Each year, more than a billion dollars of federal, state, and quasi-public funds are spent to build, renovate, preserve, maintain or subsidize affordable housing in Massachusetts.

The Commonwealth completes the Consolidated Annual Performance and Evaluation Report (CAPER) each year, posts the Report for public review and comment, and submits the final Report to HUD. The most recently submitted CAPER is found at the following link:

[2024 Consolidated Annual Performance and Evaluation Report](#)

#### **4. Summary of citizen participation process and consultation process**

The Consolidated Planning process has historically been a collaborative one. EOHLIC encourages broad citizen and stakeholder participation, especially from those low-income residents most affected by its programs, and not solely as a requirement for the Con Plan process. EOHLIC is fortunate to enjoy collaborative relationships and partnerships with several organizations committed to addressing housing and community development needs in the Commonwealth. Prior to developing the 2025-2029 Consolidated Plan, and the 2025 Action Plan, EOHLIC continued to meet regularly through various partnerships with stakeholders across the state, and organizations representing those stakeholders including the Massachusetts Housing Partnership, MassHousing, the MA Association of Community Development Corporations, the MA Association for Community Action, the Citizen’s Housing and Planning Association, and the MA Association of Regional Planning Agencies, Mass Municipal Association, Mass NAHRO, and other entities including cities and towns competing for limited state and federal resources.

Both the five-year strategic plan and the one-year action plan were issued in draft form for a 30-day public comment period that runs from April 28, 2025 through May 29, 2025. A hybrid public hearing has been scheduled for May 20, 2025, to provide in person and virtual opportunity for the public to comment on either of these documents.

The draft Plan has been shared with stakeholders and other members of the public, available electronically at EOHLIC website, <http://www.mass.gov/eohlc> and shared upon request. EOHLIC encouraged citizens to attend the public hearing to provide testimony. Comments were also accepted via email or by submission in writing.

EOHLIC will take into consideration all comments on the Consolidated and Action Plans received at the hearings or in writing prior to the close of business on May 29, 2025.

#### **PROVIDE FURTHER SUMMARY AS APPROPRIATE**

#### **5. Summary of public comments**

**PENDING PUBLIC PROCESS**

#### **6. Summary of comments or views not accepted and the reasons for not accepting them**

**PENDING PUBLIC PROCESS**

## 7. Summary

## The Process

### PR-05 Lead & Responsible Agencies 24 CFR 91.300(b)

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	MASSACHUSETTS	Executive Office of Housing & Livable Communities
HOPWA Administrator	MASSACHUSETTS	MA Department of Public Health
HOME Administrator	MASSACHUSETTS	Executive Office of Housing & Livable Communities
ESG Administrator	MASSACHUSETTS	Executive Office of Housing & Livable Communities
HTF Administrator	MASSACHUSETTS	Executive Office of Housing & Livable Communities

**Table 1 – Responsible Agencies**

### Narrative

### Consolidated Plan Public Contact Information

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## **PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.200(I) and 91.315(I)**

### **1. Introduction**

EOHLC, the administering agency for the Commonwealth of Massachusetts, encourages broad citizen and stakeholder participation, especially from those low-income residents most affected by its programs. This consultation is important to the Commonwealth's ability to design and administer programs to best meet needs and serve intended beneficiaries and communities. Prior to developing the 2025-2029 Consolidated Plan and the 2025 Action Plan, EOHLC held program-specific public input meetings across each of the ConPlan programs to solicit citizen and stakeholder feedback regarding housing and community development needs in their communities. EOHLC also participated in other working groups, partnerships and collaborations as a matter of general operations. This Five-Year Consolidated Plan is also informed by the Commonwealth's recently completed 5 Year Statewide Housing Plan, undertaken per state statute by the newly constituted Housing Advisory Council prior to this effort, and extends well beyond the HUD programs and spending included herein. That initiative included 12 stakeholder and public sessions across the Commonwealth and 2 online sessions. Copies of public notices and other documentation are found in the ES-05 Executive Summary section of the Con Plan.

### **Provide a concise summary of the state's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))**

EOHLC and 18 state agencies sign on to a Memorandum of Understanding, partnering to improve existing processes, make recommendations for new, collaborative efforts and develop a long-range action plan to meet the need for supportive housing among the Commonwealth's residents. Supportive housing helps individuals and families that are homeless or facing homelessness, institutionalized or at-risk of institutionalization, people with disabilities and the elderly. Additionally, the agencies, through an Interagency Supportive Housing Working Group, continue to assess the extent of public cost-savings generated as a result of providing permanent supportive housing and will recommend strategic reinvestments.

In addition to providing housing for families, supportive housing, which is operated in conjunction with a network of non-profit agencies across the Commonwealth, includes services such as childcare, access to job training, mental-health care and other opportunities that give participants a hand up towards stability and success.

### **Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness**

Massachusetts CoC continues to collaborate and find improved methods for coordination at a statewide level. As a result, mergers are frequent; there are currently 11 CoCs across the Commonwealth, including the Balance of State which is led by EOHLC. As a state agency, we are invested in understanding the needs of the different regions and establishing goals and action steps that best meet the needs of the people of the Commonwealth. Specifically related to ESG funding, EOHLC connects with each CoC through one-on-one meetings, surveys, and monitoring visits (for existing ESG contracts) when applicable. EOHLC staff have been in regular communication with the CoCs about meeting the need for added temporary emergency shelter capacity, connecting highly vulnerable persons to shelter and housing; communication with local Veterans' agencies, and Executive Office of Health and Human Services (EOHHS) Youth Region Leads Staff is also ongoing. In FFY25 and beyond, EOHLC will continue to work with local CoC to develop and improve policies around utilizing non-congregate settings for emergency shelter in response to communicable disease, winter planning, and other emergencies, rapid re-housing programming, coordinated entry, and access to permanent housing (including, but not limited to permanent supportive housing.)

**Describe consultation with the Continuum(s) of Care that serves the state in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS**

EOHLC engages regularly with the multiple CoC across the Commonwealth, including supporting the merging of CoC, either into the Balance of State or as in the case of a merger this year, between other CoC, providing technical assistance on a variety of CoC functions, co-chairing quarterly state-wide CoC meetings, engaging in listening sessions around the procurement of our state funded homelessness systems including both entitlement and non-entitlement ESG grants, and consulting on the best use of ESG. As a state agency, we are invested in understanding the needs of the different regions and establishing goals and action steps that best meet the needs of the people of the Commonwealth.

**2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities**



**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	Massachusetts Department of Public Health
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-Persons with HIV/AIDS Services-Health Other government - State
	<b>What section of the Plan was addressed by Consultation?</b>	Lead-based Paint Strategy HOPWA Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	MA Dept. of Public Health (DPH) is responsible for the administration of the HOPWA program. Several organizations in addition to EOHLIC participated through the public meetings/hearings. EOHLIC and DPH also began coordinating on the application for Recovery Housing Program (RHP) grant funds from HUD when that opportunity arose. The agencies collaborated on a coordinated response to address the need for both services and capital funds for sober homes, with input from the MA Association of Sober Homes. The coordination helped the State optimize utilization of the Federal RHP allocation and a supplemental state allocation, with each having its own eligibility specifications and restrictions. Finally, EOHLIC and DPH's Childhood Lead Poisoning Prevention Program also consult and partner regularly in a coordinated, reciprocal relationship on lead paint testing, lead safe remediation and abatement. The agencies consult regularly to determine whether MA will pursue lead remediation funding from HUD.
2	<b>Agency/Group/Organization</b>	Massachusetts Housing Partnership
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Massachusetts Housing Partnership (MHP) provides financial and technical assistance to communities, non-profits and housing authorities in the pre-development stages of affordable housing development. EOHLC works closely with MHP to finance new housing, and to preserve existing affordable housing and secure long-term affordability extensions. MHP and EOHLC also partner to provide housing-specific planning/zoning technical assistance to cities and towns to support the Commonwealth's housing / planning initiatives designed to encourage housing development.
3	<b>Agency/Group/Organization</b>	MassHousing
	<b>Agency/Group/Organization Type</b>	Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	EOHLC works closely with quasi-public agencies including MassHousing to finance new housing, and to preserve existing affordable housing and secure long-term affordability extensions. EOHLC and MassHousing have also worked closely to coordinate specific roles in certain areas, with EOHLC carrying out particular housing functions with MassHousing via contract, and vice versa, depending on which organization is better suited to do so. A recent example is the partnership forged to implement the State funds appropriated to EOHLC for fire suppression systems in sober homes in the Commonwealth.
4	<b>Agency/Group/Organization</b>	CEDAC
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Persons with Disabilities Services-Education
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Economic Development Market Analysis

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Among other efforts, EOHLC works closely with the Community Economic Development Assistance Corporation (CEDAC), one of its primary technical assistance partners, on several fronts. One key role is to help preserve existing affordable housing and secure long-term affordability extensions. As such EOHLC meets regularly with CEDAC to assess needs, plan for and coordinate financial assistance, structure programs, and make funding awards. EOHLC and CEDAC also collaborate on other community and economic development needs assessment and program development.
5	<b>Agency/Group/Organization</b>	Massachusetts Technology Collaborative
	<b>Agency/Group/Organization Type</b>	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development Anti-poverty Strategy Broadband Access
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Massachusetts Technology Collaborative, parent organization of the MA Broadband Initiative, is responsible for implementing the Last Mile program, which provides assistance to deliver high speed internet to residents and businesses in unserved communities. This program works in tandem with the Commonwealth network, the primary connection to internet hubs elsewhere in the Commonwealth as well as working with broadband internet service providers. That said, though EOHLC is not involved in the administration of those programs, broadband infrastructure is eligible through the MA CDBG Program, and specifically called out in the One Year Plan.
6	<b>Agency/Group/Organization</b>	Massachusetts Association of Community Development Corporations
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Employment Regional organization Membership Organization

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Families with children Economic Development
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	MACDC is a membership organization for Massachusetts community development corporations (CDCs). CDCs in Massachusetts implement several programs and initiatives funded by EOHLIC, and as we do with others, we consult regularly with MACDC on any number of program and policy issues found in the Con Plan. MACDC seeks to build and sustain a high performing and adaptive community development sector that is supported by private and public investment and sound public policies. The CDCs collectively create healthy communities where everyone lives in housing they can afford, benefits from economic opportunities and can fully participate in the civic life of their community. MACDC member organizations are partners in CDBG grant administration in several communities, develop housing with funding from virtually all CPD program resources, implement economic development and revitalization using EOHLIC resources, and are reliable partners and problem solvers when needed.
7	<b>Agency/Group/Organization</b>	Massachusetts Association for Community Action
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-homeless Membership Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Economic Development Anti-poverty Strategy

	<p><b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>EOHLC consults with the Massachusetts Association for Community Action (MASSCAP) and its members, the designated eligible entities for the Community Services Block Grant program in regular monthly meetings as well as for ad hoc issues around anti-poverty, economic self-sufficiency, emergency assistance and other resources and services targeted for low-income households and individuals. Many of their recommendations have resulted in policy and program implementation across programs. Due to the proximity of MASSCAP member organizations to local needs, and their assistance in deploying CDBG CARES Act funds and other state/federal emergency assistance funds, the partnership has grown beyond administration of USHHS program funds to include membership in more housing and homelessness related program assessment and development.</p>
8	<p><b>Agency/Group/Organization</b></p>	<p>MA Chapter National Association of Housing &amp; Redevelopment Officials</p>
	<p><b>Agency/Group/Organization Type</b></p>	<p>Housing PHA Services - Housing</p>
	<p><b>What section of the Plan was addressed by Consultation?</b></p>	<p>Housing Need Assessment Public Housing Needs Non-Homeless Special Needs</p>
	<p><b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>EOHLC solicits feedback on policy, practice, funding needs and other issues from Local Housing Authorities (LHAs - or PHAs) and other public housing stakeholders on a regular basis, including the lead up to the preparation and submission of the ConPlan. We meet with the Mass NAHRO (Massachusetts Chapter of the National Association of Housing and Redevelopment Officials) housing committee on an approximately monthly basis to discuss policy issues (the housing committee is comprised of 15-20 LHAs). We also communicate frequently with other LHAs, and somewhat frequently with the Mass Union of Public Housing Tenants. Those meetings and other regular business interactions inform the Con Plan.</p>

9	<b>Agency/Group/Organization</b>	Regional Housing Network of Massachusetts
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-homeless Services - Victims Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Regional Housing Network is made up of nine regional organizations that can address or answer questions about all types of housing problems. Tenants, landlords, prospective buyers, and homeowners can access information designed to maximize housing stability, strengthen investments, and minimize disputes. The regional administering agencies (RAAs) administer several homeless prevention programs through contracts with EOHLC. As such EOHLC consults regularly with the organizations, defining program guidelines, problem solving, prioritizing and continually assessing need and ultimately the program design.
10	<b>Agency/Group/Organization</b>	MA Exec. Office of Economic Development
	<b>Agency/Group/Organization Type</b>	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Other government - State Grantee Department
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development Municipal & Community Economic Development Needs

	<p><b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>EOHLC and the Executive Office of Economic Development (EOED) collaborate to ensure community development programs offered by each agency complement one another. EOHLC is one of the several State agencies that assist EOED as it coordinates state-funded grant programs offered through the Community One Stop for Growth platform. Those programs provide a continuum of local project assistance from conception/ideation and planning through construction. The ongoing partnership and collaboration eliminate overlap and redundancy in program offerings, optimize available funding, and inform decision-making on grant awards across those programs and the community development and housing programs included in this Plan, and via other state-funded programs.</p>
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**Identify any Agency Types not consulted and provide rationale for not consulting**

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care		

Table 3 – Other local / regional / federal planning efforts

**Describe cooperation and coordination among the State and any units of general local government, in the implementation of the Consolidated Plan (91.315(I))**

**Narrative (optional):**

In addition to the outreach and feedback loop that takes place during the development, preparation and rollout of the Five Year Consolidated Plan, EOHLC relies heavily on the most recent public hearings, information sessions, and grantee meetings and trainings specific to CDBG, ESG, HOME, and HTF. Beyond that, Massachusetts incorporates the ongoing engagement that takes place around all CPD programs, including HOPWA. EOHLC also utilizes the Qualified Allocation Plan for the Low Income Housing Tax Credit Program during the normal, collaborative course of business to solicit feedback on

housing needs. Program development and training for grantees also informs each five year ConPlan and one year Annual Action Plan. Copies of public notices and other documentation are found in the ES-05 Executive Summary section of the Con Plan.

Finally, this Five Year Consolidated Plan is also informed by the Commonwealth's recently completed 5 Year Statewide Housing Plan, undertaken per state statute by the recently constituted Housing Advisory Council prior to this effort. The 5 Year Statewide Housing Plan extends well beyond the HUD programs and spending included herein. That initiative included 34 listening sessions in which more than 3,000 stakeholders participated. The result was the publication of the Plan called "A Home for Everyone", and information can be found here: <https://www.mass.gov/info-details/a-home-for-everyone-massachusetts-statewide-housing-plan>.





## **PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation**

#### **Summarize citizen participation process and how it impacted goal-setting**

Both the five-year strategic plan and the one-year action plans will be issued in draft form for a 30-day public comment period from April 28 through May 29. A hybrid public hearing will be held on May 20, 2025, at 100 Cambridge Street, Boston, MA with an option to join remotely. A recording of the hearing will be available at [EOHLC Consolidated & Action Plans | Mass.gov](https://www.mass.gov/eohlc). That hearing will provide additional opportunity for the public to comment on these documents.

Copies of the draft Plan will be made available electronically at EOHLC’s website, <http://www.mass.gov/eohlc>, or by calling EOHLC during normal business hours at (617) 573-1100. The agency encourages citizens to attend the virtual public hearing to provide testimony. Comments will also be accepted via email or by submission in writing.

EOHLC will take into consideration all comments on the Consolidated and Action Plans received at the hearings or in writing prior to the close of business on May 29, 2025.

As a practice EOHLC also relies heavily on the most recent public hearings and information sessions specific to CDBG, HOME, HTF and ESG, as well as the ongoing engagement around all programs including HOPWA and the Qualified Allocation Plan for the Low Income Housing Tax Credit Program during the normal, collaborative course of business, program development and training to inform each five year and one year Consolidated Plan.

For example, EOHLC’s ESG staff distribute notices to a variety of partners across the Commonwealth, and in some cases, across New England. Every effort is made to ensure the information regarding ESG is shared broadly and publicly and that citizens have an opportunity to comment on the use of funding and services provided. Additionally, EOHLC shares information about performance reports with CoC lead agencies, and shares statewide outcome details with the Balance of State CoC Planning Groups and at statewide CoC meetings.

As another example, in Massachusetts during the past few years the state-level public lenders – specifically, EOHLC and its quasi-public affiliates – have taken numerous steps to evaluate development costs and to identify areas where cost reductions can be achieved. EOHLC and the quasi-public agencies have engaged in a series of very useful and informative discussions with members of the Massachusetts development community. The discussions and the efforts will continue in years to come. All state-level housing agencies are participants in this initiative:

- Executive Office of Housing and Livable Communities (EOHLC)

- Community Economic and Development Assistance Corporation (CEDAC)
- MassDevelopment
- MassHousing
- Massachusetts Housing Partnership (MHP)

The quasi-public agencies have been working with their governing boards and their staff to heighten everyone’s awareness of the importance of cost management. EOHLC and all the quasi-public affiliates have been working extensively with individual developers as they structure their projects, emphasizing that cost control is essential to the development process.

**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)

**Table 4 – Citizen Participation Outreach**

# Needs Assessment

## NA-05 Overview

### Needs Assessment Overview

Lack of affordability and availability dominate and define the housing needs for Massachusetts families and individuals across virtually all income groups, and impact low- and moderate-income households most. The auto-populated statistical data provided in the tables below derive from Federal sources.

As previously noted, this Consolidated Plan also relies to some degree on the work of the newly established Housing Advisory Council for some of the qualitative and quantitative housing needs analysis. Repeated here are some of the key concerns noted in the Housing Needs Assessment Section of the Commonwealth's recently (February 2025) released Statewide Comprehensive Housing Plan:

- An expanding wage gap contributes more and more to the growing disparity in purchasing and renting power for housing, with higher income households able to afford higher prices.
- Over one quarter of middle-income households are considered cost burdened (spend more than 30% of income on housing); while three quarters of very low-income households are cost burdened.
- From 2000 to 2023, median home prices rose 73% after adjusting for inflation while median household income grew only 4% in real dollars.
- Housing production has not kept pace with demand, leading to a historically low 1.6% rate of housing available for purchase or rent.
- A statewide 3.6% of homes are held off the market as seasonal residences or for short-term rental. This figure becomes severely pronounced in 'vacation / destination' communities. An estimated 9,000 units were lost to seasonal conversion in those regions from 2010 to 2020.
- There is an estimated need for 10,000 units of supportive housing beyond the current supply of 9,500 over the next ten years; this is necessary to meet current need, enable housing stability and improve health outcomes.
- Eviction and homelessness rates are rising; evictions had been paused during the COVID pandemic.
- Housing with 3+ bedrooms suitable for families, and homes accessible to people with disabilities are in greatest demand, while a growing senior population will also require appropriate housing options.
- Maintenance of existing affordable housing - both the physical stock and the deed restrictions protecting affordability - is at risk.

An estimated 220,000 additional homes - across all household income strata - are required to meet the housing need over the next ten years. This Consolidated Plan assumes roughly half, or 110,000 homes

will be needed to meet the need for the corresponding five year period of 2025-2029. It is made clear that low- and moderate-income households face greater challenges than upper income households.

Generally, demand exceeds supply, but the supply part of the equation is not simple. Local zoning and permitting, adequate financing, an appropriately scaled and skilled labor force, as well as other factors, contribute to the new construction challenges.

## NA-10 Housing Needs Assessment - 24 CFR 91.305 (a,b,c)

### Summary of Housing Needs

The recently published MA Statewide Housing Needs Assessment February 2025 identifies several consequences of the housing cost crisis. They include among others cost burden, evictions, foreclosures, doubling up and overcrowding, and homelessness.

According to the Assessment, "Housing cost burden is pronounced among Low-income households, renter households, and minorities - specifically Black and Latino-led households. Approximately 76% of very low-income households are cost burdened with 36% of these households being severely cost burdened. This is much higher for ELI households, of which 80% are cost burdened and 64% experience severe cost burden.

In 2023, there were over 35,000 eviction filings for all causes, not just nonpayment. Over 27,000 filings were due to nonpayment, 4,000 were no-cause filings, and the remainder were "for cause." In other words, about three out of four eviction filings were due to nonpayment of rent. Over 9,000 of these eviction cases were executed due to nonpayment, and an additional 3,000 for other reasons. This is an increase from over 5,000 in 2022 and around 3,700 in 2021. There were over 35,000 eviction filings total in 2023 for all actions, not just nonpayment. Over 4,000 were no-cause filings, but the majority of filings were due to nonpayment of rent. About three out of four eviction filings were due to nonpayment of rent.

The rising costs of property taxes, insurance, maintenance, or adjustable-rate mortgages also jeopardize the housing for lower-income and moderate-income homeowners. Foreclosure petitions saw a sharp decrease during the Covid-19 pandemic due to the accompanying Moratorium on Foreclosures, which like efforts established to halt evictions of renter households, launched new assistance programs to prevent households from facing foreclosure. Similar to the Emergency Rental Assistance Program, the Homeowner Assistance Fund (HAF), established in response to the Covid-19 pandemic, supported over 6,000 households behind on mortgage payments to prevent foreclosure. The end of the moratorium in June 2021 resulted in a steady increase in foreclosure petitions until March 2023. In contrast to recent eviction trends, the rates remained below pre-pandemic levels and foreclosure petitions are now declining. Unfortunately, numerous petitions are still working their way through the system and resulting in more foreclosure deeds transferring the property to the lender.

In Massachusetts, there are an estimated 49,000 overcrowded households, 1.8% of the total. Overcrowding is predominately a problem for households with children under the age of 18. They make up 74% of all overcrowded households and are overcrowded at a rate of 5.4% compared to a rate of 0.4% for households without children. Most overcrowded households (65%) are in rented units."

Demographics	Base Year: 2009	Most Recent Year: 2020	% Change
Population	6,705,525	6,789,319	1%

<b>Demographics</b>	<b>Base Year: 2009</b>	<b>Most Recent Year: 2020</b>	<b>% Change</b>
Households	2,549,780	2,585,715	1%
Median Income	\$0.00	\$74,167.00	

**Table 5 - Housing Needs Assessment Demographics**

**Data Source:** 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

**Number of Households Table**

	<b>0-30% HAMFI</b>	<b>&gt;30-50% HAMFI</b>	<b>&gt;50-80% HAMFI</b>	<b>&gt;80-100% HAMFI</b>	<b>&gt;100% HAMFI</b>
Total Households	415,195	295,095	349,305	241,945	1,284,175
Small Family Households	110,625	92,040	123,360	96,535	686,045
Large Family Households	17,310	16,635	21,655	19,335	106,905
Household contains at least one person 62-74 years of age	91,920	69,460	85,910	57,530	274,715
Household contains at least one person age 75 or older	85,595	68,600	56,035	26,720	78,945
Households with one or more children 6 years old or younger	53,090	38,370	45,655	33,100	130,790

**Table 6 - Total Households Table**

**Data Source:** 2016-2020 CHAS

## Housing Needs Summary Tables

### 1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	8,285	3,690	2,435	1,010	15,420	920	720	835	410	2,885
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	3,245	2,905	2,165	1,365	9,680	165	310	630	495	1,600
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	6,685	4,790	3,515	2,130	17,120	650	1,345	1,365	1,770	5,130
Housing cost burden greater than 50% of income (and none of the above problems)	149,715	47,540	9,955	1,290	208,500	74,030	46,580	32,165	9,925	162,700



	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	49,300	65,305	56,010	17,600	188,215	18,325	40,565	60,920	45,170	164,980
Zero/negative Income (and none of the above problems)	22,020	0	0	0	22,020	8,910	0	0	0	8,910

**Table 7 – Housing Problems Table**

Data 2016-2020 CHAS  
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Having 1 or more of four housing problems	167,930	58,920	18,075	5,795	250,720	75,765	48,955	34,990	12,600	172,310
Having none of four housing problems	114,480	104,410	137,390	82,420	438,700	26,090	82,810	158,855	141,130	408,885

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Household has negative income, but none of the other housing problems	22,020	0	0	0	22,020	8,910	0	0	0	8,910

**Table 8 – Housing Problems 2**

Data 2016-2020 CHAS  
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>								
Small Related	70,765	47,875	25,890	144,530	17,735	23,860	36,825	78,420
Large Related	11,110	7,355	2,440	20,905	3,150	5,230	8,365	16,745
Elderly	62,510	26,810	12,035	101,355	58,260	48,465	32,760	139,485
Other	68,960	38,545	28,225	135,730	14,570	11,270	16,475	42,315
Total need by income	213,345	120,585	68,590	402,520	93,715	88,825	94,425	276,965

**Table 9 – Cost Burden > 30%**

Data 2016-2020 CHAS  
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>								
Small Related	56,830	17,080	2,330	76,240	15,660	15,875	12,435	43,970
Large Related	8,595	1,820	165	10,580	2,905	3,150	2,015	8,070

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Elderly	39,070	12,355	2,630	54,055	44,045	21,030	11,270	76,345
Other	56,290	18,410	5,370	80,070	12,570	7,520	6,775	26,865
Total need by income	160,785	49,665	10,495	220,945	75,180	47,575	32,495	155,250

**Table 10 – Cost Burden > 50%**

Data 2016-2020 CHAS  
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Single family households	8,705	6,080	4,475	2,530	21,790	640	1,235	1,295	1,375	4,545
Multiple, unrelated family households	955	980	805	610	3,350	180	405	695	785	2,065
Other, non-family households	495	815	490	425	2,225	10	50	55	130	245
Total need by income	10,155	7,875	5,770	3,565	27,365	830	1,690	2,045	2,290	6,855

**Table 11 – Crowding Information – 1/2**

Data 2016-2020 CHAS  
Source:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

**Table 12 – Crowding Information – 2/2**

Data Source  
Comments:

**Describe the number and type of single person households in need of housing assistance.**

In 2024 there were 6,950 unaccompanied adults experiencing homelessness, the highest on record and a 12% increase from 2023. Single adults are not covered by the Commonwealth's Right to Shelter law and often rely on community-based shelter that is primarily provided through community-based organizations through funding from EOHLC as well as federal, local, and philanthropic funding support. Unfortunately, shelter is often not provided at scale, is often first come, first served, and often not utilized by many homeless individuals due to a variety of personal factors including but not limited to: safety concerns, separation from romantic partners given shelters are often single-sex, and challenges related to substance-use disorder and/or mental illness. The 2024 count showed a 19.9% increase in individuals experiencing unsheltered homelessness.

### **Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.**

There is capacity for up to 184 in 2020 families in domestic violence shelters, all of whom need housing assistance. There are also a number of families in the Emergency Assistance (family shelter) system who cite domestic violence as the reason for their homelessness. It is more difficult to extrapolate the number of people needing housing assistance who are victims of dating violence or stalking. In the 2013 National Census of Domestic Violence Services, taken on September 17, 2013, the approximately 50 participating service providers reported that 902 domestic violence victims (463 adults and 439 children) were placed in either emergency shelter or domestic violence shelters. There were 223 requests for housing that the providers were unable to meet. That represents approximately 10% of the total number of victims served on that day, both adults and children. More current data is unavailable from traditional sources at this time.

### **What are the most common housing problems?**

Consistently, individuals and households with children who also struggle with severe mental illness, substance use disorders or have dual/multiple diagnoses are among those appearing for the first time on the streets. In addition, the cost of rent in the current housing combined with fewer landlords who are willing to rent to those with poor credit histories, CORIs, and unstable income are finding themselves homeless.

### **Are any populations/household types more affected than others by these problems?**

Yes, 54% of the state's homeless population is African American but only account for 6.5% of the general population. Though less pronounced, Hispanic or Latino individuals account for roughly 30% of the total homelessness population yet just 12.6% of the state population.

Additionally, each of the populations/household types EOHLC works with struggles with housing and homelessness issues and to different degrees. Youth and young adults are particularly vulnerable to the cost of housing and don't have credit histories or lengths of employment to persuade potential landlords they are credit-worthy and present a good risk for the property owner.

**Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance**

Low-income individuals and families who are currently housed but at risk of homelessness are essentially one crisis away from losing their housing. They have low income as well as a high housing cost burden with limited to no savings. An increase in emergency financial assistance to aid households in maintaining their housing is crucial to prevent the household from entering the homeless system. Households could also benefit from more robust healthcare, mental health and substance use services. Expanding access to programs like SNAP, TANF, and other social safety net programs can provide a crucial buffer against poverty and homelessness.

Needs of households who are nearing the end of their RRH assistance are very similar/overlap to those listed above. They include more robust support systems as many may be able to temporarily support the costs of their RRH unit but they are frequently a single step away from losing it and re-entering homelessness due to most of the household income going towards rent.

To greatly reduce the possibility of homelessness for both populations listed above an increased supply of affordable housing is needed.

**If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:**

At risk populations include those who fall under HUD's Category 2 Imminent Risk of Homelessness definition. This includes households at various stages of the eviction process, those doubled up and staying with family or friends, families living in overcrowding situations, those exiting publicly funded Institution or systems of care (hospitals, foster care, prison, etc.) as well as households living in motel/hotels. This population also pays a large portion of the household income towards housing costs.

**Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness**

Various factors that have been linked to housing instability and the increased risk of homelessness including: economic factors and those living in poverty, mental health and substance use issues, domestic violence, age, as well as institutional and interpersonal discrimination due to race, sexual orientation/gender expression. There is also a severe lack of affordable housing options for this and all populations.

Overcrowding and doubling up is an issue, resulting from the extremely tight housing market. Members of overcrowded households are at risk of homelessness. There are an estimated 49,000 overcrowded households in Massachusetts, 1.8% of the total. The rate of overcrowding ranges by region from 0.4% in the Berkshire region to 2.6% in the Merrimack Valley region. Overcrowding is predominately a problem for households with children under the age of 18. They make up 74% of all overcrowded households and are overcrowded at a rate of 5.4% compared to a rate of 0.4% for households without children. Minority households are five times more likely to be overcrowded than White households, at a rate of 4.5% for all minority households compared to 0.9% for White households.

Most overcrowded households (65%) are in rented units. About 8% either own their home free and clear or don't pay rent, both of which are strong incentives to stay put. Most overcrowded households aren't huge, 30% are six or more people, 70% just need a two- or three-bedroom unit to have an adequate room.

### **Discussion**

The HUD derived data in the tables above support the narrative, some of which derives from the very current Statewide Needs Assessment prepared by EOHLC. Other narrative is supported by the findings of the State's Needs Assessment.

## NA-15 Disproportionately Greater Need: Housing Problems - 91.305 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction

As noted elsewhere herein, the Commonwealth recently completed its first comprehensive 5-year housing plan, separate from this Consolidated Plan. Among the findings, according to the US Census, one quarter of MA households are now headed by someone Black, Asian, Multiracial, or another non-White racial group. Their share of total households has doubled since 2010, with the fastest growth among the latter three. Housing outcomes for minorities are generally worse than for the population overall. Historic discriminatory policies and practices - with generational impact - such as redlining, exclusionary zoning, discriminatory real estate, restrictive covenants, transportation projects and urban redevelopment that displaced entire neighborhoods make up some of the causes. All of these contributed to a situation in which Black, Hispanic, and Native residents have less housing stability, higher rates of homelessness, fewer wealth building opportunities, less access to schools with high advancement rates, higher exposure to health risks, and less chance of upward mobility.

Findings also include the following: only 37% of Black households and 32% of Hispanic households own their home, versus 70% of non-Hispanic White householders. Many households face discriminatory practices and structures in the real estate industry. Even high-income minority borrowers in affluent neighborhoods face disparities in mortgage approval rates and home appraisal values. Analysis of Home Mortgage Disclosure Act data by the Joint Center for Housing Studies at Harvard University shows that high-income (above 120% AMI) Black and Hispanic mortgage applicants were twice as likely to be denied as White applicants.

Disparities in the rental market also present in the data though not as starkly as in homeownership.

The data below compares the incidence of housing problems (lack of complete kitchen facilities, lack of complete plumbing, more than 1.5 persons per room, and cost burden over 30% of annual household income) among racial/ethnic and income groups. The data source is HUD's 2016-2020 Comprehensive Housing Affordability Strategy.

### 0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	311,306	72,912	30,877
White	195,548	42,914	18,034
Black / African American	30,740	7,822	3,247

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Asian	16,907	4,657	4,533
American Indian, Alaska Native	843	133	24
Pacific Islander	38	35	45
Hispanic	60,027	15,738	4,179

**Table 13 - Disproportionally Greater Need 0 - 30% AMI**

Data 2016-2020 CHAS  
Source:

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

### 30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	213,749	81,264	0
White	148,632	63,517	0
Black / African American	19,673	5,222	0
Asian	10,098	2,851	0
American Indian, Alaska Native	345	75	0
Pacific Islander	80	0	0
Hispanic	29,664	8,162	0

**Table 14 - Disproportionally Greater Need 30 - 50% AMI**

Data 2016-2020 CHAS  
Source:

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%



### 50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	169,939	179,304	0
White	125,266	140,038	0
Black / African American	14,823	11,247	0
Asian	7,757	5,838	0
American Indian, Alaska Native	319	144	0
Pacific Islander	10	0	0
Hispanic	17,782	18,560	0

**Table 15 - Disproportionally Greater Need 50 - 80% AMI**

Data 2016-2020 CHAS  
Source:

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

### 80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	81,118	160,783	0
White	62,710	127,585	0
Black / African American	4,933	10,130	0
Asian	4,923	6,064	0
American Indian, Alaska Native	156	127	0
Pacific Islander	60	60	0
Hispanic	6,704	13,335	0

**Table 16 - Disproportionally Greater Need 80 - 100% AMI**

Data 2016-2020 CHAS  
Source:

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

### Discussion

Supplemental findings included in the recently completed Statewide Housing Needs Assessment identify other risks endemic in the housing across the Commonwealth. These include factors other than those noted above that indicate the existing housing stock is not fully meeting the needs of Massachusetts residents.

For example, there is a significant shortage of homes accessible for persons with disabilities, particularly among low income households. There are 650,000 households identified as having at least one member with a disability, but only 10,200 homes are reserved for low income households. In addition to the prevalence of housing units likely to contain lead paint, the age of the housing stock also poses increased risks for increased prevalence of chronic health conditions such as asthma and respiratory diseases, cardiovascular disease, cognitive effects, and cancer due to poor indoor air quality.

Additional insights can be found in the [MA Statewide Housing Needs Assessment February 2025](#).

## NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.305(b)(2)

Assess the need of any racial or ethnic group that has a disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction

As noted elsewhere herein, the Commonwealth recently completed its first comprehensive 5-year housing plan, separate from this Consolidated Plan. Among the findings, according to the US Census, one quarter of MA households are now headed by someone Black, Asian, Multiracial, or another non-White racial group. Their share of total households has doubled since 2010, with the fastest growth among the latter three. Housing outcomes for minorities are generally worse than for the population overall. Findings also include the following: only 37% of Black households and 32% of Hispanic households own their home, versus 70% of non-Hispanic White householders. Even high-income minority borrowers in affluent neighborhoods face disparities in mortgage approval rates and home appraisal values. Analysis of Home Mortgage Disclosure Act data by the Joint Center for Housing Studies at Harvard University shows that high-income (above 120% AMI) Black and Hispanic mortgage applicants were twice as likely to be denied as White applicants.

Disparities in the rental market also present in the data though not as starkly as in homeownership.

The data below compares the incidence of severe housing problems (lack of complete kitchen facilities, lack of complete plumbing, more than 1.5 persons per room, and cost burden over 50% of annual household income) among racial/ethnic and income groups. The data source is HUD's 2016-2020 Comprehensive Housing Affordability Strategy.

### 0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	243,604	140,602	30,877
White	155,072	83,316	18,034
Black / African American	23,840	14,720	3,247
Asian	13,303	8,238	4,533
American Indian, Alaska Native	619	360	24
Pacific Islander	34	39	45
Hispanic	44,786	30,979	4,179

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2016-2020 CHAS

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

### 30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	107,899	187,251	0
White	74,752	137,358	0
Black / African American	9,766	15,144	0
Asian	5,991	6,963	0
American Indian, Alaska Native	159	263	0
Pacific Islander	20	60	0
Hispanic	14,611	23,223	0

**Table 18 – Severe Housing Problems 30 - 50% AMI**

Data 2016-2020 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

### 50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	53,020	296,146	0
White	38,778	226,420	0
Black / African American	4,260	21,794	0
Asian	3,153	10,417	0
American Indian, Alaska Native	149	324	0
Pacific Islander	0	10	0
Hispanic	5,454	30,887	0

**Table 19 – Severe Housing Problems 50 - 80% AMI**

Data 2016-2020 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

### 80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	18,455	223,594	0
White	12,326	178,041	0
Black / African American	1,448	13,647	0
Asian	1,512	9,441	0
American Indian, Alaska Native	72	211	0
Pacific Islander	15	105	0
Hispanic	2,513	17,521	0

**Table 20 – Severe Housing Problems 80 - 100% AMI**

Data 2016-2020 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

### Discussion

Supplemental findings included in the recently completed Statewide Housing Needs Assessment identify other risks endemic in the housing across the Commonwealth. These include factors other than those noted above that indicate the existing housing stock is not fully meeting the needs of Massachusetts residents.

For example, there is a significant shortage of homes accessible for persons with disabilities, particularly among low income households. There are 650,000 households identified as having at least one member with a disability, but only 10,200 homes are reserved for low income households. In addition to the prevalence of housing units likely to contain lead paint, the age of the housing stock also poses increased risks for increased prevalence of chronic health conditions such as asthma and respiratory diseases, cardiovascular disease, cognitive effects, and cancer due to poor indoor air quality.

Additional insights can be found in the [MA Statewide Housing Needs Assessment February 2025](#).



## NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.305 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction

The table below shows the distribution of housing cost burden among racial/ethnic groups by income category. The table does not display the disproportionality in percentage terms, therefore additional computations must be undertaken to determine whether any particular racial or ethnic group has a need at least 10 percentage points higher than the percentage of persons in the category as a whole.

### Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	1,693,354	462,513	397,321	32,275
White	1,388,995	336,609	274,052	18,657
Black / African American	77,316	37,065	35,152	3,362
Asian	86,210	23,287	21,155	4,868
American Indian, Alaska Native	1,467	740	847	24
Pacific Islander	403	218	54	45
Hispanic	111,486	54,497	56,800	4,428

**Table 21 – Greater Need: Housing Cost Burdens AMI**

Data Source: 2016-2020 CHAS

### Discussion

Using the above data, EOHLC has calculated the Housing Cost Burden for each racial or ethnic group by income category. Two racial or ethnic groups had disproportionately greater need than the percentage of persons in the income category as a whole, Pacific Islanders in the 30%-50% of median income category, and the American Indian/Alaska Native in the 50% and above median income category.

## **NA-30 Disproportionately Greater Need: Discussion – 91.305 (b)(2)**

**Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?**

Yes, according to the data provided in the preceding sections, of those persons with a housing cost burden of greater than 30% of their income, Native Americans with income between 30%-50% median income and between 50%-80% median income have a disproportionately greater need than those income categories as a whole.

Similarly, of those persons with a housing cost of greater than 50% of their income, Native American persons at 50% and 80% median income, and Native Americans at 80%-100% median income have a disproportionately greater need than those income categories as a whole.

**If they have needs not identified above, what are those needs?**

N/A

**Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?**

While low-income residents reside in every city and town in the Commonwealth, areas of low-income concentration have traditionally been situated in Boston and other larger Entitlement and Gateway communities.

Massachusetts is not very different than many other states, both in the percent of population that is minority and in the percentage growth in the minority population between 2010 and 2020. It remains largely a non-Hispanic White state even though its largest city, Boston, and several other municipalities are “majority minority,” where non-Hispanic Whites represent less than 50 percent of the population.



## NA-35 Public Housing – (Optional)

### Introduction

Public and subsidized housing represents a safety net for the many of the Commonwealth's most vulnerable low-income residents, and Massachusetts has been a national leader in providing the resources to create and maintain that safety net. EOHLC's public housing portfolio includes approximately 43,400 units of state-assisted public housing, far more than any other state in the nation. The large majority of these public housing units were built more than 50 years ago. This state-aided housing portfolio is managed by 229 Local Housing Authorities (LHAs), which have volunteer boards and, in many cases, part-time executive directors. There are 240 LHAs with at least one subsidized housing program, when including federal public housing and vouchers.

EOHLC also administers ~24,000 federal vouchers as a Moving to Work (MTW) agency, and funds and administers over 11,000 additional state rental vouchers. These programs are reflected in the tables below.

Additionally, 65 MA PHAs own and operate 30,000 units of federally-aided public housing and over 100 MA PHAs administer approximately 70,000 federal vouchers; these are not reflected in this report.

Unless otherwise noted, data included in the tables below was collected and tabulated by the Public Housing and Rental Assistance Division of EOHLC in November 2024. EOHLC maintains this data for a variety of program and policy purposes.

### Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	0	0	0	0	0	0	0

Table 22 - Public Housing by Program Type

**\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

**Data Source Comments:** Data for both Federal and State vouchers is provided below.

Public Housing by Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project based	Tenant based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of federal units / vouchers in use	0	1,055	0	25,885	4,169	20,023	613	154	926
# of state units / vouchers in use	0	0	43,358	10,855	4,039	6,013	0	0	803
Total	0	1,055	43,358	36,740	8,208	26,036	613	154	1,729

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition, and for state vouchers AHVP

**Public Housing Units and Vouchers by Program Type**

**Characteristics of Residents**

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
# Homeless at admission	0	1	0	0	186	919	94	4
# of Elderly Program Participants (>62)	0	183	0	0	0	0	348	11
# of Disabled Families	0	342	0	0	0	0	354	40
# of Families requesting accessibility features	0	0	0	0	0	0	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

**Table 23 – Characteristics of Public Housing Residents by Program Type**

**Data Source Comments:** Federal data for Characteristics is provided above, State data is provided immediately below.

**Characteristics of Residents: State Aided Programs**

	Program Type					
	Certificate	Public Housing	Vouchers			AHVP
			Total	Project - based	Tenant - based	
# Homeless at admission	0	3,588	360	91	148	121
# of Elderly Program Participants (>62)						122
	0	23,408	2,358	1,311	925	
# of Disabled Families	0	10,632	5,436	2,162	2,490	804
# of Families requesting accessibility features	0	0				
# of HIV/AIDS program participants	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0

**Table 1 – Characteristics of Public Housing Residents by Program Type**

*Note - # of families requesting accessibility, # of HIV/AIDS participants, and # of DV Victims not easily drawn from data source*

**Characteristics of Residents - State Aided Housing**

**Race of Residents**

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	956	0	0	0	0	479	113	701
Black/African American	0	95	0	0	986	0	125	39	201
Asian	0	3	0	486	95	390	7	3	11
American Indian/Alaska Native	0	1	0	264	48	214	3	3	10
Pacific Islander	0	0	0	155	31	122	1	1	7
Other	0	0	0	611	135	459	1	3	18

**\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

**Table 24 – Race of Public Housing Residents by Program Type**

**Data Source Comments:** Federal data for Race of Residents is provided above, State data is provided immediately below.

**Race of Residents – State Aided Housing**

Race	Program Type						
	Certificate	Mod-Rehab	Public Housing	Vouchers			
				Total	Project - based	Tenant - based	Special Purpose Voucher
							AHVP
White	0	0	28,956	6,910	2,960	3,444	506
Black/African American	0	0	3,914	2,709	977	1,625	107
Asian	0	0	1,692	268	88	174	6
American Indian/Alaska Native	0	0	284	48	17	22	9
Pacific Islander	0	0	42	3	0	2	1
Other	0	0	1,933	281	79	115	87

**\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

**Table 1 – Race of Public Housing Residents by Program Type**

**Race of Residents - State Aided Housing**

**Ethnicity of Residents**

Ethnicity	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	0	0	0	0	0	0	0
Not Hispanic	0	0	0	0	0	0	0	0	0

**\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

**Table 25 – Ethnicity of Public Housing Residents by Program Type**

**Data Source Comments:** Federal and State data for Ethnicity of Residents is provided below.



**Ethnicity of Residents – Federally-aided units**

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	580	0	8,703	1,368	7,029	50	40	216
Not Hispanic	0	475	0	17,110	2,796	1,2961	562	114	707

**\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

**Ethnicity of Residents – State-Aided Units**

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type			
				Vouchers			AHVP
				Total	Project - based	Tenant - based	
Hispanic	0	0	6,487	3,126	1,222	1,839	65
Not Hispanic	0	0	31,381	7,387	3,046	3,622	719

**Ethnicity of Residents in Federal and State-Aided Housing**

**Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:**

EOHLC does not operate or oversee a Federal Public Housing program, although Massachusetts has over 65 public housing authorities with ~30,000 units of Federal public housing. The needs of tenants and applicants on the waiting lists for accessible units in the 43,400 units of state-aided public housing include both sensory and mobility impairments. Many existing tenants require transfers for the purposes of Reasonable Accommodation (for example, a person who lives in a second-floor unit becoming increasingly mobility impaired), but units to meet their needs are not always immediately available due to the high occupancy of and need for public housing statewide. Approximately 45,000 of the 240,000 (18.9%) applicants for state-aided public housing have requested a unit without stairs.

Approximately 11,200 of 240,000 applicants to the state online waitlist for public housing have requested a wheelchair accessible unit (4.7%), but only about 1,150 out of approximately 41,600 elderly and family units are wheelchair accessible (2.8%). EOHLC is investing \$3-4M annually to convert units to full accessibility, with the eventual goal of bringing the family and elderly portfolio to 5% accessibility.

**What are the number and type of families on the waiting lists for public housing and section 8 tenant-based rental assistance? Based on the information above, and any other information available to the jurisdiction, what are the most immediate needs of residents of public housing and Housing Choice voucher holders?**

In its capacity as a Housing Authority, EOHLC currently has 55,321 families statewide on its waiting lists for Section 8 vouchers. EOHLC maintains a centralized online waitlist for public housing and state-funded rental vouchers; there are currently approximately 240,000 individual applicants on the waitlist, with approximately 3,500 unit vacancies a year. The majority of families on the waiting list are extremely low income (below 30% of AMI). These families are severely rent-burdened on the private market, are forced to live with relatives/friends or in substandard conditions, or rely on a severely overcrowded Emergency Shelter system. The need is most acute in the area of family housing.

**How do these needs compare to the housing needs of the population at large**

Shortage of affordable housing is the most pressing housing issue in all areas of our state. Additional production of both low and moderate-income units is critical to ease the pressures described above. Massachusetts has one of the lowest rental vacancy rates in the country, and some of the highest rents and housing prices.

**Discussion:**

No Massachusetts state agency administers federal public housing funds, but EOHLC oversees and funds a portfolio of over 43,000 state-aided public housing units owned and operated by 229 local housing authorities (LHAs).

## NA-40 Homeless Needs Assessment – 91.305(c)

### Introduction:

There has been a significant expansion of the Commonwealth’s emergency shelter system for both families and single adults since the COVID19 pandemic. Both shelter systems are currently at capacity.

### Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	6	22,479	22,485	0	0	0
Persons in Households with Only Children	1	22	23	0	0	0
Persons in Households with Only Adults	1,627	5,323	6,950	0	0	0
Chronically Homeless Individuals	772	1,249	2,021	0	0	0
Chronically Homeless Families	2	682	864	0	0	0
Veterans	58	491	549	0	0	0
Unaccompanied Child	1	22	601	0	0	0
Persons with HIV	20	78	98	0	0	0

Table 26 - Homeless Needs Assessment

Data Source Comments:

Indicate if the homeless population is: Partially Rural Homeless

**Rural Homeless Needs Assessment**

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	0	0	0	0	0	0
Persons in Households with Only Children	0	0	0	0	0	0
Persons in Households with Only Adults	0	0	0	0	0	0
Chronically Homeless Individuals	0	0	0	0	0	0
Chronically Homeless Families	0	0	0	0	0	0
Veterans	0	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0	0
Persons with HIV	0	0	0	0	0	0

**Table 27 - Homeless Needs Assessment**

Data Source Comments:

**For persons in rural areas who are homeless or at risk of homelessness, describe the nature and extent of unsheltered and sheltered homelessness with the jurisdiction:**

Data is not available by rural areas.

**If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):**

On the night of the most recent PIT the number of homeless persons were:

- Total# of persons: 29,458
- Number unsheltered: 1,,634
- Total Number of Households: 14244
- Chronic Homeless: 2,886
- Veterans: 549
- Unaccompanied Youth: 601

Lack of affordable and low income housing continues to create barriers to housing stability for many households across Massachusetts and it has a direct impact on the number of days that persons experience homelessness. It is difficult for us to measure duration of homelessness statewide since we do not have a state-wide HMIS. While a combination of federal and state funding has enabled us to provide re-housing services to hundreds of individuals and families every year, our shelter systems remain at capacity. EOHLC remains committed to expanding the number of affordable and low income housing units and we continue to provide ongoing rental subsidies through the state funded MA Rental Voucher Program. However, we recognize that additional ongoing housing subsidies and more affordable housing remains a need for homeless persons across our jurisdiction.

**Nature and Extent of Homelessness: (Optional)**

<b>Race:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
White	7,968	1,079
Black or African American	15,654	233
Asian	229	8
American Indian or Alaska Native	86	10
Pacific Islander	107	4
<b>Ethnicity:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
Hispanic	8,566	316
Not Hispanic	19,237	1,318

Data Source  
Comments:

**Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.**

Through partnership with EOHLC, the Veterans Administration, municipal partners and the homelessness provider community, several CoCs across the commonwealth have effectively ended veteran homelessness. Twenty-five families with a veteran as head of household were homeless the night of the PIT. EOHLC additionally shelters approximately 7531 families per night through its Emergency Assistance (EA) shelter system. These families receive additional case management and housing search support, and are connected with other housing subsidies including vouchers and rapid rehousing.

**Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.**

The racial and ethnicity from data gathered on the most recent PIT is roughly as follows:

American Indian, Alaska Native, or Indigenous- .37%

Asian or Asian American- .91%

Black, African American, or African- 61.12%

Native Hawaiian or Pacific Islander- .43%

White- 34.81%

Multiple Races- 2.36%

Non-Hispanic/Non-Latin(a)(o)(x)- 69.83%

Hispanic/Latin(a)(o)(x)- 30.17%

**Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.**

The Commonwealth’s unsheltered homeless are served through a network of State and ESG funded outreach programs as well as a statewide program operated by the Massachusetts Department of Mental Health utilizing a PATH grant from The US Substance Abuse and Mental Health Services Agency. Persons living under bridges, in parks and abandoned buildings and other places not meant for human habitation are offered access to shelter, medical services, mainstream resources, and, in access to CoC housing first programming. Sheltered homeless families are served by the Commonwealth’s Emergency Assistance program – a statewide sheltering system where people are provided with case management, housing search which includes individualized service planning and, upon the ending of their homelessness, stabilization services. The state also provides funding for emergency shelter responses for individuals.

**Discussion:**

The need for more shelter and PSH/affordable housing has increased the last few years. EOHLC plans to focus most efforts on increased availability of PSH and other permanent housing solutions as a method to end homelessness for the most vulnerability. Based on our most recent analysis, PSH projects are cheaper for the Commonwealth than Emergency Shelter and come with the added bonus of ending households’ homelessness.

## NA-45 Non-Homeless Special Needs Assessment – 91.305 (b,d)

### Introduction

The Massachusetts Department of Public Health (DPH) Bureau of Infectious Disease and Laboratory Sciences (BIDLS) Office of HIV/AIDS (OHA) administers the HOPWA program. HOPWA funds are used only for housing search and advocacy services (no funding goes to housing itself). The source of data about HIV/AIDS in the Commonwealth is the DPH Epidemiologic Profile ([HIV/AIDS Epidemiologic Profiles | Mass.gov](#)). The Massachusetts HIV/AIDS Epidemiologic Profile is a collection of reports that are used at the state and local level to plan HIV prevention and care services and to inform policies and programmatic development. The Epidemiologic Profile is updated annually and includes a comprehensive statewide report, detailed statewide data tables, a regional report including Health Services Region, city, and county breakdowns, population-specific fact sheets, and technical notes.

### HOPWA

<b>Current HOPWA formula use:</b>	
Cumulative cases of AIDS reported	26,176
Area incidence of AIDS	7
Rate per population	0
Number of new cases prior year (3 years of data)	1,435
Rate per population (3 years of data)	0
<b>Current HIV surveillance data:</b>	
Number of Persons living with HIV (PLWH)	24,119
Area Prevalence (PLWH per population)	343
Number of new HIV cases reported last year	540

Table 28 – HOPWA Data

**Alternate Data Source Name:**

DPH HIV/AIDS Epidemiologic Profiles

**Data Source Comments:**

### HIV Housing Need (HOPWA Grantees Only)

Type of HOPWA Assistance	Estimates of Unmet Need
Tenant based rental assistance	0
Short-term Rent, Mortgage, and Utility	0
Facility Based Housing (Permanent, short-term or transitional)	0

Table 29 – HIV Housing Need

**Data Source:** HOPWA CAPER and HOPWA Beneficiary Verification Worksheet

**Source:**



### **Describe the characteristics of special needs populations in your community:**

People living with HIV/AIDS need access to high-quality medical and behavioral health care, stable housing, and job assistance. Structural barriers to ongoing retention in HIV medical care and adherence to HIV treatment persist. Black and Latinx people, men who have sex with men, people who inject drugs, and people born outside of the United State are disproportionately impacted by HIV infection. Retention in care and adherence to HIV treatment regimens influence both individual health outcomes and transmission of infectious disease. Factors that affect an individual's care and treatment may include acute infection, substance use, mental health issues, lack of housing, lack of health insurance, and incarceration.

### **What are the housing and supportive service needs of these populations and how are these needs determined?**

The Massachusetts HIV service system utilizes a closely connected network of care and service providers to identify individuals living with HIV and to actively engage them in medical and supportive services. These services include the HIV Drug Assistance Program, which enables low-income HIV+ individuals to access and maintain health insurance and HIV medications. Federal, state, local, and private funding enables this network to survive and to adapt to service needs as they change.

Services available to eligible people living with HIV include home-based, community-based, and clinic-based HIV/AIDS medical case management; housing search and advocacy; rental assistance; home-delivered meals; peer support; legal assistance; and correctional health reintegration services. HIV/AIDS medical case management includes medical care coordination, social services coordination, housing support, benefits access, substance use risk reduction, and sexual health promotion. DPH-funded medical case managers help clients find, access, and maintain affordable and secure housing. These providers conduct client assessments and reassessments to identify each client's needs.

### **Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:**

Suffolk County had the highest average age-adjusted rate of HIV infection diagnosis during 2021 to 2023 among all Massachusetts counties at 14.7 per 100,000, as well as the highest prevalence rate of persons living with HIV infection in 2023 at 783.2 per 100,000. Individuals diagnosed with HIV infection in Suffolk County between 2019 to 2021 were predominantly US born (60%), Black (non-Latinx) (40%), in their twenties (27% 20–29 year-olds) or thirties (36% 30–39 year-olds), with an exposure mode of male-to-male sex (MSM) (36%). While MSM was the leading exposure mode, a large percentage of new HIV diagnoses had injection drug use (24%) or no identified risk (NIR, 22%) as exposure mode.

### **If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their**

**unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))**

In the most recent comprehensive chart review (2021), fully 10% of people living with HIV were homeless. DPH does not collect data about specific housing needs.

**Discussion:**

Data notes:

Cumulative cases of AIDS reported: Number of individuals ever diagnosed with AIDS in Massachusetts regardless of their current state of residence.

Area incidence of AIDS: Rate per 100,000.

Rate per population: Number of people living with HIV in Massachusetts in 2023/Population of Massachusetts in 2023.

Number of new cases prior year (three years): Number of new HIV diagnoses in Massachusetts in 2021, 2022, and 2023.

Rate per population (three years): Number of people living with HIV between 2021 and 2023/Population of Massachusetts 2021-2023.

Area prevalence: Rate per 100,000.

## **NA-50 Non-Housing Community Development Needs - 91.315 (f)**

### **Describe the jurisdiction's need for Public Facilities:**

In the category of public facilities, neighborhood facilities such as community centers, senior centers, and facilities for youth and family services and assistance in removing architectural barriers to meet the federally mandated accessibility requirements under the Americans with Disabilities Act (ADA) represent the largest share of the requests. There has also been an uptick in requests for parks and recreation facilities since the COVID pandemic.

### **How were these needs determined?**

The process by which these needs were identified involved analysis of economic conditions and trends, with particular attention to the impacts on low- and moderate-income people and communities; input from community representatives and regional planning agencies in a series of listening sessions held across the state annually; and a review of recent CDBG funding requests.

### **Describe the jurisdiction's need for Public Improvements:**

Community development needs and priorities vary by region and by size and type of community. State-of-the-art physical infrastructure contributes to the quality of life for existing residents and is a necessary ingredient for expanded business development. Investments in sewer, utility, and road improvements in downtown areas, neighborhoods (in particular low-income), industrial zones and underdeveloped rural areas can have dramatic effects on local economies and a cumulative beneficial effect on the overall economy, but many communities do not have the financial capacity to make the necessary infrastructure improvements, especially in rural areas. Despite great advances over the last twenty years, many communities still have sidewalks and other infrastructure components that are not yet fully accessible and in compliance with the Americans with Disabilities Act. In addition to roads, sewers and other traditional infrastructure, the state's economic competitiveness requires 21st century technology and telecommunications infrastructure. Some areas of the Commonwealth, however, still rely on inadequate telecommunications systems with a particular lack of access to broadband internet services, which prevent them from attracting new technology and knowledge-based businesses.

### **How were these needs determined?**

The process by which these needs were identified involved analysis of economic conditions and trends, with particular attention to the impacts on low- and moderate-income people and communities; input from community representatives and regional planning agencies in a series of listening sessions held across the state annually; and a review of recent CDBG funding requests.

### **Describe the jurisdiction's need for Public Services:**

Current economic conditions heighten the need for financial support of broad-based social services. In the wake of the COVID-19 pandemic, public services needs grew dramatically. These needs have not abated, most especially related to food insecurity. The need for domestic violence prevention and mental health assistance has also continued to grow. The housing crisis has exacerbated these problems.

### **How were these needs determined?**

The process by which these needs were identified involved analysis of economic conditions and trends, with particular attention to the impacts on low- and moderate-income people and communities; input from community representatives and regional planning agencies in a series of listening sessions held across the state annually; and a review of recent CDBG funding requests. In addition, as the State agency responsible for oversight of the Community Services Block Grant, EOHLC reviews the federally mandated Community Needs Assessments submitted by the 23 designated Community Action Agencies that receive CSBG allocations throughout the Massachusetts program. Those assessments are undertaken every three years and provide valuable insight into the regional and statewide public/social service needs in the Commonwealth.

# Housing Market Analysis

## MA-05 Overview

### Housing Market Analysis Overview:

As noted elsewhere herein, the Commonwealth recently completed its first comprehensive 5-year housing plan: [A HOME FOR EVERYONE - A Comprehensive Housing Plan for Massachusetts 2025-2029](#).

This Plan is separate from the Consolidated Plan. That statewide housing plan presents significant analysis on the current and anticipated rental housing and homeownership markets. A needs assessment accompanied that plan, and the link to that needs assessment is presented here and in other locations in this Consolidated Plan: [MA Statewide Housing Needs Assessment February 2025](#).

A shortage of homes is the root cause of our housing cost crisis. For decades, housing supply simply hasn't kept up with demand. Units for sale or rent are at historic lows.

A growing share of residents struggle to afford the cost of living in Massachusetts and need financial support. Housing prices already exceed what is affordable for most low-income working households, fixed income seniors, people with disabilities, and new arrivals. The increasing cost of utilities, transportation, insurance, and home maintenance make the problem worse.

## MA-10 Number of Housing Units – 91.310(a)

### Introduction

A vastly inadequate supply of housing units to meet the needs of the current population, compounding the price pressures of an already tight housing market, has resulted in a housing crisis. There simply are not enough housing units to meet the current need let alone a future population with any of the projected growth scenarios. The tables below provide the most recent Federally compiled data estimating the housing supply in Massachusetts.

This more recently published data along with analysis provides a fuller picture of the Commonwealth's housing market and needs: [MA Statewide Housing Needs Assessment February 2025](#).

### All residential properties by number of units

Property Type	Number	%
1-unit detached structure	1,496,092	52%
1-unit, attached structure	151,949	5%
2-4 units	596,427	21%
5-19 units	289,655	10%
20 or more units	306,265	11%
Mobile Home, boat, RV, van, etc	24,601	1%
<b>Total</b>	<b>2,864,989</b>	<b>100%</b>

Table 30 – Residential Properties by Unit Number

Data Source: 2016-2020 ACS

### Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	6,422	0%	58,360	6%
1 bedroom	57,740	4%	287,531	30%
2 bedrooms	340,969	21%	376,923	39%
3 or more bedrooms	1,207,198	75%	250,572	26%
<b>Total</b>	<b>1,612,329</b>	<b>100%</b>	<b>973,386</b>	<b>101%</b>

Table 31 – Unit Size by Tenure

Data Source: 2016-2020 ACS

**Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.**

80% of HOME and HTF funds, as well as most state funds, are targeted to households at or below 60% AMI and 20% are target to households at or below 50% of AMI. CDBG funds are targeted to households at or below 80% AMI.

**Rental Housing:** A rental housing unit is considered to be an affordable housing unit if it is occupied by an extremely-low, very-low, or low -income household and bears a rent that is the lesser of the existing Section 8 Fair Market Rent for comparable units in the area or, 30% of the adjusted income of a family whose income equals 65% of the median income for the area, except that HUD may establish income ceilings higher or lower than 65% of the median income because of prevailing levels of construction costs or fair market rents, or unusually high or low family incomes.

**Homeownership:** Although this varies by program, housing that is for purchase (with or without rehabilitation) qualifies as affordable housing if it is purchased by an extremely-low, very-low, or low -income first-time homebuyer who will make the housing his or her principal residence and; has a sale price that does not exceed the mortgage limit for the type of single family housing for the area under HUD's single family insuring authority under the National Housing Act. Housing that is to be rehabilitated, but is already owned by a family when assistance is provided, qualifies as affordable housing if the housing is occupied by an extremely-low, very-low, or low-income household which uses the house as its principal residence and; has a value, after rehabilitation, that does not exceed the mortgage limit for the type of single family housing for the area.

**Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.**

An estimated 9,000 homes were converted to seasonal homes or short-term rentals between 2010 and 2020 and are no longer available to year-round residents in those communities. This trend is expected to continue as Massachusetts offers multiple destination and vacation opportunities for tourism and other visitors.

Beyond those conversions, approximately 6,000 units of privately-owned affordable housing are also at risk of being converted to market rate as deed restrictions expire in the coming years. While preserving the affordability of these existing homes is generally more cost-effective than building new homes elsewhere, financing retention of those affordable units in the face of more attractive returns of market rate housing presents its own challenges.

**Does the availability of housing units meet the needs of the population?**

No, according to the recently (January 2025) released Statewide Housing Needs Assessment, "EOHLC estimates that the state needs to produce or preserve at least 222,000 homes from 2025 to 2035 to address the existing crisis, accommodate unmet housing needs, achieve a healthy vacancy rate, meet the needs of our existing population, and set the stage for long-term economic growth. More than half of net household growth is projected to be people living alone, mostly older adults. An estimated 22% of

net growth is multiple adults with no children under 18 (roommates, couples, adult children living with parents, etc.). One quarter of net household growth is families with children, though it should be noted that most of these family households are already living in Massachusetts, either in doubled up & overcrowded situations or in the family shelter system.”

The assessment also calculates that in the shorter term, approximately 115,600 homes are needed over the next ten years just to solve the existing shortage. Halving that figure to roughly accommodate the 5 year span of this Consolidated Plan, there is an estimated need for the creation of 55,000 to 60,000 housing units over the next five years - if we assume zero population growth.

### **Describe the need for specific types of housing:**

The depth of the shortage of housing extends across all types of housing beyond market rate and includes that which supports low- to moderate-income families, frail seniors, chronically homeless individuals and families, persons with cognitive disabilities or severe medical conditions, families fleeing unsafe conditions, people with substance abuse disorder, veterans, and others. The supply of housing units across all strata of household size and makeup, with children and without, housing for persons with special needs, in rental and ownership units, and other identifiers is grossly inadequate to meet current and future need.

### **Discussion**

The Commonwealth and its partner organizations continue to employ various means to expand the supply of housing. These include increased financial resources and technical assistance, the freeing up underutilized State-owned properties for housing, State-wide zoning reform including both mandates and municipal option, programmatic incentives, encouragement of the use of zoning techniques such as transit oriented development, and other tools to encourage housing development that requires local municipal cooperation to unlock.



## **MA-15 Cost of Housing – 91.310(a)**

### **Introduction**

The high cost of housing is best summarized in A HOME FOR EVERYONE - A Comprehensive Housing Plan for Massachusetts 2025-2029: "It's well known that Massachusetts housing is too expensive. Recent reports have ranked Massachusetts as having the 2nd highest cost of living in the country. While the state also has the second highest median household income of any state, at \$101,000, the astronomical cost of housing burdens households across the income spectrum. The consequences of home price escalation include housing instability, overcrowding, displacement, homelessness, and outmigration, among other things.

Median home prices rose 73% from 2000 to 2023, after adjusting for inflation, while median household income rose only 4% in real dollar terms over the same period. As a result, fewer than one quarter of home sales from 2010 – 2019 were affordable to low-moderate income households (at or below 70% of AMI). Lower-cost rentals are also vanishing.

Household budgets are burdened by rising insurance costs (up 40% nationwide since 2017); transportation costs (\$13,000 annually for the average household that owns one or more cars); and utilities such as heat, electricity, and broadband service.

About 100,000 low-income households receive rental housing vouchers which provide an average benefit exceeding \$1,500 per month at the end of 2024. With rising rents and EOHL policy changes that allow more flexibility, the cost of each voucher is increasing.

The number of households paying more than 30% of their income has been rising across all income groups. More than one quarter of middle-income households are cost burdened, and more than three quarters of very low-income households.

Eviction rates have rebounded since the pandemic moratorium. There were 27,000 eviction filings for nonpayment of rent in 2023, of which 9,000 resulted in an eviction.

Homelessness of both individuals and families has been on the rise. The trend involves both long-term residents of the state as well as people who have recently arrived. Massachusetts now has the nation's 5th largest homeless population.

Some people cope with high housing costs by living with parents, roommates or other families; others move out of state. There are an estimated 49,000 overcrowded households (more than two people per bedroom), 108,000 "missing households" that didn't form due to high housing costs, and 400,000 adults living in their parent's household. On net, Massachusetts lost nearly 24,000 prime working age adults to other states in 2022, the most recent year for which these data are available."

These are not the signs of a healthy housing market.

## Cost of Housing

	Base Year: 2009	Most Recent Year: 2020	% Change
Median Home Value	333,100	352,600	6%
Median Contract Rent	966	1,031	7%

**Table 32 – Cost of Housing**

Data Source: 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	192,996	19.8%
\$500-999	291,376	29.9%
\$1,000-1,499	258,328	26.5%
\$1,500-1,999	133,671	13.7%
\$2,000 or more	97,015	10.0%
<b>Total</b>	<b>973,386</b>	<b>100.0%</b>

**Table 33 - Rent Paid**

Data Source: 2016-2020 ACS

## Housing Affordability

Number of Units affordable to Households earning	Renter	Owner
30% HAMFI	136,110	No Data
50% HAMFI	281,045	43,565
80% HAMFI	559,100	178,335
100% HAMFI	No Data	342,255
<b>Total</b>	<b>976,255</b>	<b>564,155</b>

**Table 34 – Housing Affordability**

Data Source: 2016-2020 CHAS

## Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	0	0	0	0	0
High HOME Rent	0	0	0	0	0
Low HOME Rent	0	0	0	0	0

**Table 35 – Monthly Rent**

Data Source Comments: To access Massachusetts FMR and High HOME Rent data, please use the attached link:  
[https://www.huduser.gov/portal/datasets/home-datasets/files/HOME\\_RentLimits\\_State\\_MA\\_2024.pdf](https://www.huduser.gov/portal/datasets/home-datasets/files/HOME_RentLimits_State_MA_2024.pdf)

## **Is there sufficient housing for households at all income levels?**

No, the recently completed MA Statewide Housing Needs Assessment February 2025 estimates the need for 220,000 additional housing units to end the current housing crisis. The shortfall of available housing units to meet the current and projected need cuts across all income levels.

## **How is affordability of housing likely to change considering changes to home values and/or rents?**

In simple terms, the severe shortage of available housing is a supply / demand problem that puts pressure on affordability for both buyers and renters by driving housing costs upward. But the supply/demand equation is not simple.

The various factors supply and holding back housing production are described in other sections of this Consolidated Plan, include the cost of construction - i.e., labor and materials, availability of financing - particularly for affordable housing, local resistance to affordable housing development, incomes that don't keep pace with housing costs, lack of available land coupled with local zoning constraints, as well as others.

The net result of a constrained production and diminished supply has been a continual increase in home values and rents beyond affordability for a high percentage of the Commonwealth's households. This has made Massachusetts one of the most expensive states in the US for housing, with one or two particular markets, notably Boston, regularly highlighted as being among the most expensive in the US in several recent analyses.

## **How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?**

It varies, and in several Massachusetts markets, the maximum HOME and Fair Market rents for those MSAs, Metro Areas, or Counties lag behind actual market prices, i.e., Area Median Rents. This presents challenges to project sponsors and developers seeking subsidies for affordable housing. In those cases, developers limited by Federal program requirements are restricted as to what they can charge for rent, cutting into the margins required to make the financials work and the projects feasible.

HOME rents are generally the lesser of 30 percent of the adjusted income of a family whose annual income equals 65 or 50 percent of the median income for the area, as defined by HUD and the fair market rent for existing housing for comparable units in the area, as established by HUD. Typically, area median rents are defined by particular income bands. In areas where the HOME rents are lower, the development budget may require additional subsidy for project feasibility.

## Discussion

The Commonwealth's aforementioned comprehensive housing plan lays out several strategies for solving the housing problem, many of which extend well beyond the scope of this HUD based Consolidated Plan and the five programs supported within. The first strategy is to create a state of housing abundance. This includes such approaches as:

- Increasing as-of-right zoning capacity for multi-family housing in communities served by the MBTA
- Boosting production and preservation of affordable rental housing using capital funding authorization
- Reducing barriers preventing or driving up the costs of housing production and preservation, through the Unlocking Housing Production Commission
- Making underutilized state-owned property available to housing
- Ensuring the homebuilding industry - both companies and workers - is available and ready to take on the work of building
- Exploring avenues for making it feasible for developers to build middle-market housing
- Fostering nontraditional housing such as cohousing, social housing, office conversions and accessory dwelling units
- Supporting offsite construction of housing units
- Creating new funding streams, not just statewide but regionally and locally as well
- Supporting infrastructure improvements to enable new growth

Another strategy is to protect existing homes and affordability, which includes the following approaches.

- Repairing, rehabilitating, and repositioning the State's public housing portfolio
- Preserving homes with expiring affordability restrictions
- Investing in improving accessibility, availability, and affordability of existing homes
- Bringing more vacant, distressed, and underutilized housing back online
- Developing new strategies to preserve naturally occurring affordable housing

## MA-20 Condition of Housing – 91.310(a)

### Introduction:

The condition of owner occupied housing in Massachusetts is reliant to a large degree on the capacity of the homeowners to maintain and improve what is typically their most significant personal investment. For renters there is a greater reliance on the formal administrative infrastructure by which local boards of health, building commissioners/inspectors, state agencies in some cases, rental property owners and their agents, subsidizing agencies - and their inspectors and agents, and the renters themselves to identify and address deficiencies in the condition of the housing. This administrative infrastructure also includes the housing courts responsible for enforcing the obligations of both landlord and tenant should non-legal negotiations fail.

### Describe the jurisdiction's definition of "standard condition" and "substandard condition but suitable for rehabilitation":

HUD requires participating jurisdictions to define the terms “standard condition,” “substandard condition” and “substandard condition, but suitable for rehabilitation.” For purposes of its consolidated planning, the Commonwealth considers units standard if they meet HUD’s Section 8 quality standards. Consistent with the Census Bureau definition, units are deemed to be substandard if they lack complete plumbing and/or kitchen facilities.

The category “substandard, but suitable for rehabilitation,” includes units that would not currently meet Section 8 standards, but could be brought into compliance with local codes for less than replacement cost. Such units might have functional obsolescence, moderate structural damage, inadequate or inefficient heating systems, septic problems, and the like. They may also lack energy conserving features such as insulation or storm windows, and/or contain lead paint. Because of the age of much of the existing housing stock, the severity of New England winters, and the number of communities that rely in whole, or in part, on onsite septic systems for wastewater treatment, a conservative estimate of the number of units in this category would be four times the number of substandard units.

### Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	429,935	27%	435,002	45%
With two selected Conditions	6,879	0%	25,008	3%
With three selected Conditions	615	0%	2,424	0%
With four selected Conditions	14	0%	60	0%
No selected Conditions	1,174,886	73%	510,892	52%
<b>Total</b>	<b>1,612,329</b>	<b>100%</b>	<b>973,386</b>	<b>100%</b>

Table 36 - Condition of Units

Data Source: 2016-2020 ACS

## Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	156,452	10%	82,724	9%
1980-1999	337,295	21%	143,448	15%
1950-1979	565,546	35%	301,506	31%
Before 1950	553,036	34%	445,708	46%
<b>Total</b>	<b>1,612,329</b>	<b>100%</b>	<b>973,386</b>	<b>101%</b>

**Table 37 – Year Unit Built**

Data Source: 2016-2020 CHAS

## Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	1,118,582	69%	747,214	77%
Housing Units build before 1980 with children present	102,355	6%	67,630	7%

**Table 38 – Risk of Lead-Based Paint**

Data Source: 2016-2020 ACS (Total Units) 2016-2020 CHAS (Units with Children present)

## Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

**Table 39 - Vacant Units**

Data Source: 2005-2009 CHAS

## Need for Owner and Rental Rehabilitation

EOHLC relies on the expertise of those administering its housing rehabilitation programs at the local level to estimate and prioritize housing rehabilitation needs. 69% of the owner-occupied units, and 77% of the renter-occupied units in Massachusetts were built before 1980. The need for owner and renter rehabilitation will continue to increase as the housing stock ages. There are a number of deleading financial assistance programs available to Massachusetts residents, including the Massachusetts lead paint removal tax credit, low cost financing available to owners of 1-4 family properties through the Get

the Lead Out program, the Home Improvement Loan Program, and other local programs offered through public agencies and local lenders.

### **Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards**

The Massachusetts Department of Public Health (MDPH) Childhood Lead Poisoning Prevention Program (MACLPPP) is the lead agency for educating the public about the risks of lead and for ensuring that affected children receive appropriate intervention, and evaluates blood lead screening data in order to monitor trends over time and across geographies to identify populations at risk. The MACLPPP records the lead history of homes and daycares built before 1978. The public can access a property's lead history and some inspectional documents including reports and Letters of Compliance through Lead Safe Homes. The program's actions closely follow or exceed requirements in the HUD Lead-Safe Rule. Massachusetts lead regulation (105 CMR 460.050) requires that all children be tested for blood lead between the ages of 9 and 12 months, and again at ages 2 and 3. All children living in a high-risk community should be tested again at age 4. High-risk communities for childhood lead poisoning are defined as those with a 5-year incidence rate of confirmed  $\geq 10$   $\mu\text{g}/\text{dL}$  cases that is above the state 5-year incidence rate after adjusting for low to moderate income and old housing stock. The Commonwealth will continue its implementation of the Massachusetts Lead Law and the HUD Lead-Safe Rule, targeting high-risk communities. Although the Commonwealth has continued to address lead based paint, 71% of homes in Massachusetts were built before 1978 and are therefore likely to contain some lead-based paint.

### **Discussion:**

In the Commonwealth there is a generally responsive system available to renters for reporting suspected health code violations to local or other appropriate authorities. It is true there are communities with lower capacity to respond to complaints and housing related issues. There are also documented instances in which absentee landlords with little local presence, or rental property owners with insufficient financial capacity to make required improvements, fail to provide required health and safety measures in housing units under their purview. When recourse outside the standard tenant/landlord relationship is necessary, housing courts also play a role in enforcing compliance with the building codes designed to ensure renters are provided with the safe, decent housing they are to be provided when entering into lease or other rental agreements.

## MA-25 Public and Assisted Housing – (Optional)

### Introduction:

Public and subsidized housing represents a safety net for the many of the Commonwealth's most vulnerable low-income residents, and Massachusetts has been a national leader in providing the resources to create and maintain that safety net. EOHLC's public housing portfolio includes approximately 43,400 units of state-assisted public housing, far more than any other state in the nation. The large majority of these public housing units were built more than 50 years ago. This state-aided housing portfolio is managed by 229 Local Housing Authorities (LHAs), which have volunteer boards and, in many cases, part-time executive directors. There are 240 LHAs with at least one subsidized housing program, when including federal public housing and vouchers.

EOHLC also administers ~24,000 federal vouchers as a Moving to Work (MTW) agency, and funds and administers over 11,000 additional state rental vouchers. These programs are reflected in the table below.

Additionally, 65 MA PHAs own and operate 30,000 units of federally-aided public housing and over 100 MA PHAs administer approximately 70,000 federal vouchers; these are not reflected in this report.

Data included in the table below was collected and tabulated by the Public Housing and Rental Assistance Division of EOHLC in November 2024.

### Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available									
# of accessible units									
<b>*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition</b>									

**Table 40 – Total Number of Units by Program Type**

Data Source: PIC (PIH Information Center)



**Federal & State Vouchers/Units Administered in MA**

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project based	Tenant based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of Federal units / vouchers in use	0	1,055	0	24,848	4,169	20,023	613	154	926
# of State units / vouchers in use	0	0	43,358	10,856	4,039	6,013	0	0	803
Total	0	1,055	43,358	35,704	8,208	26,036	613	154	1,729

**\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition, and for state vouchers AHVP**

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**State and Federal Vouchers Administered in MA**

**Describe the supply of public housing developments:**

**Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:**

EOHLC's public housing portfolio includes approximately 43,400 units of state-assisted public housing, far more than any other state in the nation. In fact, only Connecticut, Hawaii and Ohio have state public housing. The majority of these public housing units were built more than 50 years ago. This housing portfolio, along with the additional federally-subsidized units, is managed by 229 Local Housing Authorities (LHAs), which have volunteer boards and many have part-time executive directors.

**Describe the Restoration and Revitalization Needs of public housing units in the jurisdiction:**

State-aided public housing in Massachusetts has significant restoration and revitalization needs. The large majority of developments were built over 50 years ago, and years of underinvestment have resulted in significant capital backlogs. The value of components past their useful life exceeds \$3B, equivalent to 18% of building replacement value.

The Healey-Driscoll Administration is making a committed effort to addressing the needs of state-aided public housing. The FY25 Capital Investment Plan increased capital funding to \$157M, 30% more than the prior year and 43% more than the final year of the prior administration. The legislature also allocated \$150M of ARPA relief funds to state-aided public housing capital needs. EOHLC will expend these funds with a focus on targeted awards for replacing obsolete electrical panels and upgrading fire alarm systems.

Additionally, the recently enacted Affordable Homes Act (AHA) included record level authorizations for State borrowing for capital improvements in public housing, and several policy amendments that make it easier for housing authorities to do their jobs and collaborate amongst themselves.

EOHLC maintains a redevelopment program for state-aided public housing, to address the developments that cannot be brought up to a state of good repair without complete replacement as well as leverage the value of public housing land to develop more housing. EOHLC awards funds to 1-2 major state-aided public housing projects per year, and currently has several projects in process that will replace hundreds of units while adding hundreds more units of affordable and market-rate housing. EOHLC also funds technical assistance to LHAs through our colleagues at Mass Housing Partnership to support them in developing vacant land and for planning for redevelopment of their state-aided public housing properties.

**Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:**

The Healey-Driscoll Administration views stable housing as a platform for working families to achieve greater prosperity and to provide comfortable community housing for all ages. To that end, we have rolled out several programs to foster economic mobility for public housing residents and connect residents with services. EOHLC awarded funds in 2022 to 5 LHAs and 3 Regional Administering Agencies (RAAs) for a Self Sufficiency Program, modeled on the federal Family Self Sufficiency program, and recently announced a Notice of Funding Availability to expand this program to up to three more sites. EOHLC also funds a Resident Service Coordinator (RSC) program, funding RSCs at approximately 150 Local Housing Authorities.

**Discussion:**

The Commonwealth remains committed to supporting public housing with substantial capital funding. It continues to support investment in its portfolio on an annual basis as the public housing units provide a much needed array of fixed, subsidized units to complement the lacking supply of affordable rental units in the private housing market.

## MA-30 Homeless Facilities – 91.310(b)

### Introduction

Homeless Facilities are funded through multiple resources across the state. EOHLC funds the majority of the Commonwealth family shelter system (known as Emergency Assistance, or EA) as well as shelter for individuals experiencing homelessness. The Executive Office of Health and Human Services and Department of Public Health fund projects for homeless youth and those fleeing Domestic violence respectfully. Local municipalities and CoCs also fund projects in their specific regions.

### Facilities Targeted to Homeless Persons

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	15,679	0	507	3,202	0
Households with Only Adults	3,641	8,468	1,005	7,608	0
Chronically Homeless Households	0	0	0	0	0
Veterans	93	0	405	2,887	0
Unaccompanied Youth	48	0	0	0	0

**Table 41 - Facilities Targeted to Homeless Persons**

Data Source Comments:

**Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons**

Most of our shelter facilities are 24/7 and operate on a housing first model. This provides opportunity for guests to meet with case managers. Services are offered to connect eligible guest with other resources such as:

- Healthcare (Many shelter sites have medical providers offer walk in clinics on site)
- Mental health services and referrals
- Enrollment in MassHealth (Massachusetts Medicaid), which along with providing health insurance was offering assistance with move in costs through ARPA funds
- SOAR certified case managers are able to assist guests with connection to mainstream benefits such as SSI/SSDI
- Employment services to those who are willing to work
- Meals for all guests and referrals to local food banks once housed and/or assistance applying for SNAP
- Housing Search services including assistance with local lotteries, Section 8, MRVP's ect.

**List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.**

See attached Housing Inventory Chart (HIC) which outlines all projects/facilities serving homeless individuals and families in the state along with the CoC they are located in. [All projects from HIC - Adobe cloud storage](#)

## MA-35 Special Needs Facilities and Services – 91.310(c)

### Introduction

DPH uses HOPWA funds for supportive services, including housing search and advocacy and medical case management. HOPWA funds are not used for the types of Assistance listed below.

### HOPWA Assistance Baseline Table

Type of HOPWA Assistance	Number of Units Designated or Available for People with HIV/AIDS and their families
TBRA	0
PH in facilities	0
STRMU	0
ST or TH facilities	0
PH placement	0

Table 42 – HOPWA Assistance Baseline

Data Source: HOPWA CAPER and HOPWA Beneficiary Verification Worksheet

### **To the extent information is available, describe the facilities and services that assist persons who are not homeless but who require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing**

HOPWA providers build and maintain collaborations with traditional and non-traditional services and community-based partners to assist clients in addressing challenges around social determinants of health (SDOH) such as housing, transportation, food, legal issues, and benefits. Providers collaborate so that there is no wrong door to services. DPH contract managers monitor how programs are addressing SDOH through monthly data about referrals.

With non-HOPWA funds, DPH supports an HIV Coordinator in the Suffolk County House of Correction (HOC). This staff person conducts HIV testing and coordinates medication management while people are in the HOC. Once an individual leaves, they are linked to a community-based provider who can help them through housing search and advocacy support.

### **Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing**

DPH funds hospitals, community health centers, and community-based organizations throughout the Commonwealth. Individuals returning from institutions are re-linked to their medical case manager, who provides housing search and advocacy services. Although not funded through HOPWA, DPH supports legal services that often concern evictions and blocks to housing such as Criminal Offender Record Information (CORI).

**Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)**

DPH will provide housing search and advocacy and medical case management supportive services using HOPWA funds.

**For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))**

N/A

## **MA-40 Barriers to Affordable Housing – 91.310(d)**

### **Negative Effects of Public Policies on Affordable Housing and Residential Investment**

Insufficient resources to meet the growing gap between the cost of creating and maintaining decent housing and the incomes of very low-income households is, of course, the primary obstacle. But building new housing has become increasingly more costly and challenging in Massachusetts, making it difficult for the private market to meet the needs even of moderate- and middle-income residents. Some of the obstacles to production are unique to affordable housing, but many apply to housing development generally. The factors affecting the state's performance on housing development and rehabilitation have to do with economic and fiscal considerations, resource allocation, the state's legal and regulatory framework, and public perception and attitudes. Specific barriers include: high construction costs, including the high labor costs; high cost and relative scarcity of land available for development, especially in the eastern part of the state, and the higher costs associated with building on the marginal sites that are available; limited infrastructure in many of the Commonwealth's communities and insufficient resources or incentives for improving roads, water and sewer systems; complex or redundant building codes and the way that they are applied; restrictive local zoning and land use controls and permitting processes; limited planning and organizational capacity at the local level. According to the 2020 U.S. Census, nearly half of the Commonwealth's 351 municipalities have fewer than 10,000 residents, and most of these have no professional planning or community development staff; and reluctance of communities to allow new residential development, especially affordable housing, because of concerns related to fiscal impact, property values and "community character." Under the state constitution and "Home Rule" legislation, Massachusetts's municipalities have control over most land use decisions, and they are responsible for providing and paying for essential public services – including education – largely through the local property tax.

The ability of the State to eliminate, or even mitigate, some of these barriers is limited. For example, while materials cost roughly the same here as in other parts of the country, labor is considerably more expensive. EOHLC recognizes that expanding the supply of affordable housing is vital to the state's economic prosperity, regional and nationwide competitiveness, and its global place as a bastion of academic, research, medical, and scientific pursuit. Ensuring Massachusetts has abundant housing for people in all stages of life and at all economic levels, especially low-to-moderate income households, is paramount to the Commonwealth's and its residents' continued prosperity.



# MA-45 Non-Housing Community Development Assets -91.315(f)

## Introduction

### Economic Development Market Analysis

#### Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	5,478	6,912	0	1	1
Arts, Entertainment, Accommodations	174,994	172,272	11	12	1
Construction	90,684	100,374	6	7	1
Education and Health Care Services	372,864	273,485	24	20	-4
Finance, Insurance, and Real Estate	116,187	71,777	8	5	-3
Information	50,242	44,171	3	3	0
Manufacturing	137,856	160,717	9	12	3
Other Services	62,240	57,957	4	4	0
Professional, Scientific, Management Services	211,672	168,257	14	12	-2
Public Administration	0	0	0	0	0
Retail Trade	187,729	201,027	12	15	3
Transportation and Warehousing	43,039	47,346	3	3	0
Wholesale Trade	70,141	77,007	5	6	1
Total	1,523,126	1,381,302	--	--	--

**Table 43- Business Activity**

Data Source: 2016-2020 ACS (Workers), 2020 Longitudinal Employer-Household Dynamics (Jobs)

## Labor Force

Total Population in the Civilian Labor Force	3,926,029
Civilian Employed Population 16 years and over	3,761,173
Unemployment Rate	4.20
Unemployment Rate for Ages 16-24	0.00
Unemployment Rate for Ages 25-65	0.00

**Table 44 - Labor Force**

Data Source Comments: US Bureau of Labor Statistics Jan. 2025; Unemployment by age data unavailable

Occupations by Sector	Number of People
Management, business and financial	1,929,478
Farming, fisheries and forestry occupations	14,186
Service	601,524
Sales and office	631,650
Construction, extraction, maintenance and repair	260,039
Production, transportation and material moving	331,756

**Table 45 – Occupations by Sector**

Data Source Comments: Source: ACS 2023 1-Year Estimates Data Profiles - DP03 Selected Economic Characteristics

## Travel Time

Travel Time	Number	Percentage
< 30 Minutes	1,685,669	54%
30-59 Minutes	1,025,014	33%
60 or More Minutes	399,535	13%
<b>Total</b>	<b>3,110,218</b>	<b>100%</b>

**Table 46 - Travel Time**

Data Source Comments: Source: ACS 2023 1-Year Estimates Detailed Tables - B08303 Travel Time to Work

## Education:

### Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	0	0	0

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
High school graduate (includes equivalency)	0	0	0
Some college or Associate's degree	0	0	0
Bachelor's degree or higher	0	0	0

**Table 47 - Educational Attainment by Employment Status**

Data Source Comments:

### Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	0	0	0	0	0
9th to 12th grade, no diploma	0	0	0	0	0
High school graduate, GED, or alternative	0	0	0	0	0
Some college, no degree	0	0	0	0	0
Associate's degree	0	0	0	0	0
Bachelor's degree	0	0	0	0	0
Graduate or professional degree	0	0	0	0	0

**Table 48 - Educational Attainment by Age**

Data Source Comments:

### Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	32,493
High school graduate (includes equivalency)	43,761
Some college or Associate's degree	51,190
Bachelor's degree	79,985
Graduate or professional degree	99,844

**Table 49 – Median Earnings in the Past 12 Months**

Data Source Comments: Source: ACS 2023 1-Year Estimates Data Profiles - S1501 Educational Attainment

**Based on the Business Activity table above, what are the major employment sectors within the state?**

It is no surprise that Education and Health Care dominate the employment sectors, with that category leading in both number of workers and number of jobs. The Commonwealth has for many years boasted

several public and private colleges - including medical schools - as well as highly regarded medical facilities.

Professional, Scientific, Management Services is the second leading sector, again this supports conventional wisdom.

**Describe the workforce and infrastructure needs of business in the state.**

**Describe any major changes that may have an economic impact, such as planned public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.**

The Healey-Driscoll Administration's Workforce Agenda and Workforce Innovation and Opportunity Act State Plan includes four focus areas in response to the current business climate and workforce needs:

Focus Area I: Talent Attraction and Retention - For the Commonwealth to be a leader in attracting and retaining talent, Massachusetts must reduce barriers to employment as a critical strategy that will increase labor market participation, especially among underrepresented and underserved populations, and foster a more equitable workforce.

Focus Area II: Talent Development - As Massachusetts invests in talent pipelines and career pathways for residents, it is imperative that workforce strategies align with industry hiring demands expressed by employers today, and projected by employers for future in-demand occupations across the state.

With the goal of strengthening Massachusetts' talent pipelines, a collaborative workforce system needs to prepare future talent and create upskilling pathways for workers through effective education and training models that will fuel priority industries and occupation.

Focus Area III: Leadership by Example - Massachusetts has a tremendous opportunity to strengthen and scale effective strategies, programming, and resources to develop untapped talent especially with the Governor and Executive Branch leading by example, and the Commonwealth as the largest employer in Massachusetts.

Focus Area IV: Workforce System Infrastructure - Massachusetts needs to modernize and strengthen the infrastructure and coordination across the MassHire public workforce system to improve support for jobseekers and employers. Additionally, as the MassHire State Workforce Board serves as a convening body to influence and support Massachusetts' Workforce Agenda, the Board should also ensure alignment as a resource for the Executive Office of Labor and Workforce Development to engage Board members, regional workforce partners, and more.

## How do the skills and education of the current workforce correspond to employment opportunities in the state?

In recent years, the workforce has dramatically changed in Massachusetts, nationally, and globally. Described in **Massachusetts' 2023 Economic Development Plan**, the global pandemic reset economies at all levels, impacting industries and workforce demands. An increasingly mobile, remote, and hybrid workforce combined with accelerated technology, increased costs, downsized workplaces, shifts in downtown districts, importance on mental health, access, and costs for quality caregiving, and so many more factors continue to evolve and have adjusted the needs for both workers and employers.

In the aftermath of the global pandemic, the Massachusetts labor market increasingly tightened as workers and jobseekers left the labor market, remained disconnected from the workforce, and felt discouraged from re-entering the labor market due to several barriers to access meaningful employment. Today, employers across all industries have and continue to face urgent needs to attract, retain, and develop talent to meet hiring demands today and projected over time. **Massachusetts' Workforce Agenda** includes an economic analysis section with detailed workforce trends.

## Describe current workforce training initiatives supported by the state. Describe how these efforts will support the state's Consolidated Plan.

MA EOLWD supports seven regional Workforce Skills Cabinet Teams led by regional workforce boards, economic development, education, and employers to analyze and prioritize industries and occupations to build talent development strategies that meet the needs of employers. Each regional Workforce Skills Cabinet Team works toward workforce training and employment goals, especially in prioritized industries and occupations. The seven regional teams serve to identify and track needs and develop intentional programming in partnership with local employers, and the regularly updated priorities can be found here: [Massachusetts Workforce Planning](#). As of February 2024, the priority industries by region include:

### Berkshires

- Healthcare and Social Assistance
- Manufacturing and Engineering
- Hospitality, Culinary, and Management

### Pioneer Valley

- Healthcare and Social Assistance
- Advanced Manufacturing
- Educational Services

### Central

- Healthcare and Social Assistance
- Manufacturing
- Transportation, Warehousing, and Logistics

#### Northeast

- Advanced Manufacturing
- Healthcare and Social Assistance
- Professional, Scientific, and Technical/IT

#### Greater Boston

- Professional and Technical Services
- Healthcare and Social Assistance

#### Southeast

- Healthcare and Social Assistance
- Professional, Scientific, and Technical/IT
- Finance and Insurance

#### Cape & Island

- Healthcare and Social Assistance
- Construction and Extraction Occupations
- Accommodation and Food Service

These training initiatives and collaborative engagement support the Consolidated Plan by paving pathways for employment leading to reliable income, household income growth, and economic stability - all necessary to overcome some of the barriers to securing housing.

#### **Describe any other state efforts to support economic growth.**

The Commonwealth completed its recent Economic Development Plan, Team Massachusetts: Leading Future Generations, in 2023. This economic development plan focuses on three priority areas of Fundamentals, Talent, and Sectors, each of which are supported by specific initiatives.

#### Fundamentals

- Address Housing and Transportation Challenges: Increase housing production and make transportation more reliable.

- Invest in Infrastructure and Competitiveness: For all communities, including rural communities and Gateway Cities, and projects and programs that ensure our competitiveness.

#### Talent

- Be the Global Talent Magnet: Launch programs to retain and attract talent, including college graduates, immigrants, non-college grads, and trades/professions.
- Tell Our Story: Champion consistent branding and narrative around our vision, strengths, culture, and values.

#### Sectors

- Lengthen Our Lead: Advance bold leadership in life sciences and healthcare, advanced manufacturing and robotics, and in the application of AI for all key sectors.
- Make Things Easy for Businesses: Streamline access to state resources for businesses across all sectors.

The Plan is a framework for investments and efforts. It is notable the plan addresses the housing, transportation, and infrastructure challenges at the outset, as mutually supportive elements of a healthy state economy and livable communities.

#### **Discussion**

Each of the recent macro scale planning efforts of the connected Commonwealth Secretariats of transportation, housing, economic development, workforce development, etc. views their counterparts' strategies as connected to one another. Each of these significant plans was informed by the work and needs embedded within the mission of each counterpart, and working groups included officials and staff from the interrelated agencies.

## **MA-50 Needs and Market Analysis Discussion**

### **Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")**

With “concentration” defined as areas that exhibit higher-than-average housing problem indicators, areas with households with multiple housing problems are spread throughout the Commonwealth, with no single or few areas where they are concentrated though there are communities with pronounced high costs relative to income. Generally, housing needs fall into three categories: affordability, adequacy, and access. The extent of these housing needs varies by location, household type, household income, and race/ethnicity. However, affordability is the prevalent challenge across the categories. Despite the age of the Commonwealth’s housing stock, a relatively small share of the inventory is substandard under the HUD definition of “lacking complete kitchen facilities or plumbing.” Typically, households experiencing such conditions, and/or overcrowding also experience cost burdens. HUD considers households to have “worst case” needs if they live in severely substandard, or overcrowded, conditions and/or experience severe cost burdens.

### **Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")**

With “concentration” defined as areas that exhibit higher-than-average racial or ethnic minorities or low-income families, areas with racial or ethnic minorities or low-income families are spread throughout the Commonwealth, with few areas of concentration. According to the UMass Donahue Institute 2023 Summary of U.S. Census Bureau’s 2022 County Characteristics Estimates for Massachusetts Counties report, all Massachusetts counties are experiencing growth in minority group population. Even though Nantucket County has seen the greatest increase, it is an outlier due to seasonal population trends and do not represent a concentration as previously defined. Given the known economic disparities racial or ethnic minorities or low-income families experience, they have a propensity to reside in areas where housing costs are either lower than in others, or in locales where public transit options mitigate transportation costs, which lowers household spending.

### **What are the characteristics of the market in these areas/neighborhoods?**

Since the areas where households with multiple housing problems and racial, ethnic or low income are located throughout the Commonwealth and are not specifically concentrated, it is difficult to generalize conditions within them. However, typical urban housing market conditions include lower home values, older housing stock, and housing quality issues. Typical rural housing market conditions can include a lack of housing type (not as many multi-family units), lower home values and prices, and issues with housing quality. Outside of Greater Boston, a high percentage of the housing stock is 1-4 unit, owner-occupied dwellings and therefore most of stock is neither accessible, nor readily adaptable to meet all the needs of the populations previously described.



### **Are there any community assets in these areas/neighborhoods?**

Despite housing, affordability, accessibility and other related challenges, every community in the Commonwealth has assets. Whether they are housing in need of preservation, or existing infrastructure / public facilities that could receive further investment to create opportunities for growth and affordability, or the desire of communities to showcase to address their local housing needs, every one of the 351 cities and towns in the Commonwealth have some valuable asset that merits further investing. State funding and other programs such as CDBG, are awarded competitively throughout the Commonwealth. Community assets and opportunities are analyzed at the local level and are often discussed within competitive applications. Therefore, the assets communities highlight to CDBG and other like programs is invaluable in our ability to further allocate resources to complement the already-existing resources.

### **Are there other strategic opportunities in any of these areas?**

The Commonwealth has developed two state funded programs to target communities and neighborhoods hit particularly hard by disinvestment and blight. The Neighborhood Stabilization Program (NSP) and Gateway Housing Rehabilitation Program (GHRP) are administered by EOHLC in partnership with MassHousing. Both NSP and GHRP provide rehab assistance to distressed properties in 26 Gateway Cities for the GHRP and throughout the Commonwealth for the NSP. Through these partnerships the State offers a slate of programs to revitalize cities and towns across Massachusetts. Furthermore, CDBG, GHRP, and NSP can work together to create economies of scale to collaboratively support redevelopment, rehabilitation, and preservation of housing.

## **MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)**

### **Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.**

Access to quality, affordable broadband service is critically important for low-and-moderate income households and neighborhoods. Broadband internet service is more important than ever as many individuals and families participate remotely in day-to-day activities, such as work, telehealth, and other important activities, like online banking. In May 2016, the Commonwealth introduced a new framework to accelerate implementation of broadband projects in unserved or underserved communities in the state through a more flexible, community-based approach. While approximately 99% of Massachusetts households now have physical access to a wired broadband connection, many households do not have functional access to broadband due to affordability or other reasons. Massachusetts has found a correlation between income and broadband subscription rates, meaning that affordability in many cases can be an impediment to low- and moderate-income households taking and retaining broadband service.

According to the Commonwealth's 2023 Economic Development Plan, the remaining 18,000 Broadband Serviceable Locations (BSL) that are unserved or underserved still experience a lack of connectivity, creating a digital divide that hinders residents' ability to fully participate in today's connected world. In addition, the BSL are highly dispersed across the state with many of them located in small groups, in low density areas, and in markets that currently lack competition.

In 2023, through the Infrastructure Investment and Jobs Act, Massachusetts was allocated \$147 million to expand high-speed internet access and digital programming across the state. The first step to deploying these funds was developing a strong plan, informed by organizational stakeholders and residents of the Commonwealth. Over the last year, MBI has led a planning effort that has resulted in the development of two guiding planning documents – a statewide digital plan and an initial proposal for a broadband access, and deployment program. Through the public process in developing these documents, the Commonwealth was able to identify five areas of focus to ensure that Massachusetts residents have full broadband access and availability: Affordability and Availability; Accessibility of Devices and Device Support; Digital Literacy; Privacy and Cybersecurity; Accessibility and Inclusivity of Public Resources. Assessment of needs found that greater affordability, higher quality of service, and increased internet safety are top priorities for residents across Covered and Underrepresented Populations and regions of the state.

**Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.**

Generally speaking, increased competition is good for broadband internet service. Massachusetts is making steady progress in its goal of extending broadband service to all areas of the Commonwealth. Still, in many Massachusetts communities, we find that there is a lack of reliable, wired broadband competition. This lack of competition can exacerbate the affordability concerns mentioned above and may have an impact on quality of service and other issues, such as billing and termination practices.

## **MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)**

### **Describe the jurisdiction's increased natural hazard risks associated with climate change.**

The greatest associated risks to the Commonwealth include more severe weather, storm surge sea level rise, extreme heat, extreme precipitation, and coastal and inland flooding. The Commonwealth needs to be prepared to withstand, respond to, recover from and mitigate all types of emergencies and disasters - and to comply with FEMA requirements for pre-and post-disaster funding.

### **Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.**

Most of the Commonwealth's subsidized low- and moderate-income housing assets have low exposure to flood or storm surge hazards and minimal risk of disruption. Yet there are naturally occurring affordable housing areas, largely in Gateway Cities, and often exposed to higher risks of extreme heat and flooding from precipitation. More common is exposure to extreme weather, such as a Nor'easter, severe winter storms, ice storms, increase in average summer temperatures, and extreme heat or drought.

# Strategic Plan

## SP-05 Overview

### Strategic Plan Overview

This section summarizes what EOHLC and its partner agencies and organizations hope to accomplish over the next five years toward the goal of providing decent housing, a suitable living environment, and expanded economic opportunity for low income residents. It identifies the strategies and resources with which the Commonwealth intends to achieve its objectives and how it will measure success. The strategic plan focuses on four major program areas: affordable housing, homelessness, special needs, and community development. For each, priority needs have been identified, consistent with HUD guidelines; the objectives and strategies respond to those needs.

The Commonwealth uses the consolidated planning process to re-evaluate its housing and community development program in its entirety. The funding the state expects to receive annually over the next five years from the four HUD programs is just one piece, albeit a crucial one, of an overall investment of more than \$1 billion each year for housing production, preservation, rental assistance, anti-poverty programs, and economic development initiatives and public facilities and infrastructure. As described in the Needs Assessment section the state's housing needs cut across a wide range of incomes and household types. The type of funding a particular project or initiative receives depends in part on the extent to which it aligns with federal and state requirements. Consistent with HUD mandate, the overwhelming majority of its funding directly benefits low-income families and individuals.

The Strategic Plan describes generally how the state will allocate the resources it expects to have available during the period covered by the plan, including – but not limited to – the Con Plan programs (CDBG, HOME, ESG, HTF and HOPWA). Details on these five programs are provided in the Action Plan.

In its execution of the plan, EOHLC and its partner agencies will be guided by the following fundamental principles:

- Build upon the existing assets of each of the state's unique regions;
- Improve the capacity of community based organizations and local government;
- Remove barriers to affordable housing development; and
- Forge partnerships with municipalities and regional institutions.

## SP-10 Geographic Priorities – 91.315(a)(1)

### Geographic Area

Other Target Area Description:	HUD Approval Date:	% of Low/Mod:	Revital Type:	Other Revital Description:	Identify the neighborhood boundaries and characteristics of this target area.	Include specific housing and community characteristics of this target area.	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Identify the neighborhoods that are opposite to these improvements in this target area?	What are the opportunities for improvement in this target area?	Are there barriers to improvement in this target area?

**Table 50 - Geographic Priority Areas**

### General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

EOHLC competitively awards HOME funds in those areas of the Commonwealth that do not receive HOME funds as a result of entitlement community or HOME consortium designation. EOHLC will competitively award HOME funds for rental development projects in entitlement communities that provide a match for EOHLC-administered HOME funds. EOHLC's HOME program encourages geographic

dispersion and each contingently-funded project demonstrates marketability prior to the HOME funding commitment.

Each program year, the Massachusetts's CDBG Program identifies certain communities to be Mini-Entitlement communities if they meet specific criteria pertaining to a variety of socio-economic demographic factors. Details about the specific factors are outlined in each year's Action Plan. This program helps larger non-entitlement urban communities with the highest needs improve conditions for their low- and moderate-income residents through comprehensive planning and predictable funding. These communities are required to approach CDBG projects in a coordinated and integrated manner and to target their CDBG funds to a particular identified neighborhood or target area. For the balance of the CDBG program, MA does not specifically identify any target areas within its boundaries but encourages applicants to focus activities in target areas identified by the applicant communities as having a greater level of need.

Massachusetts will utilize ESG funding to support shelter capacity at shelters across the state.

Massachusetts utilizes its HOPWA resources to support the provision of Housing Information Services primarily in Greater Boston and the Northeast part of the State.

Massachusetts will utilize HTF funding to support the development and rehabilitation of service enriched rental housing for very low income and extremely low income families and individuals across the Commonwealth.

## SP-25 Priority Needs – 91.315(a)(2)

### Priority Needs

Table 51 – Priority Needs Summary

1	<b>Priority Need Name</b>	Community development and local priorities
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Promote Strong Sustainable Communities
	<b>Description</b>	Community development needs and priorities vary by region and by size and type of community. Through competitive funding rounds, local communities define specific needs, including but not limited to the need to upgrade aging infrastructure for the twenty-first century; the challenge of unemployment and a jobs/skills mismatch; impact of strained municipal budgets; the challenge of ensuring that economic prosperity is shared by all geographic regions and all demographic and income groups; and the need to assure that economic growth translates into a high quality of life for all residents.
	<b>Basis for Relative Priority</b>	Based on community development needs and past funding requests, demand remains high for community development activities that improve the lives of low- to moderate-income households and the communities in which they live. Livable communities, with sustainable economic growth both at the community and household level are dependent on local visioning, priority setting and community development. Residents live not simply in housing but within communities.
2	<b>Priority Need Name</b>	Rehabilitation of existing units
	<b>Priority Level</b>	High



	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Access to housing opportunities Preserve and create affordable rental housing Promote Strong Sustainable Communities
	<b>Description</b>	Rehabilitation of existing homeownership and rental units.
	<b>Basis for Relative Priority</b>	Based on housing and community development needs, and past funding requests, demand remains high for housing rehabilitation.
<b>3</b>	<b>Priority Need Name</b>	Production of new rental Units
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Access to housing opportunities Preserve and create affordable rental housing Promote Strong Sustainable Communities
	<b>Description</b>	Production of affordable rental units to meet demand.
	<b>Basis for Relative Priority</b>	Based on housing needs and demand for increased rental housing opportunities.
<b>4</b>	<b>Priority Need Name</b>	Preservation of affordable rental housing
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Access to housing opportunities Preserve and create affordable rental housing Promote Strong Sustainable Communities
	<b>Description</b>	Preservation of housing that is currently affordable.
	<b>Basis for Relative Priority</b>	Based on housing need and demand for affordable housing.
5	<b>Priority Need Name</b>	Homelessness prevention and rehousing
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Large Families Families with Children Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Reduce homelessness Access to housing opportunities
	<b>Description</b>	Prevention of homelessness, including diversion from shelter, and rehousing of homeless families and individuals currently in shelter.
	<b>Basis for Relative Priority</b>	Based on need and number of homeless families currently in shelter and overflow shelter system, and commitment to rapid rehousing and eviction diversion.
6	<b>Priority Need Name</b>	Homeownership
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Access to housing opportunities Promote Strong Sustainable Communities
	<b>Description</b>	Production of homeownership units and homeownership assistance.

<b>Basis for Relative Priority</b>	Based on need and demand.
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**Narrative (Optional)**

## SP-30 Influence of Market Conditions – 91.315(b)

### Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	N/A - Resources available via alternate funding sources.
TBRA for Non-Homeless Special Needs	ESG funding will be used to help rapidly re-house homeless households and prevent homelessness for households that are at immediate risk of homelessness due to eviction. Typically, ESG programs funded through EOHLC provide security deposits, last month’s rent, and rental arrears to households that are moving into some form of subsidized housing. Short and medium term rental assistance is provided in some cases where subsidized or affordable housing is unavailable and the participants housing stabilization plan demonstrates that ongoing assistance is necessary to truly stabilize the household and prevent future homelessness. The current rental market across Massachusetts consists of many properties that are above FMR. Due to ESG guidelines, many households that could benefit from immediate re-housing assistance experience longer periods of homelessness as they look for units that meet HUD FMR standards.
New Unit Production	HOME, HTF, and CDBG funding is used to expand the supply and availability of safe, decent, affordable and accessible housing for extremely low, low, and moderate income households through a statewide network of public and private partnerships where market conditions identify a need. MBTA Communities Law is creating new multi-family zones throughout the 177 MBTA Communities to create further opportunities for investment by EOHLC programs and to create new homes. As of January 1, 2025 there are over 3,000 Multi-family units in the pipeline as a result of new MBTA Communities zoning districts.
Rehabilitation	CDBG and HTF funds are used to expand the supply and availability of safe, decent, affordable and accessible housing for extremely low, low and moderate income households through a statewide network of public and private partnerships where market conditions identify a need. GHRP and NSP are two state funded programs that make investments for small scale housing rehabilitation projects.
Acquisition, including preservation	HOME, HTF, and CDBG funding is used to expand the supply and availability of safe, decent, affordable and accessible housing for extremely low, low and moderate income households through a statewide network of public and private partnerships where market conditions identify a need.

**Table 52 – Influence of Market Conditions**

## SP-35 Anticipated Resources - 91.315(a)(4), 91.320(c)(1,2)

### Introduction

### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	34,869,850	50,000	300,000	35,219,850	139,479,400	Annual allocation reflects level funding from 2024 as does available remainder.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	10,112,843	4,000,000	0	14,112,843	56,000,000	HOME Program Income (PI) is not precisely determinable, as our rental loans are largely deferred payment loans. HOME PI collected during each program year is estimated to be approximately \$4,000,000.



Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	381,055	0	0	381,055	1,524,220	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	4,900,000	0	0	4,900,000	19,600,000	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HTF	public - federal	Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership	4,233,855	0	4,000,000	8,233,855	40,000,000	HTF allocations fluctuate based on lending activity at Freddie Mac and Fannie Mae. The expected amount to be made available over the five year period is based on an average award of \$8 million per year. In the past five years, the annual allocation peaked at \$18M and reached it lowest point this year at \$4.2M.

Table 53 - Anticipated Resources

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

ESG - EOHLIC will match ESG funding dollar for dollar, after the first \$100,000, utilizing the state contributions for emergency shelter for individuals.

EOHLIC will match CDBG funding dollar for dollar, after the first \$100,000 in federal funding. Local CDBG administrators often leverage funds from other housing programs, such as federal weatherization funding, and state funded programs for lead paint and accessibility improvements. They also often provide in-kind services. In addition, municipalities routinely use local allotment of state highway funds to combine with CDBG

funds in supporting infrastructure projects. The CDBG program, does not currently require a match but does encourage applicants to incorporate other sources of funds into projects.

Massachusetts HOME rental projects routinely leverage a vast array of resources, including LIHTC proceeds, private construction and perm loans, local funding, and other state resources, including state rental assistance. The MA HOME program utilizes the Massachusetts Rental Voucher Program and the state's Housing Stabilization Fund as the HOME Match resource. Annual expenditures through these two programs alone are approximately \$200mil.

Massachusetts HTF rental projects also leverage a range of state and federal sources including LIHTC proceeds, private construction and perm loans, local funding including HOME funds and other state resources including state rental assistance and Section 8 assistance. HTF does not have any federal matching requirements. However, the amount of funds that are leveraged per project range from 3 to 1 to 5 to 1.

**If appropriate, describe publicly owned land or property located within the state that may be used to address the needs identified in the plan**

CDBG funds may be used for publicly held property. This is most likely in cases of infrastructure and public facility projects like sewer, water and drainage improvements; streetscape improvements; architectural barrier removal; senior centers.

**Discussion**

In Massachusetts, EOHLC is the tax credit allocating agency, through its Division of Housing Development. The Division also oversees over \$100 million annually in other federal and state affordable housing programs, including the federal HOME and HTF programs, ensuring a coordinated approach to resource allocation. We note, too, that EOHLC will be fully committing and expending the HOME-ARP program by the HUD deadline of 2030.

Developers may apply competitively for the tax credit and EOHLC's other affordable rental housing resources during regularly scheduled funding competitions. In a typical year, the Agency's credit allocations, in combination with EOHLC subsidy awards and other funds, generate support for about 1200 to 1500 affordable rental units, both production and preservation. EOHLC has emphasized to the development community the importance of structuring projects to include units for extremely low-income individuals and households, and has made project-based Section 8 allocations available to support these tenants. The Agency also is encouraging developers to target the extremely low-income units to individuals or families making the transition from homelessness.

## SP-40 Institutional Delivery Structure – 91.315(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Massachusetts Executive Office of Housing and Livable Communities	Government	Economic Development Homelessness Non-homeless special needs Ownership Planning Public Housing Rental neighborhood improvements public facilities public services	State
Massachusetts Department of Public Health	Government	Homelessness Non-homeless special needs Planning public services	State

**Table 54 - Institutional Delivery Structure**

### Assess of Strengths and Gaps in the Institutional Delivery System

The Commonwealth’s institutional structure for carrying out its housing and community development agenda – centered in EOHLG - is supported by a strong network of partners in the State administration and at the local government level, as well as regional and statewide planning agencies, non-profits, quasi-public entities, community development corporations, private developers and others. Numerous participants possess expertise in and commitment to carrying out a broad range of activities. State agencies strive to coordinate their efforts, but opportunities to more closely integrate policies and programs remain, and efforts to do so will continue to increase efficiency.

Some weaknesses in the delivery system are structural, not managerial. Fundamental aspects of state and local government will continue to pose challenges, as discussed in the section on Barriers to Affordable Housing. Massachusetts is a home rule state, and most government activity is localized in its 351 cities and towns. Sixty percent of the state’s municipalities have fewer than 10,000 residents, including the one-third with fewer than 5,000 residents. Many small towns cannot afford to have professional community development and planning staff, and this lack of capacity makes the efficient

delivery of programs and services challenging. The State establishes uniform building standards and safety codes and establishes the framework for local zoning and subdivision control laws, but implementation and enforcement rests with the municipalities. The manner in which localities interpret and exercise them influences what gets built and where. A long and strong tradition of local autonomy Consolidated Plan also makes it difficult to plan initiatives across the political boundaries of small Massachusetts communities.

To overcome these gaps and challenges, EOHLIC encourages regional cooperation among municipalities and the use of regional and other professional entities to facilitate the administration of programs and to overcome some of the limitations imposed by the small scale of some localities and their governments. EOHLIC and other state agencies will also continue to provide technical assistance and training for municipal officials to increase local government capacity.

**Availability of services targeted to homeless persons and persons with HIV and mainstream services**

<b>Homelessness Prevention Services</b>	<b>Available in the Community</b>	<b>Targeted to Homeless</b>	<b>Targeted to People with HIV</b>
<b>Homelessness Prevention Services</b>			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	
Mortgage Assistance	X		
Rental Assistance	X	X	
Utilities Assistance	X	X	
<b>Street Outreach Services</b>			
Law Enforcement	X	X	
Mobile Clinics	X	X	X
Other Street Outreach Services	X	X	X
<b>Supportive Services</b>			
Alcohol & Drug Abuse	X	X	
Child Care	X	X	
Education	X	X	
Employment and Employment Training	X	X	X
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	X
<b>Other</b>			

**Table 55 - Homeless Prevention Services Summary**

**Describe the extent to which services targeted to homeless person and persons with HIV and mainstream services, such as health, mental health and employment services are made available to and used by homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families and unaccompanied youth) and persons with HIV within the jurisdiction**

Each CoC operates differently but state partners including the Department of Children and Families, Department of Mental Health, the Office of HIV/AIDS, the Bureau of Substance Abuse Services and the Department of Veterans Services all provide their expertise and are a part of planning groups within the CoCs. Each of these departments are solely focused on serving specific populations that commonly overlap with the homeless system. This partnership also allows for these services to be provided directly to eligible participants right in the shelter setting.

Many HIV+ Massachusetts residents qualify for State funded HIV/AIDS services.

These services include home-based, community-based, and clinic-based HIV/AIDS Medical Case Management; housing search and advocacy services; rental start-up, homelessness prevention, and utilities assistance services; home-delivered, congregate meals, and food bank packages; peer support; legal assistance; and correctional health reintegration services. HIV/AIDS Medical Case Management includes medical care coordination, social services coordination, housing support, benefits access, substance use risk reduction, and sexual health promotion.

**Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above**

Current Strengths:

- There have been substantial increases in funding to serve not only those experiencing homelessness but for other special needs populations. RAFT which is primarily utilized for homeless prevention funding has greatly increased as well.
- State ESG funds have been geared towards funding full projects rather than acting as stop gaps in other programs. This has simplified the funding process for both the state as well as providers.
- State ESG and the individual homeless system have aligned practices and scopes of services which has simplified contract requirements for providers.
- There have been several CoC mergers which has reduced the redundancy of some work and has made it easier for participants to understand the system.
- Through HOPWA programs across the country, housing assistance has shown to be key in improving health outcomes. These services are critical in the Massachusetts system of care for people living with HIV.

Gaps in the current system are:

- Services for Homelessness families who are over income for the EA system. There are very limited resources for this group as most resources are aimed towards EA eligible families or individuals.
- There are multiple CoCs (11) that cover a relatively small geographic area. This presents its own set of challenges and confusion for participants who may be more transient and overlap several different CoC areas.

**Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs**

Increasing funding geared towards more permanent supportive and/or affordable housing will decrease the need for emergency shelter services. In addition, additional funding is needed for people living with HIV/AIDS, as housing is critical to achieving and maintaining low viral loads. This will hopefully allow for more flexibility and an increase in eligible populations. The Balance of State CoC is also always in talks with other CoCs about possible mergers to streamline services.



## SP-45 Goals Summary – 91.315(a)(4)

### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Reduce homelessness	2025	2029	Homeless		Homelessness prevention and rehousing	ESG: \$24,500,000	Tenant-based rental assistance / Rapid Rehousing: 2500 Households Assisted
2	Access to housing opportunities	2025	2029	Affordable Housing		Rehabilitation of existing units Production of new rental Units Preservation of affordable rental housing Homelessness prevention and rehousing Homeownership	HOPWA: \$1,905,275	Public service activities for Low/Moderate Income Housing Benefit: 500 Households Assisted
3	Preserve and create affordable rental housing	2025	2029	Affordable Housing		Rehabilitation of existing units Production of new rental Units Preservation of affordable rental housing	HOME: \$63,101,558 HTF: \$40,000,000	Rental units constructed: 565 Household Housing Unit  Rental units rehabilitated: 120 Household Housing Unit

4	Promote Strong Sustainable Communities	2025	2029	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development		Community development and local priorities Rehabilitation of existing units Production of new rental Units Preservation of affordable rental housing Homeownership	CDBG: \$170,000,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 125000 Persons Assisted  Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 125 Households Assisted  Public service activities other than Low/Moderate Income Housing Benefit: 90000 Persons Assisted  Facade treatment/business building rehabilitation: 100 Business  Rental units rehabilitated: 200 Household Housing Unit  Homeowner Housing Rehabilitated: 1500 Household Housing Unit  Direct Financial Assistance to Homebuyers: 100 Households Assisted
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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
								Homelessness Prevention: 5500 Persons Assisted  Businesses assisted: 75 Businesses Assisted  Housing Code Enforcement/Foreclosed Property Care: 750 Household Housing Unit

Table 56 – Goals Summary

**Goal Descriptions**

1	<b>Goal Name</b>	Reduce homelessness
	<b>Goal Description</b>	Provide RRH and Steet Outreach Services
2	<b>Goal Name</b>	Access to housing opportunities
	<b>Goal Description</b>	Ensure full access to housing for all residents of the Commonwealth.
3	<b>Goal Name</b>	Preserve and create affordable rental housing
	<b>Goal Description</b>	Preserve and create affordable rental housing options for low- and moderate- income residents.

<b>4</b>	<b>Goal Name</b>	Promote Strong Sustainable Communities
	<b>Goal Description</b>	Community and economic development needs of low- and moderate- income communities and low- and moderate- income persons.

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)**

HOME funds are used to provide housing to extremely low-income (30% AMI), very low-income (50% AMI), and low-income (60% AMI) households. Typically, approximately 50% of new HOME-assisted units are occupied by households at or below 30% AMI. We estimate 39 ELI and 38 VLI / LI HAU households per year.

HTF funds are used to provide housing to exclusively extremely low-income individuals and families (30% AMI). We estimate that sixty ELI individuals/households will move into HTF units annually during the five year consolidated plan period.

HOPWA funds are used to provide housing search and advocacy services to low-income individuals with HIV.

## **SP-50 Public Housing Accessibility and Involvement – 91.315(c)**

### **Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)**

EOHLC does not operate a Federal Public Housing program. Several Massachusetts Housing Authorities are under Voluntary Compliance agreements, and the local HUD Field Office actively monitors these and ensures that Capital Funds are directed toward the ultimate goal of increasing accessible units. EOHLC awards \$3-4 M annually for the conversion of state-aided public housing to full accessibility, and also provides funding for reasonable accommodation and other accessibility improvements at LHAs.

### **Activities to Increase Resident Involvements**

EOHLC encourages tenant participation in a number of ways. The Agency provides funding to the Massachusetts Union for Public Housing Tenants (MUPHT), assists tenants of public housing developments to form local tenant organizations (LTOs), and provides technical support to those organizations. EOHLC works closely with MUPHT to ensure that it is consulted on proposed changes in policies affecting tenants in state-aided public housing. State regulations require that LTOs be consulted as well when the housing authority's annual operating budget is prepared, when LHA jobs become available or when modernization funds become available. Housing authorities are required to fund the LTOs and to notify them of all LHA board meetings.

Local Housing Authorities have one resident board member under state law, and many support the formation and operation of tenant councils and other participation vehicles.

In 2020 EOHLC rolled out the Annual Plan, modeled on HUD Annual Plan. In this program, LHAs must present all major LHA policies and documents, including Capital Improvement Plan, Budget, and responses to Performance Management Review, at a public meeting.

In 2024, EOHLC and the state increased the required contribution from housing authorities to LTOs from \$6 to \$25, matching the federal level.

### **Is the public housing agency designated as troubled under 24 CFR part 902?**

No

### **Plan to remove the 'troubled' designation**

N/A

In its capacity as a Housing Authority, EOHLC is not designated as troubled. There are very few agencies designated as such in Massachusetts, and this designation changes quarterly.

## **SP-55 Barriers to affordable housing – 91.315(h)**

### **Barriers to Affordable Housing**

Insufficient resources to meet the growing gap between the cost of creating and maintaining decent housing and the incomes of very low-income households is, of course, the primary obstacle. But building new housing has become increasingly more costly and challenging in Massachusetts, making it difficult for the private market to meet the needs even of moderate- and middle-income residents. Some of the obstacles to production are unique to affordable housing, but many apply to housing development generally. The factors affecting the state's performance on housing development and rehabilitation have to do with economic and fiscal considerations, resource allocation, the state's legal and regulatory framework, and public perception and attitudes. Specific barriers include: high construction costs, including the high labor costs; high cost and relative scarcity of land available for development, especially in the eastern part of the state, and the higher costs associated with building on the marginal sites that are available; limited infrastructure in many of the Commonwealth's communities and insufficient resources or incentives for improving roads, water and sewer systems; complex or redundant building codes and the way that they are applied; restrictive local zoning and land use controls and permitting processes; limited planning and organizational capacity at the local level. According to the 2020 U.S. Census, nearly half of the Commonwealth's 351 municipalities have fewer than 10,000 residents, and most of these have no professional planning or community development staff; and reluctance of communities to allow new residential development, especially affordable housing, because of concerns related to fiscal impact, property values and "community character." Under the state constitution and "Home Rule" legislation, Massachusetts's municipalities have control over most land use decisions, and they are responsible for providing and paying for essential public services – including education – largely through the local property tax.

The ability of the State to eliminate, or even mitigate, some of these barriers is limited. For example, while materials cost roughly the same here as in other parts of the country, labor is considerably more expensive. EOHLC recognizes that expanding the supply of affordable housing is vital to the state's economic prosperity, regional and nationwide competitiveness, and its global place as a bastion of academic, research, medical, and scientific pursuit. Ensuring Massachusetts has abundant housing for people in all stages of life and at all economic levels, especially low-to-moderate income households, is paramount to the Commonwealth's and its residents' continued prosperity.

### **Strategy to Remove or Ameliorate the Barriers to Affordable Housing**

While cities and towns control many of the identified barriers, the Commonwealth has undertaken several initiatives to help communities encourage affordable housing. The Commonwealth has implemented the Housing Choice Initiative (HCI) in which high housing producing communities apply for designation as a Housing Choice Community (HCC).

HCI provides incentives, rewards, technical assistance, and targeted legislative reform to encourage & empower municipalities to plan and build the wide range of housing stock that the Commonwealth needs to continue to thrive. The Housing Choice Designation recognizes and rewards municipalities producing new housing and/or implementing certain best practices.

HCCs have exclusive access to the Housing Choice Grant Program (HCGP) and special considerations to grants and reduced interest rates for infrastructure loans. Between FY19-FY25 HCCs have received 209 awards totaling over \$32M in funds that have directly created an estimated 1049 units of new housing (564 of which were affordable) and supported an estimated 4,660 units of existing housing. 2021 law reforms reduced the quantum of vote from 2/3 majority to a simple majority for certain zoning changes. There are currently 95 Housing Choice designated communities or 27% of all Massachusetts municipalities.

The 2024 Affordable Homes Act (AHA) authorized \$5.16 billion in spending with nearly 50 policies. AHA authorized funds to modernize the state's public housing, boost programs for first-time homebuyers, and resources to build housing for low/moderate-income residents. It requires accessory dwelling units to be permitted in single-family zoning districts in 350 cities and towns, supports the conversion of vacant commercial space to housing, and creates a Seasonal Communities Initiative. As noted elsewhere herein, EOHLIC created a 5-year Statewide Housing Plan to assess housing needs, develop strategies, inform data-driven decisions, and guide local, regional, and statewide actions to promote housing. The Plan was released in February 2025.

Other legislative actions in the last 5 years to address barriers include: MBTA Communities Law which requires 177 municipalities to have at least one zoning district in which multi-family housing is permitted as of right; the Starter Home Zoning Districts Act is an option for communities to permit small homes; and the HousingWorks Infrastructure Program with \$25 million/year to fund infrastructure to unlock new housing. These actions add to previous programs to encourage housing production such as smart growth housing, Chapter 40R. The Community Preservation Act is an optional program that provides funding for communities matched with state funds. Chapter 40B allows override of local zoning in communities where less than 10 percent of the year-round housing qualifies as affordable.

## **SP-60 Homelessness Strategy – 91.315(d)**

### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

EOHLC will continue to communicate with the Continuum of Care lead agencies, other state departments, and municipalities statewide to understand and assess the needs of persons experiencing homelessness in local communities. We are currently utilizing ESG dollars to fund several projects that provide street outreach services to connect people experiencing literal homelessness with immediate shelter. EOHLC has a Street Outreach provider in each region in the Commonwealth. Finally, EOHLC will coordinate with the SAMHSA funded PATH teams across the Commonwealth. These teams are conducting street outreach and operate statewide.

### **Addressing the emergency and transitional housing needs of homeless persons**

To improve access to emergency shelter, EOHLC conducted system wide procurements for emergency shelter services funded through state appropriation in 2023. These procurements resulted in increased numbers of shelter beds for both individuals and households with children. Additionally, the procurements provided funding for temporary emergency shelter in congregate and non-congregate settings in preparation for winter weather. One year after this procurement we also held Need Assessment listening sections to see what areas still need improvement. ESG and state funded street outreach services as well as state funded triage and assessment efforts were increased dramatically through these procurements, which is expected to result in more cohesive access to shelter. An increase in shelter beds and Housing is still needed and will continue to be advocated for.

### **Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.**

EOHLC has chosen to utilize a majority of its ESG dollars to fund Rapid Rehousing projects aimed at serving individuals prioritized through the local CoC's CE system. These CE system prioritize individuals based on vulnerability including veteran, youth and chronic homeless status. RRH aims to quickly house those who are HUD Category 1 homeless and provide services to ensure housing stability. State dollars are used to fund HomeBase, a RRH project aimed to target families and those fleeing DV.

### **Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving**



**assistance from public and private agencies that address housing, health, social services, employment, education or youth needs**

The Commonwealth funds the Residential Assistance for Families in Transition (RAFT) program to provide those at risk of homelessness with short-term emergency funding to help individuals at risk of eviction, foreclosure, loss of utilities, and other housing emergencies as well as Housing Consumer Education Centers (HCECs) to act as the “front door” for those facing a housing emergency. These services are primarily state funded, thus allowing ESG & other federal funding resources to be prioritized to households experiencing literal homelessness according to HUD’s definition.

## **SP-65 Lead based paint Hazards – 91.315(i)**

### **Actions to address LBP hazards and increase access to housing without LBP hazards**

The Massachusetts Department of Public Health Childhood Lead Poisoning Prevention Program (MACLPPP) is the lead agency for educating the public about the risks posed by lead-based paint and other household and environmental hazards (for example, soil and water), and for ensuring that affected children receive appropriate intervention, including inspection and abatement. The Massachusetts statute defines lead poisoning as blood lead levels greater than or equal to 25 micrograms per deciliter (ug/dL). This has been lowered by Mass DPH to 10 micrograms per deciliter. Levels above that called EBL – elevated blood levels – what the CDC calls severe lead poisoning. A “Blood Lead Level of Concern” was established as being 5-9 ug/dL and lead exposure prevention services were extended to all families with a child exceeding this level. Although comparable state-by-state statistics are not available, Massachusetts is believed to have one of the most comprehensive screening programs in the country, testing more than 70 percent of all children under the age of four, and more than 80 percent in areas designated as high risk. The state has seen a drop in the number of children with lead poisoning.

In the public sector, all state family public housing units have been de-leaded. Further, all substantially renovated “family” (one bedroom or larger) units in EOHLC’s state and federal housing programs, including the federal HOME, CDBG, and Tax Credit programs, and the state Housing Innovations Fund, Housing Stabilization Fund and Tax Credit programs have been de-leaded to meet Massachusetts requirements. Finally, all publicly assisted leased housing units – in both state and federal programs – are required to be de-leaded whenever children under six are present. These actions closely follow or exceed requirements in the HUD Lead-Safe Rule.

The state’s lead program is substantially targeted to high-risk communities, particularly to the private rental housing stock in those communities where low and moderate income households are likely to reside in units with significant hazards. All of the units where EBL children are identified are entered in the state case management system, which often results in an Order to Correct being issued. In addition, local code officials trained to perform lead determinations continue to conduct preliminary lead inspections and order full-scale inspections where needed. Finally, targeted public education campaigns to high-risk populations and family care practitioners continue and state supported lead counselors continue to assist any Massachusetts citizen seeking a lead safe home.

### **How are the actions listed above integrated into housing policies and procedures?**

These actions extend well beyond the requirements of the HUD Lead-Safe Rule, or other federal requirements, and it is expected that they will result in abatement of lead hazards in thousands of additional units of housing. In the public sector, especially, initiatives are targeted at high-risk communities where the evidence strongly suggests that additional investment and support is needed to protect children.

## **SP-70 Anti-Poverty Strategy – 91.315(j)**

### **Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families**

Anti-poverty strategies are an integral part of program design, development and implementation throughout the Executive Office of Housing and Livable Communities (EOHLC). Through housing and community investment, EOHLC aims to increase the economic mobility of low-income families and individuals so they may thrive in healthy, safe, and connected communities.

EOHLC employs a multi-faceted approach to reducing the number of families living in poverty. The first is by providing housing stabilization through emergency shelter, rapid rehousing, and homelessness prevention programs. The second is by expanding the supply of quality affordable housing for low-income families and individuals, including privately operated affordable housing, state-aided public housing, and subsidized housing vouchers. Stable housing is a foundation for eliminating poverty.

The third is by providing supports and services for securing or maintaining housing. These include stabilization services for families exiting shelter, tenancy preservation programs for those at risk of eviction, resident service coordination programs, and supportive services for high need populations. For example, EOHLC provides a targeted program for youth coming out of foster care in partnership with supportive service providers. Pairing supports with housing has shown to bolster family housing stability.

The fourth is by providing economic mobility coaching and financial self-sufficiency programs to families with a housing subsidy. EOHLC administers the HUD Family Self Sufficiency program for Housing Choice Voucher families and a similar state funded program for MRVP participants and residents of state-aided public housing. EOHLC also administers the Family Economic Stability Program, a short-term, fixed-subsidy program for low-income working families. As a Moving to Work agency, EOHLC also supports geographic mobility through Small Area Fair Market Rents for both Housing Choice Vouchers and MRVP. EOHLC also engages providers to offer coaching services for families who choose to move to opportunity areas.

Finally, EOHLC administers Community Services Block Grant (CSBG) funding to Massachusetts' federally designated anti-poverty agencies, also known as Community Action Agencies (or CAAs). CAAs use CSBG funding to leverage other public and private funding as well as linkages with community partners, to implement services and strategies that fight poverty and meet priority community needs. Some of the most provided CAA services include assistance with food, rent and utility payments, energy efficiency improvements, early education and care services, and volunteer tax preparation.

### **How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan**

The responsibility for mitigating the causes of poverty does not rest solely with EOHLC. The Secretariat collaborates closely with on-the-ground housing owners and service providers. These include housing authorities, private affordable housing owners and operators, Community Development Corporations,

CAAs, shelter providers, regional and local non-profit service providers, and the regional housing courts and legal aid organizations. In addition, we work with the Executive Office of Labor and Workforce Development and the Department of Transitional Assistance on shared priorities related to ESOL services, work authorization, access to benefits, childcare, job training, adult education, career coaching, and economic mobility programs. Through this network of partners, the goal is to provide comprehensive programs within every community in the Commonwealth of Massachusetts.

## **SP-80 Monitoring – 91.330**

**Describe the standards and procedures that the state will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements**

ESG - EOHLC ensures all ESG sub-recipients receive ongoing technical assistance and training on ESG regulations and guidelines. In depth monitoring reviews are conducted on each project every other year at minimum. Each ESG sub-recipient submits quarterly reports and CAPERs to be reviewed throughout the contract period and all are currently participating in HMIS.

HOPWA - DPH requires sponsors to submit annual work plans, annual reports, and budgets. Sponsors are required to participate in monthly contract management calls and review of monthly client data with their contract managers.

HOME - EOHLC will continue to contract with architects/construction professionals for review and Lender Advisor services. EOHLC will continue to contract with an outside agency to provide monitoring services and technical support to the HOME Program. The monitoring agent is required to provide an annual report summarizing its monitoring and other activities. The primary HOME activity under the contract is the monitoring of recipients who have received funding from EOHLC's HOME Program to undertake eligible housing activities. While regulatory compliance is the primary emphasis, the monitoring also looks for sound management practices and record keeping, so we can assess and encourage the financial and physical health of the asset. EOHLC's monitoring guide will be updated to include additional items required by the upcoming Final Rule change to appropriation requirements, as directed by HUD. We have also updated the checklists in response to the 2013 HOME Rule Change. The agent also supports the HOME Program through program guidance on compliance questions and annual occupancy trainings.

HTF uses the same monitoring procedures as the HOME program. EOHLC will continue to contract with architects/construction professionals for review and Lender Advisor services during application review and construction and project closeout. EOHLC will continue to contract with an outside agency to provide monitoring services and technical support to the NHTF Program. The monitoring agent is required to provide an annual report summarizing its monitoring and other activities. The primary HTF activity under the contract is the monitoring of recipients who have received funding from EOHLC's HTF Program to undertake eligible housing activities. While regulatory compliance is the primary emphasis, the monitoring also looks for sound management practices and record keeping, so we can assess and encourage the financial and physical condition of the HTF-funded properties.

CDBG holds sessions with grantees each year to review all contract conditions, requirements, procedures for requesting payment, etc. EOHLC's on-line grant management system allows staff to monitor grant actions on a daily basis. CDBG also requires quarterly reports and year-end audits to track

activity and progress, and has developed a monitoring system. The monitoring protocol considers internal controls and processes, use and maintenance of databases, and the grant application review cycle. MA CDBG identifies and completes a risk analysis of all active grantees. This risk analysis assigns a monitoring priority ranking to a grantee. Based upon the assigned priority, staff develop a monitoring plan.

## Expected Resources

### AP-15 Expected Resources – 91.320(c)(1,2)

#### Introduction

At the time of posting of this plan there is a lack of certainty on funding levels for the FY 2025 program year and beyond. The estimates below are based on prior year allocations.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	34,869,850.00	50,000.00	300,000.00	35,219,850.00	139,479,400.00	Annual allocation reflects level funding from 2024 as does available remainder.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	10,112,843.00	4,000,000.00	0.00	14,112,843.00	56,000,000.00	HOME Program Income (PI) is not precisely determinable, as our rental loans are largely deferred payment loans. HOME PI collected during each program year is estimated to be approximately \$4,000,000.



Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	381,055.00	0.00	0.00	381,055.00	1,524,220.00	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	4,900,000.00	0.00	0.00	4,900,000.00	19,600,000.00	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HTF	public - federal	Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership	4,233,855.00	0.00	4,000,000.00	8,233,855.00	40,000,000.00	HTF allocations fluctuate based on lending activity at Freddie Mac and Fannie Mae. The expected amount to be made available over the five year period is based on an average award of \$8 million per year. In the past five years, the annual allocation peaked at \$18M and reached it lowest point this year at \$4.2M.

Table 57 - Expected Resources – Priority Table

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

ESG - EOHLC will match ESG funding dollar for dollar, after the first \$100,000, utilizing the state contributions for emergency shelter for individuals.

EOHLC will match CDBG funding dollar for dollar, after the first \$100,000 in federal funding. Local CDBG administrators often leverage funds from other housing programs, such as federal weatherization funding, and state funded programs for lead paint and accessibility improvements. They also often provide in-kind services. In addition, municipalities routinely use local allotment of state highway funds to combine with CDBG funds in supporting infrastructure projects. The CDBG program does not currently require a match but does encourage applicants to incorporate other sources of funds into projects.

Massachusetts HOME rental projects routinely leverage a vast array of resources, including LIHTC proceeds, private construction and perm loans, local funding, and other state resources, including state rental assistance. The MA HOME program utilizes the Massachusetts Rental Voucher Program and the state's Housing Stabilization Fund as the HOME Match resource. Annual expenditures through these two programs alone are approximately \$200mil.

Massachusetts HTF rental projects also leverage a range of state and federal sources including LIHTC proceeds, private construction and perm loans, local funding including HOME funds and other state resources including state rental assistance and Section 8 assistance. HTF does not have any federal matching requirements. However, the amount of funds that are leveraged per project range from 3 to 1 to 5 to 1.

**If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

CDBG funds may be used for publicly held property. This is most likely in cases of infrastructure and public facility projects like sewer, water and drainage improvements; streetscape improvements; architectural barrier removal; senior centers.

**Discussion**

In Massachusetts, EOHLC is the tax credit allocating agency, through its Division of Housing Development. The Division also oversees over \$100 million annually in other federal and state affordable housing programs, including the federal HOME and HTF programs, ensuring a coordinated approach to resource allocation. We note, too, that EOHLC will be fully committing and expending the HOME-ARP program by the HUD deadline of 2030.

Developers may apply competitively for the tax credit and EOHLC's other affordable rental housing resources during regularly scheduled funding competitions. In a typical year, the Agency's credit allocations, in combination with EOHLC subsidy awards and other funds, generate support for about 1200 to 1500 affordable rental units, both production and preservation. EOHLC has emphasized to the development community the importance of structuring projects to include units for extremely low-income individuals and households, and has made project-based Section 8 allocations available to support these tenants. The Agency also is encouraging developers to target the extremely low-income units to individuals or families making the transition from homelessness.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives – 91.320(c)(3)&(e)

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Reduce homelessness	2025	2029	Homeless			ESG: \$4,900,000.00	Tenant-based rental assistance / Rapid Rehousing: 500 Households Assisted
2	Access to housing opportunities	2025	2029	Affordable Housing			HOPWA: \$381,055.00	Public service activities for Low/Moderate Income Housing Benefit: 125 Households Assisted
3	Preserve and create affordable rental housing	2025	2029	Affordable Housing			HOME: \$12,620,311.74 HTF: \$4,233,855.00	Rental units constructed: 133 Household Housing Unit Rental units rehabilitated: 4 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Promote Strong Sustainable Communities	2025	2029	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development		Community development and local priorities	CDBG: \$35,000,000.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 25000 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 25 Households Assisted Public service activities other than Low/Moderate Income Housing Benefit: 18000 Persons Assisted Facade treatment/business building rehabilitation: 20 Business Rental units rehabilitated: 40 Household Housing Unit Homeowner Housing Rehabilitated: 300 Household Housing Unit Direct Financial Assistance to Homebuyers: 20 Households Assisted Homelessness Prevention: 1100 Persons Assisted Businesses assisted: 15 Businesses Assisted Housing Code Enforcement/Foreclosed Property Care: 150 Household Housing Unit

Table 58 – Goals Summary

## Goal Descriptions

1	<b>Goal Name</b>	Reduce homelessness
	<b>Goal Description</b>	
2	<b>Goal Name</b>	Access to housing opportunities
	<b>Goal Description</b>	
3	<b>Goal Name</b>	Preserve and create affordable rental housing
	<b>Goal Description</b>	
4	<b>Goal Name</b>	Promote Strong Sustainable Communities
	<b>Goal Description</b>	



## AP-25 Allocation Priorities – 91.320(d)

### Introduction:

HOME, CDBG, ESG, HTF and HOPWA funds are important resources for the Commonwealth in the execution of its housing and community development agenda. CDBG, in particular, is the State’s major resource to address the needs of its less urbanized and smaller non-entitlement communities - including their non-housing community development needs - all of which are facing fiscal constraints. The Massachusetts CDBG program supports a broad range of infrastructure, accessibility and community development projects. In addition, its housing rehabilitation funds are being used in many communities to revitalize older housing in established neighborhoods.

### Funding Allocation Priorities

	Reduce homelessness (%)	Access to housing opportunities (%)	Preserve and create affordable rental housing (%)	Promote Strong Sustainable Communities (%)	Total (%)
CDBG	10	5	25	60	<b>100</b>
HOME	0	0	100	0	<b>100</b>
HOPWA	0	100	0	0	<b>100</b>
ESG	100	0	0	0	<b>100</b>
HTF	0	0	100	0	<b>100</b>

**Table 59 – Funding Allocation Priorities**

### Reason for Allocation Priorities

HOPWA funds enable community-based organizations to provide medical case management and housing search and advocacy services for people living with HIV.

CDBG funds focus predominantly on community development activities such as infrastructure improvements, homeowner housing rehabilitation and public social services.

The main focus of HOME funds is to preserve and create affordable rental housing. We also will see accomplishments in the reduction of homelessness. We note that this planning period will also see accomplishments from the HOME-ARP program (2021 Action Plan Amendment), which also will see accomplishments in reducing homelessness and preserving/creating affordable rental housing.

ESG funds are being used to move folks experiencing homelessness directly into housing through Rapid Rehousing as well as Street Outreach services.

The main focus of HTF funds is to create and preserve affordable rental housing with supportive services. Some number of units are often set-aside for homeless individuals and homeless families as well as other special populations such as veterans, frail seniors, youth aging out of foster care, and survivors of domestic violence.

**How will the proposed distribution of funds will address the priority needs and specific objectives described in the Consolidated Plan?**

The programs funded under CDBG, HOME, ESG, HTF and HOPWA enable the Commonwealth to distribute funds to address its highest priority needs in each of the funding categories: access to affordable housing opportunities, preservation and creation of affordable rental housing (including lead paint abatement), homelessness, special needs, and community development.

## AP-30 Methods of Distribution – 91.320(d)&(k)

### Introduction:

Methods of distribution are generally provided in summary form below, with detailed descriptions referenced and contained in the Unique Appendices section attached at the end of this Plan.

### Distribution Methods

**Table 60 - Distribution Methods by State Program**

<b>1</b>	<b>State Program Name:</b>	CDBG Reserves
	<b>Funding Sources:</b>	CDBG
	<b>Describe the state program addressed by the Method of Distribution.</b>	On occasion applications, or portions thereof, that were not funded during a competitive process, including direct technical assistance to eligible communities, may be considered by the Secretary of EOHLC to be particularly worthy, innovative, or address an overarching local, regional, or statewide need. Such projects may be funded through the Reserves. Funds may also be made available for projects throughout the program year that are consistent with Massachusetts’ CDBG priorities.
	<b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b>	The application materials for Reserves will provide guidance to potential grantees on how to structure their applications. The Executive Office’s interest in providing Reserves funding for projects will be determined by a review of the proposed project to determine consistency with the goals and priorities cited above and that the activity is eligible, feasible and ready to proceed. Once complete, applications will be funded in the order in which they are received.

<p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	<p>The CDBG FFY2025 One-Year Action is attached to this Consolidated Plan and is posted separately on EOHLC's website.</p>
<p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p>	
<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	
<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>An initial allocation of \$250,000 will be available for the Reserves component. Funds may be recaptured by or returned to EOHLC at any time during the program year, or reallocated to and from program components including the Reserves component. This may result in an increase or decrease to the initial allocation.</p>

	<b>Describe threshold factors and grant size limits.</b>	All Projects funded under Reserves must meet, at a minimum, CDBG national objective and eligibility requirements, applicable rules and regulations, and project feasibility thresholds.
	<b>What are the outcome measures expected as a result of the method of distribution?</b>	See the attached appendix for the FFY2025 CDBG Action Plan and program specifics.
<b>2</b>	<b>State Program Name:</b>	Community Development Fund
	<b>Funding Sources:</b>	CDBG
	<b>Describe the state program addressed by the Method of Distribution.</b>	The Community Development Fund annually awards grants to communities throughout the Commonwealth. This program helps eligible cities and towns to meet a broad range of community development needs in housing, infrastructure, downtown revitalization, and public social services. It supports CDBG-eligible activities and encourages applicants to develop coordinated, integrated and creative solutions to local problems.
	<b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b>	The Community Development Fund (CDF), representing the bulk of the state’s CDBG allocation, will be distributed through an annual competitive application process. CDF supports revitalization efforts and addresses the needs of low and moderate income residents by supporting housing as well as community and economic development activities in Massachusetts cities and towns. The funds allocation is available to all applicants though communities with higher percentage of low and moderate income persons will have an advantage. See <a href="#">AP-15 Expected Resources</a> for allocation amount.
	<b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b>	The CDBG FFY2025 One-Year Action is attached to this Consolidated Plan and is posted separately on EOHLC's website.

<p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p>	
<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	
<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>All CDBG program funds will be available to eligible grant recipients based on applications for Massachusetts Community Development Block Grant funds and/or Notices of Funding Availability that will be distributed on a regular basis. These documents will make communities aware of the requirements of each particular component and will be available to allow communities adequate time to prepare grant applications for each program. A single community may receive no more than \$1 million from any combination of federal FFY 2025 Community Development Fund or Mini-Entitlement grant funds. Awards not subject to the \$1 million cap per community include the Reserves.</p>

	<b>Describe threshold factors and grant size limits.</b>	See attached FFY2025 CDBG One-Year Action Plan for specifics. A single community may receive up to \$850,000 in grant funds for a single or multiple activities. Regional applications involving more than one community may receive a grant of up to \$1.25 million but no single CDF community in a regional application may receive more than \$700,000. There is a minimum grant amount of \$100,000 except \$10,000 for planning or design-only grants.
	<b>What are the outcome measures expected as a result of the method of distribution?</b>	See the attached appendix for the FFY2025 CDBG Action Plan and program specifics.
<b>3</b>	<b>State Program Name:</b>	ESG
	<b>Funding Sources:</b>	ESG
	<b>Describe the state program addressed by the Method of Distribution.</b>	The Emergency Solutions Grant Program (ESG) funds eligible activities designed to prevent homelessness, support basic shelter operations and provide essential rapid re-housing services for homeless individuals and families currently in the shelter system or living in a place not meant for habitation. ESG funding will be used for rapid rehousing and street outreach services
	<b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b>	EOHLC currently contracts with sub-recipients to offer ESG services. A 10 year procurement was conducted in 2023.
	<b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b>	

<p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p>	<p>EOHLC procured our ESG funds along with state dollars geared toward Homeless Individual Shelters and homeless services. All of these funding sources were targets towards individuals without children and could renewed for up to 10 years. From this procurement ESG funds were used for RRH and Street Outreach projects. Throughout the contract period, EOHLC continues to consult with each CoC and sub-recipient about the needs of their community and their use of ESG funding.</p>
<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	
<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>All ESG funds went towards RRH and Street Outreach projects. Emergency Shelter and Homeless Prevention programs are not being funded with ESG dollars.</p>
<p><b>Describe threshold factors and grant size limits.</b></p>	<p>The agencies providing services through ESG funding have cost-reimbursement contracts. Each agency submits monthly invoices that are reviewed and monitored by the ESG contract managers and fiscal staff. Agencies shall not exceed their grant limits as outlined in provider contract language.</p>
<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	<p>Each contract year 500 homeless individuals will be rapidly rehoused and 500 individuals sleeping in places not meant for habitation will be engaged and provided services</p>



<b>4</b>	<b>State Program Name:</b>	HOME
	<b>Funding Sources:</b>	HOME
	<b>Describe the state program addressed by the Method of Distribution.</b>	EOHLC will competitively and contingently award HOME funds for Rental Loan activities. This includes the HOME PI collected during each respective HOME program year. See HOME Annual Action Plan Appendix for additional detail.
	<b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b>	See HOME Annual Action Plan Appendix for detail. We also note, EOHLC will continue its past practice of seeking to competitively award HOME funds in those areas of the Commonwealth that do not receive HOME funds as a result of entitlement community or HOME consortium designation. EOHLC also will competitively award HOME funds for rental loan projects in entitlement communities that provide a match for EOHLC administered HOME funds.
	<b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b>	
	<b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b>	

<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	
<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>During federal FY 2025, EOHLC anticipates the following approximate amounts will be awarded through a competitive RFP process, depending upon the level of demand in each program category:</p> <ol style="list-style-type: none"> <li>1. \$9,101,558.70 - rental loan program (plus HOME Program Income as collected)</li> <li>2. n/a - project-based first-time homebuyer program</li> <li>3. n/a - purchaser-based first-time homebuyer program</li> </ol>
<p><b>Describe threshold factors and grant size limits.</b></p>	<p>Typically, EOHLC will award up to \$1,000,000 to \$2,000,000 per project and up to \$100,00 per HOME-assisted unit in HOME entitlement/consortium communities. In non-entitlement or non-consortium communities, the maximum loan is up to \$200,00 per HOME-assisted unit. We reserve the option to increase the per unit amounts for family projects located in gateway communities or areas of opportunity. HLC reserves the option to increase the per unit and per project amounts to align with HOME per-unit subsidy limits.</p> <p>See attached HOME Annual Action Plan Appendix for FY 2025 HOME program details.</p>
<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	<p>EOHLC's HOME rental activities meet the HUD objective: Provide decent affordable housing. The HUD outcome for our completed activities is: Affordability.</p> <p>See attached HOME Annual Action Plan Appendix for FY 2025 HOME program specifics.</p>
<p><b>5 State Program Name:</b></p>	<p>HTF</p>
<p><b>Funding Sources:</b></p>	<p>HTF</p>

<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>The National Housing Trust Fund (HTF) is a federal program to support the development of affordable housing for low-income individuals and households. In Massachusetts, we have prioritized HTF funds for projects that provide service-enriched housing and housing for homeless families and individuals. Low-income individuals often face other economic challenges beyond accessing affordable housing. These include difficulties paying for food, health care, transportation, child care and other critical expenses often leading to food insecurity, untreated medical conditions, and barriers to secure job training, education and permanent employment. Permanent supportive housing can become a firm foundation from which to address other critical economic and social challenges.</p>
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<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p>EOHLC accepts applications for HTF funds from qualified and experienced sponsors whose projects are highly ready to proceed. Sponsors must be non-profit entities or developers partnering with non-profit entities that receive funding for supportive services from federal sources, private foundations and/or from state agencies within the Executive Office of Health and Human Services, including the Executive Office of Aging and Independence, formerly Elder Affairs.</p> <p>Applicants must have the demonstrated capacity to develop housing and provide necessary supportive services and must be in good standing with EOHLC. Sponsors who lack experience in supportive housing are ineligible to apply.</p> <p>In general, the evaluation criteria for all applications will include, but will not be limited to, the following:</p> <ul style="list-style-type: none"> <li>• Strength of the overall concept</li> <li>• Percentage of units to be reserved for homeless families or individuals</li> <li>• Strength of the development team</li> <li>• Appropriateness of the tenant selection plan</li> <li>• Evidence of market feasibility</li> <li>• Demonstrated need for the project</li> <li>• Degree of local support, including local funding commitments</li> <li>• Degree to which the project maximizes energy-efficient building standards and design principles</li> <li>• Evidence of intent to create units for residents who face multiple barriers to securing and/or maintaining permanent housing</li> <li>• Demonstrated ability to provide effective stabilization and supportive services to establish and maintain successful tenancies</li> <li>• Geographic location</li> </ul>
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	<ul style="list-style-type: none"> <li>• Degree to which project rents are affordable to ELI/VLI households</li> <li>• Minimum term of affordability: at least 30 years.</li> </ul>
<p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	
<p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p>	
<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	

	<b>Describe how resources will be allocated among funding categories.</b>	During federal FY2025, HLC anticipates awarding approximately \$4.2M in HTF funds through a competitive NOFA process to rental housing projects. HLC's HTF program does not fund any homeownership activities.
	<b>Describe threshold factors and grant size limits.</b>	Please see attached appendix for HTF Program Details.
	<b>What are the outcome measures expected as a result of the method of distribution?</b>	The main HUD objective will be to provide decent affordable housing. The HUD outcome for our completed activities is: Affordability. Please see attached appendix for HTF Program Details.
6	<b>State Program Name:</b>	Massachusetts HOPWA
	<b>Funding Sources:</b>	HOPWA
	<b>Describe the state program addressed by the Method of Distribution.</b>	The Massachusetts Department of Public Health (DPH) Bureau of Infectious Disease and Laboratory Sciences (BIDLS) Office of HIV/AIDS (OHA) administers HOPWA funds. DPH will use its HOPWA allocation in FY25 to fund home-based HIV/AIDS medical case management services through Victory Programs, Inc. and Commonwealth Land Trust. In addition, OHA will fund housing search and advocacy assistance through AIDS Project Worcester and Community Counseling of Bristol County.
	<b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b>	HOPWA project sponsors were selected through a statewide procurement process in 2017. A new procurement has been initiated and will be released in 2025.

<p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	
<p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p>	
<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	<p>The DPH procurement was specifically written to attract community-based organizations as applicants. The procurement also included community health centers and other HIV medical care organizations. DPH is required to conduct procurement processes through a rigorous State-approved process that involves comprehensive community input and structured internal review. The review participants included individuals who were not employees of OHA. All four project sponsors receiving HOPWA funds are community-based organizations.</p>

<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>All HOPWA funds will be allocated for Supportive Services. Victory Programs and Commonwealth Land Trust will use HOPWA funds to provide home-based medical case management services that include, but are not limited to, medical care coordination, adherence support, substance use risk reduction, sexual health promotion, benefits counseling, and basic housing services. AIDS Project Worcester and Community Counseling of Bristol County will use HOPWA funds to provide housing search and advocacy services that include, but are not limited to, identification of housing options, completion and submission of housing applications, visits to potential housing units, negotiation with landlords, identification of resources and services necessary to ensure housing stabilization, and assistance with eviction prevention.</p>
<p><b>Describe threshold factors and grant size limits.</b></p>	<p>The agencies providing services through HOPWA funding have cost-reimbursement contracts. Each agency submits monthly invoices that are reviewed and monitored by OHA contract managers and fiscal staff. Agencies shall not exceed their grant limits as outlined in provider contract language.</p>



<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	<p>DPH has adopted the outcome measures specified by the HOPWA program. All programs must report on the following process measure: “assess your program’s success in enabling HOPWA beneficiaries to establish and/or better maintain a stable living environment in housing that is safe, decent, and sanitary, and improve access to care.” In addition, the home-based medical case management programs report data on the number of HOPWA clients who meet the following criteria during the reporting year:</p> <ul style="list-style-type: none"> <li>• Has a housing plan for maintaining or establishing stable on-going housing</li> <li>• Had contact with a case manager/benefits counselor consistent with the schedule specified in client’s individual service plan</li> <li>• Had contact with a primary health care provider consistent with the schedule specified in client’s individual service plan</li> <li>• Located housing</li> <li>• Accessed and maintained medical insurance/assistance</li> <li>• Successfully accessed or maintained qualification for sources of income</li> <li>• Obtained an income-producing job</li> </ul>
<p><b>7</b></p>	<p><b>State Program Name:</b> Mini-Entitlement Program</p>
<p><b>Funding Sources:</b></p>	<p>CDBG</p>
<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>The Mini-Entitlement Program provides funding to municipalities that meet the three following criteria: (1) Low and moderate income percentage 40% or higher; (2) a poverty rate higher than the state average and (3) population over 12,000. This program helps larger non-entitlement urban communities with the highest needs improve conditions for their low- and moderate-income residents through comprehensive planning and predictable funding. Through this program, identified cities and towns can meet a broad range of community development needs in housing, business development, physical development, downtown revitalization, and public social services. It supports all CDBG-eligible activities and encourages applicants to develop comprehensive, creative solutions to local problems.</p>

<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p>EOHLC expects to award up to \$8,550,000 from the FFY 2025 Mini-Entitlement Program allocation to nine (9) designated Mini-Entitlement municipalities: Amherst, Chelsea, Gardner, Greenfield, North Adams, Southbridge, Wareham, Webster, and West Springfield. EOHLC requires Mini Entitlement communities to approach CDBG projects in a comprehensive and integrated manner and is directing these communities to target their CDBG funds to particular geographic areas in order to impact and effect change within neighborhoods. Housing Rehabilitation programs may be designed to allow up to 20% of the funds to be used for emergency purposes outside the target area.</p>
<p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	<p>The CDBG FFY2025 One-Year Action is attached to this Consolidated Plan and is posted separately on EOHLC's website.</p>
<p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p>	

<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	
<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>All CDBG program funds will be available to eligible grant recipients based on applications for Massachusetts Community Development Block Grant funds and/or Notices of Funding Availability that will be distributed on a regular basis. These documents will make communities aware of the requirements of each particular component and will be available to allow communities adequate time to prepare grant applications for each program. A single community may receive no more than \$1 million from any combination of federal FFY 2025 Community Development Fund or Mini-Entitlement grant funds. Awards not subject to the \$1 million cap per community include the Reserves. Reserves awards are not subject to the \$1.35 million cap per community.</p>
<p><b>Describe threshold factors and grant size limits.</b></p>	<p>The maximum grant award is up to \$950,000. Mini-Entitlement applications will contain an 18-month implementation and cash flow plan. Mini-entitlement grantees must comply with standards for timely expenditure and available program income. FFY 2025 Mini-entitlement awards to Grantees that do not meet the required standards will be reduced by an amount necessary to bring the grantee into compliance.</p>
<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	<p>See attached appendix that includes the FFY2025 CDBG Action Plan and program specifics.</p>

**Discussion:**

## AP-35 Projects – (Optional)

### Introduction:

Projects have been entered for all programs except CDBG. EOHLC will not complete the annual CDBG funding round of grant awards until after submission of the Consolidated Plan to HUD. The other programs operate from either a waiting list of individual activities not funded in prior rounds, or multi-year procurements, and are generally more likely to be ready to proceed - or at least known - at the time of submission.

#	Project Name
1	2025 HOME Rental EN
2	2025 HOME Rental CR
3	HOPWA Housing Search and Advocacy -- AIDS Project Worcester
4	HOPWA Housing Search and Advocacy -- Community Counseling of Bristol County
5	HOPWA Medical Case Management -- Commonwealth Land Trust
6	HOPWA Medical Case Management -- Victory Programs
7	2024-2025 HTF Rental Capital Grant
8	2024-2025 HTF Admin Grant
9	ESG E-23-DC-25-0001

**Table 61 – Project Information**

### **Describe the reasons for allocation priorities and any obstacles to addressing underserved needs**

Multiple state, federal, local, non-profit, and private funding sources support housing construction, rent subsidies, housing services, and all related support and other housing activities and projects in Massachusetts. Funders, stakeholders, legislators, and administrators communicate on an ongoing basis to determine funding priorities, needs and funding gaps and then design and implement programs to fill the gaps, especially those meeting underserved needs. The five Federal programs included in this Consolidated Plan are intended to optimize all available resources and deliver the greatest impact.

**AP-38 Project Summary**  
**Project Summary Information**

1	<b>Project Name</b>	2025 HOME Rental EN
	<b>Target Area</b>	
	<b>Goals Supported</b>	Preserve and create affordable rental housing
	<b>Needs Addressed</b>	
	<b>Funding</b>	:
	<b>Description</b>	HOME rental development activities funded with EN. This includes estimated \$4mil in gross HOME PI receipts.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An early estimate is that we will be able to create 66 HOME units serving low- and extremely-low-income households.
	<b>Location Description</b>	We estimate that HOME rental development activities will be in various parts of the Commonwealth.
	<b>Planned Activities</b>	Rental development activities will be created in IDIS at the time of HOME commitment.
2	<b>Project Name</b>	2025 HOME Rental CR
	<b>Target Area</b>	
	<b>Goals Supported</b>	Preserve and create affordable rental housing
	<b>Needs Addressed</b>	
	<b>Funding</b>	:
	<b>Description</b>	HOME CHDO rental development activities funded with CR.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An early estimate is that we will be able to support 1 or 2 HOME rental CHDO activities and will create approximately 11 HOME-assisted units serving low- and extremely-low-income households.
	<b>Location Description</b>	We estimate that HOME rental development activities will be in various parts of the Commonwealth, subject to eligible CHDO developers seeking HOME funds.
	<b>Planned Activities</b>	Rental development activities will be created in IDIS at the time of HOME commitment.
3	<b>Project Name</b>	HOPWA Housing Search and Advocacy -- AIDS Project Worcester
	<b>Target Area</b>	

	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	
	<b>Funding</b>	:
	<b>Description</b>	Housing search and advocacy services are provided by AIDS Project Worcester (INTF4944MM3181926001).
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>4</b>	<b>Project Name</b>	HOPWA Housing Search and Advocacy -- Community Counseling of Bristol County
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	
	<b>Funding</b>	:
	<b>Description</b>	Housing Search and Advocacy services are provided by Community Counseling of Bristol County (INTF4944MM3181926014).
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>5</b>	<b>Project Name</b>	HOPWA Medical Case Management -- Commonwealth Land Trust
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	
	<b>Funding</b>	:



	<b>Description</b>	Medical case management services are provided by Commonwealth Land Trust (INTF4944MM3181926013).
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>6</b>	<b>Project Name</b>	HOPWA Medical Case Management -- Victory Programs
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	
	<b>Funding</b>	:
	<b>Description</b>	Medical case management services are provided by Victory Programs (INTF4944MM3181926040).
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>7</b>	<b>Project Name</b>	2024-2025 HTF Rental Capital Grant
	<b>Target Area</b>	
	<b>Goals Supported</b>	Preserve and create affordable rental housing
	<b>Needs Addressed</b>	Community development and local priorities
	<b>Funding</b>	:
	<b>Description</b>	HTF capital funds for affordable rental projects
	<b>Target Date</b>	

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>8</b>	<b>Project Name</b>	2024-2025 HTF Admin Grant
	<b>Target Area</b>	
	<b>Goals Supported</b>	Preserve and create affordable rental housing
	<b>Needs Addressed</b>	
	<b>Funding</b>	:
	<b>Description</b>	Admin expenses associated with operating HTF program
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Not applicable to this project because this relates to the administrative expenses of operating the HTF program.
	<b>Location Description</b>	Not applicable. See above.
	<b>Planned Activities</b>	Not applicable. See above.
<b>9</b>	<b>Project Name</b>	ESG E-23-DC-25-0001
	<b>Target Area</b>	
	<b>Goals Supported</b>	Reduce homelessness
	<b>Needs Addressed</b>	
	<b>Funding</b>	ESG: \$4,908,143.00
	<b>Description</b>	ESG funds are used for the costs of providing street outreach and rapid rehousing to homeless individuals across the state. Some funding pays for subrecipient administrative costs.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	500 households will be moved into housing through RRH and 500 individuals will be assisted with Street Outreach services
	<b>Location Description</b>	

	<b>Planned Activities</b>	
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## **AP-40 Section 108 Loan Guarantee – 91.320(k)(1)(ii)**

### **Will the state help non-entitlement units of general local government to apply for Section 108 loan funds?**

Yes

#### **Available Grant Amounts**

Section 108 Loan Guarantees allow eligible communities to access federal loan funds for the purpose of aiding revenue-producing development activities. The Massachusetts program provides communities with a source of loan financing for a specific range of community and economic development activities. Funding is provided to the community to loan to a business or other entity. The Commonwealth guarantees repayment of the HUD loan and pledges its future CDBG allocation as collateral. Actual funding will be provided through the sale of notes by the federal Department of Housing and Urban Development. Loan Guarantees will be available to support the rehabilitation of, or conversion to, mixed-use or investor owner-residential buildings (5 or more units) located in downtown or commercial center areas. Residential projects should include mixed-income, affordable and market rate units. Housing unit rehabilitation will be limited to a maximum per unit CDBG cost of \$125,000. The entire building façade must be appropriately addressed, regardless of the portions of the building assisted. Section 108 loan assistance of \$1 million to \$5 million will be available for residential or mixed-use projects meeting these qualifications. For most housing project components, Section 108 loan funds plus all federal and state grants combined shall not exceed 75 percent of total actual project costs. Section 108 loans may also assist public facilities/infrastructure improvements that generate sufficient revenues and support downtown mixed-use or investor-owned, mixed-income residential projects. This year the Commonwealth will pledge up to \$10 million in future CDBG allocations in support of these eligible activities. The minimum award is \$1,000,000 and the maximum is \$5 million. The loan amount will not be included in the \$1 million annual limit that grantees may receive from the Commonwealth's annual CDBG allocation.

#### **Acceptance process of applications**

Applicants must contact EOHLC prior to submission of an application. A two-stage process for evaluating potential applications is in effect, consisting of a preliminary screening and a formal application. Applicants also need to review the evaluation criteria and the review process information found in the economic development guidance. Applications will be reviewed on a first come, first served basis, provided that threshold criteria are met and funds are available. Successful applicants will receive a loan from HUD, but the Commonwealth guarantees the repayment of the loan. The Commonwealth pledges its future CDBG grant funds to repay the federal government should a non-entitlement recipient of a Section 108 Loan default. EOHLC will not pledge other collateral of the Commonwealth in support of proposals. Any additional security required by HUD must come from another source. Project applications must meet all applicable criteria outlined for economic development community grants.

However, the format of any final loan application will be determined by HUD. See attached FFY2025 CDBG One-Year Action Plan for specifics.

**AP-45 Community Revitalization Strategies – 91.320(k)(1)(ii)**

**Will the state allow units of general local government to carry out community revitalization strategies?**

No

**State’s Process and Criteria for approving local government revitalization strategies**

## **AP-50 Geographic Distribution – 91.320(f)**

### **Description of the geographic areas of the state (including areas of low-income and minority concentration) where assistance will be directed**

Each program year, the Massachusetts’s CDBG Program identifies certain communities to be Mini-Entitlement communities if they meet specific criteria pertaining to a variety of socio-economic demographic factors. Details about the specific factors are outlined in each year's Action Plan. This program helps larger non-entitlement urban communities with the highest needs improve conditions for their low- and moderate-income residents through comprehensive planning and predictable funding. These communities are required to approach CDBG projects in a coordinated and integrated manner and to target their CDBG funds to a particular identified neighborhood or target area. For the balance of the CDBG program, MA does not specifically identify any target areas within its boundaries but encourages applicants to focus activities in target areas identified by the applicant communities as having a greater level of need.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>

**Table 62 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

Though Massachusetts does not specifically identify target areas, allocating a significant portion of CDBG resources toward the areas of greatest need as described above results in the greatest potential impact of the limited funds. Allowing multiple communities to apply in a single regional application provides more impact in rural areas of the state where needs are often greater.

### **Discussion**

## Affordable Housing

### AP-55 Affordable Housing – 24 CFR 91.320(g)

**Introduction:**

This section sets annual goals for projects funded through HOME and HTF.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	15
Non-Homeless	122
Special-Needs	0
Total	137

**Table 63 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	0
The Production of New Units	113
Rehab of Existing Units	24
Acquisition of Existing Units	0
Total	137

**Table 64 - One Year Goals for Affordable Housing by Support Type**

**Discussion:**

HOME assisted units:

Homeless: 5

Non-homeless: 72

Total: 77

Production of new units: 73

Rehab of existing units: 4

Total: 77

We note that the HOME numbers in the table above reflect HOME-assisted units only. Typically, HOME projects have a far greater number of total units. We anticipate that the sum of HOME projects supported in an average year under this plan will include over 315 total units.

While we may see that HOME has supported some Special-Needs housing units, the agency has other



resources that are targeted toward supportive housing.

HTF units figures are 10 Homeless households and 50 non-homeless households. 40 new units and 20 units rehabbed and preserved.

## **AP-60 Public Housing - 24 CFR 91.320(j)**

### **Introduction:**

EOHLC oversees approximately 43,400 units of state-aided public housing at 299 Local Housing Authorities (LHAs). The state provides these developments with both capital and operating subsidy, technical assistance, and regulatory oversight. EOHLC periodically issues competitive grant funding rounds for capital projects.

In the area of administrative efficiency and improvement, EOHLC also successfully incorporated state voucher programs into the CHAMP online application system, and in July 2023 launched a Centralized Screening Office (CSO) to make tenant selection more consistent and efficient. The CSO has lowered the administrative work of tenant selection for housing authorities, leading to a rate of leasing 12% higher Oct '23 -September '24 than the preceding 6 years of data.

### **Actions planned during the next year to address the needs to public housing**

EOHLC will make progress on several major projects that will replace decades-old public housing with modern apartments serving the same income levels while adding hundreds more affordable and unrestricted units. These include:

- Innes Apartments - 96 units of family housing replaced while adding 234 market units – completed and leasing up November 2024-March 2025;
- Somerville Clarendon Hills Phase 1 - replacing 130 units of family housing while adding 38 net new affordable units at other income levels - In Construction and leasing up spring 2025;
- Salem Lee Fort Terrace – replacing 50 units of elderly housing with 147 unit affordable development open to all ages. Project to include substantial resiliency investments to protect this coastal property from sea level rise. In construction starting summer 2024;
- Medford Walking Court - replacing 144 units of elderly housing through a Faircloth-to-Rad conversion while adding 54 additional deeply affordable units. Awarded 2022, hasn't secured private activity bonds to proceed;
- Worcester Curtis Apartments Phase 1 - replacing 90 units of family housing with deeply affordable Faircloth or project-based voucher units while adding 39 affordable units - construction started 2024;
- Somerville Clarendon Hills Phase 2 - completing affordable redevelopment of 1950-built family development. Second phase will replace 71 PH units and add 21 new affordable units. Funding awarded 2024, expected closing 2026;
- Curtis Apartments Phase 2 - second of four planned phases to reposition 1950-built family development will replace 114 PH units while adding 36 units and an Economic Opportunity

Center. Funding awarded 2024, expected closing 2026.

EOHLC will:

- award funding for one to three additional major redevelopment projects pursuant to the Public Housing Innovations 2025 Notice of Funding Availability. These awards will fund projects similar to the above that replace public housing while adding net-new units. Awards in late spring 2025.
- continue progress on four projects funded with MTW Reserve funds, awarded 10/2023, disposing scattered site family public housing and replacing in more consolidated, modern developments. These projects will dispose of 57 units of public housing while replacing 54 and adding 142 units of affordable and market housing to the constricted Massachusetts housing market. One of these, replacing 25 condo units at Boston Housing Authority within the Old Colony Phase VI redevelopment, has broken ground.
- oversee continued disbursement in \$150M of federal ARPA funds for state-aided public housing modernization, including \$55M allocated by formula to the LHAs and \$95M to targeted expired components, including electrical panels, fire alarm & suppression systems, elevators, and accessible unit conversions. EOHLC has obligated all ARPA funds through award letters to LHAs with hundreds of projects in design and construction and over \$50M disbursed through state FY24.

EOHLC will continue its TA and funding to LHAs to reduce vacancy rates. EOHLC and its partner LHAs have reduced units vacant at a given time by about 10% since summer 2023. 2023 also had the most units leased of any year in our data, with 2024 on track to be even more productive.

### **Actions to encourage public housing residents to become more involved in management and participate in homeownership**

EOHLC will continue to oversee implementation of legislation that requires every LHA in a town to have a tenant board member on the board (cities have had this requirement for many years). EOHLC also mandated an increase in tenant participation funds from \$6 to \$25 a unit, matching HUD housing.

### **If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

N/A

### **Discussion:**

N/A

## **AP-65 Homeless and Other Special Needs Activities – 91.320(h)**

### **Introduction**

**Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including:**

#### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

EOHLC will continue to communicate with the Continuum of Care lead agencies, other state departments, and municipalities statewide to understand and assess the needs of persons experiencing homelessness in local communities. We are currently utilizing ESG dollars to fund several projects who provide street outreach services to connect people experiencing literal homelessness with immediate shelter. EOHLC has a Street Outreach provider in each region on the commonwealth. Finally, EOHLC will coordinate with the SAMHSA funded PATH teams across the Commonwealth. These teams are conducting street outreach and operate statewide.

#### **Addressing the emergency shelter and transitional housing needs of homeless persons**

To improve access to emergency shelter, EOHLC conducted system wide procurements for emergency shelter services funded through state appropriation in 2023. These procurements resulted in increased numbers of shelter beds for both individuals and households with children. Additionally, the procurements provided funding for temporary emergency shelter in congregate and non-congregate settings in preparation for winter weather. Once year after this procurement we also held Need Assessment listening sections to see what areas still need improvement. ESG and state funded street outreach services as well as state funded triage and assessment efforts were increased dramatically through these procurements, which is expected to result in more cohesive access to shelter. An increase in shelter beds and housing is still needed and will continue to be advocated for.

#### **Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

EOHLC has chosen to utilize a majority of its ESG dollars to fund Rapid Rehousing projects aimed at serving individuals prioritized through the local CoC's CE system. These CE system prioritize folks based

on vulnerability including veteran, youth and chronic homeless status. RRH aims to quickly house those who are HUD Category 1 homeless and provide services to ensure housing stability. State dollars are used to fund HomeBase, a RRH project aimed to target families and those fleeing DV.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs**

The Commonwealth funds the Residential Assistance for Families in Transition (RAFT) program to provide those at risk of homelessness with short-term emergency funding to help folks at risk of eviction, foreclosure, loss of utilities, and other housing emergencies as well as Housing Consumer Education Centers (HCECs) to act as the “front door” for those facing a housing emergency. These services are primarily state funded, thus allowing ESG & other federal funding resources to be prioritized to households experiencing literal homelessness according to HUD’s definition.

## **Discussion**

**AP-70 HOPWA Goals – 91.320(k)(4)**

<b>One year goals for the number of households to be provided housing through the use of HOPWA for:</b>	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	0
Tenant-based rental assistance	0
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0
Total	0

N/A – No HOPWA funds support the above, all funds are used for support services.

## **AP-75 Barriers to affordable housing – 91.320(i)**

### **Introduction:**

Insufficient resources to meet the growing gap between the cost of creating and maintaining decent housing and the incomes of very low-income households is, of course, the primary obstacle. Lack of housing supply across the Commonwealth is also a major factor. Building new housing has become increasingly more costly and challenging in Massachusetts, making it difficult for the private market to meet the needs even of moderate and middle-income residents. Some of the obstacles to production are unique to affordable housing, but many apply to housing development generally. Barriers include: high construction costs, high labor costs; high cost and scarcity of land available and zoned for multi-family development, especially in the eastern part of the state, limited infrastructure in many communities with little incentive to improve water and sewer systems; restrictive local zoning and land use controls that severely limit multi-family uses and lengthy permitting processes; limited planning and organizational capacity at the local level.

Half of the Commonwealth's 351 municipalities have fewer than 10,000 residents, and most of these have no professional planning or community development staff; and reluctance of communities to allow new residential development, especially affordable and/or multi-family housing, because of concerns related to fiscal impact, property values and "community character." The ability of the State to eliminate, or even mitigate, some of these barriers is limited. For example, while materials cost roughly the same here as in other parts of the country, labor is considerably more expensive.

### **Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

While the 351 municipalities control many identified barriers, MA has undertaken initiatives to help communities encourage housing development, especially affordable. The 2017 Housing Choice Initiative (HCI) provides policy levers, incentives, rewards, technical assistance, and legislative reforms that encourage and empower municipalities to plan and build diverse housing stock. High housing producing communities, or those with adopted HCI best practices, can seek designation as a Housing Choice Community (HCC). HCCs have exclusive access to the Housing Choice Grant Program (HCGP) and bonus points or special considerations to various grants and interest rate reductions to water infrastructure loans offered by the State. The HCGP supports community planning, infrastructure, and other activities in HCCs to produce more housing and implement HCI best practices. From FY19-FY25 HCCs received 209 awards totaling over \$32M, directly creating an estimated 1049 new housing units (564 of which were affordable) and supported over 4,660 units of existing housing while unlocking potential for thousands of future units via local policy change. HCI has made it easier for communities to adopt "housing production friendly" zoning by reducing the required vote from 2/3 "supermajority" to a simple majority for certain zoning changes, more consistent with practice in most other states. HCI is tracking progress

toward a goal of 135,000 new housing units statewide through 2025. HCCs have collectively produced over 77% of all housing in the Commonwealth and continue to lead the way in housing production. Massachusetts complements its funding of housing development projects by establishing other initiatives and TA to continue its efforts to reduce the restrictive effects of government policy on housing development for individuals and families.

- EOHLC created a 5-year Statewide Housing Plan to assess state housing needs, develop strategies to solve the challenges, inform data-driven decisions, and guide local, regional, and statewide actions that promote housing.
- The 2024 Affordable Homes Act authorizes \$5.16 billion in spending over five years along with 50 policy initiatives to counter rising housing costs. The bill includes unprecedented funding to modernize the state’s public housing stock, boosts programs to support first-time homebuyers and homeownership, and resources to build more housing for low to moderate-income residents. It includes policy changes to unlock housing production such as allowing accessory dwelling units in all single-family zoning districts across 350 cities and towns, support for conversion of vacant commercial space to housing, and the creation of the Seasonal Communities Initiative.
- The 2023 HousingWorks Infrastructure Program is a flagship grant program focused on making infrastructure improvements to unlock housing.
- The 2022 Starter Home Zoning Districts Act sets up a process for communities to create Starter Home Zoning Districts, where starter homes can be built and provides incentives to promote this new zoning tool.
- The 2021 MBTA Communities Law requires that 177 municipalities designated as MBTA Communities enact at least one zoning district of reasonable size in which multi-family housing is permitted as of right and meets other criteria.

These actions complement prior steps to incentivize housing production in smart growth zoning districts through Chapter 40R; enable cities and towns to raise funds and access state funds for affordable housing through the Community Preservation Act; and allow via MA’s affordable housing law (Chapter 40B) for override of some local regulations that impede affordable housing development in communities where less than 10 percent of the housing is subsidized.

### **Discussion:**

EOHLC has continued its collaboration the Massachusetts Executive Office of Health and Human Services (“EOHHS”) and other state agencies to examine community-based housing options for persons with disabilities in accordance with the Commonwealth’s Olmstead Plan, published in 2018 followed by a 2024 Olmstead Update Report (<https://www.mass.gov/orgs/commonwealth-of-massachusetts-olmstead-plan-and-update>).



## **AP-85 Other Actions – 91.320(j)**

### **Introduction:**

Dozens of programs and activities are carried out in addition to those covered by the 2025-2029 Consolidated Plan and this 2025 Action Plan that support the state's broad housing and community development objectives. Through these programs, the Commonwealth will seek to create and preserve an adequate supply of housing; to expand homeownership; reduce homelessness; ensure that persons with special needs have access to appropriate services and accessible housing; and to enhance the prosperity and economic competitiveness of all regions, compatible with community and environment. The recently enacted \$5.16 billion Affordable Homes Act provides an important resource and foundation that the programs funded are designed to complement.

### **Actions planned to address obstacles to meeting underserved needs**

Recent significant increases in state capital funding, as well as policy initiatives, have been enacted to increase affordable housing production and choice as well as investment in livable communities pursuant to the Affordable Homes Act.

A few of the new or increased state capital authorizations under the Affordable Homes Act include:

- \$1.6 billion for state-aided public housing rehabilitation and modernization, including \$15 million for state-aided public housing accessibility upgrades.
- \$800 million for the Affordable Housing Trust Fund to support private affordable housing development and preservation, including up to \$50M for the MassDREAMS program, which assists first-time homebuyers in Disproportionately Impacted Communities (in addition to the \$100M for the Commonwealth Builder homeownership program in Gateway Cities and similar markets).
- \$200 million for the Housing Innovations Fund to support innovative and alternative forms of affordable rental housing, including single person occupancy and transitional and permanent supportive housing for people experiencing homelessness, seniors, veterans, and persons recovering from substance use disorder. This proposed funding is in addition to the proposed \$185 million for programs that assist persons with disabilities, including those in institutions or at risk of institutionalization, to remain in their homes or community or to return from institutional settings.
- \$50 million for neighborhood stabilization by funding acquisition, rehabilitation, and sale of distressed properties.

A few of the policy initiatives under the Affordable Homes Act include:

- A statewide advisory council to oversee and advise the development of a statewide housing plan every 5 years.

- Addition of inclusionary zoning ordinances and bylaws to the list of zoning changes municipalities can pass by a simple majority instead of a 2/3 super majority vote of city/town legislative body.

### **Actions planned to foster and maintain affordable housing**

The Housing Choice Initiative promotes a slate of housing best practices including many that are related to the production of affordable housing. The program will soon launch Housing Choice 2.0 which will include updates to best practices and continue to foster additional affordable housing producing best practice. To date the Initiative and its related Housing Choice Grant program have helped directly produce 564 units of new affordable housing while unlocking the potential for thousands of other future units through local policy changes.

Enacted in 2021, the MBTA Communities Law (M.G.L. Chapter 40A Section 3A) requires that 177 municipalities designated as MBTA Communities enact at least one zoning district of reasonable size in which multi-family housing is permitted as of right and meets other criteria. Many of these districts have already been created and have already helped add over 3000 new permitted units to the housing production pipeline, many of which are affordable housing units.

MA's affordable housing law (Chapter 40B) allows for a limited override of local regulations that impede the development of affordable housing in communities where less than 10 percent of the year-round housing qualifies as subsidized, 40B is the primary producer of affordable housing in suburban locations.

### **Actions planned to reduce lead-based paint hazards**

The Massachusetts Department of Public Health Childhood Lead Poisoning Prevention Program (MACLPPP) is the lead agency for educating the public about the risks of lead and for ensuring that affected children receive appropriate intervention. The program's actions closely follow or exceed requirements in the HUD Lead-Safe Rule. During the period covered by this plan, the Commonwealth will continue implementing the Massachusetts Lead Law and the HUD Lead-Safe Rule, targeting high-risk communities.

### **Actions planned to reduce the number of poverty-level families**

EOHLC employs a multi-faceted approach to reducing the number of families living in poverty. The first is providing affordable, stable housing for low-income families. For families leaving the shelter system with an MRVP, EOHLC contracts for stabilization services. EOHLC is a Moving to Work agency. Through MTW, EOHLC supports and implements elements of self-sufficiency programs, and intends to expand those further. Finally, EOHLC encourages Community Action Agencies that receive Community Services

Block Grant (CSBG) funds to offer financial self-sufficiency programs.

### **Actions planned to develop institutional structure**

This Action Plan reflects the continuing cooperative participation of the many state agencies, municipalities, and non-profit housing and service providers whose efforts are essential to its success.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

Implementation of the Action Plan is carried out by dozens of state agencies, departments, and quasi-public entities, working collaboratively with a network of for-profit service providers and developers and the 351 cities and towns of the Commonwealth.

### **Discussion:**

Massachusetts has long been considered a national leader in efforts to address housing and community development needs at the state level. Its strategies and actions rely on coordination with and cooperation from partners at all levels of planning and implementation. The Commonwealth appreciates its reciprocal relationship with local government, and their support, as well as other organizations noted above to engage, plan, and implement strategies, programs and policy efficiently and effectively to meet the needs of its residents, business community, and other beneficiaries of living and working here.

## Program Specific Requirements

### AP-90 Program Specific Requirements – 91.320(k)(1,2,3)

#### Introduction:

#### Community Development Block Grant Program (CDBG) Reference 24 CFR 91.320(k)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	50,000
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>50,000</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	70.00%

#### HOME Investment Partnership Program (HOME) Reference 24 CFR 91.320(k)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

EOHLC's forms of HOME investment fall within 92.205.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

EOHLC does not anticipate awarding new HOME project-based homebuyer funds in the coming program year and has not awarded HOME project-based homebuyer funds for a number of years, as rental projects continue to be a priority.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

n/a

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

EOHLC HOME funds support rehabilitation and general development costs associated with some preservation projects. HOME funds are not used to refinance other multifamily federal loans.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

n/a

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

n/a

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

n/a

### **Emergency Solutions Grant (ESG) Reference 91.320(k)(3)**

1. Include written standards for providing ESG assistance (may include as attachment)

ESG Written Standards are attached

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

Across the Commonwealth Massachusetts has 11 continua of care. Some regions are farther along than others in the development of each coordinated entry system. Some notable coordinated entry systems include the city of Boston (which has worked to pair permanent supportive housing units to chronically homeless individuals and veterans. As well as Rapid Rehousing for long term shelter stayers, youth, and those fleeing domestic violence situations), the city of Cambridge (who has developed a coordinated access network intake for those experiencing homelessness to join eligibility pools for Permanent Supportive Housing and/or Rapid Re-Housing programs), And the Balance of State, where a Rapid Rehousing assessment has just been implemented and incorporated into HMIS along with the previous permanent supportive housing assessment. All CoC's are working to better each system and make access more equitable across the commonwealth. Each is following ESG standards reflected in federal regulations as well as best practices. They defer to the specific mechanisms within each continuum's coordinated entry system but require compliance with HUD standards.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

After consulting with CoCs regarding their needs and priorities for ESG funding, EOHLC released a Request for Responses (RFR) for new awards in 2023. Proposals were received from every region of the Commonwealth and awards were made statewide for street outreach and rapid rehousing efforts.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

N/A

5. Describe performance standards for evaluating ESG.

EOHLC expects to move 500 people per year into permanent housing through RRH and provide street outreach services to 500 people.

**Housing Trust Fund (HTF)**  
**Reference 24 CFR 91.320(k)(5)**

1. How will the grantee distribute its HTF funds? Select all that apply:

Applications submitted by eligible recipients

2. If distributing HTF funds through grants to subgrantees, describe the method for distributing HTF funds through grants to subgrantees and how those funds will be made available to state agencies and/or units of general local government. If not distributing funds through grants to subgrantees, enter "N/A".

N/A

3. If distributing HTF funds by selecting applications submitted by eligible recipients,
  - a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

EOHLC accepts applications for HTF funds from qualified and experienced sponsors whose projects are highly ready to proceed. Sponsors must be non-profit entities or for-profit entities partnered with non-profit entities that receive support service funds from federal sources, private foundations or sources, from the Executive Office of Health and Human Services and/or the Executive Office of Aging and Independence, formerly named the Executive Office of Elder Affairs. Applicants must have the

demonstrated capacity to develop housing and provide the necessary supportive services, and must be in good standing with HLC. Sponsors who lack experience in developing and operating supportive housing are ineligible to apply.

b. Describe the grantee's application requirements for eligible recipients to apply for HTF funds. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

HTF projects must be structured as sound real estate investments as well as effective opportunities for extremely low-income tenants who need supportive services. Sponsors interested in receiving HTF funds must submit a pre-application to EOHLC through the on-line Mass OneStop+ system. Based on the information contained in the pre-application, EOHLC determines whether the sponsor has the demonstrated capacity to develop the housing and provide the necessary supportive services. At the pre-application stage, EOHLC also evaluates the status of necessary zoning and permitting approvals, the status of architectural documents, and the status of other funding commitments as part of its readiness determination. Sponsors whose projects receive preliminary approval from EOHLC during the pre-application process are invited to submit full funding applications. Full applications must be submitted through the online Mass OneStop+ system.

c. Describe the selection criteria that the grantee will use to select applications submitted by eligible recipients. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

In general, the evaluation criteria for all applications will include, but will not be limited to, the following:

- Strength of the overall project concept
- Percentage of units to be reserved for homeless families or individuals
- Strength of the development team
- Appropriateness of the tenant selection plan
- Evidence of market feasibility
- Degree to which the project maximizes energy-efficient building standards and development principles
- Evidence of intent to create units for residents who face multiple barriers to securing and/or maintaining permanent housing
- Demonstrated ability to provide effective stabilization and supportive services to establish and



maintain successful tenancies

- Geographic location of the project
- Degree to which the proposed rents are affordable to ELI households and VLI households
- Minimum term of affordability must be at least 30 years
- Demonstrated need for the project in the target community
- Financial viability of the project
- Degree of local support, including local funding commitments

d. Describe the grantee's required priority for funding based on geographic distribution (as defined by the grantee in the consolidated plan). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

EOHLC always encourage the creation of units for ELI individuals and families in "areas of opportunity." HLC defines an area of opportunity, in part, as a neighborhood or community with a relatively low concentration of poverty based on U.S. Department of Housing and Urban Development data. In addition, EOHLC identifies an area of opportunity as a neighborhood or community that offers access to jobs, health care, high performing school systems, higher education, retail and commercial enterprise and other public amenities.

e. Describe the grantee's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

It is EOHLC's intent to award HTF to projects that are highly ready to proceed. Further, it is EOHLC's intent to award the funds to sponsors with extensive experience and strong track records in the development and operation of permanent housing with supportive services (aka permanent supportive housing). Sponsor experience and organizational capacity are critical elements in the EOHLC review process for HTF. The determination of the project's degree of readiness and the sponsoring organization's ability to move through the loan closing process to construction are also critical review components.

f. Describe the grantee's required priority for funding based on the extent to which the rental project has Federal, State, or local project-based rental assistance so that rents are affordable to extremely low-income families. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

In accordance with HUD guidance, the funds available through HTF in Massachusetts can only be used to directly support housing units for ELI individuals or families. Additionally, EOHLC will typically pair HTF funds with either Section 8 PBVs or the state's rental voucher program, known as MRVP (Massachusetts Rental Voucher Program), ensuring that HTF-assisted units will have rents that are affordable to ELI individuals or families.

g. Describe the grantee's required priority for funding based on the financial feasibility of the project beyond the required 30-year period. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

All HTF-assisted rental housing in Massachusetts must meet the 30 year affordability period.

h. Describe the grantee's required priority for funding based on the merits of the application in meeting the priority housing needs of the grantee (such as housing that is accessible to transit or employment centers, housing that includes green building and development features, or housing that serves special needs populations). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

EOHLC is strongly committed to the development of housing with services for special populations.

i. Describe the grantee's required priority for funding based on the extent to which the application makes use of non-federal funding sources. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

N/A

4. Does the grantee's application require the applicant to include a description of the eligible activities to be conducted with HTF funds? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes

5. Does the grantee's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes

**6. Performance Goals and Benchmarks.** The grantee has met the requirement to provide for performance goals and benchmarks against which the grantee will measure its progress, consistent with the grantee's goals established under 24 CFR 91.315(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

Yes

**7. Maximum Per-unit Development Subsidy Amount for Housing Assisted with HTF Funds.**

Enter or attach the grantee's maximum per-unit development subsidy limits for housing assisted with HTF funds.

The limits must be adjusted for the number of bedrooms and the geographic location of the project. The limits must also be reasonable and based on actual costs of developing non-luxury housing in the area.

If the grantee will use existing limits developed for other federal programs such as the Low Income Housing Tax Credit (LIHTC) per unit cost limits, HOME's maximum per-unit subsidy amounts, and/or Public Housing Development Cost Limits (TDCs), it must include a description of how the HTF maximum per-unit development subsidy limits were established or a description of how existing limits developed for another program and being adopted for HTF meet the HTF requirements specified above.

**8. Rehabilitation Standards.** The grantee must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The grantee's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The grantee must attach its rehabilitation standards below.

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; Capital Needs Assessments (if applicable); and broadband infrastructure (if applicable).

Rehabilitation Standards are included in the HTF FY 2025 Allocation Plan in the Grantee Unique Appendices.

**9. Resale or Recapture Guidelines.** Below, the grantee must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

N/A

**10. HTF Affordable Homeownership Limits.** If the grantee intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

N/A

**11. Grantee Limited Beneficiaries or Preferences.** Describe how the grantee will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the grantee will not limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter "N/A."

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the grantee must not limit or give preferences to students. The grantee may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303(d)(3) only if such limitation or preference is described in the action plan.

See attached appendix for HTF Program Specifics.

**12. Refinancing of Existing Debt.** Enter or attach the grantee’s refinancing guidelines below. The guidelines describe the conditions under which the grantee will refinance existing debt. The grantee’s refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the grantee will not refinance existing debt, enter “N/A.”

See attached appendix for HTF Program Specifics.

**Discussion:**

## Appendix - Alternate/Local Data Sources

1	<p><b>Data Source Name</b></p> <p>DPH HIV/AIDS Epidemiologic Profiles</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>Department of Public Health</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>The Massachusetts HIV/AIDS Epidemiologic Profile is a collection of reports that are used at the state and local level to plan HIV prevention and care services and to inform policies and programmatic development. The Epidemiologic Profile is updated annually and includes a comprehensive statewide report, detailed statewide data tables, a regional report including HSR, city, and county breakdowns, population-specific fact sheets, and technical notes.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>To track and monitor trends in HIV incidence and prevalence.</p>
	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>No, the data set includes information for the entire Commonwealth. Separate reports are produced regarding priority populations and areas of cluster activity.</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>Surveillance data has always been collected by DPH. The most recent data available is from 7/1/24.</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Complete and ongoing.</p>
2	<p><b>Data Source Name</b></p> <p>Federal &amp; State Vouchers/Units Administered in MA</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>Executive Office of Housing and Livable Communities, Division of Public Housing and Rental Assistance</p>

<p><b>Provide a brief summary of the data set.</b></p> <p>The data set provides not only the current Federal vouchers and units administered in Massachusetts, but the State vouchers and units as well, in response to the question at <b>MA-25 Public and Assisted Housing - (Optional)</b>.</p>
<p><b>What was the purpose for developing this data set?</b></p> <p>Maintenance of a proper accounting of vouchers administered by EOHLC.</p>
<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>The data consists of a point in time (November 2024) tabulation of voucher data funded by EOHLC. The data covers the entirety of the Commonwealth geographically, but does not include information of local housing authorities (LHAs) providing rental assistance received directly from HUD for local administration by those LHAs.</p>
<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>The data set represents information retained by EOHLC as of November 2024.</p>
<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>The data set is a complete accounting of vouchers administered by EOHLC.</p>

## FFY2025-2029 Consolidated Plan Appendix

- CDBG One Year Annual Action Plan  
-2025 Locally Held CDBG Program Income
- ESG Annual Action Plan
- HOME Annual Action Plan
- HOPWA Annual Action Plan
- HTF Annual Action Plan



# One Year Action Plan

FFY 2025

## Massachusetts Community Development Block Grant Program



Commonwealth of Massachusetts

Maura T. Healey, Governor  
Kimberley Driscoll, Lt. Governor

Executive Office of Housing and Livable Communities

Edward M. Augustus, Jr., Secretary

## FFY 2025 One Year Action Plan - Preface

The U.S. Department of Housing and Urban Development (HUD) requires the Commonwealth of Massachusetts, and all other Formula Grantees, to prepare a Five-Year Consolidated Plan. The state's Consolidated Plan sets forth long term priorities for the use of funds received from HUD's Community Development Block Grant (CDBG), HOME, Emergency Shelter Grant (ESG), Housing Trust Fund (HTF) and Housing Opportunities for People with AIDS (HOPWA) programs, and from other state and federal sources.

The preparation of this One Year Action Plan has considered and been informed by the development of the FFY – 2025-2029 Five-Year Consolidated Plan. Publication of this draft Massachusetts CDBG One-Year Action Plan is taking place concurrent with the Five-Year Consolidated Plan/Annual Update public participation schedule that incorporates the HOME, ESG, HTF and HOPWA programs. EOHLC posted a proposed changes memo on August 20, 2024, and widely disseminated to interested parties and potential stakeholders thereafter. A public information session occurred on September 10, 2024. A formal public hearing on the annual update to the One Year Action Plan will be held in early 2025.

**MASSACHUSETTS CDBG  
ONE-YEAR ACTION PLAN FOR FEDERAL FISCAL YEAR 2025**

***INTRODUCTION:***

This One Year Action Plan describes the proposed use of Community Development Block Grant (CDBG) funding received by the Commonwealth of Massachusetts. The CDBG Program is a significant source of federal funding administered by the Executive Office of Housing and Livable Communities (EOHLC), supporting a variety of community development efforts to revitalize our communities, meet the housing and service needs of our low and moderate-income population, build and repair infrastructure vital to the health and safety of residents, and support business development and retention. The One Year Plan addresses the basic features of the state's CDBG program, the applicable federal regulations and requirements governing state and local administration of this program, and the state's policies, administration responsibilities, and description of the program components.

In its administration of CDBG funding, EOHLC is committed to:

- Programs and funding that primarily target populations of low- and moderate-incomes, and those with special needs;
- Addressing the most urgent needs and interests of communities;
- Programs and technical assistance designed to facilitate informed decision-making about community development opportunities at the local level, and to encourage self-sufficiency of residents and communities; and

For FFY 2025, EOHLC will continue to implement HUD's Outcome Performance Measurement System. The proposed system incorporates the following three Objectives set forth in the Housing and Community Development Act of 1974: 1) create suitable living environments, 2) provide decent housing, and 3) create economic opportunities. The system directs applicants/grantees to select an Objective coupled with one of the following three Outcomes to help define the intent of the activity: 1) availability/accessibility, 2) affordability, 3) promoting livable or viable communities. Therefore, for each proposed activity the applicant will select one of nine Outcome Statements. The proposed system will not change the nature of the program or its regulations. The Massachusetts CDBG Program currently asks applicants to describe the need the activity addresses, as well as the anticipated impact. This system creates a framework that allows consistent reporting to HUD on a national level.

The One Year Action Plan is organized into the following sections:

- |            |  |
|------------|--|
| SECTION A. | Massachusetts CDBG Priorities                                  |
| B.         | Eligible Municipalities  |
| C.         | Eligible Projects/Use of CDBG Program Funds                    |
| D.         | Applicant/Project Threshold Criteria                           |
| E.         | Allocation of CDBG Funds to the Commonwealth                   |
| F.         | Availability of CDBG Program Funds                             |
| G.         | Evaluation Criteria for All Program Components                 |
| H.         | Program Sanctions  |
| I.         | Citizen Participation Requirements for Applicants and Grantees |
| J.         | CDBG Program Components (description)                          |

## **A. MASSACHUSETTS CDBG PRIORITIES**

The Community Development Block Grant (CDBG Program) was authorized by Congress and is funded under Title I of the Housing and Community Development Act of 1974, as amended. The Commonwealth of Massachusetts has designated the Executive Office of Housing and Livable Communities (EOHLC) as the state's administering agency for CDBG funding. The primary objective of the federal statute creating the CDBG Program is: "...to develop viable, urban communities by providing decent housing and suitable living environment and expanding economic opportunities principally for low- and moderate-income persons." EOHLC will fund eligible projects designed to meet this objective.

EOHLC encourages:

- development and preservation of affordable housing;
- proactive and coordinated planning oriented towards both resource protection and economic activity;
- community revitalization that is integral to community development;
- public social services designed to build economic security and self-sufficiency, address homelessness and workforce development; and
- local participation in community-based planning that assesses needs and identifies strategies for addressing those needs

The Act requires that at least 70 percent of CDBG assistance shall be used to support activities that directly benefit low- and moderate-income citizens of the Commonwealth. In addition, the Massachusetts CDBG Program encourages joint or regional applications so that program funds will be used to benefit a greater number of municipalities.

## **B. ELIGIBLE MUNICIPALITIES**

There are 351 municipalities incorporated in Massachusetts. The U.S. Department of Housing and Urban Development (HUD) has designated 38 as CDBG *entitlement* communities; in general, these communities exceed 50,000 in population and receive CDBG funds directly from HUD. Any city or town **not** designated as an entitlement community by HUD may apply for and receive Massachusetts Community Development Block Grant funds. (Refer to Exhibit 1 for a listing of Massachusetts' entitlement communities.)

## **C. ELIGIBLE PROJECTS**

The following projects are eligible for funding under the Massachusetts Community Development Block Grant Program:

- planning;
- housing rehabilitation and creation of affordable housing;
- economic development projects;
- efforts directed toward rehabilitation and stabilization of existing neighborhoods, commercial areas and downtowns;
- infrastructure;
- construction and/or rehabilitation of community facilities; and
- public social services

EOHLC will accept applications through two distinct funds. The rules and program guidelines for these are set forth in Section J: *PROGRAM COMPONENTS*.

## LIMITATIONS ON THE USE OF PROGRAM FUNDS

❖ **Buildings used for the general conduct of government** - Assistance related to buildings used for the general conduct of government is specifically excluded from the program by federal statute, except for the removal of existing architectural barriers to improve access for people with disabilities. Such work is permitted on municipal buildings such as city or town halls, public works structures, public safety buildings, etc.; however, the use of CDBG funds is limited to the relevant barrier removal work. The funds must be directed to the removal of material and architectural barriers, which restrict the mobility, and accessibility of elderly and severely disabled adults. While all building codes must be met in a construction project, compliance with most codes cannot be considered as directly related to removing existing architectural barriers. In most instances, work required to meet these codes, even though it may be closely associated with or required to receive a permit for the barrier removal project, is not eligible as an ABR project under Section 105(a)(5). Applicants must include a funding commitment letter with the application to show that there is funding set-aside for the work that is ineligible for CDBG funding. All cost estimates must clearly break out the CDBG/Non-CDBG eligible expenses.

### ❖ **Public Social Services**

Public Social Services projects are not eligible as a “stand-alone” application under the Community Development Fund or Mini Entitlement Program.

Public Social Services cannot exceed 20% of a Community Development Fund, or Mini- Entitlement grant. EOHLC encourages municipalities to pursue activities that build economic security and self-sufficiency as well as Public Social Services activities that address homelessness and workforce development and seek to build social capital, increase economic mobility and enhance civic engagement. The following are Public Social Services that meet this definition:

- ABE/GED classes
- Domestic Violence Prevention
- Earned Income Tax Credit (EITC) Counseling and Preparation
- Elder Self-Sufficiency
- Family Stabilization
- Financial Literacy
- Homebuyer Counseling and First Time Home Buyer (FTHB) programs
- Individual Development Accounts (IDAs)
- Job Training
- Job-Related Childcare Assistance
- Job-Related Transportation Assistance
- Literacy Programs and Training
- Mortgage Foreclosure Prevention Counseling
- Substance Abuse Services

In describing a requested Public Social Services activity, applicants must demonstrate that the activities have been prioritized at the local level in order to determine the request for services. Such prioritizing must demonstrate an understanding of the needs assessment undertaken by the community’s Community Action Agency and not be inconsistent with such Agency’s assessment of service needs.

Applicants may apply for no more than five Public Social Services activities.

Municipalities must demonstrate that, in accordance with Section 105(a)(8) of the Housing and Community Development Act, proposed social service activities have not been funded by the community using municipal and/or state funds within 12 months prior to the application.

EOHLC will fund public social service projects that are not provided by other state or federal agencies or are currently provided but are not available to CDBG-eligible residents in the applicant municipalities.

Applicants proposing projects for the modernization of public housing facilities must provide evidence that the project has been reviewed and approved as it is described in the application by staff of the Bureau of Public Housing and Construction at EOHLC.

Planning funds may not be used to plan for public social service programs except as part of a broader community development planning project.

- ❖ **Downtown/commercial target area related projects** – Municipalities may apply for funds for downtown or commercial district related projects under the Community Development Fund or the Mini Entitlement Program. Such projects may include sign/facade programs and streetscape improvements, or other infrastructure improvements located in a downtown or commercial district delineated in the slums and blight documentation. Municipalities may also apply through the Community Development Fund and Mini Entitlement Program for funds for rehabilitation or adaptive re-use of mixed-use buildings located in downtown or commercial center areas. Applicants should contact CDBG staff prior to applying for these types of projects. Funds may be used for acquisition, demolition, and building rehabilitation activities when clearly linked to economic development and jobs.

EOHLC may fund projects that support physical downtown and commercial area revitalization efforts; however, municipalities may apply to Mass CDBG for downtown/commercial target area related projects in their downtown or commercial target areas only if they have satisfactorily demonstrated to EOHLC that the proposed project is located in an area meeting National Objective compliance requirements set forth in the Application Guidance.

CDBG funds **cannot** be used to fund overhead costs or management salaries related to the operation of a downtown organization, nor can they be used for any organizational development for a downtown organization or committee.

- ❖ **15 Year Housing Affordability Term** – In an effort to increase the supply of affordable housing, all projects supporting the creation, preservation, and rehabilitation of rental and owner-occupied housing units must be affordable to low- and moderate- income households for a 15-year period. Rehabilitation assistance for owner-occupied properties must be secured by a mortgage or lien on the subject property that includes language restricting rent levels in low- and moderate- income units for a period of fifteen years. Rehabilitation assistance for investor-owned properties must be secured by a mortgage or lien, and the affordability requirements must be secured by an **Affordable Housing Restriction** [provided by EOHLC] on the subject property that runs with the land, and that includes language restricting rent levels in low- and moderate-income units for fifteen years. “Owner-occupied” is defined as a property of no more than four (4) units, one of which is occupied by the owner. All other properties are considered “investor owned.”
- ❖ **Lead Remediation up to \$25,000 as grant** – lead remediation work in the amount up to \$25,000 may be offered as a grant as part of a Housing Rehabilitation Program. The grant is based on the work write-up and cost estimate for remediation. Any lead work exceeding \$25,000 must be part of the standard lien that

applies to other state sanitary code violation corrections. Please note, the grant cannot be applied to the cost of lead testing.

- ❖ **Build America Buy America requirements** – Build America, Buy America Act (BABA) Requirements under Title IX of the Infrastructure Investment and Jobs Act (“IIJA”), Pub. L. 177-58. Absent a waiver, and provided this project is receiving more than \$250,000 in total project costs from all sources, all iron and steel products, as well as specific construction materials, including metals, PVC pipe, lumber and drywall, not listed construction materials (all other plastic- and polymer-based products, glass, fiber optic cable, optical fiber, engineered wood, and drywall) and manufactured products used must be produced in the United States, as further outlined by the Office of Management and Budget’s Memorandum M-22-11, Initial Implementation Guidance on Application of Buy America Preference in Federal Financial Assistance Programs for Infrastructure, April 18, 2022. Municipalities must include BABA language in contracts for projects and factor the requirement into the cost estimate, as applicable. More information can be found in [CPD 23-12: Implementation Guidance for BABA](#).

<b>D. APPLICANT/PROJECT THRESHOLDS</b>
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It is the responsibility of the applicant to ensure adherence to the applicable threshold(s). The following standard threshold criteria (1 through #7) apply to all applications:

1. **Eligibility** – The project must be eligible as defined in §105(a) of Title I of the Housing and Community Development Act, as amended.
2. **National Objective** – Each project must meet one of three federal national objectives as defined below and in federal regulations 24 CFR 570.483:
  - a. benefit a majority of low- and moderate-income persons;
  - b. aid in the prevention or elimination of slums or blight; or
  - c. meet an urgent condition posing a serious threat to the health and welfare of the community and where other financial resources are not available to meet such needs. This objective is extremely difficult to meet and is generally limited to unexpected events such as natural disasters. Prior approval from Massachusetts CDBG must be obtained to use this national objective.

3. **Timely Expenditure** –

Mass CDBG requires that all lead applicants with open CDBG grants comply with a timely expenditure threshold. To apply for FFY 2025 CDBG<sup>1</sup> funding, a municipality must demonstrate, using the most recent financial status report produced by EOHLC’s grant management system, at the time of submission of application for FFY 2025 funds that:

1. 100% of all grant funds awarded to the municipality for FFY 2021 and earlier FFYs have been fully expended;
2. 50%% of all grant funds awarded to the municipality for FFY 2022/2023 have been fully expended; and

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<sup>1</sup> CDBG includes CDF, Mini-Entitlement, and Reserves, but for the purposes of this calculation excludes Section 108 guarantees. Planning- only grants of \$50,000 or less are also excluded from this calculation. This includes regional applicants.

3. for the municipality's FFY 2024 grant funds, all required procedural clearances (environmental review, special conditions and administrative services procurement(s)) have been completed.

On a case-by-case basis, EOHLC reserves the right to waive strict compliance with the threshold standards for events beyond the control of applicants, which the applicants have the burden to demonstrate. Please note, however, that for this grant round, if a municipality is less than 50% expended in the FFY21 award, a waiver will not be granted **unless good cause and a plan for implementation of funds can be demonstrated**. Municipalities must contact their program representative to find out how to apply for a waiver. Waiver requests should be submitted no later than March 14, 2025, otherwise, it may not be considered. EOHLC may at its discretion review waiver requests submitted after, March 14, 2025, if the municipality demonstrates good cause for not submitting its request to EOHLC by such date.

All lead applicants must meet this threshold at the time of application for all MA CDBG components. Municipalities that do not meet this threshold will be eliminated from further MA CDBG funding consideration. *Active grants* include those for which project activities have yet to be completed and payments are outstanding. *Unexpended CDBG funds* are defined as funds awarded for eligible Massachusetts CDBG program costs but not expended.

A Mini-Entitlement community that cannot meet this threshold may have its award amount reduced based on defined grant limitations.

4. **Displacement of Non-CDBG Funds** – Applicants shall certify in the application that CDBG funds will not be used to displace non-CDBG funds already appropriated by or to the community for a specific project. EOHLC will reduce an award, deny a grant, or impose special conditions in a grant contract with that community to assure compliance with this requirement.

5. **Community-Based Planning Requirement** – The Executive Office supports municipal efforts to engage in community-based planning, conduct needs assessments and identify strategies for addressing those needs. EOHLC seeks to fund projects identified through meaningful, public community-based planning and priority setting processes. Therefore, projects must be consistent with community efforts to identify needs and engage in strategic planning for addressing those needs. This helps to ensure that local needs have been identified and priorities determined in a comprehensive manner, and public resources are directed toward projects that address needs the community has identified as high priority. All applicants and participants should have engaged in a community-based planning process and be able to demonstrate project development as a result of this process. Applicants will be asked to address community planning through responses to scored questions in the application.

Mini-Entitlement communities must have Community Development Strategies (CDS) and be able to demonstrate proposed application project's consistency with the CDS. The Strategy (not to exceed three pages) is based on various planning documents used by a community and outlines a plan of action intended to accomplish specific community development goals that will have an impact on the community. The CDS identifies the goals and objectives of community development efforts over a 3-to-5-year period and explains how the community expects to address the priorities with CDBG and non-CDBG funds. Each activity included in a Massachusetts CDBG Mini-Entitlement application must relate to and be reflected in the Strategy. The CDS is valid for a three-year period beginning with the strategy that was submitted with the FFY 2024 application.

- a. The CD Strategy must clearly identify the goals for community development and describe the way a community will accomplish projects and activities which include but are not limited to those in the CDBG Mini-Entitlement application. All activities in the CDBG Mini-Entitlement application must be identified in the Strategy.
- b. The Strategy must conclude with a list of projects and activities in order of the priority in which the community intends to undertake them and provide specific goals and annual timelines for accomplishing



its goals.

- c. Strategies may be amended. Any substantial change to the CDS must be presented in a public municipal forum, meeting, or hearing held at least two (2) months prior to the submission of a Mass CDBG application.

5. **Outcome Performance Measurement System** – HUD issued a Final Notice on March 7, 2006, on its Outcome Performance Measurement System. Through the system HUD will collect information on activities undertaken in the following programs: HOME, CDBG, HOPWA and ESG, and aggregate that data at the national, state, and local level. The outcome measures framework contained herein will satisfy the requirements contained in the HUD notice, along with any revisions adopted by HUD.

The system incorporates the following three objectives set forth in the Housing and Community Development Act of 1974: 1) create suitable living environments, 2) provide decent housing, and 3) create economic opportunities. Beyond that, the system directs applicants/grantees to select from one of the following three outcomes to help define the intent of the activity: 1) availability/accessibility, 2) affordability, and 3) promoting livable or viable communities.

Based on the applicant's purpose for undertaking a project or activity, the applicant will determine and state in the application what the intent of the project is with one of the nine Outcome Statements.

The system will not change the nature of the program or its regulations. The Massachusetts CDBG Program currently asks applicants to describe the need the activity addresses, as well as the anticipated impact. This system creates a framework that allows consistent reporting to HUD on a national level.

Each outcome category can be connected to each of the overarching statutory objectives, resulting in a total of nine groups of outcomes/objective statements under which the grantees would report the activity or project data to document the results of their activities or projects. Each activity will provide one of the following statements,

although sometimes an adjective such as new, improved, or corrective may be appropriate to refine the outcome statement.

- Accessibility for the purpose of creating suitable living environments
- Accessibility for the purpose of providing decent affordable housing
- Accessibility for the purpose of creating economic opportunities
- Affordability for the purpose of creating suitable living environments
- Affordability for the purpose of providing decent affordable housing
- Affordability for the purpose of creating economic opportunities
- Livable communities for the purpose of creating suitable living environments
- Livable communities for the purpose of providing decent affordable housing
- Livable communities for the purpose of creating economic opportunities

In addition, there are certain data elements commonly reported by all programs, although each of the four programs may require different specificity or may not require each element listed below. Grantees will only report the information required for each program, as currently required. No new reporting elements have been imposed for program activities that do not currently collect these data elements. The elements include:

- Amount of money leveraged (from other federal, state, local, and private sources) per activity;
- Number of persons, households, units, or beds assisted, as appropriate;
- Income levels of persons or households by 30 percent, 50 percent, 60 percent, or 80 percent of area median income, per applicable program requirements. However, if a CDBG activity benefits a target area, that activity will show the total number of persons served and the percentage of low/mod persons served. Note that this requirement is not applicable for economic development activities awarding funding on a “made available basis;”
- Race, ethnicity, and disability (for activities in programs that currently report these data elements)

Finally, grantees will report on several other indicators, required as applicable for each activity type. These will be established in each program component application, and within the grant management system.

HUD will combine the objectives, outcomes, and data reported for the indicators to produce outcome narratives that will be comprehensive and will demonstrate the benefits that result from the expenditure of these federal funds.

6. **Regional Applications** – Each community in a regional application must comply with the same requirements as individual municipalities in individual applications, to participate in a regional grant. For example, each participating municipality must have been identified and be part of the required public participation/hearing process and the community must submit all required signatures. **The exception to this is the timely expenditure requirements under D (3) above, which just applies to lead municipalities.** Municipalities that fail to comply will be dropped from consideration as a regional participant and the application will be reviewed based on those municipalities that have complied with the requirements. As a result, the number of participating municipalities and/or the dollar amount requested in a regional application may be reduced during the review process.

Additional threshold criteria #9 through #12 apply to specific program applications or types of projects.

7. **Public Benefit Standards** – Economic development projects that are eligible under Title I of the Housing and Community Development Act of 1974, Sections (14), (15) and (17) must meet CDBG standards of underwriting and public benefit. Eligible projects under 105(a)(2) may also be required to meet public benefit standards when undertaken for Economic Development purposes.

8. **Senior Center Projects** – Applicants for Senior Center projects must meet the following threshold requirements to have their applications reviewed and scored:

- (i) provide evidence of site control<sup>3</sup> by the municipality, as attested to by the Mayor or Select Board/Board of Selectmen,
- (ii) provide documentation of the availability and commitment of any other funds necessary to complete the project, and
- (iii) provide one copy of the bid-ready plans<sup>4</sup> prepared by a licensed architect or engineer, a table of contents for the bid specifications and a letter signed by the project architect or engineer attesting to the fact that a complete set of specifications has been prepared and is bid-ready (modular construction may require a lesser standard – see Project Threshold Criteria #12).

CDBG-assisted senior center projects may not receive subsequent CDBG assistance for additional construction or reconstruction if the work substantially disrupts the use, until five (5) years have passed since the grant closeout.

As with other types of public facilities, the use of the facility may not change for a period of five years without prior consultation with EOHLIC to ensure that the change of use is consistent with federal regulations.

9. **ADA Self Evaluation Survey and Transition Plan and Architectural Barrier Removal** – All municipalities applying for CDBG funds must submit a copy of its ADA Transition Plan or provide a statement that the municipality does not have one. If a municipality does not have a current ADA Transition Plan, it will be referred to the Massachusetts Office on Disability (MOD) for execution of an MOU towards development of a Plan; all lead applicants and joint applicants that applied to 2017, 2018, 2019, 2020, 2021, 2021,2022/2023 and 2024 CDBG funding rounds have met this requirement.

**A municipality applying for assistance with an architectural barrier removal (ABR) project must submit a copy of its locally approved Americans with Disabilities Act (ADA) Self Evaluation Survey and Transition plan that identifies the proposed ABR activity. If a municipality does not have an approved Transition Plan, it may not receive funding for an ABR project.** The ADA was enacted in 1990 and requires local governments to evaluate for accessibility all of its programs and services that had not previously been reviewed under Section 504 of the Rehabilitation Act of 1973. The Act also required preparation of a Transition Plan for removal of programmatic and structural barriers to its programs and services and set forth a process for involving the community in the development of the Self Evaluation Survey and Transition Plan. Programmatic removal of barriers must be fully explored before considering CDBG funding for structural barrier removal. This requirement should be addressed in the application's project description for the ABR project. Submission of the Transition Plan is a required threshold for Architectural Barrier Removal applications.

It is the responsibility of each community to ensure that its Transition Plan is consistent with federal regulations. A community request for Mass CDBG funding must be consistent with the priorities set forth in these locally developed documents. Municipalities may wish to contact the Massachusetts Office on Disability or the U.S. Department of Justice for specific questions regarding the ADA and the Rehabilitation Act of 1973.

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<sup>3</sup> Evidence of site control may include but is not limited to a deed, long-term lease agreement, purchase and sale agreement, or other contract or legal document.

<sup>4</sup> Bid-ready plans and specifications are those construction documents that constitute a presentation of the complete concept of the work including all major elements of the building and site design. The bid documents shall set forth in detail and prescribe the work to be done by the construction specifications; the materials, workmanship, finishes, and equipment required for the architectural, structural, mechanical, electrical and site work; and the necessary solicitation information. Drawings shall include the following: a) Site plan showing the location and type of building; b) Scale plans of the building; c) Wall sections, details, and elevations in sufficient detail to serve as a basis for a construction estimate; d) All other required architectural, civil, structural, mechanical and electrical documents necessary to complete the project.

Applications for **Architectural Barrier Removal** projects with a total construction cost of \$200,000 or more require bid-ready plans and a letter signed by the project architect or engineer attesting to the fact that a complete set of specifications has been prepared and is bid-ready in each copy of the application. Projects less than \$200,000 but more than \$25,000, require design development drawings.

Finally, when used for Architectural Barrier Removal, CDBG funds may be used only for the relevant barrier removal work (i.e. -directly related and required for ABR). CDBG funds cannot be used to address building code or local requirements that are not directly part of the removal of the architectural barrier.

10. **Bid-ready Plans and Specifications** - Bid-ready plans and a letter signed by the project architect or engineer attesting to the fact that a complete set of specifications has been prepared and is bid-ready ***are required*** for all public facilities (including parks/playgrounds) and architectural barrier removal projects with a construction cost of \$200,000 or more (see definition in footnote #4). Design development drawings are required for public facilities and architectural barrier removal projects, with a total construction cost of more than \$25,000 but less than \$200,000.

In addition, EOHLC recognizes that this requirement may be problematic for municipalities considering modular construction projects. To satisfy these concerns, to apply for assistance to undertake modular construction a community may instead provide EOHLC with a reasonable cost estimate for the project. Detailed backup for the total costs for modular construction projects must include the cost of site preparation, off-site construction of the modular unit, and the cost of delivering and assembling the modular unit including all work necessary - including but not limited to all utility work and sub-trades - to result in the issuance of an occupancy permit. To accomplish this, the community must provide the following: the program for the building; plans, specs, and prices of comparable unit(s) from a manufacturer; evidence of the manufacturer's ability to deliver the unit during the timeframe for construction identified in the grant application; and a site plan.

11. **Project Consistency with Application** - All municipalities (including both CDF and Mini-Entitlements), upon award and subject to applicable clearances, should proceed with the projects that were submitted and reviewed as part of the application submission. EOHLC reserves the right to waive this requirement if there are extenuating circumstances, such as feasibility or funding issues that were discovered post-submission. EOHLC will consider the level of citizen participation and feedback from community stakeholders in determining need before approving any new proposed project. If a new activity is added to a grant, it must comply with all application requirements.

12. **Housing Rehabilitation Funds – Prior Performance** -

Applicants must provide a one-page rationale, including status update of recent HR programs<sup>5</sup> if applicable, to justify requested amount. The rationale should be uploaded as an attachment to the Other Attachments link. Applicants should ensure that the amount requested does not exceed the funding required for an 18-month implementation period and that the amount of funding identified connects to an existing, defined need.

If an applicant is applying for a Housing Rehabilitation activity, EOHLC reserves the right to reduce the amount requested. EOHLC will consider the past performance in the management of state grants, including but not limited to CDBG, by the applicant community and its administering agency or project sponsor, including continuing prior performance issues such program extension requests, program amendments and requests to re-program past grant funds due to inability to complete the originally awarded activities. EOHLC may also reduce an award based on the amount of HR funds remaining in previous grants. Please note, if the municipality is less than 40% expended as reflected in GMS for their housing rehabilitation activity from a FFY21 CDF grant at the time the application opens, the municipality may not apply for this activity either as a lead or participating community in this application round.

<sup>5</sup> The status update should be organized by grant year (if multiple years of funding remain) and include original budget, commitments, expenditures, original goals, status of projects to date, reasons for any delays in implementation, revised timeline for completion and approach to resolve if delayed.

**E. ALLOCATION OF CDBG FUNDS TO THE COMMONWEALTH**

EOHLC proposes the following allocation of 2025 funds based on level funding with FFY2024.

The federal Fiscal Year 2024 HUD allocation to the Commonwealth of Massachusetts was \$34,869,850. In addition to the HUD allocation, EOHLC expects to receive approximately \$50,000 in program income, for a total of \$34,919,850 proposed available for FFY2025 based on the FFY 2024 funding level. These funds will be distributed during the program year to eligible cities and towns in accordance with the allocation among program components outlined below.

MA CDBG PROGRAM COMPONENT	FFY 2025 ALLOCATION
Community Development Fund	\$24,637,133
Mini-Entitlement Program	\$8,550,000
-Section 108 Loan Guarantee*	\$10,000,000
Reserves	\$250,000
Section 108 Loan Repayments** (No. Adams, Everett)	\$336,622
Administration and Technical Assistance	\$1,146,095
<b>TOTAL AVAILABLE</b> (includes \$34,869,850 allocation plus \$50,000 in program income)	\$34,919,850
*Section 108 Loan Program allocation does not impact the FFY 2025 Allocation	
**Section 108 Loan Repayments are budgeted but not necessarily required. This is an “up to” amount. Amounts not required for repayment to HUD will be reallocated to other components.	

Reallocation of funds among program components: During the year, EOHLC may have cause to recapture earlier program year funds from non-performing grantees; or there may be small amounts of program funds from prior years that have yet to be used; or there may be opportunities to recapture program income generated by municipalities from earlier projects; or there may be extreme demand for one program component; or there may be minimal demand for one component. Funds will be reallocated depending on the timing of other components and the apparent demand for funds or to address emergency situations during the program year. When awarding those funds EOHLC will use current program guidelines as established in the most recent One Year Plan. EOHLC reserves the right to increase or decrease the allocation of a program component. When these cumulative changes meet the threshold criteria of an amendment, EOHLC will follow the process in accordance with the State’s Consolidated Plan and regulations at 24 CFR 91.505. EOHLC may also have cause to fund from any allocation or resources to respond to corrective actions after program closeouts or because of other administrative errors.

EOHLC estimates that it will receive approximately \$300,000 in funds returned from prior years activities. These funds will be allocated through the Community Development Fund. In addition, EOHLC estimates that up to

\$500,000 in locally held program income will be applied to activities including housing rehabilitation and infrastructure improvements.

Prior to the award of FFY 2025 funds, EOHLC may have the opportunity to transfer program income funds from NSP grantees to the State CDBG Program. It is EOHLC’s intent to add these funds, if they become available, to the FFY 2025 allocation and make them available to FFY 2025 applicants. At this time, EOHLC does not have an estimate of the amount of funds that may become available.

**F. AVAILABILITY OF CDBG PROGRAM FUNDS**

All CDBG program funds will be available to eligible grant recipients based on application guidance for Massachusetts Community Development Block Grant funds and/or Notices of Funding Availability. These documents will make municipalities aware of the requirements of each component and will be available to allow municipalities adequate time to prepare grant applications for each program.

The policy that a single community may receive no more than \$1.35 million from the Community Development Fund within two successive years is waived for FFY 2025. Applicants to the FFY 2025 program will not have the two-year limitation applied based on FFY 2024 awards. EOHLC will review the policy going forward in subsequent One Year Plans.

Listed below are application distribution dates for each program and the corresponding due dates. A Notice of Availability of Funds will be issued, as appropriate, prior to the release of each Application subject to the availability of federal funds. The projected timeline may be shifted later depending on when the application component of the GMS upgrade is ready to go-live. Updates will be provided on the CDBG webpage on [Mass.Gov Community Development Block Grant \(CDBG\) | Mass.gov](https://www.mass.gov/community-development-block-grant-cdbg).

Program Components <sup>6</sup>	Application Issued	FFY 2025 Applications Due
Community Development	Late January 2025	Monday, April 14, 2025
Mini Entitlement Program	Late January 2025	Monday, April 14, 2025

**G. EVALUATION CRITERIA APPLICABLE TO ALL CDBG PROGRAMS**

EOHLC reserves the right to incorporate any or all of the following Evaluation, Regulatory and Performance criteria in its award decisions:

**Evaluation:**

- solicit and verify information from any local, state or federal agencies and other entities, and based on that information, reduce, increase or deny an award to a community.
- conduct site visits for any proposed CDBG project or solicit additional information from applicants to confirm or clarify factual or procedural responses to application requirements such as copies of

<sup>6</sup> The FFY 2025 applications will be operative upon their release. Actual release of funds is contingent on HUD approval of the state’s One Year Plan and will be dictated by the date the state receives HUD approval on its Plan.



legal advertisements, minutes, survey instruments, letters, etc. Acceptance of these materials is subject to EOHLC's satisfaction that the omitted material was in existence at the time of application and submission of the requested documents within a specified timeframe. Additional information regarding responses to competitive questions will not be accepted.

- reduce or increase an award to a community to assure that a grant budget is reasonable.
- fund, fully or partially, a project from other state resources.
- reduce or deny a grant, or place special conditions on a grant, based on the management capacity of the municipality or the current or proposed administering agency.
- reduce an award to a community with an uncommitted program income balance. The program income account balance in EOHLC's Grant Management System must be maintained to match the bank program income account statement balances. Grantees must update the program income account on a regular basis and at a minimum quarterly. Upon award, grantees must add the committed program income funds to the cited grant activity(ies) through the grant amendment process.
- resolve tie scores in a competitive fund by applying the criteria below in the following order:
  1. Applications from municipalities that have not received funding in the prior three funding cycles;
  2. Applications for projects that increase the community's supply of affordable housing units;
  3. Regional applications;
  4. Applications for housing and/or economic development projects that are consistent with the goals of the Administration; and
  5. If scores remain tied after the application of steps #1 through 4, EOHLC will conduct a lottery at which a representative from HUD will be present.

#### Regulatory:

- ensure that at least 70 percent of CDBG assistance, as per federal statute, is used to support projects that directly benefit low- and moderate-income persons of the Commonwealth.
- ensure that no more than 15 percent of the FFY 2025 Massachusetts CDBG allocation is for public social service activities as per federal regulation.
- deny a grant, or a portion thereof, to ensure that no more than 20 percent of the FFY 2025 Massachusetts CDBG allocation is for planning and administration as per federal regulation.
- not review an application unless signed by the municipality's Chief Elected Official.

#### Performance:

- reduce an award, deny a grant, or impose special conditions on a community with prior year grants with a low rate of committed or expended dollars. This includes reductions in awards for projects funded in previous rounds for which unexpended funds remain.
- reduce an award, deny a grant, or impose special conditions on a community with outstanding, major findings that are unresolved at the time application decisions are being made; or which have otherwise had a history of significant, repeat findings. These findings could have resulted from any grant program offered by EOHLC.

*Major findings* mean non-compliance with a statutory requirement which, if not satisfactorily resolved by the community, would require that the federal funds be repaid by the municipality, or result in other serious sanctions.

*History of significant, repeat findings* means non-compliance with statutory or regulatory requirements in more than one grant cycle, where the community may have resolved those findings but with an unacceptably slow response.

- consider the past performance in the management of state grants, including but not limited to CDBG, by the applicant community and its administering agency or project sponsor, including continuing prior performance issues such as program extension requests, program amendments and requests to re-program past grant funds due to inability to complete the originally awarded activities.

### Awarding of Grants

Based on the scores produced through the review process, grant award recommendations are made to the Secretary of EOHLC, whose decision is final. In the competitive program, grants are awarded for projects to municipalities that receive the highest activity scores, and which meet applicable thresholds until all available funds are distributed. EOHLC reserves the right to award a grant in whole or in part, or to reject any and all proposals received.

### Grievance Procedure

Within forty-five (45) days of the date of the Secretary's written notice of grant determinations to applicant cities and towns, any municipality aggrieved by EOHLC's decision may challenge the denial of its grant by submitting a letter of appeal from the Chief Elected Official of the municipality to the Secretary, who shall respond no later than forty-five (45) days from the date of receipt of the municipality's appeal.

## **H. PROGRAM SANCTIONS**

EOHLC reserves the right to suspend payments under this contract or to terminate grant awards upon a finding by EOHLC, at its sole discretion 1) of any noncompliance, fraud, abuse, poor performance, misrepresentation, or extreme mismanagement, by the municipality or its subcontractors; or 2) that the municipality, or any of its subcontractors including any entities hired to perform grant management activities on its behalf, is unable to carry out its obligations under the award contract or its application. Prohibited or unauthorized expenses may be subject to requests to refund such expenses to HUD. Further, in the event that EOHLC finds that a project's budget is inadequate to fully implement any project as approved, EOHLC reserves the right to review and to either require a change in project scope to make such project fundable or to otherwise recapture the project's funds. In addition, if excess funds remain unspent from an activity prior to the end of period of performance, either due to budgetary reasons or because of less demand for the activity than projected, the Municipality must return the funds upon EOHLC's demand, unless EOHLC otherwise approves reprogramming of the awarded funds. In the event that a new activity is added to a grant, it must comply with all application requirements.

EOHLC's preference is to approve reprogramming for the following purposes and in the following order:

- Funds will be used for eligible housing activities, including, but not limited to, housing rehabilitation, aging in place programs, code enforcement and first-time homebuyer assistance
- Other existing CDBG-funded, eligible activities

If the excess funds cannot be used consistent with these preferences, EOHLC will require a detailed request describing



the reprogramming and may require that the funds be returned. Requests to reprogram funds should be submitted in a timely manner and meet all application requirements. EOHLC will not be inclined to extend grants beyond a three-year period.

The community staff and Chief Elected Officials will have the opportunity to discuss possible sanctions prior to any formal action. If formal sanctions are recommended, grantees will be provided with a full opportunity to appeal such decisions to the Secretary of EOHLC before any final action is taken.

All program funds recaptured through the sanctions process will be re-programmed consistent with the procedures in (E) *Allocation of CDBG Funds* and (J) *CDBG Program Components*. Based on the significance of the issues involved in any such determination, EOHLC may suspend, for a period of up to three (3) years or until final resolution is achieved, a community's eligibility to participate in any Massachusetts CDBG component. Such action will only be taken in extreme circumstances and only after all alternatives have been exhausted.

## **I. CITIZEN PARTICIPATION REQUIREMENTS FOR APPLICANTS AND GRANTEEES**

All applicants for funding under the FFY 2025 Massachusetts CDBG Program must comply with the citizen participation requirements contained in Section 508 of the Housing and Community Development Act of 1987. EOHLC expects citizen involvement in the identification of community development needs, the development of applications, program assessment and evaluation. Municipalities must include in their Massachusetts CDBG application a local citizen participation plan detailing how the community will provide:

1. citizen participation, with particular emphasis on participation by persons of low- and moderate-income, residents of slums and blighted areas and of areas in the state where CDBG funds are proposed to be used, particularly residents of a proposed target area.
2. reasonable and timely access to local meetings, information, and records relating to the grantee's proposed use of funds and relating to the actual use of funds.
3. information on the amount of state CDBG funds available during the year; the range of eligible CDBG activities; and how activities will benefit low- and moderate-income persons.
4. technical assistance to groups representative of persons of low- and moderate-income that request such assistance in developing proposals.
5. a **minimum of 2 public hearings**, each at a different stage of the program (development and implementation), to obtain citizen views and to respond to proposals and questions at all stages of the community development program, including at *a minimum* (a) the development of needs, (b) the review of proposed activities, and (c) review of program performance. These hearings shall be held after adequate notice (minimum of 15 days, per HUD), at times and accessible locations convenient to potential or actual beneficiaries, and with accommodations for persons with disabilities, and allow for written comments to be submitted. In cases of joint applications, all applicant municipalities must be included in the notice and participate in the public hearing. At least one public hearing must be held at least 14 days prior to the submission of an application; a second must be held during the course of the grant year; both **must provide the process for the submission of written comments**;
6. a timely written answer to written complaints and grievances, within 15 business days of receipt where practical; and
7. the plan must also identify how all residents and beneficiaries, including minorities and non-English speaking persons, as well as persons with disabilities can be reasonably expected to participate in the program in general, and at public hearings in particular.

**J. CDBG PROGRAM COMPONENTS**

This section briefly describes the components of the Massachusetts CDBG Program. Each program component description includes eligible uses, grant award amounts, and evaluation and award criteria. In the event of conflicting language, this One Year Action Plan takes precedence over language in all program component applications. The program components are:

1. Community Development Fund
2. Mini-Entitlement Program
3. Section 108 Loan Guarantees
4. Reserves
5. Administration and Technical Assistance by EOHLC

➤ All applications to MA CDBG are submitted online and will only be accepted using EOHLC’s web-based system. Further details and training information will be available as application materials and details are released.

**1. COMMUNITY DEVELOPMENT FUND**

**Program Description**

The Community Development Fund (CDF) awards grants to municipalities throughout the Commonwealth. This program helps eligible cities and towns to meet a broad range of community development needs in housing, infrastructure, downtown revitalization, economic development and public social services. It supports CDBG-eligible activities and encourages applicants to develop coordinated, integrated and creative solutions to local problems. The CDF is available to all municipalities and will make all CDBG eligible activities available.

For FFY25, EOHLC expects to award approximately \$24,637,133 in CDF grant funds, based on FFY 2024 funding levels, and approximately an additional \$300,000 in funds returned from prior year activities.

**Grant Award Amounts**

EOHLC proposes the following grant limits below for the FFY 2025 program.

Applicants for a CDBG grant will be eligible to receive up to the following amounts based on the type of application submitted:

Category	Minimum Grant from Competitive Round:	Maximum Grant from Competitive Round:
Single Municipality	\$ 100,000	\$850,000
Two Municipalities (Regional)	\$ 100,000	\$1,050,000
Three or More Municipalities (Regional)	\$ 100,000	\$1,250,000
Planning- or Design-only grants	\$ 10,000	/////

**Requirements:**

1. CDF grants are **Single Year Grants** that have historically been based on an 18-month implementation

period. There will be an 18-month implementation period for the FFY 2025 grants. For FFY 2025 grants, it is anticipated that the period will be from 10/01/2025 to 03/31/2027. Municipalities **must** perform due diligence regarding all critical consultations and feasibility determinations prior to an application submission.

2. Two or more municipalities may apply **regionally**. *"Regional" is not limited to geographically contiguous cities and towns.* In order to comply with federal requirements governing such applications, each participating community would:
  - enter into an inter-local agreement that will allow a lead community to conduct grant activities within other municipalities.
  - sign the joint authorization form; and
  - demonstrate in the application how the requested funds will be allocated among all participants.
3. A community may apply in either one individual CDF application or in one regional application (including as a lead applicant), or in one of each for a maximum amount of assistance of \$1.3m per community. In addition, a municipality may not receive funds for the same activity in two different applications for the FFY 2025 round.
4. All CDBG applications must be received by EOHLC's web-based application system by **Monday, April 14, 2025**, at 3:00 PM. A signed copy of the Application Cover Page must be attached in the Other Attachments link of the application. EOHLC **does not** require a hard copy of the cover page to be submitted by mail.

### Evaluation and Award Criteria

Application review and awards will be governed by the criteria and procedures as described above (Sections A through I), and the following criteria, process rules and special requirements. Additional details on evaluation criteria and the review process will be in the FFY 2025 Application Guidance.

Each criterion is described below. Please be advised that applicants must meet a minimum threshold for **Project Feasibility** -- i.e., **each project must appear to be feasible to undertake and complete in the 18-month grant period, or the other criteria will not be scored.** Projects must demonstrate financial feasibility, including adequate sources available for all costs based on reasonable cost estimates and financial need. Sources and uses of funds are limited to actual documented cash/expenditures specific to the proposed project. Proposals must also demonstrate site control, major permit approval, and other information that demonstrates the project is feasible and ready to go forward upon grant award.

**Project Need** - requires applicants to document and describe the particular needs that will be addressed by each proposed project and the severity of those needs. Applicants will also be asked to describe community input into the determination of the needs and projects identified to satisfy the need. Project Need will be evaluated based on the documented severity of need and the impact the project will have on those needs, as well as the community's efforts to include beneficiaries and other residents in the application and project development process. EOHLC will be deducting points if the involvement of stakeholders (especially those who are low-and-moderate income) in the development of projects prior to application submission is insufficient.

**Project Feasibility** - requires applicants to document and describe an understanding of the permitting and project management tasks necessary for the project, the procurement processes required of the project, the status of design and site control, the availability of all necessary funds and the readiness of the project to proceed, including completeness of environmental review requirements, and completeness and reasonableness of timeline. Project Feasibility will be evaluated on the applicant's ability to demonstrate the overall readiness of the project, management capacity and the ability of the applicant to complete the project within the 18-month grant implementation period. EOHLC will deduct points for projects that do not have bid-ready plans and

specifications. Please note, there are certain projects that have bid ready plans and specifications as a threshold requirement, such as public facilities and architectural barrier removal projects with construction costs of \$200,000 or more.

## 2. MINI-ENTITLEMENT PROGRAM

### Program Description

Municipalities were selected to be Mini-Entitlement communities if they met the three following criteria: (1) The percentage of low- and moderate-income residents is 40% or greater; (2) a poverty rate higher than the state average and (3) population over 12,000. This program helps larger non-entitlement urban communities with the highest needs improve conditions for their low- and moderate-income residents through comprehensive planning and predictable funding. Through this program, identified cities and towns can meet a broad range of community development needs in housing, business development, physical development, downtown revitalization, and public social services. It supports all CDBG-eligible activities and encourages applicants to develop comprehensive, creative solutions to local problems.

EOHLC expects to award up to \$9,500,000 from the FFY 2025 Mini-Entitlement Program allocation to 9 (nine) designated Mini-Entitlement municipalities, listed below:

Amherst  
Chelsea  
Gardner  
Greenfield  
North Adams  
Southbridge  
Wareham  
Webster  
West Springfield

EOHLC requires Mini-Entitlement communities to approach CDBG projects in a comprehensive and integrated manner and is directing these communities to target their CDBG funds to particular geographic areas in order to impact and effect change within neighborhoods. Housing Rehabilitation programs may be designed to allow up to 20% of the funds to be used for emergency purposes outside the target area.

EOHLC will offer technical assistance to Mini-Entitlement communities, including planning, priority setting, and project evaluation and development.

### Grant Award Amounts and Requirements

Mini-Entitlement communities are eligible for a minimum award of \$850,000 based upon prior performance including effective implementation of activities, timely expenditure of funds and performance as indicated in monitoring reports, along with, the community's ability to identify eligible, feasible activities that can be completed in a timely manner. A maximum award of \$950,000 will be available to Mini-Entitlements who are 100% expended in their FFY21 grant and earlier and over 70% expended in their FFY22/23 grant as reflected in GMS by January 17, 2025. Mini-Entitlements should reach out to EOHLC in January to determine which funding amount they qualify for if they are uncertain. Mini-Entitlement applications will contain an 18-month implementation plan. Mini-Entitlement grantees must comply with standards for timely expenditure and available program income (see Applicant/Project Thresholds above and #3 directly below). FFY 2025 Mini-Entitlement awards to Grantees that do not meet the required standards will be reduced by the amount necessary to bring the grantee into compliance.

Mini-Entitlement communities were guaranteed an annual commitment of funds for a three-funding cycle period that ended with FFY 2021. The Mini Entitlement program and the formula to determine communities selected for the program were re-evaluated for the FFY 2022/2023 program and will be in place through the FFY25 round. Mini Entitlements will be re-evaluated again in advance of the FFY26 CDBG application.

### Evaluation and Award Criteria

The following requirements apply to the Mini-Entitlement Program:

1. Mini-Entitlement grants are Single Year Grants that have historically been based on an 18-month implementation period. There will be an 18-month implementation period for the FFY 2025 grants. For FFY 2025 grants it is anticipated that the period will be from 10/1/2025 to 03/31/2027. Communities must perform due diligence regarding all critical consultations and feasibility determinations prior to an application submission.
2. Mini-Entitlement communities are eligible for a minimum award of \$850,000 based upon prior performance including effective implementation of activities, timely expenditure of funds and performance as indicated in monitoring reports, along with, the community's ability to identify eligible, feasible activities that can be completed in a timely manner. A maximum award of \$950,000 will be available to Mini-Entitlements who are 100% expended in their FFY21 grant and earlier and over 70% expended in their FFY22/23 grant as reflected in GMS by January 17, 2025. Mini-Entitlements should reach out to EOHLC in January to determine which funding amount they qualify for if uncertain. FFY 2025 Mini-Entitlement awards to Grantees that do not meet the required standards will be reduced by an amount necessary to bring the grantee into compliance.
3. In accordance with the Massachusetts CDBG Priorities listed in Section A, EOHLC seeks to fund projects identified through meaningful community-based planning and priority setting processes as described in SECTION D. 6. Mini-Entitlement communities will be required to submit a Community Development Strategy with the application (refer to section D.6 for more detail)
4. Activity packets must be completed and will be scored to ensure that activities are feasible and ready to proceed at the time of the award. Activities will be scored in accordance with the project feasibility question of the application as detailed above in the CDF section. Activity packets must receive a minimum 50% score for the feasibility question. All FFY 2025 Mini-Entitlement applications must describe how CDBG funds will be allocated; include goals and performance measures for each activity; demonstrate compliance with a federal national objective and all federal/state requirements; and provide a management plan. The project packets will be reviewed for compliance with these evaluation criteria.
5. Mini Entitlement applicants that can't comply with the timely expenditure threshold as described above will have a 2025 award reduced by the amount over the threshold.
6. All activities that are eligible under Section 105(a) of Title I of the Housing and Community Development Act of 1974, as amended, will be considered for funding except for organizational activities of downtown partnerships.
7. Mini-Entitlement communities may not join with other communities as joint applicants.
8. For FFY 2025, Mini-Entitlement Communities will submit a list of proposed activities to EOHLC within one week after the application has been made available. Applicants will provide the name of the activity, demonstration of eligibility including national objective, a brief description, proposed accomplishments and proposed budget. There will be a meeting with EOHLC to discuss this proposed list.

9. Mini-Entitlement communities may not request funding for more than three activities in addition to public social services.
10. Mini-Entitlement communities must proceed with the projects submitted in the application, subject to feasibility and grant clearance considerations. The community cannot propose a new activity to replace an already approved activity except in limited circumstances.
11. All Mini-Entitlement applications must be received by EOHLC's web-based application system by no later than **Monday, April 14 at 3:00 PM**. A signed copy of the Application Cover Page must be attached in the Other Attachments link of the application. EOHLC **no longer** requires a hard copy of the cover page to be submitted by mail.

### 3. SECTION 108 LOAN GUARANTEES

Section 108 Loan Guarantees allow eligible communities to access federal loan funds for the purpose of aiding revenue-producing development activities. The Massachusetts program provides communities with a source of loan financing for a specific range of community and economic development activities. Funding is provided to the community to loan to a business or other entity. The Commonwealth guarantees repayment of the HUD loan and pledges its future CDBG allocation as collateral. Actual funding will be provided through the sale of notes by the federal Department of Housing and Urban Development.

Loan Guarantees will be available to support the rehabilitation of, or conversion to, mixed-use or investor owner-residential buildings (5 or more units) located in downtown or commercial center areas. Residential projects should include mixed-income, affordable and market rate units. Housing unit rehabilitation will be limited to a maximum per unit CDBG cost of \$125,000. The entire building façade must be appropriately addressed, regardless of the portions of the building assisted. Section 108 loan assistance of \$1 million to \$5 million will be available for residential or mixed-use projects meeting these qualifications. For most housing project components, Section 108 loan funds plus all federal and state grants combined shall not exceed 75 percent of total actual project costs. Section 108 loans may also assist public facilities/infrastructure improvements that generate sufficient revenues and support downtown mixed-use or investor-owned, mixed-income residential projects.

Assistance to non-profit organizations for public services, capitalization of loan funds or business technical assistance, or direct assistance to individual businesses or other entities will also not be considered in Section 108.

This year the Commonwealth will pledge up to \$10 million in future CDBG allocations in support of these eligible activities.

#### Grant Award Amounts and Requirements

- The minimum award is \$1,000,000 and the maximum is \$5 million. The loan amount will not be included in the \$1 million annual limit that grantees may receive from the Commonwealth's annual CDBG allocation.
- In general, awards from the Section 108 Loan cannot exceed 40% of the total project costs. However, EOHLC will consider guaranteeing public infrastructure projects to a percentage greater than 40% on a case-by-case basis;
- Privately owned, non-residential real estate activities where the scope exceeds exterior façade improvements must be undertaken as economic development activities and must meet CDBG underwriting criteria. These criteria limit assistance to gap financing, which may be less than the 40% program limit;



- All Section 108 applications must include evidence that the proposed project needs grant assistance to be feasible; EOHLC is willing to consider phased projects, with the caveat that the time frame for full implementation is a maximum of five years or less;
- EOHLC or HUD may disapprove applications, or approve a reduced guarantee or approve the request with conditions, such as but not limited to additional collateral and guarantees depending on the structure of the proposal; and
- Depending on the nature of the project, the community may be required to pledge its full faith and credit.

### Evaluation and Award Criteria for Section 108 Applications

*Applicants must contact EOHLC prior to submission of an application.* A two-stage process for evaluating potential applications is in effect, consisting of a preliminary screening and a formal application. EOHLC staff will provide information on the evaluation and review process at the appropriate time. Applications will be reviewed on a first-come, first-served basis, provided that threshold criteria are met and funds are available.

Successful applicants will receive a loan from HUD, but the Commonwealth guarantees the repayment of the loan. The Commonwealth pledges its future CDBG grant funds to repay the federal government should be a non-entitlement recipient of a Section 108 Loan default. EOHLC will not pledge other collateral of the Commonwealth in support of proposals. Any additional security required by HUD must come from another source.

EOHLC will provide guidance to applicants on how to submit preliminary and formal applications. However, the format of any final loan application will be determined by HUD.

### Active Section 108 Loan Activities

Everett – \$1 million Section 108 loan for roadwork (right-of-way & construction) for the Norman St./Internet Dr. intersection and entryway into the Rivers Edge (previously Telecom City) project area. The debt service for years 1-8 (FFY 2007 – 2014) is funded with a \$1.2 million Brownfield's Economic Development Initiative (BEDI) grant.

North Adams - Massachusetts Museum of Contemporary Art (MASS MoCA): Approximate \$4.3 million loan to partially fund real estate development by the non-profit museum foundation. The \$13 million project involved rehabilitation of two buildings. This project was Phase II of the City and MASS MoCA's revitalization plan for one of North Adams' most distressed neighborhoods.

### Loan Default

In the event of loan default, EOHLC must be prepared to repay the Section 108 loans to HUD out of the Commonwealth's annual CDBG allocation. In addition to a pledge of future CDBG funds, collateral is provided from other sources. The possibility exists, however, that the loan defaults and will need to be repaid from the annual allocation. In FFY 2025 the potential liability, or repayment total, could be up to \$336,662 in the event of loan default.

If the loans do not default, or if there is default but the collateral is sufficient to cover the loan repayment (or a portion thereof), then EOHLC will reallocate the budgeted default amount among other program components.

Please note that EOHLC and HUD scrutinize Section 108 projects very carefully since any loan defaults are guaranteed by future CDBG funds and therefore could significantly affect availability of funds in future years.

#### 4. RESERVES

An initial combined allocation of \$250,000 will be available for the Reserves component. Consistent with *Section E. ALLOCATION OF CDBG FUNDS TO THE COMMONWEALTH*, funds may be recaptured by or returned to EOHLC at any time during the program year or reallocated to and from program components including the Reserves component. This may result in an increase or decrease to the initial allocation.

On occasion applications, or portions thereof, that were not funded during a competitive process, including direct technical assistance to eligible communities, may be considered by the Secretary of EOHLC to be particularly worthy, innovative, or address an overarching local, regional, or statewide need. Such projects may be funded through the Reserves.

Funds may also be made available for projects throughout the program year that are consistent with Massachusetts' CDBG priorities, as outlined in *Section A.*, particularly those that address the Administration's goals of developing and/or preserving affordable workforce housing opportunities, infrastructure improvements in support of the development of new housing and projects that seek to return vacant and blighted properties to a viable use.

The application materials for Reserves will provide guidance to potential grantees on how to structure their applications. EOHLC's interest in providing Reserve's funding for projects will be determined by a review of the proposed project to determine consistency with the goals and priorities cited above and that the activity is eligible, feasible and ready to proceed. Once complete, applications will be funded in the order in which they are received.

All Projects funded under Reserves must meet, at a minimum, CDBG national objective and eligibility requirements, applicable rules and regulations, and project feasibility thresholds. Please contact Chris Kluchman, Director of the Livable Communities Division, at [chris.kluchman@mass.gov](mailto:chris.kluchman@mass.gov) with any inquiries about Reserves.

#### 5. ADMINISTRATION AND TECHNICAL ASSISTANCE BY EOHLC

The Commonwealth of Massachusetts uses CDBG funds for administrative and technical assistance costs incurred by EOHLC during the operation of the Massachusetts CDBG Program. As allowed by the federal statute, this amount will equal three percent (3%) of the entire annual grant allocation, plus \$100,000.

Direct technical assistance will be provided to eligible municipalities for guidance relating to housing, economic development, including downtown revitalization, community development strategy and plan preparation and use, technical assistance training for non-entitlement communities and additional assistance determined necessary during the program year.

During this fiscal year EOHLC will continue to support and upgrade its software and reporting systems.

In addition, two percent (2%) of program income generated by state CDBG grantees shall be returned to the Mass CDBG Program on a bi-annual basis.

A review of all users accessing EOHLC program grant management systems shall be conducted annually to determine the accuracy of user access designations. If necessary, action shall be taken to change, revoke, or grant user access to reflect the appropriate designation.



## ONE-YEAR ACTION PLAN FOR FEDERAL FISCAL YEAR 2025

### EXHIBITS

1. LIST OF ENTITLEMENT COMMUNITIES IN MASSACHUSETTS
2. MUNICIPAL ELIGIBILITY TO APPLY TO COMMUNITY DEVELOPMENT FUND (CDF) IN FFY 2025

EXHIBIT 1

LIST OF ENTITLEMENT COMMUNITIES IN MASSACHUSETTS  
as of Federal Fiscal Year 2025

ARLINGTON	MALDEN
ATTLEBORO	MEDFORD
BARNSTABLE	NEW BEDFORD
BOSTON	NEWTON
BROCKTON	NORTHAMPTON
BROOKLINE	PEABODY
CAMBRIDGE	PITTSFIELD
CHICOPEE	PLYMOUTH
EVERETT	
FALL RIVER	QUINCY
FITCHBURG	REVERE
FRAMINGHAM	SALEM
GLOUCESTER	SOMERVILLE
HAVERHILL	SPRINGFIELD
HOLYOKE	TAUNTON
LAWRENCE	WALTHAM
LEOMINSTER	WESTFIELD
LOWELL	WEYMOUTH
LYNN	WORCESTER
	YARMOUTH

## EXHIBIT 2

### MUNICIPAL ELIGIBILITY TO APPLY FOR CDBG PROGRAM FUNDS IN FFY 2025

Historically, a single Community Development Fund community may receive no more than \$1.35 million from two successive years. This limit was waived for the FFY 2022/2023 program and EOHLC is waiving it again for the FFY 2025 program. As a result, applicants to the FFY 2025 program will not be limited by FFY 2024 awards.

# Locally Held CDBG Program Income

## Federal Fiscal Year 2025 One Year Action Plan

PROGRAM INCOME DATA TO BE INCLUDED IN FINAL PLAN WITH MOST CURRENT BALANCES

## Emergency Solutions Grant (ESG) Program One Year Plan

HLC plans to use MA non-entitlement Emergency Solutions Grant to fund projects procured in 2023 designed to provide Rapid Rehousing services and Street Outreach essential services to homeless individuals across the Commonwealth.

### **Proposed Activities and Overall Budget**

Current awarded grant funded allocations to be:

<b>Component</b>	<b>Planned Allocation</b>
Street Outreach	\$816,977.51
Emergency Shelter Operations	\$0
Rapid Rehousing	\$3,759,458.37
Homeless Prevention	\$0
Admin (split between recipient and subrecipients)	\$331,707.12
Emergency Solutions Grant FFY24	\$4,908,143.00

### **Written Standards**

HLC, with support through HUD assigned technical assistance has implemented the following standards entitled [“Written Standards and Policies and Procedures for ESG”](#). Please see the link to review them.

HLC requires all ESG respondents to clearly demonstrate how the project supports HUD’s overall vision for the Emergency Solutions Grant program. Rather than utilizing ESG funding to create separate or distinct programs, HLC and subrecipients will think strategically about how ESG funding can be leveraged with other co- procured state resources for shelter, street outreach and rapid rehousing. This strategy is intended to ensure that all projects receiving ESG resources, regardless of component, will be part of a larger network of integrated homeless services.

### **Match**

HLC expects to utilize state funding for emergency shelter for individuals as a match.

The MA GAA (budget) shall allocate not less than \$110,000,000 to HLC for Homeless Individual Emergency Shelters, Rapid Rehousing and other programming. HLC will match our ESG allocation with \$4,908,143.00 of these resources which support approximately 2400 individual shelter beds which HLC funds.

### **Homeless Facilities funded with ESG**

Awards are based on responses from this [procurement](#).

<b>Agency</b>	<b>Program Name</b>	<b>Component</b>
Action, Inc.	AI - ESG RRH	RRH
Catholic Charities Diocese of Fall River	DHCD GB CATCH RRH	RRH
Catholic Charities Diocese of Fall River	DHCD Fall River RRH	RRH
Center for Human Development, Inc.	CHD ESG Outreach- 3 County	Outreach
Center for Human Development, Inc.	CHD ESG Outreach	Outreach
Clinical and Support Options, Inc.	FOH RRH Program	RRH
Father Bill's & MainSpring, Inc.	Brockton Street Outreach	Outreach
Father Bill's & MainSpring, Inc.	Plymouth Street Outreach	Outreach
Father Bill's & MainSpring, Inc.	Warham Street Outreach	Outreach
Father Bill's & MainSpring, Inc.	Quincy-Weymouth Street Outreach	Outreach
Greater Lawrence Community Action	Housing 60	RRH
HomeStart, Inc.	DHCD ESG RRH	RRH
Lynn Shelter Association, Inc.	LSA ESG Street Outreach	Outreach
Pine Street Inn, Inc.	OPHP - RRHHI	RRH
Pine Street Inn, Inc.	OPHP - Housing Engagement Center	RRH
Respond, Inc.	RESPOND- *ESG RRH	RRH
ServiceNet, Inc.	ServiceNet Street Outreach	Outreach
Somerville Homeless Coalition	SHC - DHCD ESG Rapid Rehousing	RRH
Somerville Homeless Coalition	SHC - Somerville ESG Street Outreach	Outreach
South Middlesex Opportunity Council, Inc.	SMOC - ESG Street Outreach	Outreach
South Middlesex Opportunity Council, Inc.	Worcester Street Outreach	Outreach
Steppingstone Inc.	Steppingstone DHCD Street Outreach Program	Outreach
The Psychological Center, Inc.	TPCI - Daybreak Shelter PH - Rapid Re-Housing	RRH
The Psychological Center, Inc.	TPCI - Street Outreach	Outreach

# HOME Investment Partnerships Act (HOME) Program

## MASSACHUSETTS HOME PROGRAM

### ONE-YEAR ACTION PLAN FOR FEDERAL FISCAL YEAR 2025

The Commonwealth of Massachusetts continues to experience historic high demand for affordable housing, the need for ongoing HOME investment in rental housing development and preservation is as strong as ever and has been robustly sought in recent competitive rental funding rounds. The Executive Office of Housing and Livable Communities (HLC) anticipates \_\_\_\_\_\$10,112,843 (est.) in HOME funds in federal fiscal year 2025 (FFY25) per allocations announced □(anticipated Spring 2025). HLC also estimates that it will receive up to an additional \$4,000,000 in program income during the FY2025 annual action plan period. HLC may retain up to 10 percent of program income for administrative purposes. HLC plans to reserve 10 percent of the HOME allocation for administrative purposes, and award the majority of the remaining \$9,101.558.70 (est.) in funding through competitive funding rounds and, in certain circumstances, readiness-based rolling submissions. The HOME program follows the agency's policies and procedures regarding rental development programs.

In addition to these resources, we expect several of our previously funded HOME projects to request permission to refinance and to request HLC consent to limited partnership restructuring. Upon review of project proposals, HLC may identify an opportunity to collect either an early principal and/or early interest payment on the HOME project. Any loan payment funds collected will be treated as HOME Program Income, per 24 CFR Part 92.253.

It is HLC's intent to commit program income to projects as it is received during the 2025 Annual Action Plan Year. All program income deposited in the local trust account for rental development will be committed to projects prior to committing funds in the HOME Investment Trust Fund Treasury account for the applicable program year, in accordance with the HOME Interim final rule effective 1/31/17. Once these funds are committed, Program Income from the local account will be disbursed before HOME funds are drawn from the Treasury for those projects funded with both HOME Program Income and HOME Investment Trust Treasury account funds. Any program income that is received during the 2025 program year that is uncommitted at the end of the 2025 program year will be carried over into the 2025 program year and committed to projects prior to HOME Investment Trust Fund Treasury account funds. HLC anticipates that it will receive up to approximately \$4,000,000 in HOME program income in FFY25, of which up to ten percent may be retained for administrative purposes. This estimate is based on the program income that has been received in previous program years during this Consolidated Plan period. In general, it is difficult to precisely anticipate HOME Program Income, as HOME rental loans are nearly all deferred payment loans and the current economic factors, including interest rates and operating costs have reduced potential repayment amounts, as well as the frequency of opportunities.

The new HOME Final Rule was published on July 24, 2013 and includes clarification regarding improving performance and accountability, as well as updates to property standard requirements. In recent years, there have been further notices and guidance. We have updated monitoring checklists in response to new requirements and have updated program policies and procedures, as needed. We continue to refine program administration practices, as we receive guidance, learn of new best practices, etc. We previously incorporated the 2012/2013 allocation requirements and these requirements are reinforced by the new HOME Final Rule and subsequent notices and guidance. HLC anticipates the release of a new HOME Final Rule once finalized, and will follow all requirements therein. We will continue to refrain from committing HOME funds to any project unless HLC certifies that it has conducted an

underwriting review including cost reasonableness, assessed developer capacity and fiscal soundness and examined neighborhood market conditions to ensure adequate need. HLC also evaluates a Community Housing Development Organization (CHDO)'s capacity and staff development experience before committing HOME funds and will not provide CHDO Reserve funds to an organization whose staff does not have development experience. We will stay mindful of pertinent commitment, completion, inspection and occupancy requirements and deadlines. Property standards requirements will continue to be updated per additional HUD guidance (regarding NSPIRE, in particular) and in accordance with effective date requirements.

HLC will continue to contingently award its rental funds through a competitive RFP process. Notices of Funding Availability (NOFA) are published on HLC's website, the state's COMMBUYS site, and HLC's listServ notifies subscribers when the NOFA or any new pertinent program information is posted. To subscribe to the listServ, anyone can send a blank email to: [join-EOHLC-housingdevelopment@listserv.state.ma.us](mailto:join-EOHLC-housingdevelopment@listserv.state.ma.us). HLC also reserves the option to make rental funds available on a rolling basis with clear readiness standards for projects that will serve low- and extremely low-income homeless families and individuals and low- and extremely low-income veterans. Homeless and veteran populations have been identified as often needing housing with supportive services. Although projects serving these populations will have a link to services, accepting services will not be a condition of HOME unit occupancy. Preferences will cover all protected classes and will not violate non-discrimination laws. HLC may allow a preference in HOME-assisted housing units to certain populations identified as having priority housing needs in SP-25 of the Consolidated Plan, provided that such preference does not violate state or federal fair housing law and otherwise meets the requirements detailed in 24 CFR 92.253(d). HLC will award federal fiscal year 2025 HOME program funds and program income to the following program type: multi-family rental loans. Eligible applicants for HOME funds are municipalities, non-profit agencies (including CHDOs as defined by HUD), and for-profit developers. At this time, we anticipate that a minimum of 15 percent of the federal FY 2025 allocation will be reserved for certified CHDOs serving as owners, sponsors, or developers of rental production projects. The Secretary of HLC reserves the right to consider geographic distribution in making funding decisions, including for the 15 percent CHDO set-aside. HLC will continue to encourage CHDOs to participate in the HOME program and will provide HOME technical assistance that will be available to CHDO staff, as well as others.

As the FFY24 HOME grant agreement was signed after August 23, 2024, we note that the Build America Buy America preference will apply to HOME funds per applicable HOME program guidance from HUD, unless waived by HUD. We understand that the application of BABA requirements to HOME housing development projects will result in a measurable increase in cost, both for materials and in additional time to source or process waiver requests. HLC will be working with the development community to assess the implications and the feasibility of using HOME funds with certain rental development activities. The team will continue to follow HUD guidance.

### **Allocation of Funds**

HLC will continue its past practice of seeking to competitively award HOME funds in those areas of the Commonwealth that do not receive HOME funds as a result of entitlement community or HOME consortium designation. HLC also will competitively award HOME funds for rental loan projects in entitlement communities that provide a match for HLC administered HOME funds.

During FFY 2025 HLC anticipates the following approximate amounts will be awarded through a competitive RFP process and we note that are some rental activities from the prior fiscal year's similar competitive process that may utilize some of these funds:

- \$9,101,558.70 (est.) plus 90% of the \$4,000,000 in HOME PI (amounting to \$3,600,000 est.) that is anticipated to be received during this program year, total: \$12,701,558.70(est.)
- n/a- project-based first-time homebuyer program
- n/a– purchaser-based first-time homebuyer program

Eligible HOME rental projects may be the production of newly constructed housing units or the adaptive reuse of structures to create housing units. Eligible HOME rental projects also may be preservation endeavors where an occupied property may be at the end of (e.g.) a tax credits compliance period and needs sufficient rehabilitation to bring the housing units to a stronger standard to ensure sustainability for a minimum of another 15 years. In some cases, a developer might purchase an occupied property to do rehabilitation to either preserve or create affordability. Typically, a project developer will create a new single purpose entity for any financial restructuring. With preservation proposals, HLC reviews existing project conditions and a proposed scope of work, including a review of current/proposed management practices, as well as the proposed development and operating budgets. Operating budgets must appear feasible for a 21-year period. Typically, a capital needs assessment is part of an application submission and review; a capital needs assessment must be completed and reviewed with regard to the scope of work prior to any HOME commitment. Architects and/or construction professionals are under written contract or agreement to HLC to perform an assessment of the proposed scope of work to ensure that rehabilitation/construction will meet applicable property standards for at least 15 years.

Preservation projects involving the refinancing of existing debt must have rehabilitation as the primary eligible activity, with a minimum of approximately \$30,000 in rehabilitation work/unit. Preserving existing units, as well as creating additional units on the site are eligible. Preservation involving the refinancing of existing debt would follow the same HUD HOME minimum periods of affordability referenced in the chart below and state-wide projects are eligible. HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including the CDBG program.

### **Evaluation Criteria for HOME Projects**

HLC will continue to competitively and contingently award HOME funds for Rental Loan activities. Certain rental submissions may be assessed on a rolling basis. HOME entitlement communities must provide a match for projects seeking HLC-administered HOME funds.

The following criteria are used to evaluate projects:

- strength of overall concept
- strength of development team, including demonstrated capacity and evidence of good standing
- demonstrated need for project in the target neighborhood
- evidence of marketability and HUD-required marketing plan included in proposal
- adherence to sustainable development principles
- suitable site and design, including appropriateness with regard to efficient building standards and attention to federal Section 504 requirements
- appropriate scopes of rehabilitation or efficient construction
- appropriate total development costs for properties included in proposal
- financial viability and ongoing health of the project, including evidence of minimal, yet sufficient, utilization of HOME assistance
- degree of local support, including local funding commitments
- evidence of readiness to proceed
- evidence of satisfactory progress on previously funded projects.



- adherence to the general requirements of HLC’s current housing development rental policies and procedures, including adherence to HUD HOME rule requirements and associated guidance in vendor procurement.
- CHDO-sponsored projects

The following terms and conditions apply to all HOME competitively awarded multi-family rental projects:

<b>Terms and Conditions: Multi-Family Rental Projects</b>	
<b>Eligible Borrowers</b>	For profit developers; non-profit developers; non-profit organizations designated as CHDOs; municipalities in cooperation with any of the above. Development teams must demonstrate effective capacity.
<b>Eligible Activities</b>	Acquisition and/or rehabilitation of existing structures for multi-family rental use, including distressed or failed properties, or the new construction of multi-family rental projects. Minimum project size of 5 HOME-assisted units.
<b>Maximum Loan Amount</b>	Typically, HLC will award up to \$1,000,000 per project and up to \$100,000 per HOME-assisted unit in HOME entitlement/consortium communities. In non-entitlement or non-consortium communities, the maximum loan is typically up to \$125,000 per HOME-assisted unit. Given projected rental development budget challenges with HOME BABA applicability, HLC reserves the option to increase the per unit and per project amounts to align with HOME per-unit subsidy limits. We reserve the option to increase the per unit amounts for family projects located in gateway communities or areas of opportunity. We also reserve the option to increase the per unit amounts for projects sponsored by certified CHDOs. In some instances, HLC may award up to \$2,000,000 per project, subject to HUD HOME per unit subsidy limits.
<b>Match Requirement</b>	Projects located in HOME entitlement or consortium communities should include a commitment of local funds. Local match also will be anticipated in CPA communities. If an application is submitted without a match, it may not be scored. In general, preference will be given to applications with full match commitments.
<b>Cost/Fee Limits</b>	Rental project budgets must demonstrate cost reasonableness consistent with comparable efforts in the current market. Developer Fee + overhead may not exceed 12.5% of a project’s Total Development Cost (with the exception of applicants also seeking LIHTC, which follow HLC rental housing development guidance).
<b>Security</b>	All HOME loans will be secured by a mortgage on the property. HOME funds are often subordinate to other loans; the subordinate position will depend upon the financial structure of the deal.
<b>Affordability</b>	All units receiving HOME assistance must be occupied by households earning no more than 60% of the area median income and affordable to households earning 65% of the area median income. At least 20% of the HOME units must be occupied by and affordable to households earning no more than 50% of area median income. The minimum HUD HOME period of affordability must be met, with an extended local period of affordability.

**Terms and Conditions: Multi-Family Rental Projects**

<b>Holdback Feature</b>	HLC provides HOME funds through a simple requisition process and holds back a minimum of 10% of the HOME award until the project is substantially complete.
<b>Term of Loan</b>	Typically, loans will be for 30 years, the HUD HOME minimum period of affordability and an extended local use restriction. During the final year of a loan, the owner may request an extension of up to 30 years in order to maintain the affordability of the housing. Typically, HOME funds are structured as repayable deferred loans; in some cases, HLC may require regular payments from a project's cash flow.
<b>Recourse</b>	The loans will be non-recourse.
<b>Interest Rate</b>	Generally, HLC HOME loans are deferred payment loans with nominal or no interest rates. HLC reserves the right to assign a higher rate of interest to any HOME loan. HOME loans to projects receiving allocations of Low Income Housing Tax Credits are typically made at the Applicable Federal Rate (or higher) as required by the Tax Credits program.
<b>Debt Coverage Ratio</b>	HLC expects HOME projects to have minimum debt coverage ratios of approximately 1.15 in year one.
<b>Environmental</b>	An ASTM Phase One environmental site assessment must be completed and submitted for each property within the project, either with the application or as part of the loan closing. All HOME projects are subject to the applicable requirements of 24CFR Part 58.
<b>Lead Paint Requirements</b>	HUD Federal lead-based paint regulations at 24 CFR Part 35 apply to all projects that are awarded HOME monies.
<b>Cross-Cutting HUD Requirements</b>	All HOME projects must meet HUD vendor procurement and reporting guidelines and must follow other applicable HUD cross-cutting requirements.
<b>Violence Against Women Act (VAWA)</b>	All HOME projects must comply with HUD program guidance on the Violence Against Women Act (VAWA) and HLC rental housing development policies and procedures.
<b>HUD-Required Property Standards for Efficiency</b>	All new construction project must meet HUD-required property standards for efficiency. All rehabilitation projects must meet HUD-required property standards for efficiency to the greatest extent feasible for the project.

While we do not anticipate accepting project-based ownership project applications, the following criteria are used to evaluate first-time homebuyer projects:

- strength of overall concept
- strength of development team, including demonstrated capacity and evidence of good standing
- demonstrated need for project in the target neighborhood
- adherence to sustainable development principles
- suitable site and design, including attention to efficient building standards and to federal Section 504 requirements.
- appropriate scopes of rehabilitation or construction
- appropriate efforts to address HUD-required property standards for appropriate total development cost for properties included in proposal, including evidence of minimal utilization of HOME assistance
- appropriate sales prices and affordability analyses included in proposal
- evidence of marketability and buyer selection plan included in proposal
- degree of local support, including local funding commitments
- evidence of readiness to proceed
- evidence of satisfactory progress on previously funded projects.

***First-time Homebuyer Resale or Recapture Provisions and Resubordination Policies***

HLC does not anticipate awarding new HOME purchaser-based or project-based homebuyer funds in the coming program year, as the smaller HOME allocation has limited our ability to extend the HLC program beyond rental housing.

HLC will submit a Consolidated/Action Plan amendment proposal if the agency pursues the use of HOME funds with any new project-based or purchaser-based ownership activity and will present proposed restriction documents for HUD approval.

In general, HLC will resubordinate the HOME restriction to existing HOME first-time homebuyers when a proposed loan product is conforming, at a competitive interest rate, and in an amount that is no more than 90% loan-to-value and with ratios acceptable to HLC. HLC also typically consents if a homeowner is looking to reduce an interest rate and is not taking cash out of the transaction, even if the LTV exceeds 90% but is less than 100%. The existing HOME first-time homebuyer portfolio is minimal, as most units have passed the maturity date of applicable HOME restrictions and the program hasn't added new HOME ownership units in many years.

**Eligible Applicants for HOME Funding**

<b>PROGRAM COMPONENT</b>	<b>ELIGIBLE APPLICANTS</b>
<b>Rental Production</b>	Community Housing Development Organization (CHDO) Non-Profit Developer For-Profit Developer Municipal Entity in Partnership with Non-Profit or For-Profit Developer

***HOME Match***

Available resources for the HOME match continue to be the state-funded Massachusetts Rental Voucher Program (MRVP) and the state's Housing Stabilization Fund (both described in this section of the plan). We have sufficient MRVP expenditures to use that single source in our MATCH report for this year. Annual expenditures through this program alone are over \$150 million. Since states are permitted to "bank" match, that expenditure level will constitute match -- calculated at 25 cents (\$0.25) on the HOME dollar (\$1.00) -- for many years.

***HOME Technical Assistance***

In the coming year, the HOME team, including its compliance monitoring contractor, will continue to offer HOME technical assistance directly from HLC HOME staff, as well as through the HOME compliance monitoring contractor. Typically, program updates are shared proactively and we engage with developers and property managers to clarify program requirements. Both the listserv and our website are effective ways to convey HOME program news, as are our standard pre-HOME loan closing business meetings and pre-and post-funding round information sessions, funding round debrief calls, memos and letters. HLC will work with the affordable housing development community to ensure any changes to program requirements under BABA and the implementation of the Buy America Preference are shared proactively, and engage with developers and property managers to clarify program requirements.

Historically, HLC successfully administered four HOME Technical Assistance grants; in 2013, we closed out the fourth grant. HLC does not anticipate an additional TA grant during the 2025 HOME program year.

### ***HOME Performance Measures***

In accordance with CPD Notice 03-09, HLC's HOME program has been collecting data for quantifiable performance measurement. Representatives from Massachusetts participated with the national workgroup which developed the HUD Outcome Performance Measurement System, as outlined in the Federal Register, June 10, 2005. HOME staff project managers attended HUD-sponsored performance measurement training in the summer of 2006. The following of the Commonwealth's housing and community development objectives remain a primary focus of the HOME program:

1. Develop and maintain an adequate supply of safe, decent housing that is affordable and accessible to residents with a range of income levels and household needs.

HLC's HOME activities generally fall under the HUD objective:

- Provide decent affordable housing.

In general, the HUD outcome for our activities is:

- Affordability.

To meet these objectives and generate this outcome, HLC provides funding for rental production and rental rehabilitation. HLC has been incorporating the following primary performance measures for each funding type:

### ***Rental Production***

- Number of affordable units produced for each income category
- Amount of money leveraged for the rental activity
- Number of units for households at or below 30% of area median income
- Number of units for elderly households
- Number of households assisted by demographics
- Number that are compliant under Section 504
- Number of units meeting HUD-required property standards for efficiency
- Number of units for formerly homeless households and formerly chronically homeless households

### ***Rental Rehabilitation***

- Number of affordable units preserved for each income category
- Number of households assisted by demographics
- Number of children under age 6 within HOME-assisted units
- Amount of money leveraged for the rental activity
- Number of units for households at or below 30% of area median income
- Number of units for elderly households
- Number that are compliant under Section 504
- Number of units that meet HUD-required property standards for efficiency

- Number of units brought to lead safety standards
- Number of years of extended affordability
- Number of units for formerly homeless households and formerly chronically homeless households
- Number of units for former residents of public housing

We also ask for narrative data regarding HOME residents in new or older HOME projects to better learn how HOME units make an impact in the lives of low-income individuals and families. HLC pursues ongoing data collection through compliance monitoring and via the Massachusetts legislation regarding tenant data collection. We expect that HLC's HOME Program's performance measurement standards will further evolve, as our experience with the initiative matures.

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF PUBLIC HEALTH  
BUREAU OF INFECTIOUS DISEASE AND LABORATORY SCIENCES  
HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS (HOPWA)**

**FFY25 NARRATIVE PLAN**

The Housing Opportunities for Persons with AIDS (HOPWA) grant is administered by the Commonwealth of Massachusetts Department of Public Health (DPH), Bureau of Infectious Disease and Laboratory Sciences (BIDLS), Office of HIV/AIDS (OHA). In federal fiscal year 2025, DPH HOPWA resources will fund Support Services provided by AIDS Project Worcester, Commonwealth Land Trust, Community Counseling of Bristol County, and Victory Programs.

AIDS Project Worcester, Inc. is an AIDS Service Organization (ASO) in Central Massachusetts that provides a comprehensive range of services for persons living with HIV/AIDS and those at greatest risk for the disease. Community Counseling of Bristol County, Inc. is a behavioral health provider located in Taunton, Massachusetts that offers HIV/AIDS support services to individuals in the Southeastern region of Massachusetts. Both AIDS Project Worcester and Community Counseling of Bristol County will use HOPWA resources to support HIV Housing Search and Advocacy Services. These services will help enable low-income individuals with HIV to access and maintain safe, stable, and affordable housing that will support ongoing retention in HIV medical care.

Commonwealth Land Trust is a non-profit organization based in Boston that owns and manages affordable housing in the Greater Boston area and the city of Lawrence, Massachusetts. The agency provides on-site case management services to many of Massachusetts' most vulnerable residents, including individuals living with HIV/AIDS. Victory Programs, Inc. is a multi-service organization that provides housing and services to homeless individuals and families who may have substance use disorders and/or chronic health issues such as HIV/AIDS, hepatitis C and mental illness. Both agencies will use HOPWA resources to provide Medical Case Management (MCM) services to individuals with HIV/AIDS who live in their wide networks of housing programs throughout Greater Boston and the Northeast region of Massachusetts. HIV/AIDS MCM services include medical care coordination, social service coordination, adherence support, substance use risk reduction, sexual health promotion, benefits counseling, and basic housing services. These services are intended to help individuals living with HIV access and maintain engagement in ongoing HIV medical care and treatment in order to maximize health outcomes, prevent acquisition of other commonly co-occurring infectious diseases, and reduce potential transmission of HIV to others. MCM is provided in a home-based setting when it is determined that issues including, but not limited to, substance use, mental health, and medical care needs could make it more likely for clients to fully benefit from these services in their residences.

OHA awarded all four agencies funding for Support Services during a statewide procurement in 2017. This procurement included language to support the allocation of State, Ryan White, CDC, and HOPWA funding to successful applicants. Vendor selection involved a comprehensive community and internal review process, and as successful applicants, these agencies initiated

their new OHA contracts on November 1, 2017. OHA conducts thorough oversight of all of its contracts. Monitoring mechanisms include, but are not limited to, annual work plans, annual reports, monthly contract management calls, review of monthly client data submissions, and ongoing fiscal monitoring.

The Commonwealth anticipates receiving \$381,055 as a formula grantee. DPH will use these resources to fund home-based HIV/AIDS Medical Case Management services and HIV Housing Search and Advocacy Services.

DPH utilizes its resources to support the provision of services primarily in Greater Boston, the Central Region, and the Southeast region of Massachusetts.



**MASSACHUSETTS EXECUTIVE OFFICE OF HOUSING AND  
LIVABLE COMMUNITIES**

**National Housing Trust Fund  
(HTF)**

**ALLOCATION PLAN**

**FY 2025**

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**NATIONAL HOUSING TRUST FUND  
Allocation Plan**

**Massachusetts Executive Office of Housing and Livable Communities  
January 2025**

**I. Background and Purpose of the National Housing Trust Fund (HTF)**

The National Housing Trust Fund (HTF) is a federal program to support the development of affordable housing for low-income individuals and households. HTF is funded annually with certain proceeds available from two government-sponsored entities – the Federal National Mortgage Association (Fannie Mae) and the Federal Home Loan Mortgage Corporation (Freddie Mac). The U.S. Department of Housing and Urban Development (HUD) administered HTF at the federal level and distributes trust funds to all states in accordance with an established formula. Each state has identified one qualified housing agency to allocate the funds made available through HTF. In addition, each state must prepare and submit for HUD approval an allocation plan outlining the process it intends to follow to distribute the HTF monies. The HTF allocation process must be referenced both in the state’s Consolidated Plan (within the annual action plan) and in the state’s Qualified Allocation Plan (QAP) governing the administration of the Low Income Housing Tax Credit Program (LIHTC). The National Housing Trust Fund Interim Rule can be found at 24 CFR Parts 91 and 93.

In 2016, the Executive Office of Housing and Livable Communities (EOHLC), then DHCD, was identified as the allocating agency for the HTF in the Commonwealth of Massachusetts. The state has not appointed subgrantees for HTF and will continue to distribute funds directly to recipients, defined as “organizations, agencies, or other entities that receive HTF funds to undertake an eligible project.”

It is EOHLC’s intent to award HTF funds as rapidly and efficiently as possible. Given the amount of HTF currently available and the critical need in Massachusetts for housing with services, EOHLC will continue its practice, established in 2016, of awarding HTF exclusively to housing with services.

**II. HTF and Supportive Housing in Massachusetts**

EOHLC has a long and successful history of providing federal and state funds to service-enriched housing – typically defined as units in multifamily rental projects with appropriate services available to tenants who need them. EOHLC is strongly committed to the development of housing with services for special populations, including individuals or households who are either very low-income (VLI) or extremely low-income (ELI). Individuals or households are defined as VLI if their incomes are less than 50% of area median income (AMI). Individuals or households are defined as ELI if their incomes are less than 30% of AMI. VLI and ELI individuals or households often face other life challenges, including difficulty in paying for food, transportation, health care, child care, and other life necessities. Some VLI or ELI individuals or households face further special

challenges. Low-income homeless veterans frequently cope with difficult medical challenges, including substance abuse, post-traumatic stress disorder, and difficulty in accessing necessary services. Frail seniors who are VLI or ELI may live in apartments or houses that are not suitable for persons with mobility issues and service needs. At the other end of the age spectrum, young adults who are aging out of state foster care systems often are VLI or ELI and face significant life challenges. Almost by definition, they have very limited support systems and are particularly vulnerable to substance abuse and homelessness.

These highly vulnerable populations clearly need housing they can afford, but they frequently need support services as well. No housing program – federal, state, or local – can ever address all the life challenges encountered by people with very low or extremely low incomes. But the Housing Trust Fund offers agencies such as EOHLC the opportunity to award capital dollars to produce deeply affordable units in combination with other resources to help fund services for new HTF residents. EOHLC has the ability to help fund these support services through the state’s rental voucher program, known as MRVP (Massachusetts Rental Voucher Program). The Executive Office currently plans to set aside MRVP vouchers in support of HTF units in 2025. Each voucher that EOHLC awards will include up to \$1,500 annually in service funding for these units, in order to help provide supportive services including but not limited to:

- Case management
- Job search and training
- Financial literacy and planning
- Self-sufficiency training and coaching
- Counseling
- Parenting classes
- Early education and childcare services
- Mental health and addiction treatment
- Adult education and GED
- Skills training, etc.

Like in its prior HTF allocations, EOHLC will prioritize HTF funds for projects that will provide service-enriched housing and housing for homeless families and individuals. The tenant selection preferences for each project will be evaluated as part of EOHLC’s competition for HTF funds. As indicated below, in the evaluation process, EOHLC will give priority to projects with tenant selection plans that include some of the following criteria:

- Preference for homeless families
- Preference for homeless individuals
- Preference for veterans
- Preference for persons with disabilities
- Preference for other vulnerable populations, such as the frail elderly

Recipients should note that EOHLC has certain standards for the support services to be delivered to tenants in supportive housing units. It is the Executive Office's expectation that recipients of projects seeking HTF in Massachusetts will adhere to EOHLC's standards and policies for services and service delivery, appended to this document as Attachment A.

### **III. Eligibility Requirements**

To be eligible for HTF, sponsors must be non-profit entities or developers partnered with non-profit entities that receive support service funds from federal sources, from private foundations or sources, from the Executive Office of Health and Human Services, and/or from the Executive Office of Aging and Independence. Eligible recipients will have the opportunity to apply for HTF, as well as certain state bond funds and MRVPs, a special competition to be held in 2025. EOHLC intends to commit its full allocation of HTF through this competition, however, it may be necessary to make HTF resources available in other rental competitions held by the Executive Office throughout the year. EOHLC further anticipates allocating at least half of its HTF to units reserved for individuals or households making the transition from homelessness, as reflected in project tenant selection plans and affordable fair housing marketing plans.

Interested sponsors should note that EOHLC will award HTF as subordinate debt and will close all HTF assistance through the MassDocs process.

### **IV. Application Requirements**

The Executive Office will issue a Notice of Funding Availability (NOFA) for the HTF and several additional EOHLC resources. Consistent with EOHLC's past practice, the NOFA will include the deadlines by which sponsors interested in HTF must submit their pre-applications for EOHLC review. The full funding competition for HTF and other EOHLC monies will be invitation-only. Those sponsors whose pre-applications are approved by EOHLC will be invited to submit full funding applications for HTF and other EOHLC resources. The deadline for invitation-only, full funding applications will be included in the NOFA. Both pre-applications and full funding applications (OneStop+ applications) must be submitted through EOHLC's online OneStop+ Intelligrants system.

### **V. Selection Criteria**

In general, the evaluation criteria for all applications will include, but will not be limited to, the following:

- Strength of overall concept
- Percentage of units to be reserved for homeless families or individuals
- Strength of development team
- Appropriateness of tenant selection plan
- Evidence of market feasibility/effective demand from target population
- Demonstrated need for project in the target neighborhood or region/needs assessment of neighborhood/region
- Financial viability of the project

- Degree of local support, including local funding commitments
- Degree to which the project maximizes energy efficient building standards and development principles
- Evidence of intent to create units for residents who face multiple barriers to securing and/or maintaining permanent housing
- Demonstrated ability to provide effective stabilization and supportive services to establish and maintain successful tenancies
- Geographic location of project
- Degree to which proposed rents are affordable to ELI/VLI households
- Minimum term of affordability: at least 30 years

It is EOHLC's intent to award HTF and state resources to projects that are highly ready to proceed. Further, it is EOHLC's intent to award the funds to recipients with extensive experience and strong track records in the development and operation of housing with support services. Sponsor experience and capacity will be critical elements in the EOHLC review process. The degree of readiness of a project and its ability to move through the loan closing process to construction also will be critical review components. It is the Executive Office's expectation that projects receiving HTF and/or state resources during the 2025 HTF competition will proceed to construction during 2026.

## **VI. Eligible Activities and Certification**

In accordance with HUD guidance, the funds available through HTF can only be used to directly support housing units for the target income groups (ELI individuals or households). HTF units can be included in projects that also serve higher income level tenants, but the HTF monies can only support the HTF-designated units. All HTF-assisted rental housing must meet a 30 year affordability period.

HTF funds may be used for the production or preservation of affordable housing through the acquisition, new construction, reconstruction and/or rehabilitation of non-luxury rental housing with suitable amenities. All HTF applications must include a description of the eligible activities to be conducted with HTF funds. Funds may be used to support:

- Real property acquisition
- Site improvements and development hard costs
- Related soft costs
- Demolition
- Financing costs
- Relocation assistance

Additionally, HTF funds may be used to refinance existing debt secured by rental housing units that are being rehabilitated with HTF funds. Refinancing may be permitted in order to reduce interest or other payments on primary debt when the added revenue will enable the project to remain solvent, increase contributions to replacement reserve, or reduce costs to a state agency that pays some or all of operating costs. Refinancing

may also be permitted in order to create an increase in debt that enables essential improvements such as life-safety systems or accessibility. Such improvements must enhance safety and quality of life for the residents. Refinancing costs are only permitted when:

- Rehabilitation is the primary eligible activity
- Refinancing is necessary to reduce the overall housing cost and to make the housing more affordable and is proportional to the number of HTF-assisted units in the rental project; and
- The rehabilitation cost attributable to the HTF units is greater than the amount of debt to be refinanced that is attributable to the HTF units.

HUD requires that each recipient of an HTF award certify the number of HTF units by income group. In addition, recipients must certify that:

- All tenants in HTF-assisted units meet the income limits as required by program guidelines
- The recipient will comply with rent limits, determined to be no more than 30% of 30% of area median income.

#### **VII. Maximum Per-Unit Subsidy Amount**

The U.S. Department of HUD requires all HTF allocating agencies to establish maximum per-unit subsidy limits for all projects that include HTF assistance. The HUD guidance on establishing per-unit limits gives allocating agencies the option of developing and implementing new per-unit subsidy limits or using per-unit limits established for other federal programs, such as the Low Income Housing Tax Credit program (LIHTC).

The Massachusetts Executive Office of Housing and Livable Communities has served as the allocating agency for the LIHTC and the federal HOME program for over 30 years and maintains an extensive database of multifamily rental projects funded through federal and state resources. The database currently contains information on more than 5,000 multifamily projects with 40,000 units and is updated with each new EOHLC funding award or modification to an existing project. The information contained in the data base has been invaluable to EOHLC in the development of numerous affordable housing policies. For example, during the past decade, the Executive Office has been engaged in an ongoing effort to better manage the cost of developing affordable housing in Massachusetts. The information contained in the data base has helped EOHLC make various determinations relative to appropriate project costs. Using the database and working with its quasi-public affiliate, the Massachusetts Housing Partnership, EOHLC regularly updates statistics on cost. Each year, in EOHLC's Qualified Allocation Plan (QAP) for the Low Income Housing Tax Credit (LIHTC), the Executive Office uses the updated data to establish recommended cost limits per unit, based on project type, location, and size. The recommended cost limits per unit that apply to tax credit projects also apply to all other EOHLC housing resources, including the HOME program and ten

state-funded bond programs. The recommended cost limits per unit also apply to the Housing Trust Fund.

EOHLC maintains different per-unit cost limits depending on the size of the project as defined by the bedroom mix. EOHLC categorizes projects that primarily feature studios and one-bedroom units as “smaller” projects. Projects with a significant number of two- and three-bedroom units are characterized as “larger” projects. In every region of the state, recommended cost limits are lower for smaller projects than for larger.

For EOHLC, there is a direct correlation between the recommended cost limits per unit and the Executive Office’s commitment of subsidy per unit. Historically, EOHLC is willing to award subsidy to support approximately 25% of the cost of producing or preserving an affordable unit. It is the Executive Office’s long-standing practice to inform recipients that they must obtain the balance of the financing per unit from other private and/or public sources. EOHLC intends to follow its long-standing policy on subsidy per-unit in making HTF awards. However, smaller highly supportive projects may need more state assistance to achieve feasibility. If a recipient seeks other EOHLC resources in addition to HTF, as many are expected to do, the amount of HTF may be reduced below the typical limit as EOHLC awards other sources to the project. In general, recipients should assume that EOHLC typically will cap all HTF awards at approximately \$125,000 to \$150,000 per unit, depending on project characteristics and up to \$2,000,000 per project. This award level will, in general, be utilized to fund projects with ten or more HTF units. In special circumstances, EOHLC may commit a maximum of \$2.5 million to a single project. EOHLC would direct this level of funding solely to projects with a high percentage of ELI units and to projects serving the most vulnerable populations including but not limited to, homeless families, chronic homeless individuals, veterans with supportive service needs, individuals in recovery from substance abuse disorder and homeless unaccompanied youth.

### **VIII. Additional Information**

Sponsors of potential HTF projects for 2025 should note the following:

- In order to fund as many HTF units as possible, EOHLC typically will cap the amount of HTF per eligible unit. Details on per-unit caps are included in the previous section of this plan. However, as previously indicated, recipients also may seek certain additional state resources to complete their financing packages. Overall, recipients should assume that EOHLC will cap all Executive Office assistance, other than state rental assistance, at \$150,000 per HTF unit, inclusive of the HTF per-unit cap.
- In order to support multiple projects with HTF units, EOHLC typically will cap the amount of HTF per project at \$2,000,000.
- Priority will be given to applicants who propose rents that are affordable to ELI households through the use of project-based rental assistance or other means



such as cross subsidization of rents within the project. EOHLC will set aside MRVP vouchers to be available to HTF applicants in 2025.

- During the HTF competition, EOHLC will consider both new construction and preservation/rehabilitation projects for HTF. Design and scope of work standards apply to both types of projects. Sponsors who previously have received EOHLC assistance on affordable housing projects are familiar with EOHLC's various standards. The design and scope standards are delineated in the Executive Office's annual Qualified Allocation Plan (QAP) for the Low Income Housing Tax Credit. Standards also are delineated in the document entitled, "HTF Rehabilitation Standards" and included within this document as Attachment B. EOHLC's architects will review the design and scope components of all applications for HTF and state resources.
- The Executive Office believes that there is a need for supportive housing units in every region of the state. However, in Massachusetts, the number of homeless and the surrounding metropolitan area. In EOHLC's view, this area would be well served by HTF projects. In addition, EOHLC always encourages the creation of units for ELI individuals and families in so-called "areas of opportunity." The Executive Office defines an area of opportunity, in part, as a neighborhood or community with a relatively low concentration of poverty based on U.S. Executive Office of HUD data. In addition, EOHLC identifies an area of opportunity as a neighborhood or community that offers access to jobs, health care, high performing school systems, higher education, retail and commercial enterprise, and public amenities.

Additionally, sponsors interested in seeking HTF to support eligible units within their projects should review all the following materials related to HTF or to EOHLC's recent rental rounds:

- The HUD interim rule for HTF at <https://www.gpo.gov/fdsys/pkg/FR-2015-01-30/pdf/2015-01642.pdf>
- For additional information on this allocation plan, please contact Catherine Racer or Bronia Clifton at EOHLC at [Catherine.Racer@mass.gov](mailto:Catherine.Racer@mass.gov) and [Bronia.Clifton@mass.gov](mailto:Bronia.Clifton@mass.gov).

# **ATTACHMENT A**

## **EOHLC and Support Services**

## ATTACHMENT A

### **EOHLC and Support Services**

The standards and policies described below apply to services to be funded through the HTF as well as other EOHLC sources.

Support services for individuals or families living in service-enriched housing units must be based on an individualized and detailed assessment of the individual or family's strengths and areas of needed support and improvement. In order for the assessments to be effective, the service provider must be experienced at individual or family outreach and engagement. As part of any application to EOHLC for supportive housing (SH) funds, the recipient is expected to describe the method to be used to prepare individual or family assessments.

EOHLC will give preference in funding decisions to qualified applicants who intend to create SH units for individuals or families who face multiple barriers to securing permanent housing. Multiple barriers may include poor credit, prior evictions, past criminal offenses, poor rental history, and multiple shelter placements.

Effective stabilization and case management should assist an individual or family in maintaining a successful tenancy and increasing self-sufficiency. After an initial assessment of each tenant household, the service provider will develop an individualized service plan with measurable goals and objectives. The service plan should address the following: 1) maintaining a successful tenancy; 2) securing quality childcare, education, healthcare and recreational activities for any children in the household, 3) securing or improving adult education attainment and employment; 4) improving and maintaining behavioral and physical health; 5) improving financial and asset management skills; and 6) improving community connections.

The entity providing stabilization services and case management must document the individual or family's initial assessment and work plan and also must track and document the individual or family's engagement and progress toward the goals and measures outlined in the work plan. The services to be provided as well as the reporting requirements are subject to further EOHLC guidance.

If the service provider is a different entity from the owner of the property receiving EOHLC funds, the provider and the owner should have a successful record of previous collaboration and should provide EOHLC with documentation (such as an MOU) of their previous work together.

Persons with disabilities will not be required to accept any medical or disability related services, although exceptions may apply to treatment for people with addictions.

# **ATTACHMENT B**

## **HTF REHABILITATION STANDARDS**

**ATTACHMENT B**  
**HTF REHABILITATION STANDARDS**

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## ATTACHMENT B

### HTF REHABILITATION STANDARDS

In May 2016, the U.S. Department of HUD issued Frequently Asked Questions (FAQs) on the rehabilitation standards to be established by state allocating agencies for rental or homebuyer housing with HTF assistance. Although the Massachusetts Executive Office of Housing and Livable Communities (EOHLC) has had extensive experience in establishing and implementing rehabilitation standards for programs including HOME and the Low Income Housing Tax Credit, EOHLC has modified its existing rehabilitation standards in order to conform as closely as possible to the guidance published by HUD in the May 2016 FAQs.

All recipients of multifamily rental projects seeking HTF assistance must ensure that their projects conform to all the rehabilitation standards identified in this memorandum.

#### **I. Health and Safety In Occupied Rehabilitation Projects**

As part of the funding application to EOHLC, each recipient of an occupied project must provide a narrative describing the existing condition of the property and must identify any life-threatening deficiencies and a plan for addressing such deficiencies prior to commencement of renovation activities. The recipient must describe how residents who will remain in structures under renovation will be assured of safe egress, protection from fire hazards, noxious fumes, exposure to hazardous materials, and loss of security for themselves and their possessions. This narrative is a mandatory requirement for occupied rental projects whose recipients are seeking HTF. The narrative will be reviewed by EOHLC's architects as well as other Executive Office staff, and EOHLC will conduct an inspection of the property prior to making a funding decision.

Certain health and safety issues must be addressed immediately when a unit is already occupied. These items include:

- Air Quality - Propane/Natural Gas/Methane Gas Detected
- Blocked Egress/Ladders
- Electrical Hazards - Exposed Wires/Open Panels
- Electrical Hazards - Water Leaks on/near Electrical Equipment
- Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable
- Missing Outlet Covers
- Missing/Damaged/Expired Extinguishers
- Misaligned Chimney/Ventilation System
- Outlets/Switches/Cover Plates - Missing/Broken
- Smoke Detector - Missing/Inoperable
- Windows - Security Bars Prevent Egress

For a complete list of health and safety requirements, please see Attachment D.

#### **II. Major Systems**

The HUD FAQs from May 2016 identify major systems as structural support; roofing; cladding and weather proofing (e.g., windows, doors, siding, gutters); plumbing; electrical; heating, ventilation, and air conditioning. As part of the application to EOHLC for HTF, each recipient – regardless of the size of the project – must commission a capital needs study to be performed by a third party entity acceptable to EOHLC. The capital needs study must address all major systems as defined by HUD as well as other components of the proposed project including fire suppression and/or detection, security, tel/data, stormwater management systems, basic livability requirements mandated by the Massachusetts State Sanitary Code, as well as requirements of the Massachusetts Architectural Access Board and applicable Federal accessibility standards. In addition, each recipient’s architect must complete a systems checklist identifying each major system, its current condition, the proposed scope of rehabilitation, and the expected useful life of the system following rehabilitation. EOHLC’s reviewing architects will evaluate the capital needs assessment as well as the systems checklist and all other components of the recipient’s design and scope submission.

The term of affordability for all EOHLC-funded HTF projects will be at least 30 years. If EOHLC and its reviewing architects conclude that the useful life of one or more major systems in the proposed project does not meet the minimum period of affordability, the Executive Office will require the recipient to establish an appropriately-funded replacement reserve. If the project is funded, the Executive Office will monitor the performance of the various systems over time and the recipient’s response to systems deficiencies. Every EOHLC-funded HTF project must meet health and safety standards as well as all applicable code requirements throughout the term of HTF affordability.

### **III. Energy Conservation and Green Design**

EOHLC has a long history of encouraging and requiring recipients of affordable housing projects to incorporate energy conservation measures and other thoughtful approaches to green design into their projects. Recipients of rehabilitation projects seeking HTF will be required to provide information on energy efficiency and green design in their applications to EOHLC, in particular, aspects of developments that exceed requirements of the base Massachusetts Building Code, or the “Stretch Code” if adopted by the locality

- The project recipient must address how the site layout and site design adequately address environmental issues; vehicular and pedestrian circulation, parking needs; stormwater management; trash management, appropriate open space requirements; landscaping, outdoor amenities appropriate for the target population, accessibility to public ways and common amenities, visitability, etc.
- The project recipient must address whether the project complies with energy efficient building envelope guidelines such as EPA’s Energy Star standards (including regular quality control inspections during construction), for appliance and light fixture selection as well as air sealing and insulation measures.

- The project recipient must address how the project will incorporate materials and equipment consistent with promoting a healthful interior environmental quality, including mechanical ventilation measures to provide fresh air, control humidity, exhaust bathrooms and kitchens, and generally promote good indoor air quality.
- The project recipient must confirm that the project will provide interior CO detectors as mandated by state regulations.
- The project recipient must confirm that the proposed project, at a minimum, will conform to state and local code-mandated regulations for water conservation (low flush volume. toilets, low-flow faucet and showerhead devices, etc.) as well as storm water management. The recipient should identify all water conservation measures that go beyond state/local regulations.
- The project recipient must confirm that there will be sufficient construction oversight, building envelope testing, and building system commissioning to ensure that all systems are properly installed, adjusted, and meet all specified performance criteria. .
- The project recipient must confirm that he/she has employed effective cost management techniques in the design process, including but not limited to Integrated Project Delivery methods, and significant involvement by contractors or other cost estimation professionals early on, and throughout the design process. In rehabilitation (as in new construction), EOHLC strongly prefers project designs that incorporate site planning, exterior envelope, detailing, and mechanical system technologies to achieve energy efficiency. EOHLC strongly encourages demolition and rehabilitation processes that result in waste reduction and conservation of resources. EOHLC also encourages the use of building materials that are local in origin and durable and that incorporate recycled content. EOHLC also strongly encourages recipients to avoid the use of toxic materials.

#### **IV. Lead-Based Paint**

Recipients of rehabilitation projects seeking HTF from EOHLC must conform to all applicable provisions of 24 CFR Part 35 regarding lead-based paint. Recipients also must conform to all Massachusetts laws and regulations, as well as EPA requirements regarding lead-based paint, including protection of workers who may be exposed to lead paint during the construction process. .



## **V. Accessibility**

Recipients of all rehabilitation projects seeking HTF must conform to all accessibility requirements of 24 CFR Part 8 (<http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:1.1.1.1.8>) implementing Section 504 of the Rehabilitation Act of 1973) and Titles II and III of the Americans with Disabilities Act implemented at 28 CFR Parts 35 and 36)

For “covered multifamily dwellings”, as defined at 24 CFR 100.205 ([http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title24/24cfr100\\_main\\_02.tpl](http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title24/24cfr100_main_02.tpl)), EOHLC will require recipients to meet the design and construction requirements at 24 CFR 100.205.

In addition, recipients must conform to any and all applicable Massachusetts laws and regulations regarding accessibility, including, in renovation projects, obtaining all necessary variances from the Massachusetts Architectural Access Board. Recipients must complete the EOHLC accessibility checklist appended to this memorandum.

## **VI. Disaster Mitigation**

Recipients must ensure that projects conform or exceed all federal and state requirements and best practices to mitigate the potential impact of disasters or disruptions, such as extended power outages, earthquakes, hurricanes, floods, and wildfires in accordance with state or local codes, ordinances, and requirements. Recipients shall submit a “resiliency narrative” that describes all such measures incorporated into the project.

## **VII. State and Local Codes**

All recipients seeking HTF from EOHLC must meet all applicable Massachusetts state and local codes, ordinances, and requirements including but not limited to the following:

- Local Zoning Ordinances
- Massachusetts State Building Code
- National Electrical Code
- Massachusetts Fuel Gas and Plumbing Code
- Massachusetts Fire Regulations
- Massachusetts Elevator Regulations
- Massachusetts Sanitary Code
- Massachusetts Department of Public Health Requirements
- Massachusetts Historic Commission Regulations
- U.S. Department of Energy Regulations
- Massachusetts Department of Environmental Protection Regulations
- HUD Rehabilitation Guidelines
- HUD Section 8 Housing Quality Standards
- Americans with Disabilities Act
- Massachusetts Architectural Access Board Regulations

- Local, State and Federal Requirements Related to Sewage/Septic Systems
- Requirements for Housing Trust Fund Environmental Provisions

### **VIII. Uniform Physical Condition Standards (UPCS)**

EOHLC will require all recipients to ensure that HTF-assisted housing will be decent, safe, sanitary, and in good repair as described in 24 CFR 5.703 (<http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:1.1.1.1.5>). As it monitors HTF-assisted projects, EOHLC will include the UPCS inspectable items and observable deficiencies for the site, building exterior, building systems (multifamily housing only), common areas (multifamily housing only), and units identified on the following. Recipients should review the HTF FAQ appendices: Uniform Physical Condition Standards for Multifamily and Single Family Housing Rehabilitation (/onecpd/assets/File/HTF-FAQ-Appendices-UPCS-for-Multifamily-and-Single-Family-Housing-Rehabilitation.pdf) as well as Attachment E to the HTF Allocation Plan, Uniform Physical Condition Standards for Multifamily Housing Rehabilitation - August 2016.

### **IX. Additional EOHLC Standards for Multifamily Rehabilitation Projects**

As indicated, the Executive Office has maintained design and scope standards for multifamily rental rehabilitation projects for many years. EOHLC encourages recipients of multifamily rental projects to follow its standards as closely as possible and to discuss their projects -- prior to submission -- with Executive Office staff.

#### **Overall Unit Size:**

- SRO: 120 square feet (sf)
- Enhanced SRO: 175 sf (includes food preparation area and bathroom)
- One-bedroom unit: 600 sf (or applicable HUD program standards; for example for Section 202)
- Two-bedroom unit: 850 sf
- Three-bedroom unit: 950 sf
- Four- or more bedroom unit: 1,100 sf

#### **Minimum Room Size:**

Rooms in rehabilitation projects shall meet the following minimums (including a dimensional minimum):

- Primary bedrooms: 120 sf (10.5 ft.)
- Secondary bedrooms: 100 sf (9.5 ft.)
- Living room: 150 sf (12 ft.)
- Dining room: 100 sf (10 ft.)
- Living/dining room combo: 200 sf (12 ft.)
- Full bathroom: 40 sf (5 ft.)

If a room has a sloped ceiling, any portion of the room measuring less than 5 feet from the finished floor to the finished ceiling shall not be included in the measurements of the floor area.

Closets and storage cannot be included in the measurement of the floor area.

**Kitchen:**

The size of the unit should determine the amount of counter space to be provided:

	<i>counter space length</i>	<i>minimum circulation width</i>
• One-bedroom unit	6 linear feet	4 feet
• Two-bedroom unit	8 linear feet	4 feet
• Three or more bedroom unit	10 linear feet	4 feet

The minimum total linear feet of counter cannot include the space occupied by the sink, stove, and refrigerator.

**Bathrooms:**

The number of bedrooms within the unit determines the number of bathrooms:

• One-bedroom unit	One bathroom
• Two-bedroom unit	One bathroom
• Three bedroom unit	One-and-a-half bathrooms (minimum)
• Four or more bedroom units	Two bathrooms

**Reusable and Sustainable Material Use:**

Recipients are asked to:

- Use fewer building materials thorough advanced framing techniques or other systems approach to building construction.
- Use recycled content such as:
  - High fly ash content concrete in foundations, wall systems and finish floors.
  - Cementitious siding or stucco with high fly ash content.
- Composite framing such as engineered joists instead of dimensional lumber:
  - Light-gauge steel in whole house or interior walls. (Verify that thermal bridging is avoided if steel is used in exterior walls.)
  - Rapidly renewable resource materials for flooring and finishes, such as wheat straw board.
  - Insulation made of renewable, easily recyclable material or recycled content such as recycled newspaper (cellulose), soy-based foam, cotton fiber, or other when appropriate.
- Use locally available building materials, such as:

- Locally produced masonry
- Recycled lumber or locally milled timber or Forest Stewardship Council (FSC) certified lumber or other recycled materials.
- Recycled aggregate from demolition of existing site work or structure or nearby source.

**Energy Efficiency:**

Recipients are asked to:

- Use properly sized and designed sealed combustion boilers or furnaces and distribution systems or other low-energy use heating.
- Use tankless water heaters, indirect water heaters, sealed combustion water heaters, or solar hot water heaters.
- Specify LED fixtures.
- Specify insulation as required by Energy Star standards and above code where feasible and contributing to significant energy savings.
- If possible, avoid or minimize air-conditioning with natural ventilation or other passive cooling strategy. Ensure that adequate cooling is included in all elderly developments.
- Consider renewable energy sources such as solar thermal collectors, photovoltaics (or pre-wire and provide adequate roof structure so that systems can be added when feasible), or wind turbines, using research grants and rebates when possible.

**Indoor Environmental Quality – Healthy Buildings:**

Recipients are asked to:

- Detail building envelope to shed water with adequate flashing and a continuous drainage plane (rain-screen). Design walls to be able to dry to the interior, exterior, or both as appropriate.
- Provide operable windows with screens to take advantage of natural cross-ventilation when possible.
- Provide continuously running, dual-speed exhaust fans in all bathrooms.
- Provide kitchen range hoods that are ducted to the outdoors, preferably exhausted at roof level.
- Use air sealing techniques during construction to compartmentalize units to minimize unwanted air transmission.
- Provide mechanical ventilation to remove excess moisture and indoor pollutants from living spaces and to provide an adequate amount of outside air, preferably individually supplied to each dwelling unit.
- Specify sealed combustion boilers, furnaces, and water heaters.
- Use only low volatile organic compound (VOC) paints, sealants, and finishes.
- Use paperless gypsum board or cement board substrates at all damp areas.

- Install flooring with low or no off-gassing such as concrete, ceramic tile, FSC certified wood flooring, linseed-oil based resilient flooring, or bamboo with low urea formaldehyde content. If wood flooring is finished on site, use low VOC water-based polyurethane finish.
- Minimize the use of carpeting, which can hold dirt, mold, and other allergens. If carpeting is necessary, specify carpet with low VOCs recyclable fiber and backing content. If available, install carpeting that can be recycled.
- Install carbon monoxide detectors in living areas as well as garages.
- Perform fresh air flushing before occupancy.
- Educate tenants or owners by providing user manuals on use of systems, their required maintenance such as changing of filters and batteries. Use filters that remove allergens in forced-air units.
- Protect onsite building materials from rain during construction to prevent mold growth.
- Design wall and ceiling assemblies to mitigate impact sound and air-borne sound transmission between units, preferably at a level that exceeds building code requirements. .

### **Additional Design Considerations for Multifamily Rehabilitation Projects:**

Recipients should note:

- Rehabilitation projects funded with federal funds must be demonstrably improved in order to mitigate the impact of potential natural disasters or service disruptions (e.g., significant power outages, earthquakes, hurricanes, floods) in accordance with applicable state and local ordinances.
- Kitchens must be designed with a pantry or broom closet.
- All applicable appliances must be Energy Star\* rated.
- Range hood vented to outdoors.
- Garbage disposal, ¾ HP minimum.
- 30" range with self-cleaning oven.
- Dishwasher, if the unit includes a full kitchen and is larger than one-bedroom.
- Refrigerator sized for maximum energy savings.
- Storage space within units or in central storage spaces should be provided wherever possible.
- The design should optimize the use of space. Unit size and layout should maximize efficiency and minimize circulation (hallways), provide spacious furnishable main living areas and provide adequate storage.
- For all buildings under rehabilitation, designs shall include durable, low maintenance, energy efficient systems and materials. Electric heat is not acceptable.

- Cementitious siding materials, such as Hardi-plank or Cem-plank is the preferred exterior siding, as opposed to vinyl cladding for residential buildings.
- Specifications should include fiberglass/asphalt roofing shingles with a minimum of a 25-year warranty or light-colored TPO membrane for flat roofs. All pitched roofs must have a ridge and soffit venting system when appropriate.
- Window guards, window sash limiters, and heavyweight screening must be installed in windows of housing units where a child age 6 or under may live or regularly visit.
- Painted finishes should have a one-coat primer and two finish coats.
- Bathroom floors must be tiled with a floor grade, non-slip glazed or unglazed ceramic tile or sheet vinyl. VCT is not approved for bathrooms. If carpeting is installed, 26 oz. minimum fabric face weight per square yard is the standard. Specify carpet with low VOCs and recyclable fiber and backing content. If available, install carpeting that can be recycled.
- Stacked plumbing with suitable shut-offs to facilitate maintenance is strongly recommended in order to reduce material and construction costs, centralize water supply and drain lines.
- All outdoor mechanical equipment should be located and installed so that it cannot be seen from the surrounding street. Special attention must be given to adhere to all standards promulgated to prevent excessive noise or other kinds of annoyance from any mechanical equipment.
- As previously indicated, if the useful life of one or more major systems (including structural support, roofing, cladding, weatherproofing, plumbing, electrical and HVAC) is less than the applicable period of affordability, the recipient must ensure that a replacement reserve is established to replace systems as needed.

Any proposed deviations from design recommendations should include a narrative describing why an alternative approach/material is preferred.

#### **X. Required Architectural Submission (Multifamily Rental Rehabilitation Projects)**

This section outlines the type of drawings and other documentation that recipients must submit for rehabilitation projects that fall within these guidelines. EOHLC requires that an architect and/or construction cost estimator prepare the plans and construction budgets for each project.

**Site Plan:** Indicate the location of the building, property lines, access to the building from the street, landscape, curb cuts, driveways, orientation (north arrow), at an appropriate scale.

**Existing Floor Plan:** Include plans for each floor, including basement and roof. Drawings should be drawn at an appropriate scale. The existing floor plans should include the following information:

- Structural elements such as existing bearing walls, columns (indicate this with a note or graphically, e.g.: shade in the structural walls).
- Direction of floor joists if structural changes are being made.
- Existing plumbing, ventilation chase, fireplaces and any other information that affects design.

**Proposed Floor Plans:** Drawings should address changes of layout, removal of walls or structural elements, or any other changes. The proposed floor plans should include the following information:

- Unit Floor Area (i.e., the total area within the unit exterior walls).
- Room Areas (i.e., the area within the perimeter wall of the room excluding storage and closet space).
- Critical overall and interior dimensions.
- Vertical structural elements.
- Wall thickness to scale.
- Location and size of windows, indicating the window-sill height (measured from the finished floor).
- Ceiling heights.
- Location of mechanical equipment, meters, and electric service panels.
- Location of water, gas, sewer, and electric services.
- In the case of attic renovation, drawings should be provided indicating ceiling heights, knee wall heights, dormers location, etc.
- All units should be built with internet connectivity, COAX cable for TV and CAT5e or better for tel/data.

**Elevations:** Drawings should include all elevations impacted by the scope of work. .

## **XI. Landscaping Guidelines**

This section outlines suggestions for site improvements and landscaping for projects that all under these guidelines.

### **Site Design:**

- Where possible and feasible, provide usable areas such as the following where the community can meet and gather:
  - Safe play areas for children in multifamily developments.
  - Community garden areas, including planters for vegetables, herbs, flowers. .
  - Semi-public open spaces.
  - Patios, front yards, porches, or balconies to encourage community interaction and provide eyes-on-the-street surveillance.
- Provide for alternative transportation, e.g., bike paths and storage, pedestrian links, car shares.

- Provide all required accessible routes of travel, and in general, avoid use of stairs, wherever the terrain permits.

Prioritize pedestrian over vehicular traffic and use traffic calming devices. Incorporate attractive well-lit pedestrian paths wherever possible

#### **Site Demolition and Clearing:**

- Remediate all hazardous materials such as asbestos (ACMs), lead (LCMs), PCB's, VOC's, Arsenic, etc. carried out in accordance with all applicable local, state and federal regulations.
- Provide a summary and accurate estimate of the site remediation plan, if applicable, along with grading plans.

#### **Tree/Shrub Pruning and Removal:**

- Remove trees that originate at foundation wall of building or present a hazard to the structure.
- Remove dead trees.
- Trim stump to below grade.
- Prune back branches that overhang roof or brush walls of building.
- Prune branches that may threaten utility connections.
- Clean up and properly dispose of brush and wood.
- Remove shrubs that are diseased, those that obstruct walkways, drives and pathways, and those that obstruct windows.

**Grading:** Restore grade to include, when appropriate, a 6" minimum deep planting bed of clean loam/topsoil. New grade should slope away from buildings and fit the existing neighboring grades, particularly at street or sidewalk. Grades for usable lawn areas should not exceed twenty percent. The grade across paved areas should not exceed four percent, or any applicable maximum slope required by accessibility or applicable site engineering standards.

#### **Paving, Fencing and Walls:**

- Restore walks and driveways to good condition.
- Fences should generally never exceed a height of 6 feet. Material and style should be appropriate to surrounding neighborhood.

#### **Lawns:**

- Sod or seed new lawns. If seeded, pegged cloth or salt hay should be used to prevent erosion on slopes in excess of six percent. If lawn area is shady, seed or sod should include appropriate mix of fescues or other low-maintenance grasses, which will tolerate shade.
- Require general contractor to maintain all lawns throughout applicable warranty periods.



**Plantings:** Select hardy, maintainable, regional stock. All plantings should be placed in a manner that enhances the appearance of the property and is in keeping with the surrounding neighborhood.

**All recipients and/or other development team members should contact EOHLC staff in advance of submitting applications for HTF assistance. EOHLC staff members are available to answer questions on rehabilitation standards as well as other aspects of HTF.**

# **ATTACHMENT C**

## **MA DHCD HTF**

### **Uniform Physical Condition Standards for Multifamily Housing Rehabilitation August 2016**

MIA DHCD RTF Rehab Standards Appendix E: Uniform Physical Condition Standards for Multifamily Housing Rehabilitation - August 2016

NOTE: Deficiencies highlighted in blue are life-threatening and must be addressed immediately. If the housing is occupied.	
<p><b>Requirements for Site Accessible Item</b>                      Peeling and Gaps</p>	<p>Visible Deficiency                      Cracks/peeling/falling/loosening                      Holes</p> <p>Missing sections</p> <p>Cracks/Peeling Areas</p> <p>Overgrown/Overhanging Vegetation</p>
<p><b>Grounds</b></p>	<p>There is an accumulation of more than 5 inches deep water in a large section of the grounds more than 20% is suitable for its intended purpose due to poor drainage or pooling</p> <p>Seeds which may pose a health risk if ingested for prolonged periods</p> <p>Strong odors, natural gas or methane odors that could pose a risk of explosion fire and/or pose a health risk (leakage)</p> <p>Any exposed bare wires or openings in electrical panels/closets/wires do not pose a risk</p> <p>Any water leaking, dripping or seeping on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion</p> <p>Flammable materials are improperly stored, causing the potential risk of fire or explosion</p> <p>Too much garbage has gathered more than the planned storage capacity, or garbage has gathered in an area not maintained for storage or storage of debris</p> <p>Any general defects or hazards that pose a risk of health injury</p> <p>Any physical defect that could cause falling or branching of human skin or other bodily harm</p> <p>Any physical defect in walkways or other travel areas that poses a tripping risk</p> <p>Presence of infestation of insects, including roaches and ants throughout a unit or room, that penetration or storage area or other area of building</p> <p>Substantial enough to present a health and safety risk</p> <p>Evidence of rats or mice - sightings, set or mousetraps, or droppings substantial enough to present a health and safety risk</p> <p>Washbasin cannot be locked or is missing</p> <p>The project site is not usable or not usable because of deterioration or damage</p> <p>Cracks that are large enough to affect traffic ability over more than 5% of the assembly's parking lot/sidewalks/roads or pose a safety hazard</p> <p>2 inches or more of water has accumulated making 5% or more of a parking lot/sidewalk unusable or unsafe</p> <p>Articles or loose material that have made a parking lot/sidewalk unusable or unsafe for vehicles and/or pedestrians or could cause tripping or falling</p> <p>Settlement/heaving has made a parking lot/sidewalk unusable or creates unsafe conditions for pedestrians and vehicles</p> <p>More than 20% of the equipment is broken or does not operate as it should or any item that poses a safety risk</p> <p>More than 20% of the play surface area shows deterioration or the play surface area could cause tripping or falling and thus poses a safety risk</p> <p>A single well or part of the enclosure has collapsed or is heaving and in a state of falling or may cannot be stored in the designated area because it is too small to store before work is done</p> <p>The system is partially or fully blocked by a large quantity of debris, causing people into adjacent areas or unsafe where unsafe is not intended</p> <p>The door will be missing, damaged, loose or otherwise unusable</p> <p>Cracks, sagging/dipping or missing sections that affect traffic ability over more than 5% of the assembly's walkways/roads or any defect that creates a tripping or falling hazard</p> <p>More than 5% of walkways have large areas of spalling - larger than 4 inches by 4 inches - that affects traffic ability</p>
<p><b>Health &amp; Safety</b></p>	<p>Parasitic Drainage</p> <p>Air Quality - Sewer Odor Detected</p> <p>Air Quality - Propane/Natural Gas/Methane Gas Detected</p> <p>Electrical Hazards - Exposed Wires/Open Panels</p> <p>Electrical Hazards - Water Leaks on Near Electrical Equipment</p> <p>Flammable Materials - Improperly Stored</p> <p>Garbage and Debris - Clutters</p> <p>Hazards - Other</p> <p>Hazards - Sharp Edges</p> <p>Hazards - Tripping</p> <p>Infestation - Insects</p> <p>Infestation - Rats/Mice/Varnish</p> <p>Kitchen Missing/Damaged</p> <p>Stairs Damaged</p> <p>Peeling</p> <p>Pathology/Local Mosquito</p> <p>Settlement/Heaving</p> <p>Damaged/Broken Equipment</p> <p>Discolorated Play Area Surface</p> <p>Broken/Damaged Enclosure/Enclosures Outside Storage Space</p> <p>Damaged/Falling/Learning</p> <p>Damaged/Obstructed</p> <p>Broken/Missing Hand Railing</p> <p>Cracks/Settlement/Heaving</p> <p>Spalling/Exposed rebar</p>
<p><b>Requirements for Building Accessible Item</b></p>	<p>Visible Deficiency</p> <p>Damaged Frames/Thresholds/Doors/Tiles</p> <p>Damaged Hardware/Locks</p> <p>Damaged Surface (Holes/Paint/Building Glass)</p> <p>Damaged/Missing Screens/Storm/Security Door</p> <p>Deteriorated/Missing Caulking/Seals</p>

Fire Protection	Missing Door	Any window above that is missing	Any window above that is missing
	Blocked Egress/Exit	Blocked egress or exit between rooms or block access from egress	Blocked egress or exit between rooms or block access from egress
	Utility Missing Components	Any of the functional components that affect the function of the fire escape - any section of a ladder or railing, for example - are missing	Any of the functional components that affect the function of the fire escape - any section of a ladder or railing, for example - are missing
	Cracks/Leaks	Large cracks in foundation more than 1/8" wider than 1/8" inches deep by 6 inches long that prevent a joint or edge of a masonry structure problem, or opportunity for water penetration or systems of wall or floor that are broken apart	Large cracks in foundation more than 1/8" wider than 1/8" inches deep by 6 inches long that prevent a joint or edge of a masonry structure problem, or opportunity for water penetration or systems of wall or floor that are broken apart
	Spalling/Reinforced Rebar	Significant spalling areas affecting more than 10% of any foundation wall or other exposed reinforcing and not repair or allow	Significant spalling areas affecting more than 10% of any foundation wall or other exposed reinforcing and not repair or allow
	Structural Hazards - Exposed Steel/Reinforced Concrete	Any exposed steel reinforcement or systems of electrical joints (except where they could pose a risk of fire, electrocution or explosion)	Any exposed steel reinforcement or systems of electrical joints (except where they could pose a risk of fire, electrocution or explosion)
	Structural Hazards - Water Leaking into/over Floor/Slab/Joist	The wall cannot be used or left in place because a door or window is needed that, a hole is needed, joint is missing, cracked, tilted, damaged or other condition blocks exit	The wall cannot be used or left in place because a door or window is needed that, a hole is needed, joint is missing, cracked, tilted, damaged or other condition blocks exit
	Emergency Fire Exit - Emergency Exit Exit, Blocked/Unusable	For stairs that clearly identify all emergency exit missing or there is an alternative in the area of the exit	For stairs that clearly identify all emergency exit missing or there is an alternative in the area of the exit
	Emergency Fire Exit - Missing Exit Signs	Recognizable exit signs are conspicuously placed, coating the potential risk of fire or explosion	Recognizable exit signs are conspicuously placed, coating the potential risk of fire or explosion
	Flammable/Combustible Materials - In properly stored	Too much garbage is left piled up more than the planned storage capacity or garbage has gathered in an area not designed for storage or storage garbage or debris	Too much garbage is left piled up more than the planned storage capacity or garbage has gathered in an area not designed for storage or storage garbage or debris
	Garbage and Debris - Outside	Any garbage debris or materials that pose risk of bodily injury	Any garbage debris or materials that pose risk of bodily injury
	Hazards - Other	Any physical defect that could cause falling or knocking of person, pain or other bodily harm	Any physical defect that could cause falling or knocking of person, pain or other bodily harm
	Hazards - Sharp Edges	Any physical defect in workplace or other controlled area that poses a tripping risk	Any physical defect in workplace or other controlled area that poses a tripping risk
	Hazards - Tripping	Condition of operation of non-slip-safety shoes and mats throughout a unit or room, floor penetration or a foreign object in either area of building	Condition of operation of non-slip-safety shoes and mats throughout a unit or room, floor penetration or a foreign object in either area of building
	Infestation - Insects	Presence of rats or mice - including, but not limited to, rat or mouse holes, or droppings substantial enough to present a health and safety risk	Presence of rats or mice - including, but not limited to, rat or mouse holes, or droppings substantial enough to present a health and safety risk
	Infestation - Rod/Mice/Vermis	10% or more of the lighting fixtures and bulbs are broken or missing	10% or more of the lighting fixtures and bulbs are broken or missing
	Broken Hardware/Bells	Significant missing or damaged hardware	Significant missing or damaged hardware
	Damaged Scaffolding	Missing or damaged scaffolding	Missing or damaged scaffolding
	Damaged Vent	Missing or damaged vent	Missing or damaged vent
	Damaged/Chipped Doors	Missing or damaged door	Missing or damaged door
	Damaged/Chipped Windows/Sliding Doors	Missing or damaged window or door	Missing or damaged window or door
	Missing/Damaged Components from Downpour/Gutter	Missing or damaged component from downpour/gutter	Missing or damaged component from downpour/gutter
	Missing/Damaged Signage	Missing or damaged signage	Missing or damaged signage
	Fencing	Missing or damaged fence	Missing or damaged fence
	Cracks/Leak	Missing or damaged crack/leak	Missing or damaged crack/leak
	Damaged Chimney	Missing or damaged chimney	Missing or damaged chimney
	Missing/Damaged Building Material	Missing or damaged building material	Missing or damaged building material
	Missing/Peeling/Flaking/Spalling	Missing or damaged peeling/flaking/spalling	Missing or damaged peeling/flaking/spalling
	Stained/Peeling/Chipped Paint	Missing or damaged stained/peeling/chipped paint	Missing or damaged stained/peeling/chipped paint
	Broken/Missing/Cracked Panels	Missing or damaged broken/missing/cracked panels	Missing or damaged broken/missing/cracked panels
	Damaged Gutter/Downspout/Drainage	Missing or damaged gutter/downspout/drainage	Missing or damaged gutter/downspout/drainage
	Missing/Blocked/Sealed	Missing or damaged missing/blocked/sealed	Missing or damaged missing/blocked/sealed
	Peeling/Needs Paint	Missing or damaged peeling/needs paint	Missing or damaged peeling/needs paint
	Security Alarm Present/Alarm	Missing or damaged security alarm present/alarm	Missing or damaged security alarm present/alarm
	Requirements for Building Systems	Missing or damaged requirements for building systems	Missing or damaged requirements for building systems
	Unusable/Inoperative	Missing or damaged unusable/inoperative	Missing or damaged unusable/inoperative
	Corrosive Water	Missing or damaged corrosive water	Missing or damaged corrosive water
	Water Leaking into/over	Missing or damaged water leaking into/over	Missing or damaged water leaking into/over
	Blocked Access/Storage	Missing or damaged blocked access/storage	Missing or damaged blocked access/storage
	Panel Missing	Missing or damaged panel missing	Missing or damaged panel missing















	Downward Compression Test	100% or more of the wall is in compression
	Pushing/Shear/Pull	100% or more of interior wall panel is pushing or pulling
	Interior Slab/Wall/Wind Bracing	Evidence of a block, arch or nail/bow covering a wall area greater than 1 foot square
Windows	Cracking/Spalling/Missing Panes	Any remaining areas of glass have the cracks either greater than 4" length or numerous enough to impact the structural integrity of the window pane
	Distorted Window Sill	Distortion of sill is less than 1/4" over the length of the sill
	Missing/Overstressed/Carrying/Walking/Compression	There are missing or distorted sills or arches with evidence of loads or stresses in the window or surrounding adjacent part
	Transferable Load Acceptable	Any window that is not functioning or causing the adjacent frame work to transfer
	Panel/Beams/Pier	More than 10% of interior window panel is peeling or missing
	Security from Insects/Fires	Fire ability to pass through the window is limited by security bars that do not fail or function improperly, therefore, pane safety risks