

## 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) in order to receive federal housing and community development funding. HUD has established three basic goals for the programs it funds under the Consolidated Plan: to provide decent housing, a suitable living environment and expanded economic opportunities, especially for low income people.

The 2020 – 2024 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 2020 Action Plan pertain to the activities of the following programs:

- Community Development Block Grant Program (CDBG)
- HOME Investment Partnerships Program (HOME)
- Housing Opportunities for Persons with AIDS (HOPWA)
- Emergency Solutions Grant (ESG)
- 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 takes into account population, poverty, incidence of overcrowded housing, and age of housing stock. Consolidated Plans must be submitted every five years; more detailed action plans are required annually.

By design a collaborative process, the Consolidated Plan creates the opportunity for strategic planning and citizen participation to take place 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 Department of Housing and Community Development (DHCD), 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 \$59.4 million per year over the next five years for these programs, beginning with the federal fiscal year that started on 10/01/19. The Community

Development Block Grant funds, which represent nearly two-thirds of that amount (approximately \$34.7 million annually) *may only be expended* in the state’s “non-entitlement” communities. These are the 314 cities and towns that are not eligible to apply for community development funding directly from HUD. (Thirty-seven other communities – mostly larger cities – receive more than \$86.7 million annually, directly from HUD, for which they submit their own consolidated plans.) Funding under the other four programs may be allocated statewide, although DHCD 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 2020-2024 Consolidated Plan provides the framework for the Commonwealth’s continuing investment to help meet the housing and community development needs of its residents and municipalities. 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 in a variety of public forums, a 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 2020-2024 Massachusetts plan are:

- Promote strong, sustainable 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 full and fair 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 Department of Housing and Community Development, 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.

Progress has been made in the past five years. In 2018, the legislature passed an historic \$1.8 Billion housing bond bill. The bill included provisions to recapitalize DHCD's bond-funded affordable housing production and preservation programs, to invest in public housing modernization, provided options to help disabled residents remain in their homes, to support neighborhood stabilization and the development of housing units in commercial areas served by public transit. Further, the bill extended the Massachusetts Low Income Housing Tax Credit (LIHTC) at \$20 million per year. The state increased its commitment to new housing production, a challenging task in an era of high costs and shrinking subsidies, and to removing the barriers that have stifled housing production. In 2017 the Administration launched the Housing Choice Initiative to build 135,000 new housing units by 2025. The initiative rewards communities that are building housing, provides coordinated technical assistance and proposed legislative reform to the state's land use laws to make it easier for local governments to adopt specific zoning measures that will produce more housing. On the non-housing front, Massachusetts has invested heavily in its public facilities and infrastructure, including the roads, bridges, schools and libraries that are a prerequisite to sustainable housing and community development.

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

The Consolidated Planning process is a collaborative one. DHCD, 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, and not solely as a requirement for the Con Plan process. DHCD 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 2020-2024 Consolidated Plan, and the 2020 Action Plan, DHCD 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 ran from October 19, 2020 through November 18, 2020. A virtual public

hearing on November 18, 2020, was held using a virtual format due to the state of public health emergency provided additional opportunity for the public to comment on either of these documents.

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

DHCD took into consideration all comments on the Consolidated and Action Plans received at the hearings or in writing prior to the close of business on November 18, 2020.

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

Broadband availability and connectivity in rural Massachusetts, primarily in Western MA, continues to be an issue in some of the smaller, more remote towns. Affordability and availability of housing in the tight MA market continue to be of concern, as well as adequate protections for low income households, especially those affected by COVID-19. Concern around policy regarding emergency housing assistance issues continue primarily as relates to adequate funding.

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

N/A

## **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	MA Dept. of Housing & Community Development
HOPWA Administrator		MA Dept. of Public Health
HOME Administrator	MASSACHUSETTS	MA Dept. of Housing & Community Development
ESG Administrator	MASSACHUSETTS	MA Dept. of Housing & Community Development
	MASSACHUSETTS	MA Dept. of Housing & Community Development

**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**

The Consolidated Planning process is a collaborative one. DHCD, 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. Prior to developing the 2020-2024 Consolidated Plan, and the 2020 Action Plan, DHCD held several public input meetings across each of the Consolidated Plan programs and in various parts of the state specifically to solicit citizen input regarding housing and community development needs in their communities. Among other topics, the focus group participants were asked to identify key priorities; discuss if and how their needs had shifted since the last Consolidated Plan was prepared; what progress had been made over the past five years; which strategies succeeded and which fell short; what the current gaps in services are; and what types of non-financial resource requirements they have. Beyond the statutorily required citizen participation and consultation, over the spring and summer of 2019, the Baker-Polito Administration hosted nine regional engagement sessions across the Commonwealth, soliciting feedback from residents and businesses. Expert moderators led breakout discussions across six areas: Community & Neighborhood Development, Innovation & Start-Ups, Jobs & Workforce Development, Housing, Key Clusters & Industries, and Business Growth. These led to the development and implementation of the “Partnerships for Growth” Economic Development Plan, and informed to a degree the 2020-2024 Consolidated 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))**

DHCD 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**

There are currently 16 CoC across the Commonwealth, including the Balance of State. DHCD engages regularly with the multiple CoC across the Commonwealth, including supporting the merging of CoC, either into the Balance of State or between other CoC, providing technical assistance on a variety of CoC functions, participating in state-wide CoC meetings, engaging in listening sessions around the procurement of our state funded shelter systems, and consulting on the best use of ESG funding. 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, DHCD connects with each CoC through one on one meetings, surveys, and monitoring visits (for existing ESG contracts). Since the onset of COVID, DHCD staff have been in regular communication with the CoCs about meeting the need for temporary emergency shelter & connecting highly vulnerable persons to shelter and housing; communication with local veterans agencies, the Massachusetts Interagency Council on Housing and Homelessness (ICHH), and Executive Office of Health and Human Services (EOHHS) Youth Region Leads Staff is also ongoing. DHCD is leading conversations between CoC Leads and their local entitlement communities and in many instances are coordinating ESG-CV and state funded services with CARES allocations by entitlement communities. Additionally, staff are coordinating the exchange of information between these DHCD, the Massachusetts Command Center (a cross agency structure spearheading the statewide response to COVID,) homeless service providers, and the Massachusetts Emergency Management Agency (MEMA), specifically regarding statewide and local government efforts to request FEMA reimbursement for emergency shelter necessary to protect the public and prevent the spread of COVID-19.

In FFY20 and beyond, DHCD will continue to work with local CoC to develop and improve existing policies around utilizing motels for emergency shelter in response to COVID, 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**

DHCD continues to provide each CoC with detailed information about the DHCD ESG funded program within their jurisdiction including the sub-recipients success at meeting the proposed performance measurements and compliance with ESG rules and regulations. ESG staff communicate with CoC Lead organizations individually to discuss the needs in their communities & as a group through the Massachusetts Statewide CoC planning meetings. DHCD intends to release a new ESG NOFA (for FFY21 funding) and is coordinating with the CoCs to understand what current gaps exist (both programmatically and administratively) that can be addressed through the procurement.

Please see the attached Appendix for ESG-specific information pertaining to consultation.

**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-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 is responsible for the administration of the HOPWA program. Many other organizations participated through the public meetings/hearings. DHCD and DPH's Childhood Lead Poisoning Prevention Program also consult and partner regularly in a coordinated, reciprocal relationship on an ongoing basis on lead paint testing, lead safe remediation and abatement. The two agencies consult regularly to determine whether MA will pursue lead remediation funding from HUD. The most recent conversations involved utilization of a settlement from Home Depot, and the use of a trust fund established to remediate units occupied by low income families.
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. DHCD works closely with MHP to finance new housing, and to preserve existing affordable housing and secure long-term affordability extensions.
3	<b>Agency/Group/Organization</b>	MassHousing
	<b>Agency/Group/Organization Type</b>	Housing Quasi public housing finance agency

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Program design and resource allocation
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	DHCD works closely with quasi-public agencies including MassHousing to finance new housing, and to preserve existing affordable housing and secure long-term affordability extensions.
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 Community and 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>	Among other efforts, DHCD 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 DHCD meets regularly with CEDAC to assess needs, plan for and coordinate financial assistance, structure programs, and make funding awards. DHCD 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 - Narrowing the Digital Divide MA Technology Collaborative
	<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>	Both DHCD and the Massachusetts Technology Collaborative (MTC) operate under the broad umbrella of the Executive Office of Housing and Economic Development (EOHED), and through EOHED coordination it was determined that broadband issues have been assigned to the MTC. 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 DHCD 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

	<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>MACDC is a membership organization for Massachusetts community development corporations (CDCs). CDCs in Massachusetts implement several programs and initiatives funded by DHCD, 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. [They] advance racial and economic equity by creating 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 DHCD resources, and are reliable partners and problem solvers when needed.</p>
7	<b>Agency/Group/Organization</b>	Massachusetts Association for Community Action
	<b>Agency/Group/Organization Type</b>	Membership organization
	<b>What section of the Plan was addressed by Consultation?</b>	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>DHCD 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.</p>



8	<b>Agency/Group/Organization</b>	EOHED
	<b>Agency/Group/Organization Type</b>	Housing Services-Education Services-Employment Service-Fair Housing Other government - State Other government - Local Regional organization Planning organization Business and Civic Leaders Community Development Financial Institution Foundation Neighborhood Organization Private Sector Banking / Financing
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development See brief description below
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	See "Partnerships for Growth" discussion in the Introduction above. EOHED led the effort and administered the stakeholder engagement. The stakeholder engagement included a secondary level of deep dive sessions on specific subjects that informed the process and programmatic content of the Consolidated Plan, as well as operational considerations for all grants within the Secretariat.
9	<b>Agency/Group/Organization</b>	MA Chapter National Association of Housing & Redevelopment Officials
	<b>Agency/Group/Organization Type</b>	PHA Services - Housing Service-Fair Housing MA NAHRO, LHAs and others
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	DHCD 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 Con Plan. 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.
10	<b>Agency/Group/Organization</b>	Regional Housing Network of Massachusetts
	<b>Agency/Group/Organization Type</b>	Housing Services-Children Services-Elderly Persons Services-homeless Service-Fair Housing 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

	<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>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 DHCD. As such DHCD consults regularly with the organizations, defining program guidelines, problem solving, prioritizing and continually assessing need and ultimately the program design.</p>
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**Identify any Agency Types not consulted and provide rationale for not consulting**

N/A

**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	DHCD	The goals work with one another; the priorities and funding allocation decisions are designed to optimize available funds and leverage other resources.
Moving to Work	DHCD	The goals work with one another; the priorities and funding allocation decisions are designed to optimize available funds and leverage other resources.

**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))**

The implementation of the Consolidated Plan is carried out by dozens of state agencies, departments and quasi-public entities, working in concert with a network of for-profit and nonprofit service providers and developers and the 351 cities and towns of the Commonwealth of Massachusetts. The Executive Office of Housing and Economic Development (EOHED) aligns the state's traditional housing and economic development agencies to more effectively coordinate policies and programs in these areas. DHCD consults regularly with cities and towns, and regional planning agencies, in the development and implementation of its programs.

**Narrative (optional):**

As a practice, in addition to the outreach and feedback loop that takes place during the development, preparation and rollout of the Five Year Consolidated Plan, DHCD relies heavily on the most recent public hearings and information sessions specific to CDBG, HOME, HTF and ESG. Beyond that, we incorporate the ongoing engagement that takes place 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. This became particularly salient this year as the COVID-19 pandemic impacted DHCD's traditionally robust public engagement process. Copies of public notices and other documentation is found in the ES-05 Executive Summary section of the Con 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 were issued in draft form for a 30-day public comment period that ran from October through November. A public hearing on November 18, 2020, in a virtual format due to the public health emergency. A recording of the hearing is available at <https://www.mass.gov/service-details/dhcd-consolidated-action-plans>. That hearing provided additional opportunity for the public to comment on these documents.

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

DHCD took into consideration all comments on the Consolidated and Action Plans received at the hearings or in writing prior to the close of business on November 18, 2020.

As a practice DHCD 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. This became particularly salient this year as the COVID-19 pandemic impacted DHCD's traditionally robust public engagement process.

For example, DHCD'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 opportunity to comment on the use of funding and services provided. Additionally, DHCD shares information about performance reports with CoC lead agencies, and shares statewide outcome details with at Balance of State CoC Planning Groups and at statewide CoC meetings.

As another example, in preparing its Qualified Allocation Plan (QAP) DHCD engages in broad consultation. In Massachusetts during the past few years, the state-level public lenders – specifically, the Department of Housing and Community Development and its quasi-public affiliates – have

taken numerous steps to evaluate development costs and to identify areas where cost reductions can be achieved. The Department 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:

- Department of Housing and Community Development (DHCD)
- 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. DHCD 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)
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1	Public Hearing	Non-targeted/broad community	Attendance was virtual, and was lower than in past years which was not surprising due to the hearing being held remotely in the midst of the COVID-19 pandemic.	Broadband availability and connectivity in rural Massachusetts, primarily in Western MA, continues to be an issue in some of the smaller, more remote towns. Affordability and availability of housing in the tight MA market continue to be of concern, as well as adequate protections for low income households, especially those affected by COVID-19. Concern around policy regarding emergency housing assistance issues	N/A	<a href="https://www.mass.gov/doc/con-plan-2020-public-hearing-notice-november-18-2020/download">https://www.mass.gov/doc/con-plan-2020-public-hearing-notice-november-18-2020/download</a>
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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)
				continue primarily as relates to adequate funding.		

**Table 4 – Citizen Participation Outreach**

# Needs Assessment

## NA-05 Overview

### Needs Assessment Overview

The state has 6.67 million residents in 2.65 million households with a median household income of \$85,843 and a poverty rate of 9.4%. Approximately 65% of the population is employed. Even though the Massachusetts economy was doing quite well prior to the 2020 COVID-19 health emergency, Massachusetts had not met the demand for housing units that are affordable to most people. One reason is the lack of housing production relative to the increases in population and number of households. For example, between 1960 and 1990 Massachusetts produced 900,000 new housing units, while between 1990 and 2020 there have been approximately 450,000 new housing units. This drastic reduction in new housing units constrains the supply of units available and resulted in steady increases in housing prices for both renters and homeowners resulting in high levels of cost burden among both of these groups. Based on ACS data, the number of severely cost burdened homeowner households is estimated to be 182,801 while severely cost burdened rental households is 230,585.

Massachusetts housing prices over time are among the highest in the country, higher than other states that compete for employment and economic activity such as California, Colorado, New York, Oregon and Washington state.

Of immediate concern in 2020 is the economic impact of COVID-19 and the threat to the ability of Massachusetts households to remain in their homes. The closing of thousands of businesses, with job losses across most employment sectors and the resulting high unemployment rate has created a pending housing crisis beyond supply and cost. The U.S. Center for Disease Control issued an eviction moratorium protecting renters through December 31, 2020. The Commonwealth's own moratorium on evictions expired October 17, 2020. On October 12, 2020 Governor Baker announced a \$171M Eviction Diversion Initiative intended to mitigate the effects of COVID-19 related evictions on the most vulnerable and provide economic relief to landlords. Though the needs assessment for this Consolidated Plan is based on data derived before COVID-19 struck, needs have shifted as a result of COVID-19 and the full extent of the need is unknown at this time.

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

### Summary of Housing Needs

Massachusetts statewide data shows that the state is diverse in terms of demographics and socio-economic characteristics, and therefore housing needs vary somewhat by region. There are just over 2,500,000 housing units in the Massachusetts, an increase of approximately 3 percent (3%) since the last Consolidated Plan was prepared. Nearly two-thirds of the state's households own their homes and one third rent, most in small structures of 1-4 units.

Approximately 346,000 extremely low- and low-income households experience housing problems, most often affordability problems. The number of all low income (earning <80% of AMI) with affordability problems is even higher, nearly 406,000. In addition, housing that is affordable and accessible to populations with special needs are inadequate.

Housing affordability remains a problem that affects not only low-income households and those with special needs, but moderate- and middle-income households as well. There is a need for affordable rental housing and sustainable homeownership opportunities for a range of incomes, especially in areas where economic expansion and job growth is likely to occur. Although there is regional variation in need, all regions identified affordable housing, housing rehabilitation/preservation, and public infrastructure improvements as priorities.

Demographics	Base Year: 2009	Most Recent Year: 2015	% Change
Population	6,547,629	6,705,586	2%
Households	2,465,654	2,549,721	3%
Median Income	\$64,496.00	\$68,563.00	6%

**Table 5 - Housing Needs Assessment Demographics**

**Data Source:** 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

### Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	424,560	299,425	352,190	243,855	1,229,690
Small Family Households	114,565	95,835	128,255	99,840	664,010
Large Family Households	18,750	17,565	23,240	20,410	104,120
Household contains at least one person 62-74 years of age	87,225	66,845	80,500	53,780	245,780

	<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>
Household contains at least one person age 75 or older	87,885	69,125	54,680	25,275	71,660
Households with one or more children 6 years old or younger	56,635	39,605	47,105	34,665	127,905

**Table 6 - Total Households Table**

**Data** 2011-2015 CHAS  
**Source:**

## 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	8,250	3,305	2,365	885	14,805	1,145	780	785	370	3,080
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	3,815	2,620	2,165	1,260	9,860	230	335	615	320	1,500
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	7,150	4,395	3,535	1,985	17,065	570	1,435	1,595	2,070	5,670
Housing cost burden greater than 50% of income (and none of the above problems)	154,645	46,720	9,345	1,140	211,850	75,955	49,365	35,565	11,325	172,210

	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)	48,370	67,010	56,330	16,505	188,215	18,570	41,515	62,285	49,950	172,320
Zero/negative Income (and none of the above problems)	20,690	0	0	0	20,690	8,670	0	0	0	8,670

**Table 7 – Housing Problems Table**

Data 2011-2015 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
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	173,860	57,045	17,410	5,265	253,580	77,900	51,915	38,555	14,090	182,460
Having none of four housing problems	116,530	107,000	139,775	83,315	446,620	26,910	83,465	156,450	141,185	408,010

	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	20,690	0	0	0	20,690	8,670	0	0	0	8,670

**Table 8 – Housing Problems 2**

Data 2011-2015 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
NUMBER OF HOUSEHOLDS								
Small Related	74,315	49,725	25,530	149,570	18,615	25,375	41,760	85,750
Large Related	11,670	7,310	2,275	21,255	3,810	5,955	10,105	19,870
Elderly	59,040	25,755	11,805	96,600	57,660	48,640	30,150	136,450
Other	73,085	38,120	28,400	139,605	15,925	12,595	17,400	45,920
Total need by income	218,110	120,910	68,010	407,030	96,010	92,565	99,415	287,990

**Table 9 – Cost Burden > 30%**

Data 2011-2015 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
NUMBER OF HOUSEHOLDS								
Small Related	59,770	17,400	2,190	79,360	16,510	17,545	15,250	49,305



	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Large Related	8,840	1,960	165	10,965	3,495	3,560	2,975	10,030
Elderly	36,820	11,670	2,810	51,300	43,400	20,475	10,680	74,555
Other	60,750	17,760	4,610	83,120	13,780	8,755	7,145	29,680
Total need by income	166,180	48,790	9,775	224,745	77,185	50,335	36,050	163,570

**Table 10 – Cost Burden > 50%**

Data 2011-2015 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
NUMBER OF HOUSEHOLDS										
Single family households	9,405	5,625	4,405	2,415	21,850	680	1,220	1,640	1,510	5,050
Multiple, unrelated family households	1,240	1,020	870	475	3,605	120	510	530	770	1,930
Other, non-family households	530	540	515	445	2,030	15	80	35	125	255
Total need by income	11,175	7,185	5,790	3,335	27,485	815	1,810	2,205	2,405	7,235

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

Data 2011-2015 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**

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

The data in the above tables show that both small related households and the elderly, with incomes under 30% AMI and a housing cost burden are most in need of housing assistance. There are 59,770 ELI households are severely cost burdened. Data from the 2009-2013 American Community Survey 5-Year Estimates show that 46% of single person households are women (median income \$27,400) and 44% are men (median household income \$37,800).

### **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 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 give 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.

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

The most common housing problem is the lack of affordable rental housing. As the above tables show, the most prevalent problem is for renter households earning less than 100% AMI, who have a housing cost burden of greater than 50%.

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

Low income families, non-white families, and the elderly are the most severely affected by this.

### **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**

The Commonwealth provides a variety of homelessness prevention services through a combination of state and federal funding, including funding from the Emergency Solutions Grant. Unfortunately, the prevention programs available do not meet all of the needs of low-income household who are imminently at risk of homelessness nor are they able to resolve all of the evictions cases which are filed. Homelessness prevention providers have found that many characteristics are shared among low-income households at imminent risk of becoming homeless. Common characteristics, which often turn into barriers to housing include, but are not limited to, language restrictions, disabilities among one or more household members, sporadic employment coupled with low wage jobs, lower levels of education, and domestic violence. Common needs of low income households include access to reliable and timely transportation, child care, employment training, legal services and support, and housing opportunities that are affordable on extremely low and low incomes.

Greater access to permanent supportive housing and long term housing vouchers remain the primary need of households nearing termination of their rapid re-housing assistance. Homeless individuals and families who receive rapid re-housing assistance in Massachusetts are usually in extremely low or low income households. Various rapid re-housing programs available across the Commonwealth offer different levels of financial assistance, though rental assistance typically does not last longer than 6-12 months. Unfortunately, given the short term nature of our rapid re-housing programs, households frequently lack the time necessary to sufficiently increase their income in order to afford market rate housing. A tight housing market coupled with extremely high rent rates often leave households struggling to maintain rent once their rapid re-housing assistance ends.

Rapid rehousing reentry rates are currently unknown in the individual system, but through the Commonwealth's new Rehousing Data Collective – which will compile and match data across all CoCs – this information will be identifiable. For the time being, anecdotal and small sample reports suggest that extremely low income, formerly homeless households struggle to retain housing after the end of RRH benefits.

**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:**

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

Consistent with national research, DHCD has not found reliable predictors of which low-income households will experience homelessness. The type of housing benefit (RRH, PSH, etc) continues to be the strongest predictor of shelter reentry, outpacing known and observable client-level factors.

**Discussion**

It is important to note, that while household median income has increased, rents over the same period have continued to rise, resulting in housing that is still not affordable for many low- to moderate-income households.

In some Gateway cities, with large immigrant populations, evidence from local building authorities suggests that overcrowding is a more serious problem than the data indicates. Often families double and triple up and because their occupancy may be illegal, it is not reported and difficult to collect data.

## 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

The tables below show the number of households by race and ethnicity that have at least one housing problem measured by the 2011-2015 CHAS data. The problems are a lack of complete kitchen facilities, a lack of complete plumbing facilities, overcrowding (more than one person per room), and cost burden (housing costs in excess of 30% of annual household income).

### 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	318,670	76,552	29,336
White	205,271	46,735	17,517
Black / African American	31,384	7,705	3,142
Asian	16,771	4,571	3,886
American Indian, Alaska Native	815	109	47
Pacific Islander	54	50	0
Hispanic	56,783	15,480	3,937

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

Data 2011-2015 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	217,469	81,952	0
White	154,593	65,294	0
Black / African American	18,650	4,878	0
Asian	9,673	2,367	0
American Indian, Alaska Native	372	64	0
Pacific Islander	45	0	0
Hispanic	28,899	7,938	0

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

Data 2011-2015 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	174,605	177,574	0
White	131,691	139,841	0
Black / African American	14,282	11,610	0
Asian	8,538	5,839	0
American Indian, Alaska Native	244	187	0
Pacific Islander	14	50	0
Hispanic	16,473	16,385	0

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

Data 2011-2015 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	85,818	158,032	0
White	68,069	127,621	0
Black / African American	5,359	9,562	0
Asian	4,618	5,250	0
American Indian, Alaska Native	109	86	0
Pacific Islander	20	0	0
Hispanic	6,138	12,182	0

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

Data 2011-2015 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

The incidence and prevalence of housing problems correlate to income, however some population groups show need for safe and affordable housing across income categories. All racial and ethnic groups experience proportionately fewer housing problems as they move up the economic ladder, but minorities continue to report problems at a substantially higher rate than their white counterparts.

Disproportionately greater need seems to exist among many lower-income black/African American, Asian, and Hispanic households. All three types of households display higher proportions of housing problems than does the State as a whole.

## NA-20 Disproportionately Greater Need: Severe 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

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.

### 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	251,780	143,426	29,336
White	163,464	88,541	17,517
Black / African American	24,663	14,399	3,142
Asian	13,607	7,742	3,886
American Indian, Alaska Native	687	231	47
Pacific Islander	44	60	0
Hispanic	42,911	29,351	3,937

**Table 17 – Severe Housing Problems 0 - 30% AMI**

Data 2011-2015 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%

### 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	108,986	190,439	0
White	77,788	142,092	0



<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Black / African American	9,287	14,228	0
Asian	5,859	6,172	0
American Indian, Alaska Native	184	251	0
Pacific Islander	35	10	0
Hispanic	13,353	23,448	0

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

Data 2011-2015 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**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	55,982	296,211	0
White	41,989	229,576	0
Black / African American	4,132	21,763	0
Asian	3,230	11,188	0
American Indian, Alaska Native	48	382	0
Pacific Islander	4	60	0
Hispanic	5,616	27,235	0

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

Data 2011-2015 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	19,332	224,447	0
White	13,624	181,909	0
Black / African American	1,668	13,262	0
Asian	1,568	8,311	0
American Indian, Alaska Native	61	134	0
Pacific Islander	0	20	0
Hispanic	1,844	16,429	0

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

Data 2011-2015 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

The data suggests that as with the less-severe housing problems, Asian, Hispanic and Black/African American households have disproportionate rates of severe housing problems when compared to the state population as a whole.

## 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.

### Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	1,627,451	480,190	411,262	30,758
White	1,351,995	358,714	290,388	18,147
Black / African American	71,933	35,879	35,470	3,306
Asian	77,594	22,707	21,259	4,156
American Indian, Alaska Native	1,395	684	910	47
Pacific Islander	368	85	83	0
Hispanic	98,952	52,798	53,876	4,217

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

Data Source: 2011-2015 CHAS

### Discussion

Two groups among the Commonwealth's households tend to experience cost burden at a higher rate than the general population - Black/African Americans and Hispanics. This is even more evident for households paying in excess of 50% of their income on housing costs.

## **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?**

Among households that earn less than 30% of AMI, Black/African American and Hispanic households are disproportionately affected by housing problems. This is also true for households in those two racial/ethnic groups in the 30% to 50% and 50% to 80% income categories.

**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 are primarily in Boston and other larger entitlement and gateway communities. The more rural, non-entitlement areas of the Commonwealth are less densely populated and less ethnically and racially diverse. The Commonwealth's larger entitlement and gateway cities have more diverse populations.

Even though its population is becoming more diverse, Massachusetts ranks in the middle of the pack among states, both in the percent of population that is minority and in the percentage growth in the minority population between 2000 and 2010. It remains largely a non-Hispanic White state even though its largest city, Boston, and seven 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 the providing the resources to create and maintain that safety net. DHCD's public housing portfolio includes approximately 45,000 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. Many 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 242 Local Housing Authorities (LHAs), which have volunteer boards and in many cases part-time executive directors.

### 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	1,055	0	19,016	943	17,825	179	1	68

**Table 22 - Public Housing by Program Type**

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

**Data Source:** PIC (PIH Information Center)

## 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	15	13	1	1	0
# of Elderly Program Participants (>62)	0	183	0	2,510	204	2,276	20	0
# of Disabled Families	0	342	0	7,884	354	7,357	114	1
# of Families requesting accessibility features	0	1,055	0	19,016	943	17,825	179	1
# 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: PIC (PIH Information Center)

## Race of Residents

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	956	0	13,456	718	12,535	144	1	58
Black/African American	0	95	0	5,007	188	4,784	28	0	7
Asian	0	3	0	361	17	341	3	0	0

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
American Indian/Alaska Native	0	1	0	144	7	132	3	0	2
Pacific Islander	0	0	0	48	13	33	1	0	1
Other	0	0	0	0	0	0	0	0	0
<b>*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition</b>									

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

Data Source: PIC (PIH Information Center)

## Ethnicity of Residents

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	580	0	6,198	279	5,888	11	0	20
Not Hispanic	0	475	0	12,818	664	11,937	168	1	48
<b>*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition</b>									

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

Data Source: PIC (PIH Information Center)

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

DHCD does not operate or oversee a Federal Public Housing program, although Massachusetts has over 200 local housing authorities with both state and Federal public housing. The needs of tenants and applicants on the waiting lists for accessible units 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 5,500 of 179,000[1] applicants to the state online waitlist for public housing have requested a wheelchair accessible unit (3.1%), but only 1,140 out of approximately 42,000 elderly and family units are wheelchair accessible (2.7%[2]). DHCD is investing \$3-4 M annually to convert units to full accessibility, with the eventual goal of bringing 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, DHCD currently has 100,709 families statewide on its waiting lists for Section 8 vouchers. DHCD maintains a centralized online waitlist for public housing; there are currently approximately 180,000 individual applicants on the waitlist, with approximately 4,000 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 the more urban areas of our state. Additional production of both low and moderate-income units is critical to ease the pressures described above.



**Discussion:**

No MA state agency administers federal public housing funds, but DHCD does oversee and fund a portfolio of over 45,000 state-aided public housing units owned and operated by 242 local housing authorities (LHAs)

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

### Introduction:

As a result of the significant expansion of its emergency shelter system over the past two decades and its current focus on ending, rather than managing, homelessness, the Commonwealth's priority approaches to unmet homeless needs – for both families and individuals – are Prevention and Rapid Rehousing. DHCD typically currently provides 3,428 shelter beds for homeless individuals and approximately 3,600 emergency shelter placements units, including a small number of motels and hotels, for homeless families.

DHCD also implemented reforms to the Emergency Assistance (EA) system in an effort to reduce the reliance on the shelter as a response to housing instability while maintaining a solid safety net. The response combined targeting shelter to those truly in emergency situations with an increase in funding for prevention (using the Residential Assistance for Families in Transition [RAFT] program) and permanent housing (through the Massachusetts Residential Voucher Program [MRVP]).

### 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)	9	12,203	0	0	0	0
Persons in Households with Only Children	2	29	0	0	0	0
Persons in Households with Only Adults	818	5,410	0	0	0	0
Chronically Homeless Individuals	245	1,147	0	0	0	0
Chronically Homeless Families	0	978	0	0	0	0

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				
Veterans	33	884	0	0	0	0
Unaccompanied Child	71	409	0	0	0	0
Persons with HIV	29	105	0	0	0	0

**Table 26 - Homeless Needs Assessment**

Data Source Comments: 2019 HUD HIC; PIT

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

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				
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:** 2019 HUD HIC; PIT

**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:**

**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):**

The most recent PIT data available indicate that the number of homeless persons average 18,495 on any given night across Massachusetts. Due to the extensive state funded shelter systems across Massachusetts, approximately 4% of our homeless population is unsheltered. 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 length of homelessness statewide since we do not have a state-wide HMIS. However, using publicly available information from each CoC's 2018 system performance measures, we have been able to calculate an average length of time homeless at 193 days (6.4 months). 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. DHCD remains committed to expanding the number of affordable and low income housing units and we continue to provide ongoing rental subsidies through state funded MRVP. 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	0	0
Black or African American	0	0
Asian	0	0
American Indian or Alaska Native	0	0
Pacific Islander	0	0
<b>Ethnicity:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
Hispanic	0	0
Not Hispanic	0	0

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 DHCD, the Veterans Administration, municipal partners and the homelessness provider community, The Balance of State continuum of care, as well as the cities of Lowell and Lynn have effectively ended veteran homelessness in their areas. The city of Boston has effectively ended chronic homelessness for all veterans within the city. In 2019 (the last year for which there is complete data) Massachusetts had the fourth lowest rate of unsheltered homelessness in the country, with a total of 972 homeless veterans 33 (3%) of which were unsheltered. The majority (60%) were in Transitional Housing (mostly Grant Per Diem Projects) operated by the Veterans Administration. DHCD additionally shelters approximately 3,000 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 following racial & ethnicity data is pulled from DHCD's 2019 CAPER in SAGE. While this sampling is not necessarily representative of all people experiencing homelessness in Massachusetts, it is informative and provides insight into what communities are receiving homeless services. Specifically, DHCD subgrants ESG funding to homelessness providers who are well connected to their communities & CoCs and are also providing myriad other homelessness assistance programs. Additionally, these ESG data points encompass all program types (i.e. outreach, shelter, rapid re-housing, and prevention.)

Therefore, the data are likely reflective of which communities have access to mainstream services in Massachusetts.

- 54% of those served are White
- 31% are Black or African American
- 8% are Native Hawaiian or Other Pacific Islander
- 3% are Asian
- 1% are American Indian or Alaska Native
- 1% are Multiple Races
- 1% didn't know/refused answer
- 1% data was not collected
- 79% are not Hispanic / 20% are Hispanic / 1% didn't know/refused answer or data was not collected.

The Massachusetts Department of Housing and Community Development, in collaboration with its 13 Continua of Care, has developed and is implementing a statewide data warehouse that will allow us to better understand homelessness across the Commonwealth – including how homelessness manifests itself with regard to race, ethnicity, and any other collected demographic. More than 50% of the CoC's have begun to onboard their data, but it is preliminary and final analysis is not available at the time of this reporting.

ESG staff intend to utilize racial & ethnicity data from the previous five years, as well as tools developed by HUD to conduct a more complete analysis of racial and ethnicity data. This analysis will inform our next ESG procurement.

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

The Commonwealth's unsheltered homeless are served, through a network of State funded outreach programs and 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. Massachusetts had the third lowest percentage of unsheltered persons in households with children, with just 0.1% (9 people) of any state or territory in the country.

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 (including ESG funding) for emergency shelter responses for individuals. While the percentage of homeless families in Massachusetts is high in comparison to many other states, we did see a decrease of 7.9% in the last year.

**Discussion:**

The Commonwealth has adopted a comprehensive approach to family homelessness, and has engaged other state agencies, including HHS, in the effort: the strategy consists of preventing homelessness; establishing a strong safety net of shelters and services; rehousing families and linking them with support services in the community; and creating more permanent affordable housing.

The first priority is to prevent homelessness and help families avoid entering the shelter system. The RAFT, HomeBASE and MRVP programs are valuable tools in achieving this. While prevention and diversion are key, we also know that many families need the safety net of emergency shelter when they are facing a crisis and, fortunately, we have one of the most extensive networks in the country. DHCD only infrequently needs to place families in motels (11 families resided in motels in December 2020), and is regularly able to place eligible families into shelter units that meet their needs.

DHCD continues to invest heavily in rapid rehousing programs to rehouse families in its EA system, as well as permanent supportive housing for families and individuals.

In addition to the system of services that DHCD offers to families, the Commonwealth supports a network of 50 individual shelter providers, with approximately 3,070 beds, as well as service agencies that address the needs of an unaccompanied adult population. Individual shelter programs operate more independently than the family system as there is no eligibility requirement for access to shelter. Providers make beds available as needed on a nightly basis. In addition to the actual shelter beds, DHCD funds providers who offer health care, day programs, and food services.

Please note data is not available by rural areas.



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

### Introduction

#### HOPWA

Current HOPWA formula use:	
Cumulative cases of AIDS reported	0
Area incidence of AIDS	0
Rate per population	0
Number of new cases prior year (3 years of data)	0
Rate per population (3 years of data)	0
Current HIV surveillance data:	
Number of Persons living with HIV (PLWH)	456
Area Prevalence (PLWH per population)	538
Number of new HIV cases reported last year	0

Table 28 – HOPWA Data

Data CDC HIV Surveillance  
Source:

#### 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 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 behavior 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, transgender people, people who inject drugs, and people born outside the United State are disproportionately impacted HIV infection. Retention in care and adherence to HIV treatment regimens impact both individual health outcomes and transmission of infectious disease. Factors that affect an individual's care and treatment may include advanced HIV disease, substance use disorders, lack of health insurance, recent incarceration, hepatitis-C co-infection, domestic violence, very low-income, and pregnancy.

In addition to the challenge of affordability, many seniors have health issues that make living independently a challenge. Supportive housing is a key need for this population, as it is for other populations with disabilities. Especially vulnerable are those seniors age 75 and over who live by themselves. The state's elderly population continues to grow and the percent of the population over age 65 will rise to 18 percent by 2025, with the greatest increase occurring between 2010 and 2030. Because the incidence of disability increases with age, the demands of the "giant" baby boom generation are expected to strain the system. Traditionally, non-elderly people with disabilities have been among the most underserved populations in government housing programs. Until 1974, there were no specific building requirements for physical accessibility, and units typically were not designed or built to allow for accessibility. The few units that were available specifically for people with disabilities were intended for those with physical disabilities. The housing choices of people with other disabilities were limited to segregated housing such as group homes, hospitals and skilled nursing facilities.

### **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 into non-medical and medical services, including 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 housing and supportive service needs as they change. MDPH-funded HIV/AIDS services are provided in a framework that is consistent with objectives articulated by the United States Interagency Council on Homelessness relative to integrating health care services with homeless assistance programs and housing.

Many HIV+ Massachusetts residents qualify for State funded HIV/AIDS services that are available for individuals with incomes under 500% FPL. 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. The MDPH-

funded service system ensures that hepatitis C and STI testing, HIV and STI partner services, and specialized risk reduction counseling is accessible to individuals living with HIV.

Securing and maintaining affordable and secure housing is an ongoing challenge for many MA residents. In recognition that residential stability is a critical part of maintaining engagement in medical care and health-related support services, all MDPH-funded HIV/AIDS medical case management providers are expected to help clients access and maintain affordable and secure housing. These providers conduct client assessments and reassessments to identify specific client needs and the acuity of these needs, tailoring services accordingly. Assessments address current housing status and percent of income spent on rent, housing safety and security, and client interest/need to relocate. Based on this information, providers either provide specialized Housing Search and Advocacy services directly or via an established coordination mechanism with another agency. Providers also ensure that clients have access to home-based service provision, as determined by established eligibility criteria such as disease progression, acute period of illness, history of lapses in care, history of chronic homelessness, active substance use; unstable mental health, lack of access to transportation, etc.

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

The following information is summarized from the “2019 Massachusetts HIV/AIDS Epidemiologic Profile” which includes HIV/AIDS case data reported to the Massachusetts Department of Public Health HIV/STD Surveillance Program as of 1/1/19.

As of January 1, 2018, 22,634 people are living with HIV/AIDS in the Commonwealth of Massachusetts. Populations facing often intersecting barriers maintained by systemic inequity remain disproportionately impacted:

- Men who have sex with men continued to represent the largest proportion of new diagnoses (42% in 2015–2017, as of 1/1/19).
- Persons who inject drugs accounted for almost half of all deaths among HIV+ individuals but only 17% of all individuals living with HIV infection (as of 1/1/19).
- Black (non-Hispanic) and Hispanic/Latino individuals were diagnosed with HIV infection during 2015-2017 at population rates seven and four times that of white (non-Hispanic) individuals, respectively.
- During 2015-2017, 36% (N=670) of all individuals diagnosed with HIV infection were born outside the US. This proportion varied by race/ethnicity: 72% of Asian/Pacific Islander individuals diagnosed with HIV infection were born outside the US, compared to 58% of black (non-Hispanic), 45% of Hispanic/Latino, and 11% of white (non-Hispanic) individuals. An

- While 11% of all Massachusetts residents live in the Boston HSR, it is the current residence of 28% individuals living with HIV infection. <sup>10</sup>

## Consolidated Plan

## **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.

### **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, 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. 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 2020, in the wake of the COVID-19 pandemic, public services needs have grown dramatically. The unemployment rate spiked as businesses closed and job losses mounted. Food insecurity, risk of homelessness and small business assistance have been identified as critical needs by local elected officials and community based organizations. Though the state and federal eviction moratoria have helped prevent homelessness, the state moratorium expires 10/17/20 and the Federal CDC's expires 12/31/20.

### **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, DHCD 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:

2015-2019 ACS shows that there are 2.897 million housing units, 52% are one-unit detached structures, followed by 21% which are 2-4 unit structures. Structures with 5-19 units and 20 or more units each comprise 10% of the total number of residential units. The majority (74%) of homeowner units have 3 or more bedrooms, while the rental units are more varied - only 25% have 3 or more bedrooms, 32% have 1 bedroom and 38% have 2 bedrooms, while 5% are efficiency SRO units.

Massachusetts is and has been a high cost housing market, for both renters and homeowners. With its relatively older housing stock, Massachusetts is a costly state in which to maintain and operate housing. Housing prices and rents have increased to the point where housing costs as a share of income have increased sharply for a growing proportion of the region's households.

Demand for affordable rental housing units in many locations throughout the country is at or near an all-time high. Recent research and analysis, including studies released by the Joint Center for Housing Studies at Harvard University, document the increasing rent burden experienced by the lowest income individuals and families and the growing gap between the demand for affordable rental units and the supply in various markets. Like other states, Massachusetts is affected by this problem. The rental markets in numerous cities and metropolitan areas in Massachusetts are highly stressed. In many locations, rents exceed pre-recession levels, and vacancy rates are at historic lows. In this environment, the importance of federal and state programs to support the production of new affordable rental housing cannot be overstated.

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

### Introduction

#### All residential properties by number of units

Property Type	Number	%
1-unit detached structure	1,474,897	52%
1-unit, attached structure	148,269	5%
2-4 units	596,266	21%
5-19 units	287,910	10%
20 or more units	295,922	10%
Mobile Home, boat, RV, van, etc	24,556	1%
<b>Total</b>	<b>2,827,820</b>	<b>100%</b>

Table 30 – Residential Properties by Unit Number

Data Source: 2011-2015 ACS

#### Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	5,706	0%	54,108	6%
1 bedroom	58,286	4%	292,364	30%
2 bedrooms	335,805	21%	368,752	38%
3 or more bedrooms	1,183,870	75%	250,830	26%
<b>Total</b>	<b>1,583,667</b>	<b>100%</b>	<b>966,054</b>	<b>100%</b>

Table 31 – Unit Size by Tenure

Data Source: 2011-2015 ACS

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

80% of HOME 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.**

Much of the Commonwealth's stock of affordable housing units built in the 1960s, 1970s and 1980s are facing the elimination of restrictions requiring them to serve low-income residents due to the potential for owners to prepay their federally-subsidized mortgages, or opt out of their existing Section 8 rental subsidy contracts. In November 2009, M.G.L. Ch. 40T – An Act Preserving Publicly Assisted Affordable Housing was passed. This landmark legislation aims to help preserve existing privately-owned affordable housing in Massachusetts. The legislation establishes notification provisions for tenants, a right of first refusal for DHCD or its designee to purchase publicly assisted housing, and modest tenant protections for projects with affordability restrictions that terminate. Chapter 40T has helped to preserve affordability in communities across the state, ensuring that families are able to stay in their homes and neighborhoods. Since the passage of Chapter 40T, DHCD has used state resources to help preserve or extend affordability at 215 housing projects with more than 22,000 units.

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

No, see next.

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

The pipeline of rental units currently in development is lengthy, and the need for the units is significant. Located in every region of the state, the rental units funded through DHCD serve many populations, including low- to moderate-income families; frail seniors; homeless individuals and families; persons with special needs; persons with disabilities; veterans; and others. These projects cover a wide range, from urban revitalization projects, to projects located near major transit, to projects located in some of the state's most rural communities.

The effort to evaluate the need for affordable rental units is complicated by the fact that there is no single Massachusetts housing market. Rather, there are hundreds of local housing markets, and they differ significantly from each other. The median home sales prices in the most affluent western suburbs of Boston exceed \$1,000,000, yet homebuyers in the more rural areas of the state can still find units priced below \$150,000. In addition, the effects of the seven-year foreclosure crisis continue to impact some communities far more than others.

Because of the disparate characteristics of various local housing markets, the best measures of affordable housing need in one market may not be the best measures in another. For example, some communities have relatively few residents with household incomes below 50% of area median income. But the average sales prices for homes in these communities may be above \$700,000, and there may be virtually no rental units available. So, while one indicator of need -- the number of poverty households -- may be low, another indicator -- average or median sales prices -- may be extremely high. It's important to note that a household at 200% of the Federal Poverty Guidelines will still be low-income and likely have severe housing needs based on affordability

## **Discussion**

## MA-15 Cost of Housing – 91.310(a)

### Introduction

### Cost of Housing

	Base Year: 2009	Most Recent Year: 2015	% Change
Median Home Value	357,600	333,100	(7%)
Median Contract Rent	849	966	14%

Table 32 – Cost of Housing

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	201,349	20.9%
\$500-999	321,117	33.2%
\$1,000-1,499	260,465	27.0%
\$1,500-1,999	112,703	11.7%
\$2,000 or more	70,420	7.3%
<b>Total</b>	<b>966,054</b>	<b>100.0%</b>

Table 33 - Rent Paid

Data Source: 2011-2015 ACS

### Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	137,655	No Data
50% HAMFI	292,260	44,375
80% HAMFI	574,325	182,330
100% HAMFI	No Data	353,365
<b>Total</b>	<b>1,004,240</b>	<b>580,070</b>

Table 34 – Housing Affordability

Data Source: 2011-2015 CHAS

### Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	0	0	1,299	0	0
High HOME Rent	0	0	0	0	0

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

**Table 35 – Monthly Rent**

**Data Source Comments:** HUD 2019 average FMR for 16 metro designations; HOME 2019

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

No

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

As home values and rents continue to increase, the availability of affordable options decreases.

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

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**

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

### Introduction:

### Definitions

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	459,721	29%	434,113	45%
With two selected Conditions	7,349	0%	24,585	3%
With three selected Conditions	744	0%	2,636	0%
With four selected Conditions	2	0%	81	0%
No selected Conditions	1,115,851	70%	504,639	52%
<b>Total</b>	<b>1,583,667</b>	<b>99%</b>	<b>966,054</b>	<b>100%</b>

Table 36 - Condition of Units

Data Source: 2011-2015 ACS

### Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	141,329	9%	74,337	8%
1980-1999	330,964	21%	135,956	14%

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
1950-1979	564,243	36%	297,780	31%
Before 1950	547,131	35%	457,981	47%
<b>Total</b>	<b>1,583,667</b>	<b>101%</b>	<b>966,054</b>	<b>100%</b>

**Table 37 – Year Unit Built**

Data Source: 2011-2015 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	1,111,374	70%	755,761	78%
Housing Units build before 1980 with children present	100,595	6%	67,810	7%

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

Data Source: 2011-2015 ACS (Total Units) 2011-2015 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

DHCD relies on the expertise of those administering its housing rehabilitation programs at the local level to estimate and prioritize housing rehabilitation needs. 70% of the units in Massachusetts were built before 1978. 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. 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 MACLPPP High Risk Community Incidence Rate Statistics 2014-2018 Calendar Year Data report identifies 17 high-risk communities in the Commonwealth of Massachusetts, wherein 81% of the housing units were built before 1978 and 36% of households live with incomes at or below 200% of the poverty level, as reported by the 2013-2017 American Community Survey (households of low to moderate income, annual income of approximately \$45,000). According to the MACLPPP Screening Prevalence and Statistics Calendar Year 2018 Data report, 1.3% of children screened had a confirmed blood lead level greater than or equal to the CDC reference level of  $5 \mu\text{g}/\text{dL}$ . 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, the fact that 70% of the housing stock was built prior to 1978 indicates that many units still contain lead based paint.

### **Discussion:**

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

### Introduction:

### Totals Number of Units

	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	1,068		19,405	795	18,610	1,051	0	626
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

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

Data Source: PIC (PIH Information Center)

### 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:

DHCD's public housing portfolio includes approximately 45,000 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. of the majority these public housing units were built more than 50 years ago. This housing portfolio, along with the additional federally-subsidized units, is managed by 233 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:

Within the last five years, we have implemented major administrative reforms to enhance the transparency and accountability of the LHAs. Chapter 235, "An Act Relative to Local Housing Authorities," was passed in 2014 and is currently being implemented by the Baker-Polito Administration. Building on recent reforms, this legislation further strengthened the governance



structure of the housing authorities and significantly increases the transparency among LHAs, provides the Department with the tools necessary to monitor operations of LHAs and hold them accountable, increases efficiencies and economies of scale for delivery of services to tenants, increases staffing and assistance in the field, and provides incentives for LHAs to implement creative and innovative practices to improve the lives of residents.

DHCD has implemented most of the provisions included in Chapter 235; including establishing an annual Performance Management Review (PMR), annual “agreed upon procedures” (“Skinny Audit” for financial review, oversight and approval of Executive Director salaries, and implementation of Regional Capital Assistance Team program to support small LHAs. Performance-based monitoring provides a uniform assessment standard for evaluating housing authority operations. The monitoring program and assessment standards will enable DHCD to identify LHAs that are failing to meet the minimum standards and to develop and implement corrective action plans and targeted assistance by DHCD to improve performance to a satisfactory level.

DHCD has also, pursuant to the Public Housing Reform Act, developed the Common Housing Application for Massachusetts Public Housing (CHAMP), a centralized, online waitlist for state-aided public housing. Rolled out to applicants in April, 2019, this system allows applicants to apply for housing at any of 233 LHAs with state-aided public housing. LHAs and applicants can upload documents. Additionally, CHAMP allows greater transparency and oversight of tenant selection.

DHCD has also made substantial investments in the physical condition of public housing. In addition to increasing funding allocated by formula to each LHA in the FY23 capital planning year to \$55 M, in recent years DHCD has awarded funds through several competitive funding rounds. Noteworthy capital programs include

Partnership to Expand Housing Opportunities – funding for Mixed-Income Redevelopment of state-aided public housing.

Gateway City Neighborhood Revitalization – Large capital grants to rehabilitate family developments in gateway cities in coordination with city economic development efforts. Four projects awarded \$29.6 M in Summer 2020.

Modernizing Public Housing and Supporting Elders Initiative (MODPHASE) - Rehabilitation of elderly developments leverage service commitments. 11 projects awarded over \$45 M across two rounds in January 2017 and December 2019.

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

The Baker-Polito administration views stable housing as a platform for working families to achieve greater prosperity. To that end, we have rolled out several programs to foster economic mobility for public housing residents. The “A Better Life” program pilots work requirements coupled with intensive wrap around services for state-aided public housing residents. The intention is to create opportunities for families to move through the public housing system more quickly so that we can serve more families. DHCD has awarded funds to three ABL LHAs and modeled the program on an existing program at Worcester Housing Authority. DHCD released awarded funds to 5 LHAs and 3 RAAs for a Self Sufficiency Program, modeled on the federal Family Self Sufficiency program.

**Discussion:**

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

### Introduction

### 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)	0	0	876	0	0
Households with Only Adults	0	931	0	0	0
Chronically Homeless Households	0	0	0	0	0
Veterans	533	0	670	0	0
Unaccompanied Youth	166	0	147	137	0

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

**Data Source Comments:** For some reason IDIS would not save the data entries in the all of the fields in the table above, so the table with data displayed was saved as a JPEG below.

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

### Introduction

#### 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)	12,268	0	876	4,128	0
Households with Only Adults	4,461	931	1,385	8,414	0
Chronically Homeless Households	0	0	0	7,424	0
Veterans	533	0	670	4,030	0
Unaccompanied Youth	166	0	147	137	0

Table 36 - Facilities Targeted to Homeless Persons

#### Facilities Housing Targeted to Homeless Households

**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**

As one aspect of its Social Innovation Financing Initiative, Massachusetts has opted to target chronically homeless individuals who are frequent users of services, often on an emergency basis. Under this demonstration program, homeless shelters will do proactive outreach to the target population, and work with them to place them in permanent housing with intensive case management to ensure that they get the services they need, thereby preventing hospitalizations or other medical emergencies. The demonstration program is an extension of the nationally recognized Home and Healthy for Good program, a “housing first” model that the Massachusetts Housing and Shelter Alliance has run with DHCD funding since 2006. DHCD will be closely monitoring this pilot to determine the implications for providing outreach, triage, and assessment services to the broader chronically homeless individual population across the state. The Commonwealth established several working groups focusing on specific populations at high risk of becoming homeless, including youth, veterans, and inmates being released by the Department of Corrections. The Youth Working Group focused on single, unaccompanied youth.

Through partnership with DHCD, the Veterans Administration, municipal partners and the homelessness provider community, The Balance of State continuum of care, as well as the cities of Lowell and Lynn have effectively ended veteran homelessness in their areas. The city of Boston has effectively ended chronic homelessness for all veterans within the city. In 2019 (the last year for which there is complete data) Massachusetts had the fourth lowest rate of unsheltered homelessness in the country.

**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 - in ESG Section of FFY2020 Action Plan Appendix, located in AD-25 Administration of the Consolidated Plan, Grantee Unique Appendices

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

### Introduction

DPH provides funding for organizations to provide home-based HIV medical case management to individuals in need of supportive housing, both in congregate and scattered site settings. DPH also funds housing search and advocacy services for individuals living with HIV; these services are available to any eligible HIV+ person in the Commonwealth, including individuals returning from mental and physical health institutions.

### HOPWA Assistance Baseline Table

Type of HOWA 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**

DHCD collaborates with Massachusetts's Executive Office of Health and Human Services (EOHHS), the state agency responsible for the operation of the state's Medicaid program (MassHealth), on various programs that serve non-homeless persons exiting from institutions to live independently in community settings. DHCD collaborates with various EOHHS agencies including the Department of Mental Health (DMH), Department of Developmental Services (DDS), the Executive Office of Elder Affairs (EOEA), and the Massachusetts Rehabilitation Commission (MRC). A major component of this collaboration is the HUD Section 811 Project Rental Assistance program for non-elderly disabled individuals exiting institutions or at-risk of institutionalization but for affordable, appropriate housing units.

Massachusetts has a comprehensive system of long-term services and supports (LTSS) in place for individuals with disabilities, serving some 287,000 people with LTSS needs a year through the

MassHealth State Plan Fee-for-Service programs. In FY2019, approximately \$5.5B was spent via these programs on LTSS for elders and people with disabilities. The state offers 10 Home and Community Based Services waivers, serving a total of approximately 32,000 people in FY2018 – frail elders, adults with intellectual disabilities, adults with brain injury, those transitioning from state institutions and private nursing homes, etc. The state also offers a rich array of optional Medicaid State Plan services that facilitate community living, such as personal care, home health services, day habilitation, and case management. In addition, other EOHHS agencies (including DMH, DDS and MRC) offer an array of independent living services to support people with disabilities who are living, participating, and working in their communities.

EOHHS agencies each have staff dedicated to working on housing issues, working closely with service providers and disability advocates to identify gaps in services and to fill them using innovative state-funded programs like the Home Modification Loan Program, the CBH and FCF programs, MassAccess Housing Registry, and others.

Another key DHCD program is Community Based Housing (CBH). CBH is a state bond-funded program aimed at increasing community housing options for very low-income people with significant, long-term disabilities who are institutionalized or at risk of institutionalization. In operation since 2006, the program provides capital financing along with project-based rental assistance for units that are integrated into mainstream, affordable multifamily developments, making up no more than 15% of total units. To date, DHCD has awarded funds to 136 projects with a total of 432 CBH.

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

See description of programs and services above.

**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)**

See description of programs and services above.

**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))**





## **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 little incentive 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. 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. DHCD recognizes that that expanding the supply of affordable housing is vital to the state's economic prosperity, and economic prosperity is what will boost the income and economic self-sufficiency of low income residents.

## 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	4,989	0	0	0	0
Arts, Entertainment, Accommodations	167,270	0	11	0	-11
Construction	78,969	0	5	0	-5
Education and Health Care Services	362,031	0	24	0	-24
Finance, Insurance, and Real Estate	115,109	0	8	0	-8
Information	50,056	0	3	0	-3
Manufacturing	144,265	0	10	0	-10
Other Services	60,443	0	4	0	-4
Professional, Scientific, Management Services	197,344	0	13	0	-13
Public Administration	0	0	0	0	0
Retail Trade	193,735	0	13	0	-13
Transportation and Warehousing	41,312	0	3	0	-3
Wholesale Trade	72,945	0	5	0	-5
Total	1,488,468	0	--	--	--

**Table 43- Business Activity**

**Data Source:** 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)

## Labor Force

Total Population in the Civilian Labor Force	3,773,721
Civilian Employed Population 16 years and over	3,570,257
Unemployment Rate	0.00
Unemployment Rate for Ages 16-24	0.00
Unemployment Rate for Ages 25-65	0.00

**Table 44 - Labor Force**

Data Source Comments: 2018: ACS 5-Year estimates, DP03;

Occupations by Sector	Number of People
Management, business and financial	1,643,529
Farming, fisheries and forestry occupations	14,765
Service	624,434
Sales and office	726,280
Construction, extraction, maintenance and repair	241,808
Production, transportation and material moving	334,206

**Table 45 – Occupations by Sector**

Data Source Comments: 2018: ACS 5-Year estimates, DP03

## Travel Time

Travel Time	Number	Percentage
< 30 Minutes	1,798,094	54%
30-59 Minutes	1,100,290	33%
60 or More Minutes	425,805	13%
<b>Total</b>	<b>3,324,189</b>	<b>100%</b>

**Table 46 - Travel Time**

Data Source Comments: 2018: ACS 5 Year estimates, B08303

## 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	158,385	17,476	114,938

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
High school graduate (includes equivalency)	592,489	41,624	193,686
Some college or Associate's degree	680,710	35,302	157,252
Bachelor's degree or higher	1,440,399	39,869	194,467

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

Data Source Comments: 2018: ACS 5 Year estimates, B23006

### Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	8,263	0	0	0	0
9th to 12th grade, no diploma	65,450	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: 2018: ACS 5 Year estimates, B15001

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

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	0
High school graduate (includes equivalency)	0
Some college or Associate's degree	0
Bachelor's degree	0
Graduate or professional degree	0

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

Data Source Comments: 2018: ACS 5 Year estimates, B20004

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

According to the data above, the major employment sectors are Manufacturing/Production, Construction, Business and Financial, Sales and Office and Transportation. Education and Health Care are also major employment sectors.

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

The decline of traditional manufacturing and the rise of the knowledge economy have disconnected many of the state's regions and their cities from the manufacturing export-income and investment that was the life-blood of a thriving economy. The stark result has been lower incomes, less job growth and fewer opportunities in many of the state's regions compared to Greater Boston. Leveraging the state's assets to bring prosperity to every region is a theme echoed across the state by community development directors and businesses. The Commonwealth promotes vibrant regional economies by building on the various regions' existing assets. Massachusetts has a strong competitive advantage in its leading industries and unparalleled workforce; the key to rebuilding a strong statewide economy is effectively leveraging all of the state's assets in a framework for regional reinvention and renewal.

Four sectors have been the engine of job growth in Massachusetts: (1) Professional, Scientific and Business Services; (2) Trade, Transportation & Utilities; (3) Education & Health Services; and (4) Leisure & Hospitality sectors. Massachusetts is well positioned to continue to grow jobs in the sectors that are driven by innovation and knowledge. The state suffers from an older infrastructure in many areas, requiring expensive upgrades to help us maintain our economic competitiveness. Many roads and bridges are in need of repair, cities and towns have aging sewer systems, and Greater Boston's mass transit system (the MBTA) urgently needs capital investment.

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, 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. While there are several state funding programs that can be used for infrastructure improvements, the need outweighs the available funding. Communities look to CDBG funding to supplement these other resources. At the same time, 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.

**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.**

In the wake of the Coronavirus pandemic unemployment in Massachusetts spiked to 17.7% in June 2020. Though it since declined to 9.6% in September, it is still approximately three times the pre-COVID rate. Federal, state and local resources have been made available to assist small and large businesses, and unemployed, and continued efforts will be required to prevent long term economic harm, especially for those unable to make rent or mortgage payments.

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

The labor market continues to concentrate jobs in occupations that require technical skill and some post-secondary education beyond a high school diploma. There is an education and skill gap for a significant portion of our unemployment insurance claimants and for many of our long-term unemployed. The Commonwealth faces the challenge of retooling the skills of a large number of unemployed individuals for growing occupations that require technical skills and credentials.

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

A top priority is to strengthen the connection between the Massachusetts workforce system, our public education system, and economic development agencies to ensure that the state has programs and pathways that are well-aligned with industry skill demand and economic opportunity for lower-skilled workers. Strategies include increased training for high-demand occupations and use of apprenticeship programs. These efforts will support the broader community development goals of the Consolidated Plan, especially in Gateway Cities.

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

The state conducted listening sessions in Fall of 2019 with stakeholders statewide in order to create a comprehensive economic development strategy (including but not limited to housing production).

## **Discussion**

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

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

For the population at large, housing needs fall into three categories: affordability, adequacy and access. The extent of these housing problems varies by location, household type, and race/ethnicity, but affordability is the major challenge across the board. 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. Concentration is defined as areas that exhibit higher-than-average housing problem indicators.

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

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

Since the areas of racial, ethnic and income concentrations are located throughout the state, 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 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, for persons with disabilities.

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

Since this is the State Program, our funding and programs are awarded competitively throughout the Commonwealth. Community assets and opportunities are analyzed at the local level and are often discussed within competitive applications.

### **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 foreclosure and abandonment. The Liabilities to Assets (LTA) program and Gateway Cities Housing Rehabilitation (GHRP) program are administered by DHCD. LTA uses eminent domain to return properties to productive status, with the properties moving into ownership first by community development corporations, then made available to first time income-eligible buyers. GHRP provides rehab assistance to targeted properties in cities meeting specific criteria for income, population and educational status.

## **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 in the face of the pandemic as many individuals and families are participating remotely in day-to-day activities, such as school, work, telehealth, and other important activities, like online banking. In May 2016, the Baker-Polito Administration 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 97% 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.

### **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 Department of Housing and Community Development (DHCD) Vulnerability Assessment Report provides a summary of the vulnerability assessment completed by DHCD using the State Agency Vulnerability Assessment Survey Tool, which was developed as part of the 2018 Massachusetts State Hazard Mitigation and Climate Adaptation Plan. This self-assessment was completed to help identify agency vulnerabilities to climate change and natural hazards and provides the basis for the development of agency-specific priority actions to strengthen resilience and preparedness to climate change and extreme events.

DHCD's Division of Public Housing also contracted with New Ecology Inc. for a comprehensive study of the vulnerability of the state-aided public housing portfolio to climate change, focusing on extreme heat, sea level rise and storm surge, and extreme precipitation and inland flooding. This study identified about 20 developments as being at most risk of coastal flooding, with almost all developments expected to suffer more episodes of extreme heat. Very few developments have air conditioning aside from tenant-provided window units.

### **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 assets have a low exposure to the hazards and minimal disruption. Medium exposure during a Nor'easter, severe winter storms, ice storms, increase in average summer temperatures, and extreme temperatures/heat waves for weatherization and critical populations.

# Strategic Plan

## SP-05 Overview

### Strategic Plan Overview

This section summarizes what DHCD 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. 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, DHCD and its partner agencies will be guided by the following fundamental principles:

- Build upon the existing assets of the state's diverse regions;
- Promote sustainable development;
- 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

**Table 50 - Geographic Priority Areas**

#### General Allocation Priorities

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

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.

DHCD 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. DHCD will competitively award HOME funds for rental development projects in entitlement communities that provide a match for DHCD administered HOME funds. DHCD's HOME program encourages geographic diversity and each contingently funded project demonstrates marketability prior to the HOME funding commitment.

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>	<p align="LEFT">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.</p>
	<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 Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Promote Strong Sustainable Communities Preserve and create affordable rental housing Access to housing opportunities
	<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>	Promote Strong Sustainable Communities Preserve and create affordable rental housing Access to housing opportunities
	<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>Priority Need Name</b>	Preservation of affordable rental housing
4	<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 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>	Promote Strong Sustainable Communities Preserve and create affordable rental housing Access to housing opportunities
	<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.
<b>5</b>	<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 Rural 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>	Promote Strong Sustainable Communities Preserve and create affordable rental housing 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>	Promote Strong Sustainable Communities Access to housing opportunities
	<b>Description</b>	Production of homeownership units and homeownership assistance.
	<b>Basis for Relative Priority</b>	Based on need and demand.

### 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
TBRA for Non-Homeless Special Needs	ESG funding will be used to help rapidly re-house literally homeless households and prevent homelessness for households that are at immediate risk of homelessness due to eviction. Typically, ESG programs funded through DHCD 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 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.
Rehabilitation	CDBG and HTF funds are used to 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.
Acquisition, including preservation	HOME, HTF, and CDBG funding is used to 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	34,662,543	50,000	250,000	34,962,543	138,650,172	

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	9,779,460	2,993,673	0	12,773,133	44,000,000	HOME Program Income (PI) is indeterminable, as our rental loans are largely deferred payment loans. HOME PI collected during program year 2019 is being referenced in a 2019 Action Plan amendment. The \$2,993,673.15 referenced here is HOME PI collected and referenced in a 2020 Action Plan amendment done in February 2021.

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	349,851	0	0	349,851	1,336,632	

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	4,777,475	0	0	4,777,475	19,109,900	



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	7,039,756	0	2,500,000	9,539,756	17,000,000	

**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**

DHCD 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 often provide in-kind service. For the CDBG program, bonus points are available if an applicant demonstrates that non CDBG-funded projects consistent with the community's Community Development Strategy and the requested CDBG activities are also targeted to the same geographic area and will also result in measurable improvements. These points will not be awarded for municipal operating budget activities, maintenance activities/projects, or activities that are an extension of a requested CDBG activity such as lead abatement funds to serve the same units as those in a proposed housing rehabilitation program.

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.

The resources for the HOME match continue to be the state-funded Massachusetts Rental Voucher Program and the state's Housing Stabilization Fund. Annual expenditures through these two programs alone are approximately \$48 million. Since states are permitted to "bank" match, that expenditure level would constitute match -- calculated at 25 cents (\$0.25) on the HOME dollar (\$1.00) -- for many years.

**If appropriate, describe publically 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. Additionally, MA is exploring the use of state-owned land for the development of affordable housing.

**Discussion**

In Massachusetts, DHCD is the tax credit allocating agency, through its Division of Housing Development. The Division also oversees approximately \$100 million annually in other federal and state affordable housing programs, including the federal HOME program, ensuring a coordinated approach to resource allocation.

Developers have the opportunity to apply competitively for the tax credit and DHCD's other affordable rental housing resources during regularly scheduled funding competitions. In a typical year, the Department's credit allocations, in combination with DHCD subsidy awards and other funds, generate support for about 1200 to 1500 affordable rental units, both production and preservation. DHCD 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 Department also is encouraging developers to target the extremely low income units to individuals or families making the transition from homelessness.

DHCD is the lead agency for the preparation of both the Consolidated Plan and the state's Low Income Housing Tax Credit (LIHTC) Qualified Allocation Plan. The Qualified Allocation Plan (QAP) establishes the priorities and policies under which the state will operate and distribute funds in its federal tax credit program. In much the same manner as it does when it prepares its HUD Community Planning and Development Consolidated Plan and One Year Action Plans, DHCD considers the Commonwealth's affordable housing needs and the condition of its housing markets when it prepares its LIHTC Qualified Allocation Plan. The two plans are complementary and consistent, and the QAP is incorporated by reference into this Consolidated Plan. The QAP is available in its entirety on the DHCD website.

Massachusetts received a CDBG Disaster Recovery grant under P.L. 113-2. DHDC performed a needs assessment for these funds which is available at: <http://www.mass.gov/hed/community/funding/community-development-block-grant-disaster-recovery-.html> The majority of these funds have been obligated.

## 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 DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT	Government	Economic Development Homelessness Non-homeless special needs Ownership Planning Public Housing Rental neighborhood improvements public facilities public services	State
State of Massachusetts Department of Public Health		Planning	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 is robust. 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

also makes it difficult to plan initiatives across the political boundaries of small Massachusetts communities.

To overcome these gaps and challenges, EOHED and DHCD encourage 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. DHCD 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	X
Mortgage Assistance	X		
Rental Assistance	X	X	X
Utilities Assistance	X	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	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	
<b>Other</b>			
	X	X	

**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**

A great many of the Commonwealth's CoC funded programs are operated in conjunction with State agency partners (including the Department of Children and Families, Department of Mental Health, the Office of HIV and AIDS, the Bureau of Substance Abuse Services and the Department of Veterans Services) to provide appropriate, individualized services designed to end each households homelessness and provide stabilization services and resources to assure their ongoing tenancy stability.

Many HIV+ Massachusetts residents qualify for State funded HIV/AIDS services which are available for individuals with incomes under 500% FPL. 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. The MDPH-funded service system ensures that hepatitis C and STI testing, HIV and STI partner services, and specialized risk reduction counseling is accessible to individuals living with HIV.

**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**

The State's institutional structure for carrying out its housing and community development agenda is robust. 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 and service providers will continue to pose challenges. To overcome these gaps and challenges, EOHE and DHCD encourage regional cooperation among municipalities and program and the use of regional and other professional entities to facilitate the administration of programs. DHCD and other state agencies will also continue to provide technical assistance and training for programs to increase capacity.

**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**

"Community First" represents the Commonwealth's commitment to empower and support individuals with disabilities and elders to live with dignity and independence in the community. Most individuals with long-term care needs prefer to remain in the community rather than receive care in a nursing facility or other institutional setting, and in many instances, community-based care can be more cost-

effective than institutional alternatives. The Commonwealth implements its homelessness strategy in the locations across the state where it has a Homeless Coordinator in a DTA Office to mobilize all the resources the agency can marshal: Continuum of Care, regional housing agencies, housing authorities, community action organizations, private developers and property managers, and family emergency shelter providers. The framework allows for regional differences and conditions. The goal is to identify players in each EA region who can build on the elements of strategy in place in their region—filling in gaps and leveraging other resources. Anti-poverty strategies are an integral part of program design, development and implementation throughout the Department of Housing and Community Development. The State’s objective is to empower low income families to thrive with minimal dependence on public assistance; the desired outcome of its activities is to enable participants to achieve the highest level of family and community self-sufficiency. DHCD collaborates with a variety of resources within the community as well as other state agencies (e.g., the Interagency Supportive Housing Working Group), to provide comprehensive programs within every community in the Commonwealth of Massachusetts.

## 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
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1	Promote Strong Sustainable Communities	2020	2024	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 Homelessness prevention and rehousing Homeownership		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 44000 Persons Assisted  Public service activities other than Low/Moderate Income Housing Benefit: 12000 Persons Assisted  Facade treatment/business building rehabilitation: 45 Business  Rental units rehabilitated: 200 Household Housing Unit  Homeowner Housing Rehabilitated: 500 Household Housing Unit  Direct Financial Assistance to Homebuyers: 25 Households Assisted  Jobs created/retained: 30 Jobs  Businesses assisted:
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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
								15 Businesses Assisted  Housing for Homeless added: 15 Household Housing Unit  Housing Code Enforcement/Foreclosed Property Care: 150 Household Housing Unit
<b>2</b>	Preserve and create affordable rental housing	2020	2024	Affordable Housing		Rehabilitation of existing units Production of new rental units Preservation of affordable rental housing Homelessness prevention and rehousing		Rental units constructed: 750 Household Housing Unit  Rental units rehabilitated: 175 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Reduce homelessness	2020	2024	Homeless		Homelessness prevention and rehousing		Tenant-based rental assistance / Rapid Rehousing: 1900 Households Assisted  Homeless Person Overnight Shelter: 600 Persons Assisted  Homelessness Prevention: 3000 Persons Assisted
4	Access to housing opportunities	2020	2024	Affordable Housing		Rehabilitation of existing units Production of new rental units Preservation of affordable rental housing Homelessness prevention and rehousing Homeownership		

Table 56 – Goals Summary

## Goal Descriptions

1	Goal Name	Promote Strong Sustainable Communities
	Goal Description	Community economic development needs of low- and moderate-income communities.
2	Goal Name	Preserve and create affordable rental housing
	Goal Description	Preserve and create affordable rental housing options for low- and moderate-income residents.
3	Goal Name	Reduce homelessness
	Goal Description	Reduce chronic and family homelessness through a housing-based approach, with the goal of ending homelessness.
4	Goal Name	Access to housing opportunities
	Goal Description	Ensure full and fair access to housing for all residents of the Commonwealth.

**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)**

The Commonwealth's annual goals are subject to change, based on funding allocations, funding award decisions, and local needs and priorities.

## **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)**

DHCD 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. DHCD awards \$3-4 M annually for the conversion of state-aided public housing to full accessibility.

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

DHCD 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. DHCD 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 DHCD 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.

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

No

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

In its capacity as a Housing Authority, DHCD 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.Â Some of the obstacles to production are unique to affordable housing, but many apply to housing development generally.Â 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.Â Specific barriers include:Â 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 little incentive 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. 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.Â 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.Â Â

The ability of the State to eliminate, or even mitigate, some of these barriers is limited.Â For example, while materials cost roughly the same here as in other parts of the country, labor is considerably more expensive.Â DHCD recognizes that that expanding the supply of affordable housing is vital to the state's economic prosperity, and economic prosperity is what will boost the income and economic self-sufficiency of low income residents.

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

While localities still control many of the identified barriers, MA has undertaken a number of initiatives to help communities approach residential development more positively to encourage development of affordable housing.

In 2017 MA launched the Housing Choice Initiative (HCI). HCI provides incentives, rewards, technical assistance (TA), and proposed legislative reform to encourage and empower municipalities to plan and build a diverse housing stock in MA. There are 4 components to the HCI:

1. Designates communities that produce new housing at a 5% rate or more and rewards them with exclusive access to Housing Choice Capital Grants, Housing Choice Communities received \$8 million in funding for capital projects in state FY 2019 and 2020. These communities also get Bonus Points or other considerations for certain Commonwealth funding programs including Clean Water Trust loans, MassWorks, Seaport Council Grants, Complete Streets, MassDOT capital projects, Energy and Environmental Affairs Planning, LAND, and PARC grants.
2. To assist municipalities to achieve Housing Choice status, DHCD's Housing Choice Program Director coordinates existing TA and provides "one-stop shopping" for info on technical assistance grants for local governments.
3. The HCI is tracking progress toward a goal of 135,000 new housing units statewide by 2025, or about 17,000 new units per year.
4. Targeted legislation to make it easier for communities to adopt "housing production friendly" zoning. The Act to Promote Housing Choices would change state law to reduce the required vote from 2/3 "supermajority" to a simple majority for certain zoning changes. This change makes MA more consistent with current practice in most states in the country.

MA continued with other efforts by funding housing development projects, establishing programs and technical assistance. MA will continue its efforts to reduce the restrictive effects of government policy on housing development for individuals and families.

- The Legislature enacted Chapter 40R, allowing communities to adopt residential Smart Growth overlay districts. This 2004 law offers payments to communities that adopt smart growth zoning that include an affordable housing component. A companion 2005 law (Chapter 40S) provides payments to offset school costs in 40R districts.
- Community Preservation Act enables cities and towns to raise funds for affordable housing, historic preservation and open space. These funds are important for communities that have established Emergency Rental Assistance programs in response to the COVID-19 health emergency.
- MassWorks state funded competitive grant program assists municipalities to upgrade and expand infrastructure.
- DHCD offers TA in training sessions, workshops, and conferences such as the Citizen Planner Training Collaborative.
- 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.



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

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

The Commonwealth's Emergency Assistance program (providing emergency shelter and rapid rehousing resources) conducts extensive intake assessments and develops individualized service and rehousing plans for each household. DHCD is in the process of redesigning a new telephonic emergency shelter intake system to ensure program access to homeless families with limited access to public transportation.

DHCD funds street outreach programs to connect with unsheltered homeless individuals. Additionally, partners at the Department of Mental Health and local governments marshal resources to reach out to this population.

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

The Commonwealth is the primary funder for the Emergency Shelter system. This includes a Coordinated Entry system for family shelter as well as coordination of all ESG services with the local Continuums of Care.

The Commonwealth is a primary though not sole funder of the individual shelter system.

**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.**

The Commonwealth has undertaken a number of initiatives to transform the homelessness system to focus more heavily on housing. Among other initiatives, a coordinated system of Regional Networks has tested prevention, diversion, and rehousing strategies, in combination with federal Homelessness Prevention and Rapid Rehousing resources.

The Baker-Polito Administration is committed to moving the Commonwealth's response to homelessness from a shelter program to a housing program through a two-pronged effort: rapidly

rehouse homeless families currently in shelters; and, implement prevention and diversion activities to reduce the need for shelter by providing suitable housing alternatives.

To accomplish this, DHCD will:

- Continue to pursue the goal to advance *housing first*;
- Provide cost predictability and cost containment;
- Provide a responsible emergency shelter safety net;
- Expand prevention programs and ELI housing resources across DHCD by building out its existing infrastructure;
- Align with new federal housing strategies implemented through the HEARTH Act;
- Eliminate use of motels;
- Coordinate resources across DHCD Divisions.
- Coordinate with EOHHS agencies and upstream systems of care to connect individuals with housing resources before they become literally homeless.
- 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.

DHCD has adopted a comprehensive approach to family homelessness, and have engaged other state agencies in the effort: preventing homelessness; establishing a strong safety net of shelters and services; rehousing families and linking them with support services in the community; and creating more permanent affordable housing. Our first priority is to prevent homelessness and help families avoid entering the shelter system. DHCD has also increased its investment in supportive housing which helps individuals and families that are homeless or facing homelessness, institutionalized or at-risk of institutionalization, people with disabilities and the elderly. 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.

In response to provider requests for training and additional support, DHCD has added new staff to continue to support families experiencing homelessness; a trainer to coordinate trainings on a range of topics including safe sleep, de-escalation, and trauma-informed care, and an intensive case manager to support providers and families with complex needs through coaching and warm handoffs to other resources.

**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 has undertaken a number of initiatives to transform the homelessness system to focus more heavily on housing. Among other initiatives, a coordinated system of Regional Networks has tested prevention, diversion, and rehousing strategies, in combination with federal Homelessness Prevention and Rapid Rehousing resources.

The Baker-Polito Administration is committed to moving the Commonwealth's response to homelessness from a shelter program to a housing program through a two-pronged effort: rapidly rehouse homeless families currently in shelters; and, implement prevention and diversion activities to reduce the need for shelter by providing suitable housing alternatives.

To accomplish this, DHCD will:

- Continue to pursue the goal to advance *housing first*;
- Provide cost predictability and cost containment;
- Provide a responsible emergency shelter safety net;
- Expand prevention programs and ELI housing resources across DHCD by building out its existing infrastructure;
- Align with new federal housing strategies implemented through the HEARTH Act;
- Eliminate use of motels;
- Coordinate resources across DHCD Divisions.
- Coordinate with EOHHS agencies and upstream systems of care to connect individuals with housing resources before they become literally homeless.
- 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.

DHCD has adopted a comprehensive approach to family homelessness, and have engaged other state agencies in the effort: preventing homelessness; establishing a strong safety net of shelters and services; rehousing families and linking them with support services in the community; and creating more permanent affordable housing. Our first priority is to prevent homelessness and help families avoid entering the shelter system. DHCD has also increased its investment in supportive housing which helps individuals and families that are homeless or facing homelessness, institutionalized or at-risk of

institutionalization, people with disabilities and the elderly. 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.

In response to provider requests for training and additional support, DHCD has added new staff to continue to support families experiencing homelessness; a trainer to coordinate trainings on a range of topics including safe sleep, de-escalation, and trauma-informed care, and an intensive case manager to support providers and families with complex needs through coaching and warm handoffs to other resources.

## **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 (mcg/dL). Levels above that called EBL – elevated blood levels – what the CDC calls severe lead poisoning. 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.

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 DHCD’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 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 Department of Housing and Community Development. The State's objective is to empower low income families to thrive with minimal dependence on public assistance; the desired outcome of its activities is to enable participants to achieve the highest level of family and community self-sufficiency.

DHCD 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, DHCD contracts for stabilization services. DHCD is a Moving to Work agency. Through MTW, DHCD has begun to pilot elements of self-sufficiency programs, and intends to expand those in the coming months. Finally, DHCD has begun a concerted effort to encourage the Community Action Agencies that receive Community Services Block Grant (CSBG) funds to offer financial self-sufficiency programs, including working with community colleges to ensure that participants in CSBG job training programs are prepared to take advantage of the training offered by the community colleges.

DHCD's infrastructure programs – housing construction, weatherization, etc. all represent major employment opportunities, and the Department coordinates with other state agencies such as the Executive Office of Labor and Workforce Development, to ensure that the administration's overall job creation and anti-poverty strategies are coordinated.

### **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 DHCD. The Agency collaborates with a variety of resources within the community as well as other state agencies, 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**

Monitoring activities are conducted in accordance with the HUD regulations for each program, and may include the following: explanation of grant contract requirements and deadlines; desk reviews and/or field visits; calls or field visit to grantees; ongoing consultation with HUD CPD regional office; and suspension of grant activities where warranted.

CDBG holds sessions with grantees each year to review all contract conditions, requirements, procedures for requesting payment, etc. DHCD'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 develops a monitoring plan.

DHCD ensures that all ESG sub-recipients receive ongoing technical assistance and training on ESG regulations and guidelines. DHCD has provided written standards for recordkeeping and reporting on ESG to each sub-recipient. DHCD requires each ESG sub-recipient to submit monthly reports throughout the contract period. All ESG sub-recipients are required to participate in HMIS, with the exception of DV providers who are required to enter data into a comparable system and submit an Annual Performance Report and CAPER at the end of the contract period.

DHCD will continue to contract with an outside agency to provide monitoring services and technical support to the HOME Program. The consulting 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 DHCD'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. DHCD's monitoring guide was updated to include additional items required by the 2012/2013 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 advice on compliance questions and annual occupancy trainings.

MDPH ensures that all HOPWA requirements are met through comprehensive monitoring practices that are consistent with internal protocol. Annual work plans are submitted and reviewed by contract managers and incorporated into the agency's contracted scope of service.



## Expected Resources

### AP-15 Expected Resources – 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	34,662,543	50,000	250,000	34,962,543	138,650,172	

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	9,779,460	2,993,673	0	12,773,133	44,000,000	HOME Program Income (PI) is indeterminable, as our rental loans are largely deferred payment loans. HOME PI collected during program year 2019 is being referenced in a 2019 Action Plan amendment. The \$2,993,673.15 referenced here is HOME PI collected and referenced in a 2020 Action Plan amendment done in February 2021.

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	349,851	0	0	349,851	1,336,632	

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	4,777,475	0	0	4,777,475	19,109,900	



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	7,039,756	0	2,500,000	9,539,756	17,000,000	

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**

DHCD 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 often provide in-kind service. For the CDBG program, bonus points are available if an applicant demonstrates that non CDBG-funded projects consistent with the community's Community Development Strategy and the requested CDBG activities are also targeted to the same geographic area and will also result in measurable improvements. These points will not be awarded for municipal operating budget activities, maintenance activities/projects, or activities that are an extension of a requested CDBG activity such as lead abatement funds to serve the same units as those in a proposed housing rehabilitation program.

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.

The resources for the HOME match continue to be the state-funded Massachusetts Rental Voucher Program and the state's Housing Stabilization Fund. Annual expenditures through these two programs alone are approximately \$48 million. Since states are permitted to "bank" match, that expenditure level would constitute match -- calculated at 25 cents (\$0.25) on the HOME dollar (\$1.00) -- for many years.

**If appropriate, describe publically 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. Additionally, MA is exploring the use of state-owned land for the development of affordable housing.

**Discussion**

In Massachusetts, DHCD is the tax credit allocating agency, through its Division of Housing Development. The Division also oversees approximately \$100 million annually in other federal and state affordable housing programs, including the federal HOME program, ensuring a coordinated approach to resource allocation.

Developers have the opportunity to apply competitively for the tax credit and DHCD's other affordable rental housing resources during regularly scheduled funding competitions. In a typical year, the Department's credit allocations, in combination with DHCD subsidy awards and other funds, generate support for about 1200 to 1500 affordable rental units, both production and preservation. DHCD 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 Department also is encouraging developers to target the extremely low income units to individuals or families making the transition from homelessness.

DHCD is the lead agency for the preparation of both the Consolidated Plan and the state's Low Income Housing Tax Credit (LIHTC) Qualified Allocation Plan. The Qualified Allocation Plan (QAP) establishes the priorities and policies under which the state will operate and distribute funds in its federal tax credit program. In much the same manner as it does when it prepares its HUD Community Planning and Development Consolidated Plan and One Year Action Plans, DHCD considers the Commonwealth's affordable housing needs and the condition of its housing markets when it prepares its LIHTC Qualified Allocation Plan. The two plans are complementary and consistent, and the QAP is incorporated by reference into this Consolidated Plan. The QAP is available in its entirety on the DHCD website.

Massachusetts received a CDBG Disaster Recovery grant under P.L. 113-2. DHDC performed a needs assessment for these funds which is available at: <http://www.mass.gov/hed/community/funding/community-development-block-grant-disaster-recovery-.html> The majority of these funds have been obligated.

## 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
<b>1</b>	Promote Strong Sustainable Communities	2020	2024	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 Homelessness prevention and rehousing Homeownership		
<b>2</b>	Preserve and create affordable rental housing	2020	2024	Affordable Housing		Rehabilitation of existing units Production of new rental units Preservation of affordable rental housing		Rental units constructed: 150 Household Housing Unit Rental units rehabilitated: 35 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Reduce homelessness	2020	2024	Homeless		Homelessness prevention and rehousing		
4	Access to housing opportunities	2020	2024	Affordable Housing		Community development and local priorities Rehabilitation of existing units Production of new rental units Preservation of affordable rental housing Homelessness prevention and rehousing Homeownership		

**Table 58 – Goals Summary**

## Goal Descriptions

1	Goal Name	Promote Strong Sustainable Communities
	Goal Description	
2	Goal Name	Preserve and create affordable rental housing
	Goal Description	The goals below are for HOME-funded units only.

<b>3</b>	<b>Goal Name</b>	Reduce homelessness
	<b>Goal Description</b>	
<b>4</b>	<b>Goal Name</b>	Access to housing opportunities
	<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 non-entitlement communities and 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

Program	Goals		
CDBG			
HOME			
HOPWA			
ESG			

Table 59 – Funding Allocation Priorities

### Reason for Allocation Priorities

Massachusetts allocates the funds it receives from HUD under the four programs covered by this Consolidated Plan to a number of specific programs. CDBG funds focus predominantly on community development activities such as infrastructure improvements, home owner housing rehabilitation and public social services.

### 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 equitably distribute funds to address its highest priority needs in each of the funding categories: affordable housing (including lead paint abatement), homelessness, special needs, and community development.



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

### Introduction:

### Distribution Methods

Table 60 - Distribution Methods by State Program

1	<b>State Program Name:</b>	CDBG Reserves
	<b>Funding Sources:</b>	CDBG
	<b>Describe the state program addressed by the Method of Distribution.</b>	<p>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 Undersecretary of DHCD to be particularly worthy, innovative, or address an overarching local, regional, or statewide need. Such projects may be funded through the Reserves.</p> <p>Funds may also be made available for projects throughout the program year that are consistent with Massachusetts' CDBG priorities.</p>
	<b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b>	<p>The application materials for Reserves will provide guidance to potential grantees on how to structure their applications. The Department'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>

<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 FY2020 One-Year Action is attached to this Consolidated Plan and is posted separately on DHCD'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>	

	<b>Describe how resources will be allocated among funding categories.</b>	An initial allocation of \$150,000 will be available for the Reserves component. Funds may be recaptured by or returned to DHCD 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.
	<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 FY2020 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.

<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p>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 (\$22,613,488 available) is available to all applicants though communities with higher percentage of low and moderate income persons will have an advantage.</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 FY2020 One-Year Action is attached to this Consolidated Plan and is posted separately on DHCD'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.</p> <p>A single community may receive no more than \$1 million from any combination of federal FY 2020 Community Development Fund or Mini-Entitlement grant funds. Awards not subject to the \$1 million cap per community include the Reserves.</p> <p>Additionally, a single community may receive no more than \$1.35 million from the Community Development Fund within two successive years. 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>See attached FY2020 CDBG One-Year Action Plan for specifics. A single community may receive up to \$800,000 in grant funds for a single or multiple activities. Regional applications involving more than one community may receive a grant of up to \$1.3 million but no single CDF community in a regional application may receive more than \$700,000. There is a minimum grant amount of \$10,000 for planning or design-only grants.</p>

	<b>What are the outcome measures expected as a result of the method of distribution?</b>	See the attached appendix for the FY2020 CDBG Action Plan and program specifics.
<b>3</b>	<b>State Program Name:</b>	Emergency Solutions Grant
	<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 shelter support, rapid rehousing and stabilization, and homelessness prevention.
	<b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b>	DHCD currently contracts with sub-recipients to offer ESG services. DHCD expects to release a request for response (RFR) for ESG funding in the fall of 2020. The RFR will be written with consideration of input provided from each Continuum of Care.
	<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>	After consulting with each CoC regarding their needs and priorities for ESG funding, DHCD released a request for responses (RFR). The RFR allowed awards made through the procurement process to be renewed for up to two additional years. Throughout the contract period, DHCD continues to consult with each CoC and sub-recipient about the needs of their community and their use of ESG funding.
	<b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b>	
	<b>Describe how resources will be allocated among funding categories.</b>	See attached appendix that includes FY2020 ESG Program Description for specifics.
	<b>Describe threshold factors and grant size limits.</b>	See attached appendix that includes FY2020 ESG Program Description for specifics.
	<b>What are the outcome measures expected as a result of the method of distribution?</b>	See attached appendix that includes FY2020 ESG Program Description for specifics.
<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>	DHCD will competitively and contingently award HOME funds for Rental Loan activities. This includes the HOME PI that was referenced in a 2020 HOME Action Plan amendment posted in February 2021.
<b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b>	DHCD 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. DHCD also will competitively award HOME funds for rental loan projects in entitlement communities that provide a match for DHCD administered HOME funds.  See the attached appendix that includes FY2020 HOME Program details.
<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>	



<b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b>	
<b>Describe how resources will be allocated among funding categories.</b>	<p>During federal FY 2020 DHCD 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. \$8,801,000 - rental loan program</li> <li>2. n/a- project-based first-time homebuyer program</li> <li>3. n/a– purchaser-based first-time homebuyer program</li> </ol>
<b>Describe threshold factors and grant size limits.</b>	<p>Typically, DHCD will award up to \$750,000 to \$1,000,000 per project and up to \$95,000 per HOME-assisted unit in HOME entitlement/consortium communities. In non-entitlement or non-consortium communities, the maximum loan is up to \$100,000 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.</p> <p>See attached appendix for FY2020 HOME Program details.</p>
<b>What are the outcome measures expected as a result of the method of distribution?</b>	<p>DHCD's HOME activities generally fall under the HUD objective: Provide decent affordable housing. In general, the HUD outcome for our activities is: Affordability.</p> <p>See the attached appendix that includes FY2020 HOME program specifics.</p>
<b>State Program Name:</b>	HOPWA

5	<b>Funding Sources:</b>	HOPWA
	<b>Describe the state program addressed by the Method of Distribution.</b>	The Massachusetts Department of Public Health (MDPH) Bureau of Infectious Disease and Laboratory Sciences (BIDLS) Office of HIV/AIDS (OHA) administers HOPWA funds. MDPH will use its HOPWA allocation in FY20 to fund home-based HIV/AIDS medical case management services provided by Victory Programs Inc. and AIDS Project Worces, and housing search and advocacy assistance through Commonwealth Land Trust 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>	OHA awarded Victory Programs and Commonwealth Land Trust funding for home-based HIV/AIDS Medical Case Management (MCM) funds during a statewide procurement in State Fiscal Year 2018. OHA awarded AIDS Project Worcester and Community Counseling of Bristol County funding for housing search and advocacy services. This procurement included language to support the allocation of State, Ryan White, and HOPWA funding to successful applicants. Vendor selection involved a comprehensive community and internal review process.
	<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</b></p> <p><b>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>N/A Massachusetts utilized HOPWA resources for case management services.</p>
<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>Victory Programs will use HOPWA resources to expand its Medical Case Management services to serve additional individuals living with HIV/AIDS in its wide network of housing and substance use treatment 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.</p>
<p><b>Describe threshold factors and grant size limits.</b></p>	<p>N/A</p>

	<b>What are the outcome measures expected as a result of the method of distribution?</b>	See attached appendix that includes FY20 HOPWA specifics.
6	<b>State Program Name:</b>	Mini-Entitlement Program
	<b>Funding Sources:</b>	CDBG
	<b>Describe the state program addressed by the Method of Distribution.</b>	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 of 8.0% 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.
	<b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b>	<p>DHCD expects to award up to \$9,075,000 from the FY 2020 Mini-Entitlement Program allocation to eleven (11) designated Mini-Entitlement municipalities: Amherst, Chelsea, Everett, Gardner, Greenfield, North Adams, Palmer, Southbridge, Wareham, Webster, and West Springfield.</p> <p>DHCD 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 FY2020 One-Year Action is attached to this Consolidated Plan and is posted separately on DHCD'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>	

	<b>Describe how resources will be allocated among funding categories.</b>	<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.</p> <p>A single community may receive no more than \$1 million from any combination of federal FY 2020 Community Development Fund or Mini-Entitlement grant funds. Awards not subject to the \$1 million cap per community include the Reserves.</p> <p>Additionally, a single community may receive no more than \$1.35 million from Community Development Fund within two successive years. Reserves awards are not subject to the \$1.35 million cap per community.</p>
	<b>Describe threshold factors and grant size limits.</b>	The maximum grant award is up to \$825,000. 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. FY 2020 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.
	<b>What are the outcome measures expected as a result of the method of distribution?</b>	See attached appendix that includes the FY2020 CDBG Action Plan and program specifics.
7	<b>State Program Name:</b>	National Housing Trust Fund
	<b>Funding Sources:</b>	HTF
	<b>Describe the state program addressed by the Method of Distribution.</b>	DHCD will competitively and contingently award HTF funds for Rental Loan activities.

<b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b>	See the attached appendix that includes HTF Program details.
<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>	
<b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b>	

<b>Describe how resources will be allocated among funding categories.</b>	<p>During federal FY 2021 DHCD 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. \$- rental loan program</li> <li>2. n/a- project-based first-time homebuyer program</li> <li>3. n/a- purchaser-based first-time homebuyer program</li> </ol>
<b>Describe threshold factors and grant size limits.</b>	<p>Typically, DHCD will award up to \$1,000,000 per project and up to \$50,000 per HTF-assisted unit. We reserve the option to increase the per unit amounts for family projects located in gateway communities or areas of opportunity.</p> <p>See attached appendix for HTF Program details.</p>
<b>What are the outcome measures expected as a result of the method of distribution?</b>	<p>DHCD's HTF activities generally fall under the HUD objective: Provide decent affordable housing. In general, the HUD outcome for our activities is: Affordability.</p> <p>See the attached appendix that includes HTF program specifics.</p>



**Discussion:**

## AP-35 Projects – (Optional)

### Introduction:

N/A. Massachusetts distributes its Consolidated Plan resources statewide through a competitive process.

#	Project Name

Table 61 – Project Information

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

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

## **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?**

No

### **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 DHCD 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 Fund Application 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. DHCD 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 EDF community grants. However, the format of any final loan application will be determined by HUD.

See attached FY2020 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**

No

## **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**

See SP-10

### **Geographic Distribution**

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

**Table 62 - Geographic Distribution**

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

### **Discussion**

## Affordable Housing

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

#### Introduction:

One Year Goals for the Number of Households to be Supported	
Homeless	40
Non-Homeless	630
Special-Needs	17
Total	687

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	120
Rehab of Existing Units	400
Acquisition of Existing Units	0
Total	520

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

#### Discussion:

HOME one-year goals:

Homeless: 10

Non-Homeless: 134

Production of New Units: 134

Rehab of Existing Units: 10

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 600 total units.

While we may see that HOME has supported some Special-Needs housing units, the Department has other resources that are targeted toward supportive housing.



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

### **Introduction:**

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

- DHCD will bring several recently awarded projects to construction start, including two mixed-income redevelopment projects that will replace 300+ public housing units and build hundreds more units of market-rate housing; several ModPHASE projects to rehabilitate elderly public housing.
- DHCD will make capital awards to address high-risk developments and alter capital planning processes to address climate-change related hazards.
- DHCD will continue to make improvements to the CHAMP online application system
- DHCD will continue to improve oversight of LHAs through the PMR, striving to implement data-driven performance review that can more quickly identify troubled housing authorities

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

- New Annual plan requires LHAs to present all relevant information (Budget, CIP, policies) in one document to residents at a public meeting.

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

N/A

### **Discussion:**

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

### **Introduction**

DHCD pursues a housing-focused approach to homelessness in advancing its vision that homelessness be rare, brief, and non-recurring.

DHCD continues to focus on diversion from family shelter to safe alternatives using the Commonwealth's HomeBASE benefit and accompanying case management services. For families needing shelter, DHCD continues to encourage providers to embrace housing-focused approaches, best practice sharing between providers, and added support for complex cases. To facilitate exits from the EA system, DHCD continues to fund the HomeBASE rapid rehousing benefit and work with other entities to expand access to subsidized housing.

With individuals, DHCD pursues various priorities including:

- Reducing discharges from upstream systems of care into the shelter system, and aiding those facilities in navigating housing resources
- During the pandemic in particular, working to identify sufficient shelter capacity for individuals with no alternative to shelter, particularly outside of Boston
- Coordinating with the Commonwealth's housing development entities, within and beyond DHCD, to expand permanent supportive housing for chronically homeless individuals

### **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**

DHCD will continue to work closely with our Constituent Service Coordinator and Intensive Care Manager who work closely with persons experiencing homelessness to ensure that barriers to services (both direct & indirect) are identified and removed. The Intensive Care Manager also works to identify policies & procedures that may negatively impact someone's ability to ask for and receive emergency shelter and other services. Additionally, DHCD will continue to communicate with the Continuum of Care lead agencies, other state departments, and municipalities statewide to understanding and assess the

needs of persons experiencing homelessness in local communities.

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

Goal: ensure access to safe and effective emergency shelter during the pandemic.

Actions: to improve access to emergency shelter, DHCD is working closely with the Massachusetts Emergency Management Agency to secure reimbursement for emergency shelter expenses in response to COVID-19. Additionally, we are working closely with cities and towns across the Commonwealth to identify and put up temporary emergency shelter in congregate and non-congregate settings in preparation for winter weather.

**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**

Goal: improving access to RRH resources for individuals statewide.

Action: DHCD is currently working with HUD assigned consultants (Abt Associations) to develop statewide standards for providing rapid re-housing assistance to persons experiencing homelessness. Additionally, new RRH training is being developed for providers across Massachusetts focusing on providing individualized RRH services.

**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**

Goal: Increase access to homelessness prevention services statewide.

Action: In response to COVID-19, the Commonwealth has launched a statewide initiative expanding the

capacity of existing homelessness prevention services as bulleted below. 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. Additionally, to increase access to expanded services, DHCD staff launched a training video directed to service providers on how to access expanded services. The video is available at <https://www.youtube.com/watch?v=XJuGJUaMnIY&feature=youtu.be>.

\$100 million commitment this fiscal year to expand the capacity of the Residential Assistance for Families in Transition (RAFT) program to provide relief to renters and landlords impacted by COVID-19;

\$48.7 million to HomeBASE and other rapid rehousing programs for when tenants are evicted and are at risk of homelessness;

\$12.3 million to provide tenants and landlords with access to legal representation and related services prior to and during the eviction process, as well as community mediation to help tenants and landlords resolve cases outside of court;

\$6.5 million for Housing Consumer Education Centers (HCECs), the "front door" for those facing a housing emergency; and

\$3.8 million for the Tenancy Preservation Program (TPP), to provide case management support and to act as a neutral party to help tenants and landlords come to agreement. Goal: Increase access to services for youth and young adults experiencing homelessness.

Action: In response to COVID-19, DHCD is partnering with the Massachusetts Interagency Council on Housing and Homelessness and the Executive Office of Health and Human Services (EOHHS) to provide emergency shelter (funded through ES-CV) and flexible, yet intensive wrap-around support services (funded through EOHHS) to young adults experiencing homelessness. To support this effort, EOHHS is connecting each emergency shelter provider with direct connections and training on the resources available to young adults through multiple state offices including the Office of the Child Advocate, Dept. of Children & Families, and Dept. of Mental Health.

## **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

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

### **Introduction:**

**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 localities still control many of the identified barriers, MA has undertaken a number of initiatives to help communities approach residential development more positively to encourage development of affordable housing.

In 2017 MA launched the Housing Choice Initiative (HCI). HCI provides incentives, rewards, technical assistance (TA), and proposed legislative reform to encourage and empower municipalities to plan and build a diverse housing stock in MA. There are 4 components to the HCI:

1. Designates communities that produce new housing at a 5% rate or more and rewards them with exclusive access to Housing Choice Capital Grants, Housing Choice Communities received \$8 million in funding for capital projects in state FY 2019 and 2020. These communities also get Bonus Points or other considerations for certain Commonwealth funding programs including Clean Water Trust loans, MassWorks, Seaport Council Grants, Complete Streets, MassDOT capital projects, Energy and Environmental Affairs Planning, LAND, and PARC grants.
2. To assist municipalities to achieve Housing Choice status, DHCD's Housing Choice Program Director coordinates existing TA and provides "one-stop shopping" for info on technical assistance grants for local governments.
3. The HCI is tracking progress toward a goal of 135,000 new housing units statewide by 2025, or about 17,000 new units per year.
4. Targeted legislation to make it easier for communities to adopt "housing production friendly" zoning. The Act to Promote Housing Choices would change state law to reduce the required vote from 2/3 "supermajority" to a simple majority for certain zoning changes. This change makes MA more consistent with current practice in most states in the country.

MA continued with other efforts by funding housing development projects, establishing programs and technical assistance. MA will continue its efforts to reduce the restrictive effects of government policy on housing development for individuals and families.

- The Legislature enacted Chapter 40R, allowing communities to adopt residential Smart Growth overlay districts. This 2004 law offers payments to communities that adopt smart growth zoning

that include an affordable housing component. A companion 2005 law (Chapter 40S) provides payments to offset school costs in 40R districts.

- Community Preservation Act enables cities and towns to raise funds for affordable housing, historic preservation and open space. These funds are important for communities that have established Emergency Rental Assistance programs in response to the COVID-19 health emergency.
- MassWorks state funded competitive grant program assists municipalities to upgrade and expand infrastructure.
- DHCD offers TA in training sessions, workshops, and conferences such as the Citizen Planner Training Collaborative.
- 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.

**Discussion:**

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

### **Introduction:**

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

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

#### **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**

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

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

### **Discussion:**



## 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.	0.00%

#### 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:

DHCD'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:

DHCD 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:

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

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

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

The current ESG standards are attached. The standards were developed to support ESG projects selected from our last procurement process (in 2016.) FFY20 was intended to be the last year of that procurement. Due to the current pandemic, DHCD will extend the existing ESG projects for another year; allowing them to use the funding to support COVID related costs, if necessary. The revised expectation is that DHCD will release a new procurement for ESG projects/services with anticipated

program start dates of April 1, 2022. DHCD is working to update our existing standards & develop new standards (where applicable) aligned with updated guidance from HUD in response to the COVID pandemic. Additionally, DHCD is working with our HUD assigned TA provider (Abt Associates) to develop statewide RRH standards that support ESG funded projects. Finally, DHCD subrecipients are encouraged to develop their own regional standards for providing ESG assistance in partnership with their local Continuum of Care.

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

There are currently 16 Continuum of Care (CoC) 'networks' in Massachusetts, each with their own coordinated entry system. DHCD requires ESG subrecipients to incorporate ESG funded services into their local coordinated entry system. To date all 16 CoCs in Massachusetts have implemented a fully functioning coordinated entry or assessment system and are actively making improvements to their system based on the current COVID crisis. DHCD communicates regularly with CoCs on the incorporation of ESG funded projects into their CES and provides technical assistance when requested.

Additionally, as part of our procurement in 2016, DHCD determined that ESG programs must be part of a larger network of resources to be successful. Therefore, to continue to be eligible for renewal funding, subrecipients are required to work with other mainstream organizations and service providers to connect their program participants to available services across the Commonwealth. ESG services are provided in close coordination with other services funded by the Commonwealth, including Rental Assistance for Families in Transition (RAFT) & HomeBase. DHCD has further identified the need for connecting families experiencing Domestic Violence with emergency housing services and continues to encourage our subrecipients to offer shelter and rapid re-housing services to households in DV situations.

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, DHCD released a Request for Responses (RFR) for new awards to be issued in FFY16 (contract period 4/1/16 – 3/30/17). The RFR allowed awards made through the procurement process to be renewed for up to four additional years. DHCD will utilize our FFY20 ESG allocation to continue to support the ESG projects established in FFY16. Current ESG subrecipients are a mix of units of general local government and private nonprofit organizations, including community and faith-based organizations.

Additionally, DHCD published a Notice of Funding Availability (NOFA) on May 13, 2020 to distribute ESG-CV funding. Through the ESG-CV NOFA process, DHCD has conducted significant training & outreach to community & faith-based organizations encouraging participation in our ESG-CV NOFA & other CoC activities. Finally, DHCD regularly shares information regarding the availability and use of ESG funding through a variety of outlets, including but not limited to the Massachusetts Statewide CoC Group, the Mass Municipal Association Human Services Committee, the Boston Mayor's Task Force & RRH Working Group, the Massachusetts EOHHS Youth Regions, and the Western Mass Network to End Homelessness.

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.

DHCD encourages all subrecipients to consult with homeless or formerly homeless individuals in a variety of ways, including through program evaluation and acting as board members. Additionally, through a series of listening sessions and activities coordinated through partner agencies, DHCD incorporates recommendations to our ESG process.

5. Describe performance standards for evaluating ESG.

DHCD tracks the number of persons served with ESG through HMIS utilizing the data elements HUD has established. Additionally, subrecipients are required to report on the following performance indicators:

- Number of households prevented from becoming homeless
- Number of households rapidly re-housed into permanent housing
- Number of emergency shelter bed nights made available to individuals and families with DHCD ESG funding

ESG Recordkeeping and Reporting - Standards for Administering Rapid Re-Housing and Homelessness Prevention Projects are contained in the ESG Section of the FFY2020 Action Plan Appendix, located in AD-25 Administration of the Consolidated Plan, Grantee Unique Appendices.

**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".

DHCD 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 partnered with non-profit entities that receive support service funds from federal sources, from private foundations or sources, from the Massachusetts Executive Office of Health and Human Services, and/or from the Executive Office of Elder Affairs. Applicants must have the demonstrated capacity to develop the housing and provide necessary supportive services, and must be in good standing with the Department. Sponsors who lack experience in 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 low-income tenants who need support services. Sponsors interested receiving HTF funds must submit a pre-application to the Department through the on-line Mass OneStop+ system. Based on the information contained in the pre-application, DHCD determines whether the sponsor has the demonstrated capacity to develop the housing and provide the necessary supportive services. At the

pre-application stage, DHCD 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 DHCD during the pre-application process are invited to submit full funding applications. Full funding applications must be submitted through the on-line 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 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

Demonstrated need for project in the target neighborhood

Financial viability of the project

Degree of local support, including local funding commitments

Degree to which the project maximizes green building standards and sustainable 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

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

DHCD always encourages the creation of units for ELI individuals and families in "areas of opportunity." The Department 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 HUD data. In addition, DHCD 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.

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 DHCD's intent to award HTF to projects that are highly ready to proceed. Further, it is DHCD'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 are critical elements in the DHCD review process for HTF. The degree of readiness of a project and its 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 households. Additionally, DHCD will typically pair HTF funds with 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 households.

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 a 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 sustainable development features, or housing that serves special needs populations). If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

DHCD 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). In Massachusetts we have prioritized HTF funds for projects that provide service-enriched housing and housing for homeless families and individuals. VLI, ELI and homeless individuals or households often face other life challenges, including difficulty in paying for food, transportation, health care, child care, and other life necessities. These highly vulnerable populations clearly need housing they can afford, but they frequently need support services as well.



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".

Historically, DHCD is willing to award subsidy to support approximately 25% of the cost of producing or preserving an affordable unit. It is the Department'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.

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.

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.

Each year, in DHCD's Qualified Allocation Plan (QAP) for the Low Income Housing Tax Credit (LIHTC), the Department uses 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 DHCD housing resources, including the Housing Trust Fund (HTF), HOME program, and ten state-funded bond programs. The current QAP can be found online at <https://www.mass.gov/service-details/qualified-allocation-plan>.

For DHCD, there is a direct correlation between the recommended cost limits per unit and the Department's commitment of subsidy per unit. Historically, DHCD has been willing to award subsidy to support approximately 25% of the cost of producing or preserving an affordable unit. However, it is important to note that, historically, DHCD has also been willing to prioritize greater subsidy support to supportive housing projects. Once DHCD has identified the amount of subsidy it will provide, it is the Department'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. DHCD intends to follow its long-standing policy on subsidy per-unit in making HTF awards.

In general, recipients should assume that DHCD typically will cap all HTF awards at approximately \$100,000 - \$125,000 per unit, depending on project characteristics and at \$1,000,000 per project.

**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; and Capital Needs Assessments (if applicable).

See attached

**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".

See attached

**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".

☒ The grantee will use the HUD issued affordable homeownership limits.

**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

**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

**Discussion:**

## Attachments

## Citizen Participation Comments

Both the five-year strategic plan and the one-year action plans were issued in draft form for a 30-day public comment period that ran from October through November. A public hearing on November 18, 2020, in a virtual format due to the public health emergency. A recording of the hearing is available at <https://www.mass.gov/service-details/dhcd-consolidated-action-plans>. That hearing provided additional opportunity for the public to comment on these documents.

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

DHCD took into consideration all comments on the Consolidated and Action Plans received at the hearings or in writing prior to the close of business on November 18, 2020.

As a practice DHCD 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. This became particularly salient this year as the COVID-19 pandemic impacted DHCD's traditionally robust public engagement process.

For example, DHCD'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 opportunity to comment on the use of funding and services provided. Additionally, DHCD shares information about performance reports with CoC lead agencies, and shares statewide outcome details with at Balance of State CoC Planning Groups and at statewide CoC meetings.

As another example, in preparing its Qualified Allocation Plan (QAP) DHCD engages in broad consultation. In Massachusetts during the past few years, the state-level public lenders – specifically, the Department of Housing and Community Development and its quasi-public affiliates – have taken numerous steps to evaluate development costs and to identify areas where cost reductions can be achieved. The Department 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:

- Department of Housing and Community Development (DHCD)
- 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. DHCD 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.

A final example is in the CDBG Program. DHCD begins its annual CDBG public process earlier than the Consolidated Plan process. We do so in order to provide adequate time to share proposed changes to the program – especially if they involve the method of distribution, receive comments, prepare feedback and adjust the final draft One Year Plan so we can finalize and

issue the annual NOFA and grant application on schedule. The CDBG One Year Plan is then made available again during the Consolidated Plan process for further comment and feedback. These more formal sessions are supplemented with the ongoing public engagement that takes place during trainings and other program-based conversations with stakeholders.

Notices of various public hearings and information sessions including for the 2020-2024 Five Year Consolidated Plan follow.

NOTICE OF PUBLIC HEARING

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT (DHCD)  
COMMONWEALTH OF MASSACHUSETTS

Draft FY 2020 – 2024 HUD Consolidated Plan  
for  
CDBG, HOME, ESG, HOPWA, HTF

In accordance with the provisions of Title 24 – Department of Housing and Urban Development (HUD) Part 91 – Consolidated Submissions for Community Planning and Development Programs, notice is given of the proposed following action to be undertaken by this Department.

DHCD has posted a Draft FY 2020-2024 Consolidated Plan. During the period in which the draft of the above Consolidated Plan is available for public review, DHCD will hold the following public hearing and will accept written comments until Wednesday, November 18th, prior to finalizing the FY 2020-2024 Consolidated Plan.

Wednesday, November 18<sup>th</sup> 2020

10:00 am – 11:00 am

To attend the meeting through video access, please join the meeting by clicking on the following link: [Zoom](#)

To attend the meeting through audio access only, please join the meeting by dialing:

+13126266799,,94372497542#,,,,,0#,,773192# US (Chicago)

+19292056099,,94372497542#,,,,,0#,,773192# US (New York)

Dial by your location

+1 312 626 6799 US (Chicago)

+1 929 205 6099 US (New York)

+1 301 715 8592 US (Washington D.C.)

+1 346 248 7799 US (Houston)



+1 669 900 6833 US (San Jose)

+1 253 215 8782 US (Tacoma)

Meeting ID: 943 7249 7542

Passcode: 773192

Find your local number: <https://zoom.us/j/94372497542>

DHCD's 2020-2024 Consolidated Plan:

<https://www.mass.gov/doc/draft-fy2020-2024-consolidated-plan/download>

Written Comments may be sent to:

[ryan.ambrose@mass.gov](mailto:ryan.ambrose@mass.gov)

**Pursuant to the Governor's March 12, 2020 Order suspending certain requirements of the Open Meeting Law** in response to the COVID-19 state of emergency, this meeting of the Manufactured Housing Commission will be conducted through remote participation as noted above to ensure that the public can adequately access the meeting in real time.

For reasonable accommodations regarding this meeting, please contact (617) 573-1100 (TTY 617-573-1102) and direct requests to Ryan Ambrose, Policy Development Manager.

Favor de comunicarse con el Departamento de Vivienda y Desarrollo de la Comunidad de Massachusetts en (617) 573-1100 (TTY 617-573-1140) para ayuda gratis con el idioma.

Entre em contato com o Departamento de Moradia e Desenvolvimento Comunitário de Massachusetts no número (617) 573-1100 (TTY 617-573-1140) para obter assistência gratuita com o idioma.

如果您需要免費的語言翻譯幫助，請聯絡麻州住宅及社區發展部 (The Massachusetts Department of Housing and Community Development) 聯絡方式：(617) 573-1100 (TTY 617-573-1140)。

Свяжитесь с сотрудником Департамента жилищного хозяйства и общественного развития штата Массачусетс на предмет оказания бесплатной помощи по переводу на иностранный язык. ((617) 573-1100 (TTY 617-573-1140)).

Vui lòng liên hệ Bộ Phát Triển Nhà Ở và Cộng Đồng Massachusetts tại (617) 573-1100 (TTY 617-573-1140) để được hỗ trợ ngôn ngữ miễn phí. Tanpri kontakte Department of Housing and Community Development [Depatman Devlopman Lojman ak Kominote] Masachousèt la nan (617) 573-1100 (TTY 617-573-1140) pou asistans gratis nan lang.

Si prega di contattare il Dipartimento Edilizia Abitativa e Sviluppo della Comunità dello Stato del Massachusetts al (617) 573-1100 (TTY 617-573-1140) per avere assistenza gratuita per la traduzione.

ខ) នេះគឺជាឯកសារសំខាន់។ សូមទំនាក់ទំនងផ្នែកអភិវឌ្ឍន៍សហគមន៍និងលំនៅដ្ឋានរបស់រដ្ឋាភិបាល (Massachusetts Department of Housing and Community Development) តាមរយៈ (617) 573-1100 (TTY 617-573-1140) នដើម្បីទទួលបានជំនួយផ្នែកភាសាខ្មែរឥតគិតថ្លៃ។

This notice was posted at <http://www.mass.gov/hed/economic/eohed/dhcd> (link to “Open Meeting Notices” in left column under “Key Resources”) and copies were sent to the Secretary of State, Regulations Division.

2020-2024 Consolidated Plan Public Meeting Attendees:

11/18/2020

- Lindsay Rowe: Community Development Administrator, City of Greenfield
- Mike Nuvallie: North Adams
- Chris Kluchman: Deputy Director Community Services Director, DHCD
- Louis Martin: Director of Community Services DHCD
- Anna Whitten: DHCD
- Nathan Delude: Nathan Delude, DHCD
- Ryan Ambrose: Policy Development Manager and Legislative Liaison, DHCD
- Jeff Legros: Department of Community Development and Planning, City of Gardner

Summary of Comments:

Broadband availability and connectivity in rural Massachusetts, primarily in Western MA, continues to be an issue in some of the smaller, more remote towns. Affordability and availability of housing in the tight MA market continue to be of concern, as well as adequate protections for low income households, especially those affected by COVID-19. Concern around policy regarding emergency housing assistance issues continue primarily as relates to adequate funding.



Commonwealth of Massachusetts  
**DEPARTMENT OF HOUSING &  
COMMUNITY DEVELOPMENT**

Charles D. Baker, Governor ♦ Karyn E. Polito, Lt. Governor ♦ Janelle Chan, Undersecretary

**PUBLIC INFORMATION SESSION**  
**Community Development Block Grant (CDBG) Program**  
**Fiscal Year 2020**  
**One-Year Action Plan**

The Massachusetts Department of Housing and Community Development (DHCD) will hold public information sessions in order to provide opportunity for public comment and discussion on proposed changes to the Community Development Block Grant (CDBG) Program for the next fiscal year. When finalized, the proposed changes will appear in the CDBG FY 2020 One-Year Action Plan. A memo detailing these changes is attached.

**Tuesday October 29, 2019**

10:00 a.m. to 12:00 p.m.  
Pioneer Valley Planning Comm.  
60 Congress Street, 2<sup>nd</sup> Floor  
Springfield, MA 011104

**Wednesday October 30, 2019**

10:30 a.m. to 12:30 p.m.  
DHCD 2<sup>nd</sup> Floor,  
Conference Room D  
100 Cambridge Street  
Boston, MA 02114

Interested parties should feel free to submit comments, in writing or via email, directly to the CDBG program prior to the scheduled session or up to November 1, 2019. Comments may be directed to: Mark Southard, Community Development Manager, DHCD, 100 Cambridge St, Suite 300, Boston, MA 02114 or [mark.southard@mass.gov](mailto:mark.southard@mass.gov).

Please indicate your intent to attend one of the sessions by emailing Mark Southard at [mark.southard@mass.gov](mailto:mark.southard@mass.gov). Provide the names of all attendees and the community that you represent. For the Boston session, please reply by Friday October 25, 2019 so that we can register you with security.

100 Cambridge Street, Suite 300  
Boston, Massachusetts 02114

[www.mass.gov/dhcd](http://www.mass.gov/dhcd)  
617.573.1100



Commonwealth of Massachusetts  
**DEPARTMENT OF HOUSING &  
COMMUNITY DEVELOPMENT**

Charles D. Baker, Governor ♦ Karyn E. Polito, Lt. Governor ♦ Janelle Chan, Undersecretary

**Memorandum**

To: All Interested Parties  
From: Catherine Racer, Associate Director (Division of Housing Development)  
Subject: Public Hearing on the 2020-2021 Draft Qualified Allocation Plan for the Low Income Housing Tax Credit  
Date: September 25, 2019

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In accordance with Internal Revenue Code Section 42, notice is hereby given of the following public hearing concerning the:

**2020-2021 DRAFT QUALIFIED ALLOCATION PLAN FOR THE LOW INCOME HOUSING TAX CREDIT**

The Massachusetts Department of Housing and Community Development (DHCD) has scheduled a public hearing to solicit comments on the 2020-2021 Draft Qualified Allocation Plan (QAP) for the Low Income Housing Tax Credit (LIHTC). The hearing will be held at 1:30 p.m. on Thursday, October 10, 2019, in second floor conference room A, 100 Cambridge Street, Boston, MA 02114. At that time and place, interested parties will have the opportunity to offer comments relative to the 2020-2021 Draft QAP. Interested parties also may submit written comments at the hearing, or at any time prior to the hearing, by directing the same to: The Department of Housing and Community Development, Low Income Housing Tax Credit Program, 100 Cambridge Street, 3<sup>rd</sup> floor, Boston, MA 02114.

The 2020-2021 Draft QAP can be viewed online at DHCD's website at:

<https://www.mass.gov/service-details/qualified-allocation-plan>

Copies of the 2020-2021 Draft QAP also will be available for inspection at 100 Cambridge Street, 3<sup>rd</sup> floor, during regular business hours prior to the hearing.

If you have any questions, please call DHCD at 617-573-1309. If you wish to attend the hearing, please notify Bertha Borin at [bertha.borin@mass.gov](mailto:bertha.borin@mass.gov) or 617-573-1309. Bertha will place your name on the building security list.

100 Cambridge Street, Suite 300  
Boston, Massachusetts 02114



[www.mass.gov/dhcd](http://www.mass.gov/dhcd)  
617.573.1100





Commonwealth of Massachusetts  
**DEPARTMENT OF HOUSING &  
COMMUNITY DEVELOPMENT**

Charles D. Baker, Governor ♦ Karyn E. Polito, Lt. Governor ♦ Janelle Chan, Undersecretary

**MASSACHUSETTS COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)  
PROGRAM**

**FY 2020 Application Training**

The Department anticipates the availability of funding for the following Federal Fiscal Year 2020 Massachusetts Community Development Block Grant (MA CDBG) program components:

**Community Development Fund / Mini-Entitlement Program**

The MA CDBG program provides federal funds on a competitive basis to municipalities with a population of less than 50,000 that are not designated by HUD as entitlement areas. Communities may apply to the Community Development Fund or the Mini-Entitlement Program for a variety of projects including rehabilitation of housing stock, improvements to infrastructure, stabilization of neighborhoods, planning, public social services and downtown related projects.

Information sessions providing application guidance will be held at the following times and locations. Application guidance materials will be available online at [www.mass.gov/dhcd](http://www.mass.gov/dhcd) and will also be available at these sessions. Comments on the draft One Year Plan will also be accepted. An additional formal hearing on the Plan is anticipated in early 2020. The CDBG on-line application will be released upon the conclusion of the trainings.

Tuesday, December 3, 2019 10:00 am to 3:00 pm      at      DHCD  
100 Cambridge Street  
Conference Room C, 2<sup>nd</sup> Floor  
Boston, MA

Monday, December 9, 2019 10:00 am to 3:00 pm      at      Pioneer Valley Planning Comm.  
60 Congress Street, 2<sup>nd</sup> Floor  
Springfield, MA 01104

We will need to provide you with a security ID badge in order for you to access **Conference Room C on the 2<sup>nd</sup> Floor** of 100 Cambridge Street. Please RSVP by November 25, 2019, via e-mail to [Mark.Southard@mass.gov](mailto:Mark.Southard@mass.gov) if you plan to attend the Boston session.

If you require an accommodation (materials in Braille/large print, sign language interpreters, etc.), please contact DHCD by November 25, 2019.

100 Cambridge Street, Suite 300  
Boston, Massachusetts 02114

[www.mass.gov/dhcd](http://www.mass.gov/dhcd)  
617.573.1100



#### Directions to DHCD – 100 Cambridge St., Boston

##### **Driving from the North**

From 93S take the Storrow Drive exit, at the bottom of the bridge turn off at Nashua Street. **DO NOT GO INTO THE TUNNEL.** Turn right at end of ramp onto Nashua Street going towards the Fleet Center. Follow Nashua Street around the Jail and past Spaulding Hospital. The street will make a right turn and come to a traffic light where you have to turn left. Turn left. Go to the next traffic light and go straight. This is Merrimac Street. Follow Merrimac to the next traffic light and turn as if going right. The entrance to the Government Center garage will be in front of you. If you are going to 100 Cambridge Street continue turning right (New Chardon Street). Follow New Chardon up the hill thru the pedestrian light and to the working traffic light at Cambridge Street. 100 Cambridge Street is diagonally across on your left (a large 100 is in the window over the front entrance).

##### **Driving from the South**

Take Interstate 95N to Interstate 93N to Boston, enter new 93N Tunnel. Take Exit 26/Storrow Drive. After exiting you are on Martha Way, bear left on Merrimac Street. Government Center Parking Garage is straight ahead at the end of Merrimac (across New Chardon).

##### **Driving from the West**

Take 90E (Mass Pike) to 93N to Boston, enter new 93N Tunnel. Take Exit 26/Storrow Drive. After exiting you are on Martha Way, bear left on Merrimac Street. Government Center Parking Garage is straight ahead at the end of Merrimac (across New Chardon).

FY 2020 CDBG Information Session  
October 29, 2019  
Springfield

Name	Community	Phone/Fax	E-Mail
MARC STRANGE	AGAWAM	(413) 728-5738	MSTRANGE@AGAWAM.MA.US
Katie Medina	Gardner	978-630-4011	Kmedina@gardner-ma.gov
Denise LeDuc	Hampden County	413 296-4536	denise@hilltown-cdc.org
Deborah Harris	Hampden County	413-296-4536	deborah@hilltown-cdc.org
Richard Harris	South Hadley	413-538-5027	rharris@south-hadley-ma.gov
Wendy Rowe	Greenfield	412 742-1541	wj.adams@greenfield-ma.gov
Lindsay Rowe	Greenfield	413 772-1540	lindsay.rowe@greenfield-ma.gov
Ryan McHusht	Palmer		Town of Palmer
Sarah Szczepaniak	Palmer	(413) 203-2683	sszczepaniak@townofpalmer.com
Blair Mollugh	Framingham	513 803-9716	bm-mollugh@sechec.org
Becky Ferguson	Holmes	413 277 8300	cferguson@town-of-holmes-ma.us
Dakota DeRocher	Palmer	413 386 1873	dderocher@townofpalmer.com
Ted Harvey	PVC		tharvey@pvc.org
Andrew Lyden	CMLPC	508 459 3339	alyden@cmlpc.org



## Springfield

[illegible]

FY 2020 CDBG Information Session  
October 30, 2019  
Boston

Name	Community	Phone/Fax	E-Mail
Cassie Boydmarsh	BBA	508-430-4499	Cboyd@baileyford.com
Patricia Antoon	MENHLEN	978-983-8866	PLANTON@C.I. MICHLEN, MALES
Alex Train	Chelsea	617-466-4192	ATRAIDN@chelseama.gov
Lisa Pearson	Salisbury	978 4632266	LPearson@salisburyma.gov
Lisa Beaulieu	"		LBeaulieu@salisburyma.gov

## Grantee Unique Appendices

### FFY2020 Action Plan Appendix

- 2020 Locally Held CDBG Program Income
- CDBG Action Plan
- HOME Program Specifics
- HTF Program Specifics
- ESG Program Specifics
  - Homeless Facilities Listing
  - Standards for Administering Rapid Re-housing and Homelessness Prevention Projects
- HOPWA Program Specifics



## 2020 Locally Held CDBG Program Income

Municipality	Contact Name	phone	email	Amount of PI	Activity Type	National Objective
Amesbury	Angela Cleveland	978-388-8110	<a href="mailto:clevelanda@amesburyma.gov">clevelanda@amesburyma.gov</a>	\$72,939	Housing Rehabilitation	LMH
Athol	Eric Smith	978-721-8500 ext 517	<a href="mailto:planning@townofathol.org">planning@townofathol.org</a>	\$45,801	Infrastructure repairs	LMA
Ayer	Alicia Hersey	978-772-8221	<a href="mailto:ahersay@ayerma.us">ahersay@ayerma.us</a>	\$62,777	Housing Rehabilitation	LMH
Buckland	Heather Butler	413-625-6330 ext 5		\$7,426	Housing Rehabilitation	LMH
Chesterfield	Susan Labrie	413-296-4771	<a href="mailto:townadmin@townofchesterfieldma.com">townadmin@townofchesterfieldma.com</a>	\$49,747	Housing Rehabilitation	LMH, LMC
Dennis	Elizabeth Sullivan	508-760-6148	<a href="mailto:esullivan@town.dennis.ma.us">esullivan@town.dennis.ma.us</a>	\$121,476	Planning	LMH, LMC
Edgartown	James Hagerly	508-627-6180	<a href="mailto:jhagerly@edgartown-ma.us">jhagerly@edgartown-ma.us</a>	\$15,203	Housing Rehabilitation	LMH
Everett	Tony Sousa	617-394-2245	<a href="mailto:tony.sousa@ci.everett.ma.us">tony.sousa@ci.everett.ma.us</a>	\$5,050	Housing Rehabilitation	LMH
Gardner	Jeff Legros	978-630-4011 ext 1	<a href="mailto:jlegros@gardner-ma.us">jlegros@gardner-ma.us</a>	\$1,000	Housing Rehabilitation	LMH
Greenfield	Lindsay Rowe	413-772-3548 ext 5	<a href="mailto:lindsay.rowe@greenfield-ma.gov">lindsay.rowe@greenfield-ma.gov</a>	\$8,567	Housing Rehabilitation	LMH
Heath	Kristi Nartowicz	413-337-4934		\$43,724	Housing Rehabilitation	LMH
Marlborough	Vonnice Morris	508-624-6908	<a href="mailto:vmorris@marlborough-ma.gov">vmorris@marlborough-ma.gov</a>	\$24,561	Housing Rehabilitation	LMH
Methuen	Patricia Antoon	978-983-8566	<a href="mailto:patantoon@ci.methuen.ma.us">patantoon@ci.methuen.ma.us</a>	\$71,840	Housing Rehabilitation	LMH
Middleborough	Janis Akerstrom	508-946-2402	<a href="mailto:jakerstrom@middleborough.com">jakerstrom@middleborough.com</a>	\$42,000	Housing Rehabilitation	LMH
Montague	Eileen Seymour	413-863-3200 ext 202	<a href="mailto:treasurer@montague-ma.gov">treasurer@montague-ma.gov</a>	\$5,685	Housing Rehabilitation	LMH
Rockland	Douglas Lapp	781-871-3874 ext 1105	<a href="mailto:td@rockland-ma.gov">td@rockland-ma.gov</a>	\$36,497	Housing Rehabilitation	LMH
Shirley	Michael McGovern	978-425-2600		\$56,183	Housing Rehabilitation	LMH
Wareham	Peter Sanborn	508-291-3100 ext 3171	<a href="mailto:psanborn@wareham.ma.us">psanborn@wareham.ma.us</a>	\$7,000	Housing Rehabilitation	LMH
TOTAL				\$677,476		

**DRAFT**

## One Year Action Plan

FY 2020

### Massachusetts Community Development Block Grant Program



Commonwealth of Massachusetts

Charles D. Baker, Governor

Karyn E. Polito, Lt. Governor

Department of Housing and Community Development

Jennifer Maddox, Undersecretary

## FY 2020 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), 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 FY - 2020 - 2024 Five Year Consolidated Plan. Publication of the draft Massachusetts CDBG One Year Action Plan takes place in advance of the Five Year Consolidated Plan/Annual Update public participation schedule that incorporates the HOME, ESG, and HOPWA programs. DHCD held informational sessions on CDBG program changes considered for FY 2020 Draft CDBG One Year Action Plan in October 2019, and expects to hold formal public hearings on the annual update to the One Year Action Plan beginning in early 2020.

<b>MASSACHUSETTS CDBG</b> <b>ONE-YEAR ACTION PLAN FOR FEDERAL FISCAL YEAR 2020</b>
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**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 Department of Housing and Community Development, 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, DHCD 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;
- Projects that are consistent with the Commonwealth's Sustainable Development Principles; and
- Sound business practices that ensure the highest standards of public accountability and responsibility.

For FY 2020, DHCD 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, and 3) sustainability - 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 for 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 Department of Housing and Community Development (DHCD) 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." DHCD will fund eligible projects designed to meet this objective, and that are consistent with the Commonwealth's sustainable development principles listed in Exhibit 5. DHCD encourages:

- development and preservation of affordable housing;
- proactive and coordinated planning oriented towards both resource protection and sustainable 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 37 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 I 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.

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

## LIMITATIONS ON 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 and directly related and required construction.

- ❖ **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. DHCD encourages communities 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
- Citizenship Training
- Domestic Violence Prevention
- Earned Income Tax Credit (EITC) Counseling and Preparation
- Elder Self-Sufficiency
- English for Speakers of Other Languages (ESOL)
- Family Stabilization
- Financial Literacy
- Homebuyer Counseling and FTHB programs
- Individual Development Accounts (IDAs)
- Immigrant services
- 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.

Communities must demonstrate that, in accordance with Section 103(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.

DHCD 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 communities.

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 DHCD.

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** – Communities 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. Communities 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 submitting an application for these types of projects. Funds may be used for acquisition, demolition, and building rehabilitation activities when clearly linked to economic development and jobs.

DHCD may fund projects that support physical downtown and commercial area revitalization efforts; however, communities 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 DHCD 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 DHCD] on the subject property that runs with the land, and that includes language restricting rent levels in low and moderate income units for a 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."

<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 applicants – including lead applicants and joint participants – who have received grants comply with a timely expenditure threshold in order to apply for FY 2020 programs. If a joint participant has been a lead grantee in a CDBG grant, that community must meet the timely expenditure threshold in order to be included in a joint application. In order to apply for CDBG<sup>1</sup> funding, a community must demonstrate, using the most recent financial status report at the time of application that 100% of all grant funds awarded for fiscal year 2017 and earlier have been fully expended, 80% of funds awarded in FY 2018 have been expended and for funds awarded in FY 2019 all required procedural clearances (environmental review, special conditions and administrative services procurement(s)) have been completed at the time of an application for FY 2020 funds. On a case-by-case basis DHCD reserves the right to waive strict compliance with this threshold for communities based on grant award dates and/or events beyond the control of grantees.

*Active grants* include those for which project activities have yet to be completed and payments are outstanding. All lead applicants and participating applicants must meet this standard. An applicant must meet this threshold requirement at the time of application for all Mass CDBG components. Communities that do not meet this threshold will be eliminated from further Mass CDBG funding consideration. *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. DHCD 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. **Sustainable Development** – In order to receive funding a project or activity must be consistent with the Sustainable Development principles. Additional guidance on this threshold may be found in Exhibit 3. **This threshold does not apply to Public Social Services, business assistance for projects not requiring construction, or projects that eliminate a public health or safety risk.**

In addition, housing rehabilitation programs and public facilities projects are required to use Energy Star building performance standards. Those standards are found at [www.energystar.gov](http://www.energystar.gov). Streetlights installed as part of a road or streetscape improvement project must be “full cut-off” or “semi cut-off” fixtures.

6. **Community-Based Planning Requirement** – The Department supports municipal efforts to engage in community-based planning, conduct needs assessments, and identify strategies for addressing those needs. DHCD 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*

<sup>1</sup> CDBG includes CDF, Mini-Entitlement, and Reserves, but for the purposes of this calculation excludes CDBG-DR and Section 106 guarantees. Planning-only grants of \$50,000 or less are also excluded from this calculation.

*comprehensive manner, and public resources are directed toward projects that address needs the community has identified as high priority. All applicants and participants<sup>2</sup> 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.*

7. **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) sustainability - 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 for a 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
- Sustainability for the purpose of creating suitable living environments
- Sustainability for the purpose of providing decent affordable housing
- Sustainability 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;

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<sup>2</sup>This includes regional applicants.

- 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.

8. **Regional Applications** – Each community in a regional application must comply with the same requirements as individual communities in individual applications, in order to participate in a regional grant. For example, each participating community must have been identified and be part of the required public participation/hearing process and the community must submit all required signatures. Communities that fail to comply will be dropped from consideration as a regional participant and the application will be reviewed on the basis of those communities that have complied with the requirements. As a result, the number of participating communities 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.

9. **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.

10. **Senior Center Projects** – Applicants for Senior Center projects must meet the following threshold requirements to have their applications reviewed and scored:

- provide evidence of site control<sup>3</sup> by the municipality, as attested to by the Mayor or Board of Selectmen,
- provide documentation of the availability and commitment of any other funds necessary to complete the project, and
- 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 until five (5) years have passed since the grant closeout date.

<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.



Senior Centers, as with other types of public facilities, may not change the use of the facility for a period of five years without prior consultation with DHCD to ensure that the change of use is consistent with federal regulations.

11. **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 the 2017, 2018 and 2019 CDBG funding rounds have met this requirement.

Regardless of the above 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. 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. Completion 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's request for Mass CDBG funding must be consistent with the priorities set forth in these locally developed documents. Communities 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.

Applications for Architectural Barrier Removal projects with a total construction cost of \$100,000 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 \$100,000 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 and directly related and required construction. CDBG funds cannot be used to address building code or local requirements that are not directly part of the removal of the architectural barrier.

12. **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 and architectural barrier removal projects with a construction cost of \$100,000 or more (see definition in footnote #3). Design development drawings are required for public facilities and architectural barrier removal projects or equivalent site and landscaping plans for Playground/Park projects, with a total construction cost of more than \$25,000 but less than \$100,000.

In addition, DHCD recognizes that this requirement may be problematic for communities considering modular construction projects. To satisfy these concerns, in order to apply for assistance to undertake modular construction a community may instead provide DHCD 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.

**E. ALLOCATION OF CDBG FUNDS TO THE COMMONWEALTH**

The federal Fiscal Year 2020 HUD allocation to the Commonwealth of Massachusetts is \$34,662,543. DHCD's funds are subject to availability from the federal government, which is contingent on the federal budget and appropriations process and the HUD allocation process. In addition to the HUD allocation, DHCD expects to receive approximately \$50,000 in program income, for a total of \$34,712,543 available for FY 2020. 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	FY 2020 ALLOCATION
Community Development Fund	\$23,911,045
Mini-Entitlement Program	\$ 9,075,000
-Section 108 Loan Guarantee*	\$ 10,000,000
Reserves	\$ 250,000
Section 108 Loan Repayments** (No. Adams, Everett)	\$ 336,622
Administration and Technical Assistance	\$ 1,139,876
<b>TOTAL AVAILABLE</b> (includes \$34,662,543 allocation plus \$50,000 in program income)	<b>\$34,712,543</b>
*Section 108 Loan Program allocation does not impact the FY 2020 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, DHCD 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 communities 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 DHCD will use current program guidelines as established in the most recent One Year Plan. DHCD reserves the right to increase or decrease the allocation of a program component. When these cumulative changes meet the threshold criteria of an amendment, DHCD will follow the process in accordance with the State's Consolidated Plan and regulations at 24 CFR 91.505. DHCD may also have cause to fund from any allocation or resources to respond to corrective actions after program closeouts or as a result of other administrative errors.

DHCD estimates that it will receive approximately \$300,000 in funds returned from prior year activities. These funds will be allocated through the Community Development Fund. In addition, DHCD 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 FY 2020 funds, DHCD may have the opportunity to transfer program income funds from NSP grantees to the State CDBG Program. It is DHCD's intent to add these funds, if they become available, to the FY



2020 allocation and made available to FY 2020 applicants. At this time, DHCD 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 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 FY 2020 Community Development Fund or Mini-Entitlement grant funds.

Additionally, a single community may receive no more than \$1.35 million from the Community Development Fund within two successive years. Beginning with the FY 2021 program year, DHCD will allow communities to apply for this amount in a single year provided that the community, if successful, will not be eligible to apply in the subsequent year.

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 release of each Application subject to the availability of federal funds.

Program Components <sup>3</sup>	Application Issued	FY 2020 Applications Due
Community Development	December 2019	Friday, March 6, 2020
Mini Entitlement Program	December 2019	Friday, March 6, 2020

#### ***G. EVALUATION CRITERIA APPLICABLE TO ALL CDBG PROGRAMS***

DHCD 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 in order to confirm or clarify factual or procedural responses to application requirements such as copies of legal advertisements, minutes, survey instruments, letters, etc. Acceptance of these materials is subject to DHCD'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.

<sup>3</sup> The FY 2020 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.

- 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 DHCD'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 communities that have not received funding in the prior three years;
  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, DHCD 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 FY 2020 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 FY 2020 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 DHCD.

*Major findings* means 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 the number of 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 Undersecretary of DHCD, whose decision is final. In the competitive program, grants are awarded for projects to municipalities that received the highest project scores and which meet applicable thresholds until all available funds are distributed. DHCD 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 Undersecretary's written notice of grant determinations to applicant cities and towns, any municipality aggrieved by DHCD'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 Undersecretary, who shall respond no later than forty-five (45) days from the date of receipt of the municipality's appeal.

<b><i>H PROGRAM SANCTIONS</i></b>
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DHCD reserves the right to suspend or terminate grant awards made to eligible communities should there be instances of fraud, abuse, poor performance, misrepresentation, or extreme mismanagement, or in the event a grantee is unable to carry out a project as approved in an application. DHCD reserves the right to apply this standard to any entity involved in grant management activities on behalf of a municipality. Communities should be aware that in the event that a project budget is found to be inadequate to fully implement the project as approved, DHCD reserves the right to review and approve any change in project scope to make a project fundable and may opt for recapturing the funds instead of authorizing a project with a reduced scope of work. In addition, if excess funds remain from an activity, either due to budgetary reasons or because of less demand for the activity than projected, the community must return the funds or request DHCD approval to reprogram the awarded funds.

DHCD's preference is to approve reprogramming for the following purposes and in the following order:

- Funds will be used for eligible housing activities.
- Other existing activities.

If the excess funds cannot be used consistent with these preferences, DHCD 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. DHCD will not be inclined to extend grants beyond a two 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 a full opportunity to appeal such decisions to the Undersecretary of DHCD 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, DHCD 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 GRANTEES***

All applicants for funding under the FY 2020 Massachusetts CDBG Program must comply with the citizen participation requirements contained in Section 508 of the Housing and Community Development Act of 1987. DHCD expects citizen involvement in the identification of community development needs, the development of applications, program assessment and evaluation. Communities 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, at times and accessible locations convenient to potential or actual beneficiaries, and with accommodations for persons with disabilities. In cases of joint applications, all applicant communities must be included in and participate in the public hearing. At least one public hearing must be held prior to submittal of an application; a second must be held during the course of the grant year;
6. a timely written answer to written complaints and grievances, within 15 working 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. Reserves
4. Administration and Technical Assistance by DHCD

- All applications To MA CDBG are submitted online and will only be accepted using DHCD'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 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, 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 communities and will make all CDBG eligible activities available.

In federal FY 2020 DHCD expects to award approximately \$23,911,045 in CDF grant funds and approximately an additional \$260,000 in funds returned from prior year activities, depending upon Massachusetts' federal allocation.

### Grant Award Amounts

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 Community	\$ 100,000	\$ 800,000
Two Communities (Regional)	\$ 100,000	\$1,000,000
Three or More Communities (Regional)	\$ 100,000	\$1,300,000
Planning or Design-only grants	\$ 10,000	-----

### Requirements:

1. CDF grants are **Single Year Grants** based on an 18-month implementation period. Communities should not apply for funds if the proposed project is not ready to proceed.
2. Two or more communities 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 communities;
  - sign the application certifications stating compliance with program regulations; 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. In addition, a municipality may not receive funds for the same activity under more than one CDF application during any one Mass CDBG federal fiscal year.
4. All CDBG applications must be received by DHCD's web-based application system by **Friday, March 6, 2020, at 11:59 PM**. However, one hard copy of the required Application Cover page, and the Joint

Authorization page(s), with original signatures of the appropriate Chief Elected Official(s) must be received by 5:00 PM or the close of business, whichever is later, on Friday, March 1, 2020.

#### 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 detail on evaluation criteria and the review process will be in the FY 2020 Community Development Fund Application Package.

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. All projects must also meet threshold consistency with the Sustainable Development Principles.

**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.

**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.

### 3. 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 of 8.0% 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.

DHCD expects to award up to \$9,075,000 from the FY 2020 Mini-Entitlement Program allocation to eleven (11) designated Mini-Entitlement municipalities, listed below:

Amherst  
Chelsea  
Everett  
Gardner

Greenfield  
North Adams  
Palmer  
Southbridge

Wareham  
Webster

West Springfield

DHCD 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.

DHCD 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 an award of up to \$825,000 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. 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 below). FY 2020 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.

FY 2020 Mini Entitlement communities were guaranteed an annual commitment of funds for a three year period that ends with FY 2021, subject to federal funding and HUD's approval of the Commonwealth's One Year Plan.

#### Evaluation and Award Criteria

The following requirements apply to the Mini-Entitlement Program:

1. In accordance with the Massachusetts CDBG Priorities listed in Section A, DHCD seeks to fund projects identified through meaningful community-based planning and priority setting processes as described in SECTION D.6.
2. Activity packets must be completed and will be scored to ensure that activities are feasible and ready to proceed at the time of 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 of each item in the feasibility question. All FY 2020 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.

Mini Entitlement applicants that exceed the timely expenditure threshold as described above will have a 2020 award reduced by the amount over the threshold.

3. 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 with the exception of organizational activities of downtown partnerships.
4. Mini-Entitlement communities may not join with other communities as joint applicants.
5. Mini-Entitlement communities will submit a list of proposed activities to DHCD within one month of the date the application is released. Applicants will provide the name of the activity, a brief description, proposed accomplishments and proposed budget.



6. Mini Entitlement communities may not request funding for more than three activities in addition to public social services. For FY 2020, DHCD will consider waiving this requirement on a case-by-case basis.

All Mini-Entitlement applications must be received by DHCD's web-based application system by no later than Friday, March 6, 2020, at 11:59 PM. DHCD will accept mini entitlement applications prior to the March 6, 2020 deadline. However, one hard copy of the required Application Cover page, and the Joint Authorization page, with original signatures of the appropriate Chief Elected Official(s) must be received by 5:00 PM or the close of business, whichever is later, on Friday, March 6, 2020.

### 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, DHCD 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;

- DHCD is willing to consider phased projects, with the caveat that the time frame for full implementation is a maximum of five years or less;
- DHCD 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 DHCD 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. DHCD 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 a non-entitlement recipient of a Section 108 Loan default. DHCD will not pledge other collateral of the Commonwealth in support of proposals. Any additional security required by HUD must come from another source.

DHCD 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 (FY 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, DHCD 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 FY 2020 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 DHCD will reallocate the budgeted default amount among other program components.

Please note that DHCD 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.

### 6. RESERVES

An initial 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 DHCD 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 Undersecretary of DHCD 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. The Department'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.

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 Louis Martin, Associate Director of the Division of Community Services, at 617 573-1402 with any inquiries about Reserves.

## **7. ADMINISTRATION AND TECHNICAL ASSISTANCE BY DHCD**

The Commonwealth of Massachusetts uses CDBG funds for administrative costs incurred by DHCD during the operation of the Massachusetts CDBG Program. As allowed by federal statute, this amount will equal two percent (2%) of the entire annual grant allocation, plus \$100,000.

An additional one percent (1%) of the allocation will be used for direct technical assistance 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, fair housing training, and additional assistance determined necessary during the program year.

During this fiscal year DHCD will continue to support and upgrade its software and reporting systems. Technical assistance will be available to communities for downtown revitalization planning activities.

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.

ONE-YEAR ACTION PLAN FOR FEDERAL FISCAL YEAR 2020

EXHIBITS

1. LIST OF ENTITLEMENT COMMUNITIES IN MASSACHUSETTS
2. MUNICIPALITIES ELIGIBILITY TO APPLY TO COMMUNITY DEVELOPMENT FUND (CDF) IN FY 2020
3. SUSTAINABLE DEVELOPMENT PRINCIPLES
4. GUIDANCE ON MEETING THE SUSTAINABLE DEVELOPMENT THRESHOLD
5. MASSACHUSETTS FAIR HOUSING MISSION STATEMENT AND PRINCIPLES

EXHIBIT 1

LIST OF ENTITLEMENT COMMUNITIES IN MASSACHUSETTS  
as of Federal Fiscal Year 2020

ARLINGTON	MALDEN
ATTLEBORO	MEDFORD
BARNSTABLE	NEWBEDFORD
BOSTON	NEWTON
BROCKTON	NORTHAMPTON
BROOKLINE	PEABODY
CAMBRIDGE	PITTSFIELD
CHICOPEE	PLYMOUTH
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 FY 2020

Based on the FY 2019 One Year Action Plan, a single Community Development Fund community may receive no more than \$1.35 million from two successive years. Reserves awards are not subject to the \$1.35 million cap per community.

As a result, FY 2020 award limits apply to the following FY 2019 grantees, in the following amounts:

Adams - \$550,000	Orange - \$800,000
Amesbury - \$550,000	Otis - \$931,000
Athol - \$883,559	Russell - \$0
Bellingham - \$550,000	Salisbury - \$550,000
Dennis - \$550,000	Sandisfield - \$916,667
Easthampton - \$800,000	Sheffield - \$931,000
Edgartown - \$850,000	Shelburne - \$867,067
Egremont - \$916,667	Shutesbury - \$800,000
Fairhaven - \$772,819	South Hadley - \$800,000
Hardwick - \$800,000	Southwick - \$800,000
Huntington - \$654,248	Spencer - \$550,000
Methuen - \$550,000	Templeton - \$550,000
Montague - \$737,935	Tisbury - \$850,000
Monterey - \$916,667	Ware - \$800,000
New Marlborough - \$931,000	Warren - \$500,000
North Brookfield - \$750,000	Wendell - \$800,000
Oak Bluffs - \$850,000	West Tisbury - \$850,000

## EXHIBIT 3

### Sustainable Development Principles

The Commonwealth of Massachusetts shall care for the built and natural environment by promoting sustainable development through integrated energy and environment, housing and economic development, transportation, public health and safety, and other policies, programs, investments, and regulations. The Commonwealth will encourage the coordination and cooperation of all agencies; invest public funds wisely in smart growth and equitable development; and give priority to investments that will deliver good jobs and wages, transit access, housing, and open space, in accordance with the following Sustainable Development Principles. Furthermore, the Commonwealth shall seek, through incentives and assistance, to advance these Principles in partnership with regional and municipal governments, non-profit organizations, businesses, and other stakeholders.

#### **1. Concentrate Development and Mix Uses**

Support the revitalization of city and town centers and neighborhoods by promoting development that is compact, conserves land, reduces infrastructure and service costs, protects historic resources, integrates uses, enables pedestrian and bicycle access, and connects to transit. Encourage remediation, restoration, and reuse of existing sites, structures, and infrastructure rather than new construction on farm, forest, or other undeveloped land. Create pedestrian and bicycle friendly districts and neighborhoods that mix commercial, civic, cultural, educational, and recreational activities with open spaces and homes. Promote the creation of vibrant public spaces that facilitate strong civic and social engagement, through deliberate planning, design, construction, and management.

#### **2. Advance Equity**

Promote, through plans, regulations, and investments, equitable sharing of the benefits and burdens of development including access to housing, recreational opportunities, and transportation choices. Provide technical and strategic support for inclusive community planning and decision making to ensure social, economic, and environmental justice. Ensure that the interests of our most vulnerable populations and future generations are not compromised by today's decisions.

#### **3. Make Efficient Decisions**

Make state and local regulatory, investment, and permitting processes clear, predictable, coordinated, and timely. Ensure that zoning and other development guidelines and regulations result in projects that align with the goals of smart growth, environmental stewardship, and healthy communities. Set goals and track performance to enhance consistency with these Principles.

#### **4. Protect Land and Ecosystems**

Protect and restore environmentally sensitive lands, natural resources, productive forest and agricultural lands, critical habitats, wetlands and water resources, and cultural and historic landscapes. Increase the quantity, connectivity, quality and accessibility of open spaces and recreational opportunities.

#### **5. Use Natural Resources Wisely**

Site, design, construct, and promote developments, buildings, and infrastructure that conserve natural resources by reducing waste and pollution through efficient use of land, energy, water,



and materials. Operate fleets, facilities, and other assets in a manner that reduces greenhouse gas emissions, costs, and resource consumption. Advance the use and reuse of durable, sustainable materials considering their production, transportation, use, and disposal. Protect, enhance, and restore natural infrastructure and promote ecological design.

#### **6. Expand Housing Opportunities**

Support the construction and rehabilitation of homes to meet the needs of people of all abilities, income levels, and household types. Build homes near jobs, transit, and where services are available. Encourage energy-efficient design, the use of sustainable materials, and consideration of resiliency to climate change and extreme weather. Foster the development of housing, particularly multifamily and smaller single-family homes, in a way that is compatible with the community's character and vision, while providing new housing choices for people of all means.

#### **7. Provide Transportation Choice**

Maintain and expand transportation options to enhance mobility, maximize access, promote healthy and active lifestyles, reduce congestion, minimize fuel consumption, improve air quality, reduce greenhouse gas emissions, and ensure the safety of those traveling by all modes. Prioritize rail, bus, boat, rapid and surface transit, shared-vehicle and shared-ride services, bicycling, and walking in order to increase travel by these modes. Consider climate change impacts in transportation planning, project selection, and prioritization, ensuring infrastructure resilience and provision of transportation options during extreme weather events. Distribute resources equitably. Invest strategically in existing and new passenger and freight transportation infrastructure that supports sound economic development and housing construction consistent with smart growth objectives.

#### **8. Increase Job and Business Opportunities**

Encourage businesses to locate near housing, infrastructure, and transportation options. Promote economic development through policies and programs intended to enhance the business climate in Massachusetts across industry sectors. Expand access to education, training, and entrepreneurial opportunities. Support the growth of local businesses, including sustainable natural resource-based businesses, such as agriculture, forestry, clean energy technology, and fisheries. Protect and enhance the basis of natural resource economies.

#### **9. Mitigate and Adapt to Climate Change**

Endeavor to limit and prepare for climate change. Reduce greenhouse gas emissions from buildings, electricity generation, transportation, and other sources through decreased consumption of fossil fuels. Maximize energy efficiency and renewable energy opportunities. Support energy conservation strategies, local clean power generation, distributed generation technologies, and innovative industries. Encourage ecological siting and design before mechanical solutions. Protect against hazards in order to enhance resilience and decrease vulnerability to climate change and natural disasters in the natural and built environment. Promote redundancy of critical systems and coordinated regional, state, and local resilience planning in response to climate change and extreme weather events.

#### **10. Plan Regionally**

Support the collaborative development and implementation of local, regional, state, and interstate plans that are consistent with these Principles. Foster development projects, land and water conservation, transportation and housing that have a regional or multi-community benefit. Consider the long-term ecological, economic, and social costs, benefits, and impacts to the residents and natural resources of the Commonwealth.

## EXHIBIT 4

### Guidelines for Project Consistency with the Commonwealth's Sustainable Development Principles

Important choices about where and how Massachusetts will grow are made every day. These decisions have profound implications. While the Commonwealth has made progress, more needs to be done to ensure that the interests of future generations are not compromised by today's decisions.

It will take our cooperative efforts to build a greater quantity and diversity of housing, develop the businesses we need to provide jobs and increase revenue, and do a better job of acting as stewards of our natural resources for future generations. The administration is interested in working in partnership with the development community and municipalities to improve our conservation and development practices. State policies, programs, and investments must encourage smart growth and development interests and municipalities must do the same. The Commonwealth has established a framework to insure a strong economic future for the state and a high quality of life for its residents by undertaking a comprehensive approach to housing and community investment in a way that respects landscape and natural resources. The administration believes that sustainable development can and should take place in all communities. To be successful, our investments must bring the housing market into equilibrium and enable the state to attract new businesses while making strategic land use choices. In order to achieve our housing and community development goals, we rely on our strategic partners to develop projects that enable us to optimize our limited natural and financial resources.

The administration has refined its 10 Principles of Sustainable Development as a way to articulate and describe this vision to our strategic partners and to guide our investment decisions. Projects seeking funding from DHCD's Community Development Block Grant (CDBG) programs must be consistent with the Principles of Sustainable Development in the manner described below. A community development project must adhere to Method 1, Method 2 or Method 3.

#### Method 1

Be consistent with Concentrate Development and Mix Uses. Support the revitalization of city and town centers and neighborhoods by promoting development that is compact, conserves land, protects historic resources, and integrates uses. Encourage reuse and rehabilitation of existing sites, structures, and infrastructure rather than new construction in undeveloped areas. Create pedestrian friendly districts and neighborhoods that mix commercial, civic, cultural, educational, and recreational activities with open space and homes.

In order to demonstrate consistency with this principle for Method 1, a project must:

- a. Involve the rehabilitation or redevelopment of, or improvements to, vacant or occupied, existing structures or infrastructure; or

b. If new construction, contribute to the revitalization of a town center or neighborhood and/or be walkable to transit; the downtown; a village center; a school; a multiple activity retail, services or employment center; or be located in a municipally-approved growth center.

#### Method 2

Be consistent with at least five (5) of the Sustainable Development Principles, of which one must be either Protect Land and Ecosystems or Use Natural Resources Wisely.

#### Method 3

If a housing project involving new construction is sited on municipally owned or municipally provided land, involves municipal funding or is supported by a letter from the chief elected official of the municipality at the time of Project Eligibility or an application for funding, only four (4) of the Principles must be met, of which one must be Concentrate Development and Mix Uses, Protect Land and Ecosystems or Use Natural Resources Wisely. See Further Guidance below for examples of ways in which a project can be consistent with Concentrate Development and Mix Uses beyond the characteristics used in Method 1.

#### Further Guidance

Each Principle is listed below with examples of ways projects may demonstrate consistency. Projects need to satisfy only one of the examples, not all those listed; other ways to satisfy the Principles will also be considered.

Concentrate Development and Mix Uses: Support development that is compact, conserves land, integrates uses, and fosters a sense of place. Create walkable districts mixing commercial, civic, cultural, educational and recreational activities with open space and housing for diverse communities.

Examples of ways to demonstrate consistency:

- ☐ The project creates or supports mixed use.
- ☐ The project rehabilitates or redevelops existing structures or infrastructure.
- ☐ The project involves new construction that contributes to town or center revitalization.
- ☐ The project is at a higher density than the surrounding area.
- ☐ The project mixes uses or adds new uses to an existing neighborhood.
- ☐ The project produces multi-family housing.
- ☐ The project utilizes existing water and/or sewer infrastructure.
- ☐ The project is compact and/or clustered so as to preserve undeveloped land.

Advance Equity: Promote equitable sharing of the benefits and burdens of development. Provide technical and strategic support for inclusive community planning to ensure social, economic, and environmental justice. Ensure that the interests of future generations are not compromised by today's decisions.

Examples of ways to demonstrate consistency:

- ☐ The project involves a concerted public participation effort (beyond the minimally required public hearing), including the involvement of community members, residents of the development and/or key stakeholders in the planning and design of the project.
- ☐ The project conforms to Universal Design standards and/or incorporates features that allow for "visitability".
- ☐ The project creates affordable housing in a neighborhood or community whose residents are predominantly middle to upper income and/or meets a regional need.
- ☐ The project targets a high-poverty area and makes available affordable homeownership and rental opportunities.
- ☐ The project promotes diversity and social equity and improves the neighborhood.

**Make Efficient Decisions:** Make regulatory and permitting processes for development clear, transparent, cost-effective, and oriented to encourage smart growth and regional equity.

- ☐ The project involves a streamlined permitting process, such as found in Ch. 40B, 40R or 43D.

**Protect Land and Ecosystems:** Protect and restore environmentally sensitive lands, natural resources, agricultural lands, critical habitats, wetlands and water resources, and cultural and historic landscapes. Increase the quantity, quality and accessibility of open spaces and recreational opportunities.

Examples of ways to demonstrate consistency:

- ☐ The project involves the creation or preservation of open space or passive recreational facilities.
- ☐ The project protects sensitive land, including prime agricultural land, and/or resources from development.
- ☐ The project involves environmental remediation or clean up.
- ☐ The project is part of the response to a state or federal mandate (e.g., clean drinking water, drainage).
- ☐ The project eliminates/reduces neighborhood blight.
- ☐ The project addresses a public health and safety risk.
- ☐ The project significantly enhances an existing community or neighborhood by restoring an historic landscape.

**Use Natural Resources Wisely:** Construct and promote developments, buildings, and infrastructure that conserve natural resources by reducing waste and pollution through efficient use of land, energy, water, and materials.

Examples of ways to demonstrate consistency:

- ☐ The project uses alternative technologies for water and/or wastewater treatment that result in land or water conservation.
- ☐ The project uses low impact development (LID) or other innovative techniques for storm water management that result in land or water conservation.
- ☐ The project repairs or rehabilitates sewer or water infrastructure to conserve resources.

**Expand Housing Opportunities:** Support the construction and rehabilitation of homes to meet the needs of people of all abilities, income levels, and household types. Build homes near jobs, transit,

and where services are available. Foster the development of housing, particularly multifamily and smaller single-family homes, in a way that is compatible with a community's character and vision and with providing new housing choices for people of all means.

Examples of ways to demonstrate consistency:

- ☐ The project increases the number of rental units available to residents of the Commonwealth, including low- or moderate-income households.
- ☐ The project increases the number of homeownership units available to residents of the Commonwealth, including low- or moderate-income households.
- ☐ The project increases the number of housing options for special needs populations and people with disabilities.
- ☐ The project expands the term of affordability

Provide Transportation Choice: Maintain and expand transportation options that maximize mobility, reduce congestion, conserve fuel and improve air quality. Prioritize rail, bus, boat, rapid and surface transit, shared-vehicle and shared-ride services, bicycling, and walking. Invest strategically in existing and new passenger and freight transportation infrastructure that supports sound economic development consistent with smart growth objectives.

Examples of ways to demonstrate consistency:

- ☐ The project is walkable to public transportation.
- ☐ The project reduces dependence on private automobiles (e.g., provides previously unavailable shared transportation (such as Zip Car or shuttle buses).
- ☐ The project reduces dependence on automobiles by providing increased pedestrian and bicycle access.
- ☐ For rural areas, the project is located in close proximity (i.e., approximately 1 mile) to a transportation corridor that provides employment centers, retail/commercial centers, civic or cultural destinations.

Increase Job and Business Opportunities: Attract businesses and jobs to locations near housing, infrastructure, and transportation options. Promote economic development in industry clusters. Expand access to education, training, and entrepreneurial opportunities. Support the growth of local businesses, including sustainable natural resource-based businesses, such as agriculture, forestry, clean energy technology, and fisheries.

Examples of ways to demonstrate consistency:

- ☐ The project creates or retains permanent jobs.
- ☐ The project creates or retains permanent jobs for low- or moderate-income persons.
- ☐ The project locates jobs near housing, service or transit.
- ☐ The project supports natural resource-based businesses, such as farming, forestry, or aquaculture.
- ☐ The project involves the manufacture of resource-efficient materials, such as recycled or low toxicity materials.
- ☐ The project supports businesses which utilize locally produced resources such as locally harvested wood or agricultural products.

Mitigate and Adapt to Climate Change: Maximize energy efficiency and renewable energy opportunities. Support energy conservation strategies, local clean power generation, distributed generation technologies, and innovative industries. Reduce greenhouse gas emissions and consumption of fossil fuels.

Examples of ways to demonstrate consistency:

- ☐ The project complies with EPA's Energy Star guidelines or with a similar system.
- ☐ The project uses a renewable energy source, recycled and/or non-/low-toxic materials, exceeds the state energy code, is configured to optimize solar access, and/or otherwise results in waste reduction and conservation of resources.
- ☐ The project reuses or recycles materials from a local or regional industry's waste stream.

Plan Regionally: Support the development and implementation of local and regional, state and interstate plans that have broad public support and are consistent with these principles. Foster development projects, land and water conservation, transportation and housing that have a regional or multi-community benefit. Consider the long-term costs and benefits to the Commonwealth.

Examples of ways to demonstrate consistency:

- ☐ The project is consistent with a municipally supported regional plan that identifies sub region, area or location, and the number and type of housing units or jobs needed.
- ☐ The project addresses at least one of the barriers identified in a regional Analysis of Impediments to Fair Housing.
- ☐ The project has a measurable public benefit beyond the applicant community.

#### NOTES:

Projects that entirely serve to eliminate a public health or safety risk (e.g., demolition of a blighted structure) are exempt from the Sustainable Development threshold. In addition, CDBG-funded Public Social Service and business assistance for projects not requiring construction are also exempt. Projects seeking funding from the state's community development programs remain subject to the specific programmatic requirements. Similarly, projects proposed under c. 40B are governed by MGL c. 40B Sections 20-23, and applicable regulations, as well as all Fair Housing Laws. Projects should also demonstrate consistency with the Commonwealth's Fair Housing Principles, attached at the end of this document.

## EXHIBIT 5

### Massachusetts Fair Housing Mission Statement and Principles

The mission of DHCD through its programs and partnerships is to be a leader in creating housing choice and providing opportunities for inclusive patterns of housing occupancy to all residents of the Commonwealth, regardless of income, race, religious creed, color, national origin, sex, sexual orientation, age, ancestry, familial status, veteran status, or physical or mental impairment.

It shall be our objective to ensure that new and ongoing programs and policies affirmatively advance fair housing, promote equity, and maximize choice. In order to achieve our objective, we shall be guided by the following principles:

1. Encourage Equity. Support public and private housing and community investment proposals that promote equality and opportunity for all residents of the Commonwealth. Increase diversity and bridge differences among residents regardless of race, disability, social, economic, educational, or cultural background, and provide integrated social, educational, and recreational experiences.
2. Be Affirmative. Direct resources to promote the goals of fair housing. Educate all housing partners of their responsibilities under the law and how to meet this important state and federal mandate.
3. Promote Housing Choice. Create quality affordable housing opportunities that are geographically and architecturally accessible to all residents of the commonwealth. Establish policies and mechanisms to ensure fair housing practices in all aspects of marketing.
4. Enhance Mobility. Enable all residents to make informed choices about the range of communities in which to live. Target high-poverty areas and provide information and assistance to residents with respect to availability of affordable homeownership and rental opportunities throughout Massachusetts and how to access them.
5. Promote Greater Opportunity. Utilize resources to stimulate private investment that will create diverse communities that are positive, desirable destinations. Foster neighborhoods that will improve the quality of life for existing residents. Make each community a place where any resident could choose to live, regardless of income.
6. Reduce Concentrations of Poverty. Ensure an equitable geographic distribution of housing and community development resources. Coordinate allocation of housing resources with employment opportunities, as well as availability of public transportation and services.
7. Preserve and Produce Affordable Housing Choices. Encourage and support rehabilitation of existing affordable housing while ensuring that investment in new housing promotes diversity, and economic, educational, and social opportunity. Make housing preservation and production investments that will create a path to social and economic mobility.
8. Balance Housing Needs. Coordinate the allocation of resources to address local and regional housing need, as identified by state and community stakeholders. Ensure that affordable housing preservation and production initiatives and investment of other housing resources promote diversity and social equity and improve neighborhoods while limiting displacement of current residents.
9. Measure Outcomes. Collect and analyze data on households throughout the housing delivery system including the number of applicants and households served. Utilize data to assess the fair housing impact of housing policies and their effect over time, and to guide future housing development policies.
10. Rigorously Enforce All Fair Housing and Anti-Discrimination Laws and Policies. Direct resources only to projects that adhere to the spirit, intent, and letter of applicable fair housing laws, civil rights laws, disability laws, and architectural accessibility laws. Ensure that policies allow resources to be invested only in projects that are wholly compliant with such laws.



## HOME Investment Partnerships Act (HOME) Program

### MASSACHUSETTS HOME PROGRAM

#### ONE-YEAR ACTION PLAN FOR FEDERAL FISCAL YEAR 2020

These are extraordinary times and the need for continued HOME investment in rental housing development and preservation is as strong as ever. The Department of Housing and Community Development anticipates receiving an allocation of \$9,779,460 in HOME funds in federal fiscal year 2020 and DHCD has accumulated \$2,968,716.61 in HOME Program Income (PI) between 4/1/19 and 3/31/20, which already has been referenced in a 2019 Action Plan amendment, as we expect to commit these PI funds to rental activities beginning as that amendment was approved. DHCD plans to reserve 10 percent of the HOME allocation for administrative purposes, and award the majority of the remaining \$8,801,514 through competitive funding rounds and, in certain circumstances, readiness-based rolling submissions.

In addition, we expect several of our HOME projects to request permission to refinance and to request DHCD consent to limited partnership restructuring. Upon review of project proposals, DHCD 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. We currently plan to accumulate any HOME PI received in the 2020 program year and will reference these amounts in next year's Action Plan, per the HOME Interim final rule effective 1/31/17. The expectation is that funds will be reinvested in additional HOME activities through the same round, rolling and commitment structures/requirements described above. Previous program year HOME Program Income deposits will be committed to the first HOME projects committed during HOME FY 2020. 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 this HOME Program Income. At this time, DHCD is not apportioning any part of Program Income for administrative costs. In the past, we have received sporadic HOME Recaptured Funds from old Homeowner Rehabilitation or other first-time homebuyer restrictions. These amounts are typically small and we anticipate very few collection opportunities as nearly all of these restrictions have matured. In general, it is difficult to precisely anticipate HOME Program Income, as our rental loans are nearly all deferred payment loans.

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 also 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. We will continue to refrain from committing HOME funds to any project unless DHCD certifies that it has conducted an underwriting review, assessed developer capacity and fiscal soundness and examined neighborhood market conditions to ensure adequate need. DHCD 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 and in accordance with effective date requirements.

DHCD will continue to contingently award its rental funds through a competitive RFP process. Notices of Funding Availability (NOFA) are published on DHCD's website, the state's COMMBUYS site, and



DHCD'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-dhcd-housingdevelopment@listserv.state.ma.us](mailto:join-dhcd-housingdevelopment@listserv.state.ma.us). DHCD 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. The homeless and veterans populations have been identified as being in need of 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. DHCD will award federal fiscal year 2020 HOME program funds 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. DHCD acknowledges the available COVID-19 HOME program waivers; however, DHCD intends to utilize only waivers that may be necessary to best support the existing HOME portfolio and the production/addition of new HOME units. At this time, we anticipate that a minimum of 15 percent of the federal FY 2020 allocation will be reserved for certified CHDOs serving as owners, sponsors, or developers of rental production projects. The Undersecretary of DHCD reserves the right to consider geographic distribution in making funding decisions, including for the 15 percent CHDO set-aside. DHCD 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.

#### Allocation of Funds

DHCD 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. DHCD also will competitively award HOME funds for rental loan projects in entitlement communities that provide a match for DHCD administered HOME funds.

During federal FY 2020 DHCD anticipates the following approximate amounts will be awarded through a competitive RFP process, depending upon the level of demand in each program category:

- \$8,801,514 plus the accumulated HOME PI that was referenced in a 2019 Action Plan amendment for rental loan program
- 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, DHCD 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 DHCD 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

DHCD 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 DHCD-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 affirmative fair marketing plan included in proposal
- adherence to sustainable development principles
- suitable site and design, including appropriateness with regard to green building standards and increased accessibility
- appropriate scopes of rehabilitation or construction
- appropriate efforts to address energy conservation
- appropriate total development costs for properties included in proposal
- financial viability and sustainability 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 DHCD's current Qualified Allocation Plan
- CHDO-sponsored projects

The following terms and conditions apply to all HOME competitively awarded multi-family rental projects:

Terms and Conditions: Multi-Family Rental Projects	
Eligible Borrowers	For profit developers; non-profit developers; non-profit organizations designated as CHDOs; municipalities in cooperation

Terms and Conditions: Multi-Family Rental Projects	
	with any of the above. Development teams must demonstrate effective capacity.
Eligible Activities	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.
Maximum Loan Amount	Typically, DHCD will award up to \$750,000 to \$1,000,000 per project and up to \$95,000 per HOME-assisted unit in HOME entitlement/consortium communities. In non-entitlement or non-consortium communities, the maximum loan is up to \$100,000 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. We also reserve the option to increase the per units amounts for projects sponsored by certified CHDOs.
Match Requirement	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.
Cost/Fee Limits	Projects with Total Development Costs in excess of \$200,000 per unit may not be scored. 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 QAP guidance).
Security	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.
Affordability	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.
Holdback Feature	DHCD 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.
Term of Loan	Typically, loans will be for 30 years. 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, DHCD may require regular payments from a project's cash flow.

Terms and Conditions: Multi-Family Rental Projects	
Recourse	The loans will be non-recourse.
Interest Rate	Generally, DHCD HOME loans are deferred payment loans with zero percent interest rates. DHCD 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.
Debt Coverage Ratio	DHCD expects HOME projects to have minimum debt coverage ratios of approximately 1.15 in year one.
Environmental	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.
Lead Paint Requirements	HUD Federal lead-based paint regulations at 24 CFR Part 35 apply to all projects that are awarded HOME monies.
Section 3 and MWBE Requirements	All HOME projects must meet Section 3 and M/WBE provisions, including appropriate outreach.
Energy Star, Sustainability and Other Green Measures	All new construction must meet applicable Energy Star or comparable/better standards. Any rehabilitation must meet Energy Star standards to the greatest extent feasible for the project. DHCD also expects projects to consider greening and sustainability to the maximum extent possible; all proposals must follow the guidelines as outlined in the Commonwealth's Qualified Allocation Plan.
Accessibility for Persons with Disabilities	For the new construction of any units or the substantial rehabilitation of 15 or more units of multi-family housing, Section 504 requires that 5% of the units (but not less than 1 unit) be accessible to individuals with mobility impairments and an additional 2% of the units (but not less than 1 unit) be accessible to individuals with sensory impairments. For moderate rehabilitation of 15 or more units, Section 504 also requires to the maximum extent feasible that the units be accessible to and usable by individuals with disabilities.
Good Standing at DHCD	Applicants for HOME funds, including all members of their development teams, must be in good standing with DHCD with respect to other DHCD-assisted projects.

Terms and Conditions: Multi-Family Rental Projects	
Application Fees	The application fee for non-profit developers is \$450 per project; the fee for for-profit developers is \$1,250 per project. For projects seeking DHCD tax credits, only the tax credit application fees apply.

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 green building standards and increased accessibility
- appropriate scopes of rehabilitation or construction
- appropriate efforts to address energy conservation
- 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

DHCD 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 DHCD program beyond rental housing.

We will submit a Consolidated/Action Plan amendment proposal if we pursue 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, DHCD 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 DHCD. DHCD 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 many units have passed the maturity date of HOME restrictions and we haven't added new HOME ownership units in many years.

#### Eligible Applicants for HOME Funding

PROGRAM COMPONENT	ELIGIBLE APPLICANTS
Rental Production	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 expect to have sufficient MRVP expenditures to use that single source in our MATCH report for this year. Annual expenditures through this program alone is approximately \$97.5 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, we will continue to offer HOME technical assistance directly from DHCD HOME staff and through our HOME compliance monitoring contractor. Typically, we proactively share program updates and work 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.

Historically, DHCD successfully administered four HOME Technical Assistance grants; in 2013, we closed out the fourth grant. DHCD does not anticipate an additional TA grant during the 2020 HOME program year.

#### HOME Performance Measures

In accordance with CPD Notice 03-09, DHCD'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. Two of the Commonwealth's housing and community development objectives are the 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, and
2. Expand sustainable homeownership opportunities for low, moderate and middle income families.

DHCD'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, DHCD provides funding for rental production and rental rehabilitation. DHCD 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 minority households assisted
- Number of children under age 6 within HOME-assisted units
- Number that are accessible under Section 504
- Number of units that meet the IECC energy standards
- Of the units meeting IECC standards, the number meeting Energy Star (or similar) standards
- Number of units for formerly homeless households and formerly chronically homeless households
- Number of units for former residents of public housing
- Number designated for persons with HIV/AIDS

#### Rental Rehabilitation

- Number of affordable units preserved for each income category
- Number of minority households assisted
- 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 accessible under Section 504
- Number of units that meet the IECC energy standards
- Of the units meeting IECC standards, the number meeting Energy Star (or similar) standards
- 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
- Number designated for persons with HIV/AIDS

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. DHCD pursues ongoing data collection through compliance monitoring and via the Massachusetts legislation regarding tenant data collection. We expect that DHCD's HOME Program's performance measurement standards will further evolve, as our experience with the initiative matures.





MASSACHUSETTS DEPARTMENT OF  
HOUSING AND COMMUNITY DEVELOPMENT

National Housing Trust Fund  
(HTF)

ALLOCATION PLAN

2020

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## ATTACHMENTS

Attachment A – DHCD and Supportive Services

Attachment B – HTF Rehabilitation Standards

Attachment C – Recommended Cost Limits for Massachusetts Multifamily  
Rental Projects with DHCD Assistance

Attachment D – Uniform Physical Condition Standards for Multifamily Housing  
Rehabilitation - August 2016

NATIONAL HOUSING TRUST FUND  
Allocation Plan

Massachusetts Department of Housing and Community Development  
June 2020

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. The HTF will be 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) will administer the HTF at the federal level and will distribute trust funds to participating states in accordance with an established formula. Each participating state must identify 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 the Commonwealth of Massachusetts, Governor Charles D. Baker has identified the Department of Housing and Community Development (DHCD) as the allocating agency for the HTF. Massachusetts does not intend to appoint subgrantees for HTF and will distribute funds directly to recipients, defined as "organizations, agencies, or other entities that receive HTF funds to undertake an eligible project."

It is DHCD'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, DHCD will continue its practice, established in 2016, of awarding HTF exclusively to housing with services.

II. HTF and Supportive Housing in Massachusetts

DHCD 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. DHCD 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 huge 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 new Housing Trust Fund offers agencies such as DHCD the opportunity to award capital dollars to produce deeply affordable units in combination with other resources to help fund services for new HTF residents. DHCD has the ability to help fund these support services through the state's rental voucher program, known as MRVP (Massachusetts Rental Voucher Program). The Department currently plans to set aside MRVP vouchers in support of HTF units in 2020. Each voucher that DHCD 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:

- 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, DHCD will prioritize HTF funds for projects that will provide service-enriched housing and housing for homeless families and individuals. The tenant preferences for each project will be evaluated as part of DHCD's competition for HTF funds. As indicated below, in the evaluation process, DHCD 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 DHCD has certain standards for the support services to be delivered to tenants in supportive housing units. It is the Department's expectation that recipients of projects seeking HTF in Massachusetts will adhere to DHCD'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 Elder Affairs. 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 2020. DHCD 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 department throughout the year. DHCD 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 DHCD will award HTF as subordinate debt and will close all HTF assistance through the MassDocs process.

### IV. Application Requirements

The Department will issue a Notice of Funding Availability (NOFA) for the HTF and several additional DHCD resources. Consistent with DHCD's past practice, the NOFA will include the deadlines by which sponsors interested in HTF must submit their pre-applications for DHCD review. The full funding competition for HTF and other DHCD monies will be invitation-only. Those sponsors whose pre-applications are approved by DHCD will be invited to submit full funding applications for HTF and other DHCD 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 DHCD'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 individual
- Strength of development team
- Appropriateness of tenant selection plan
- Evidence of market feasibility
- Demonstrated need for project in the target neighborhood
- Financial viability of the project
- Degree of local support, including local funding commitments
- Degree to which the project maximizes green building standards and sustainable 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 DHCD's intent to award HTF and state resources to projects that are highly ready to proceed. Further, it is DHCD'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 DHCD 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 Department's expectation that projects receiving HTF and/or state resources during the 2020 HTF competition will proceed to construction during 2021.

#### 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 (VLI and 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 Department of Housing and Community Development has served as the allocating agency for the LIHTC and the federal HOME program for over 24 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 DHCD funding award or modification to an existing project. The information contained in the data base has been invaluable to DHCD in the development of numerous affordable housing policies. For example, during the past decade, the Department 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 DHCD make various determinations relative to appropriate project costs. Using the database and working with its quasi-public affiliate, the Massachusetts Housing Partnership, DHCD regularly updates statistics on cost. Each year, in DHCD's Qualified Allocation Plan (QAP) for the Low Income Housing Tax Credit (LIHTC), the Department 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 DHCD housing resources, including the HOME program and ten state-funded bond programs. The recommended cost limits per unit also will apply to the new Housing Trust Fund. The current recommended cost limits per unit are included with this document as Attachment C.



As indicated, the recommended cost limits take into account geography as well as other project characteristics, such as construction type and bedroom mix. For example, the DHCD database confirms what many lenders and developers understand anecdotally: projects located in certain regions of the state – particularly western Massachusetts and northern Worcester County – cost less to build or preserve than projects located within the city of Boston and the immediate metropolitan area. The recommended cost limits reflect these differences. As another example, DHCD maintains different per-unit cost limits depending on the size of the project as defined by the bedroom mix. DHCD 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 DHCD, there is a direct correlation between the recommended cost limits per unit and the Department’s commitment of subsidy per unit. Historically, DHCD is willing to award subsidy to support approximately 25% of the cost of producing or preserving an affordable unit. It is the Department’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. DHCD intends to follow its long-standing policy on subsidy per-unit in making HTF awards. For example, if a recipient seeks HTF for a “small” production project located in Berkshire County, DHCD typically will hold the recipient to a recommended TDC per unit of \$199,000 and an HTF award, if the project meets all criteria, not to exceed \$49,750. If a recipient seeks HTF for a “larger” production project located in Suffolk County (City of Boston), DHCD typically will hold the recipient to a recommended TDC per unit of \$399,000 and an HTF award not to exceed \$99,750. If a recipient seeks other DHCD resources in addition to HTF, as many are expected to do, the amount of HTF may be reduced below the typical limit as DHCD awards other sources to the project. In general, recipients should assume that DHCD typically will cap all HTF awards at approximately \$50,000 to \$100,000 per unit, depending on project characteristics and at \$500,000 per project.

#### VIII. Additional Information

Sponsors of potential HTF projects for 2020 should note the following:

- In order to fund as many HTF units as possible, DHCD 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 DHCD will cap all Department assistance, other than state rental assistance, at \$125,000 per HTF unit, inclusive of the HTF per-unit cap.
- In order to support multiple projects with HTF units, DHCD typically will cap the amount of HTF per project at \$1,000,000.

- 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. DHCD will set aside MRVP vouchers to be available to HTF applicants in 2020.
- During the HTF competition, DHCD 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 DHCD assistance on affordable housing projects are familiar with DHCD's various standards. The design and scope standards are delineated in the Department'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. DHCD's architects will review the design and scope components of all applications for HTF and state resources.
- The Department believes that there is a need for supportive housing units in every region of the state. However, in Massachusetts, the number of homeless and extremely low income families and individuals is greatest in the City of Boston and the surrounding metropolitan area. In DHCD's view, this area would be well served by HTF projects. In addition, DHCD always encourages the creation of units for ELI individuals and families in so-called "areas of opportunity." The Department 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 HUD data. In addition, DHCD 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 DHCD'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>
- DHCD's Qualified Allocation Plan (QAP) for LIHTC (posted at <https://www.mass.gov/doc/2020-2021-qap-low-income-housing-tax-credit-qualified-allocation-plan-qap/download>)
- DHCD's NOFA for the Winter Rental funding competition (posted at <https://www.mass.gov/doc/nofa-winter-2021-affordable-housing-competition-for-rental-projects/download>)

For additional information on this allocation plan, please contact Catherine Racer or Bronia Clifton of DHCD at 617-573-1322 or 617-573-1305, respectively.

# ATTACHMENT A

## DHCD and Support Services

## ATTACHMENT A

### DHCD and Support Services

The standards and policies described below apply to services to be funded through the HTF as well as other DHCD 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 DHCD for supportive housing (SH) funds, the recipient is expected to describe the method to be used to prepare individual or family assessments.

DHCD 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 DHCD guidance.

If the service provider is a different entity from the owner of the property receiving DHCD funds, the provider and the owner should have a successful record of previous collaboration and should provide DHCD 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 Department of Housing and Community Development (DHCD) has had extensive experience in establishing and implementing rehabilitation standards for programs including HOME and the Low Income Housing Tax Credit, DHCD 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.

During the first implementation year for HTF, DHCD will allocate the new funds only to multifamily rental projects. 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 DHCD, 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 DHCD's architects as well as other Department staff, and DHCD 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 DHCD 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 DHCD. 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. DHCD'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 DHCD-funded HTF projects will be at least 30 years. If DHCD 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 Department will require the recipient to establish an appropriately-funded replacement reserve. If the project is funded, the Department will monitor the performance of the various systems over time and the recipient's response to systems deficiencies. Every DHCD-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

DHCD 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 DHCD, 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), DHCD strongly prefers project designs that incorporate site planning, exterior envelope, detailing, and mechanical system technologies to achieve energy efficiency. DHCD strongly encourages demolition and rehabilitation processes that result in waste reduction and conservation of resources. DHCD also encourages the use of building materials that are local in origin and durable and that incorporate recycled content. DHCD also strongly encourages recipients to avoid the use of toxic materials.

#### IV. Lead-Based Paint

Recipients of rehabilitation projects seeking HTF from DHCD 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)), DHCD 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 DHCD 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 measure incorporated into the project.

## VII. State and Local Codes

All recipients seeking HTF from DHCD 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)

DHCD 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, DHCD 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 DHCD Standards for Multifamily Rehabilitation Projects

As indicated, the Department has maintained design and scope standards for multifamily rental rehabilitation projects for many years. DHCD encourages recipients of multifamily rental projects to follow its standards as closely as possible and to discuss their projects -- prior to submission -- with Department 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:

	counter space length	minimum circulation width
• 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. DHCD 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 DHCD staff in advance of submitting applications for HTF assistance. DHCD staff members are available to answer questions on rehabilitation standards as well as other aspects of HTF.

## ATTACHMENT C

### Recommended Cost Limits for Massachusetts Multifamily Rental Projects With DHCD Assistance

# ATTACHMENT C

## Recommended Cost Limits for Massachusetts Multifamily Rental Projects with DHCD Assistance

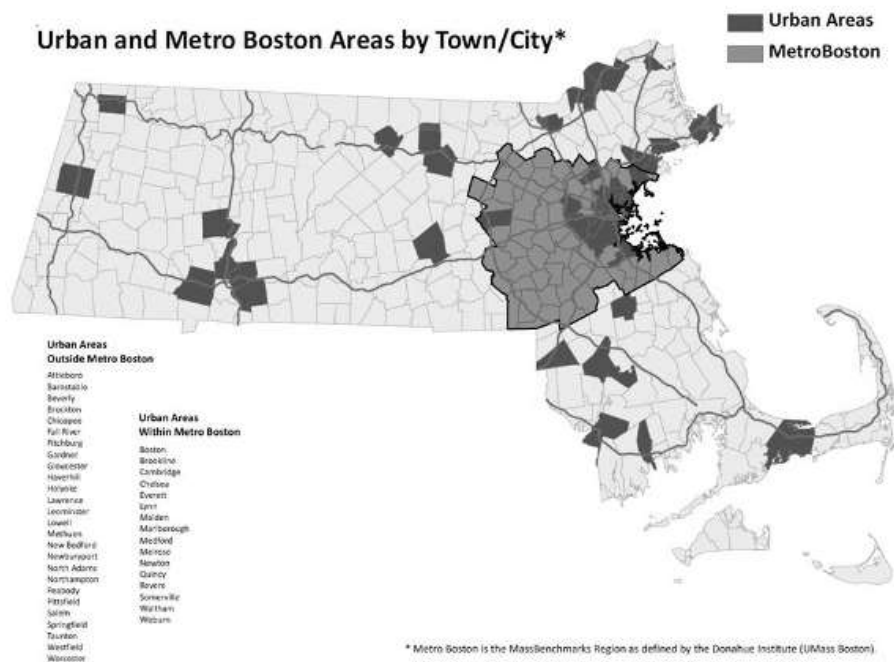
The Massachusetts Department of Housing and Community Development has implemented recommended cost limits per unit for multifamily rental projects, based on extensive data analysis, project location, and bedroom configuration. These limits typically are updated annually and will apply to HTF projects.

Production Project	(Residential TDC/Unit)
Outside Metro Boston*	
Single Room Occupancy/Group Homes/Assisted	
Living/Small Unit** Supportive Housing	\$199,000
Suburban/Rural Area with Small Units	\$279,000
Suburban/Rural Area* with Large** Units	\$319,000
Urban* Area with Small Units	\$359,000
Urban Area with Large Units	\$379,000
Within Metro Boston*	
Single Room Occupancy/Group Homes/Assisted	
Living/Small Unit Supportive Housing	\$259,000
Suburban Area with Small Units	\$329,000
Suburban Area with Large Units	\$349,000
Urban Area with Small Units	\$379,000
Urban Area with Large Units	\$399,000
Preservation Project	(Residential TDC/Unit)
Outside Metro Boston*	
Single Room Occupancy/Group Homes/Assisted	
Living/Small Unit Supportive Housing	\$139,000
Suburban/Rural Area, All Unit Sizes	\$199,000
Urban Area with Small Units	\$209,000
Urban Area with Large Units	\$219,000

Within Metro Boston*	
Single Room Occupancy/Group Homes/Assisted	
Living/Small Unit Supportive Housing	\$189,000
Suburban/Rural Area, All Unit Sizes	\$229,000
Urban Area with Small Units	\$299,000
Urban Area with Large Units	\$299,000

\*See the map below to determine the proper geographic category for each project based on its location.

\*\*Large Unit projects must have an average of at least two bedrooms per unit or consist of at least 65% two or more bedroom units and 10% three or more bedroom units. All other projects are considered Small Unit projects.



# ATTACHMENT D

## MA DHCD HTF

### Uniform Physical Condition Standards for Multifamily Housing Rehabilitation August 2016

[illegible]



[illegible]



Item	Material	Quantity	Unit	Price	Total	Notes
1	Concrete	100	cu yd	120.00	12000.00	Concrete for foundation and walls.
2	Rebar	100	lb	0.50	50.00	Rebar for reinforcement.
3	Formwork	100	sq ft	2.00	200.00	Formwork for concrete pouring.
4	Gravel	100	cu yd	10.00	1000.00	Gravel for base layer.
5	Sand	100	cu yd	8.00	800.00	Sand for base layer.
6	Asphalt	100	cu yd	15.00	1500.00	Asphalt for driveway.
7	Bricks	100	1000's	1.00	100.00	Bricks for wall construction.
8	Mortar	100	cu yd	12.00	1200.00	Mortar for brickwork.
9	Plaster	100	cu yd	10.00	1000.00	Plaster for interior walls.
10	Paint	100	gal	2.00	200.00	Paint for exterior walls.
11	Roofing	100	sq ft	5.00	500.00	Roofing material for roof.
12	Insulation	100	sq ft	3.00	300.00	Insulation for walls and roof.
13	Windows	100	unit	10.00	1000.00	Windows for interior.
14	Doors	100	unit	15.00	1500.00	Doors for interior.
15	Flooring	100	sq ft	4.00	400.00	Flooring material for interior.
16	Lighting	100	unit	2.00	200.00	Lighting fixtures for interior.
17	Electrical	100	unit	1.00	100.00	Electrical wiring and outlets.
18	Plumbing	100	unit	1.00	100.00	Plumbing fixtures and pipes.
19	HVAC	100	unit	1.00	100.00	HVAC system for climate control.
20	Landscaping	100	unit	1.00	100.00	Landscaping services and materials.
21	Permits	100	unit	1.00	100.00	Permits for construction.
22	Insurance	100	unit	1.00	100.00	Insurance for construction.
23	Tools	100	unit	1.00	100.00	Tools for construction.
24	Transportation	100	unit	1.00	100.00	Transportation for materials.
25	Labor	100	unit	1.00	100.00	Labor for construction.
26	Design	100	unit	1.00	100.00	Design services for construction.
27	Consulting	100	unit	1.00	100.00	Consulting services for construction.
28	Testing	100	unit	1.00	100.00	Testing services for construction.
29	Monitoring	100	unit	1.00	100.00	Monitoring services for construction.
30	Reporting	100	unit	1.00	100.00	Reporting services for construction.
31	Documentation	100	unit	1.00	100.00	Documentation services for construction.
32	Communication	100	unit	1.00	100.00	Communication services for construction.
33	Coordination	100	unit	1.00	100.00	Coordination services for construction.
34	Management	100	unit	1.00	100.00	Management services for construction.
35	Supervision	100	unit	1.00	100.00	Supervision services for construction.
36	Quality Control	100	unit	1.00	100.00	Quality Control services for construction.
37	Safety	100	unit	1.00	100.00	Safety services for construction.
38	Environmental	100	unit	1.00	100.00	Environmental services for construction.
39	Historical	100	unit	1.00	100.00	Historical services for construction.
40	Archaeological	100	unit	1.00	100.00	Archaeological services for construction.
41	Geological	100	unit	1.00	100.00	Geological services for construction.
42	Hydrological	100	unit	1.00	100.00	Hydrological services for construction.
43	Ecological	100	unit	1.00	100.00	Ecological services for construction.
44	Biological	100	unit	1.00	100.00	Biological services for construction.
45	Chemical	100	unit	1.00	100.00	Chemical services for construction.
46	Physical	100	unit	1.00	100.00	Physical services for construction.
47	Mathematical	100	unit	1.00	100.00	Mathematical services for construction.
48	Statistical	100	unit	1.00	100.00	Statistical services for construction.
49	Computational	100	unit	1.00	100.00	Computational services for construction.
50	Information	100	unit	1.00	100.00	Information services for construction.
51	Communication	100	unit	1.00	100.00	Communication services for construction.
52	Transportation	100	unit	1.00	100.00	Transportation services for construction.
53	Energy	100	unit	1.00	100.00	Energy services for construction.
54	Environment	100	unit	1.00	100.00	Environment services for construction.
55	Health	100	unit	1.00	100.00	Health services for construction.
56	Education	100	unit	1.00	100.00	Education services for construction.
57	Research	100	unit	1.00	100.00	Research services for construction.
58	Development	100	unit	1.00	100.00	Development services for construction.
59	Production	100	unit	1.00	100.00	Production services for construction.
60	Distribution	100	unit	1.00	100.00	Distribution services for construction.
61	Consumption	100	unit	1.00	100.00	Consumption services for construction.
62	Disposal	100	unit	1.00	100.00	Disposal services for construction.
63	Recycling	100	unit	1.00	100.00	Recycling services for construction.
64	Reuse	100	unit	1.00	100.00	Reuse services for construction.
65	Repair	100	unit	1.00	100.00	Repair services for construction.
66	Replacement	100	unit	1.00	100.00	Replacement services for construction.
67	Restoration	100	unit	1.00	100.00	Restoration services for construction.
68	Rehabilitation	100	unit	1.00	100.00	Rehabilitation services for construction.
69	Renovation	100	unit	1.00	100.00	Renovation services for construction.
70	Refurbishment	100	unit	1.00	100.00	Refurbishment services for construction.
71	Refinishing	100	unit	1.00	100.00	Refinishing services for construction.
72	Reupholstering	100	unit	1.00	100.00	Reupholstering services for construction.
73	Rebuilding	100	unit	1.00	100.00	Rebuilding services for construction.
74	Reconstructing	100	unit	1.00	100.00	Reconstructing services for construction.
75	Recreating	100	unit	1.00	100.00	Recreating services for construction.
76	Reestablishing	100	unit	1.00	100.00	Reestablishing services for construction.
77	Reforming	100	unit	1.00	100.00	Reforming services for construction.
78	Reframing	100	unit	1.00	100.00	Reframing services for construction.
79	Reframing	100	unit	1.00	100.00	Reframing services for construction.
80	Reframing	100	unit	1.00	100.00	Reframing services for construction.







## FFY 2020 Emergency Solutions Grant (ESG) Program One Year Plan

DHCD uses our MA non-entitlement Emergency Solutions Grant to fund projects designed to support basic shelter operations, conduct street outreach, prevent homelessness, and provide essential rapid re-housing services for homeless individuals across the Commonwealth. In January of 2016, DHCD released a Request for Responses (RFR) to solicit qualified, cost effective, creative, and competitive applications to develop and operate Emergency Solutions Grant (ESG) eligible projects across the Commonwealth for up to five years. DHCD issued contracts stemming from this RFR process beginning April 1<sup>st</sup>, 2016, aligning our subcontracted ESG programs with our ESG federal award period. Our FFY20 ESG award will be used to renew existing projects through March 31, 2021.

Due to COVID, DHCD is also considering our options for renewing contracts until March 31, 2022. This will be determined before March of 2021. The goal of the extension would be to allow homelessness prevention and rapid re-housing programs additional time to utilize their funding; program enrollments have stalled due to eviction moratoriums and lack of movement in the general housing market.

DHCD expects to allocate Massachusetts nonentitlement funding for FFY20 as indicated in chart below. Please note: DHCD contracts allow projects to move funding from one activity type to another if there is a legitimate community need. Due to complications of the COVID pandemic, we expect that many projects may reallocate funding to other activities throughout their contract period.

### Proposed Activities and Overall Budget

Component	Planned Allocation (FFY20)
Street Outreach	\$32,000
Emergency Shelter Renovation	\$0
Emergency Shelter Conversion	\$0
Shelter Support (Operations/Essential Services)	\$2,015,366
Rapid Re-Housing and Homelessness Prevention	\$2,275,027
HMIS	\$123,794
Administration (split between recipient and sub-recipients)	\$331,288
Emergency Solutions Grants FFY20	\$4,777,475

\*Planned allocation amounts are estimated based on existing contracts. DHCD does not currently fund projects providing, shelter renovation, or shelter conversion. However, should the need arise during the grant period, DHCD may re-allocate funding to unfunded components.

### Written Standards

Upon initial awards, all ESG projects must have clearly demonstrated how the project supports HUDs overall vision for the Emergency Solutions Grant, Opening Doors, the Federal strategic plan for ending homelessness, the work of DHCD, and the local Continuum of Care in ending homelessness. Rather than solely utilizing ESG funding to create separate or distinct programs, subrecipients were encouraged to think strategically about how ESG funding can be leveraged with other funding sources to help support existing efforts to reduce and end homelessness within their region and the Commonwealth.

DHCD intends for subrecipients to maximize resources and requires that all organizations receiving ESG funding, regardless of component, be part of a larger network of homeless services. To help support this effort and to continue to encourage conversations about the best use of funding at the local level, DHCD also requires that each subrecipient consult with their continuum of care about their ESG project annually.

Since the onset of the COVID pandemic, DHCD has been in regular communication with CoC and fellow entitlement communities across Massachusetts regarding the use of ESG and ESG-CV funding, HUD ESG waivers, each CoC's coordinated entry system, and CoC's written standards for RRH and homelessness prevention services. ESG funded prevention & RRH projects were greatly impacted by temporary eviction moratorium and have had to restructure outreach efforts in order to target eligible households. Additionally, Massachusetts has launched a \$171M effort using a combination of state and federal funding to prevent evictions. Many households that would have previously utilized ESG funded programming, now have access to the state funded Residential Assistance for Families in Transition (RAFT) program and other expanded state resources. This has created a unique opportunity for DHCD, CoCs, and entitlement communities to work together to reallocate federal funding to other local priorities, especially emergency shelter and rapid re-housing. Finally, DHCD is working closely with the Massachusetts Emergency Management Agency (MEMA) and the Federal Emergency Management Agency (FEMA) to seek reimbursement for emergency shelter activities. As this is an ongoing initiative, it is unclear what the final impact will be on DHCD's FFY20 ESG allocation, but the expectation is that some CoCs may choose to reallocate prevention funding to support re-housing folks experiencing homelessness in temporary emergency shelters supported with ESG-CV and other state resources.

#### Rapid Re-Housing

ESG participants must meet the HUD definition of homelessness defined by the ESG Interim Rule. Subrecipients are asked to refer to 24 CFR §576.104, §576.105, and §576.106 of the Interim Rule for a complete list of eligible program activities. Rapid Re-housing projects funded by DHCD may provide services to individuals and/or families who do not have access to other state funded services. Additionally, Rapid Re-housing projects may supplement services received through HomeBASE or other Rapid Re-housing programs, though they may not offer the same type of service to the same household at the same time.

Subrecipients may use ESG funding to provide both financial and non-financial activities and are encouraged to carefully consider their personnel needs in their funding requests to DHCD.

All DHCD ESG sub-recipients are required to determine and document the ESG eligibility of each household prior to providing services and must comply with the record keeping requirements per 24 CFR §576.500. Eligible costs include third party payments for one or more of the activities cited in 24 CFR §576.105 and §576.106, to the extent necessary to help a household move as quickly as possible into permanent housing and achieve stability in that housing. For a detailed description of eligible costs DHCD references 24 CFR §576.105 and §576.106.

DHCD received approval for HUD funded technical assistance through Abt. Associates. This technical assistance effort is focused on developing statewide training and standards for rapid re-housing services that incorporate best practices and identify how all organizations may utilize the myriad rapid re-housing programs available in Massachusetts. This training effort will be available to all homeless service organizations. CoCs and subrecipients of ESG funding are being encouraged to update their existing program models by building out intensive supports and financial assistance for folks who need longer term assistance and may be successful long term if they could receive longer term rental assistance



through rapid re-housing (i.e. utilize RRH as a bridge to permanent housing.) The training will begin in late January.

#### Homelessness Prevention

ESG participants must meet the HUD criteria for homelessness prevention services described in 24 CFR §576.103.

Subrecipients are asked to refer to 24 CFR §576.103, §576.105, and §576.106 of the Interim Rule for a complete list of eligible program activities. Homelessness prevention projects funded by DHCD may provide services to individuals and/or families. Subrecipients may supplement services received through others state sources including Residential Assistance for Families in Transition (RAFT), Tenancy Preservation Program (TPP), or other prevention programs, though they may not propose to offer the same type of service to the same household at the same time. For example, organizations may propose to utilize ESG funds for case management services to support households receiving RAFT financial assistance to prevent eviction.

Subrecipients may use ESG funding to provide both financial and non-financial activities and are encouraged to carefully consider their personnel needs in their funding requests to DHCD.

The costs of Homelessness Prevention services are eligible only to the extent that the assistance is necessary to help the household regain stability in their current permanent housing or move into other permanent housing and achieve stability in that housing. Per HUD regulations, no amount of ESG funded assistance shall exceed 24 months within a 3-year period.

Prior to authorizing any third party payments with ESG rental assistance funds, organizations must obtain the required documentation specified in the ESG Interim Rule and by DHCD; ensure the housing unit identified for the individual meets HUD habitability standards and verify the rent is reasonable in accordance with HUD's rent reasonableness standards (24 CFR §576.105).

ESG subrecipients must require that all households receiving Homelessness Prevention services participate in housing stability case management not less than once per month while enrolled in the program to ensure long-term housing stability. Additionally, subrecipients must re-evaluate a household's eligibility, and the types and amounts of assistance the household needs, not less than once every 3 months for households receiving homelessness prevention assistance, in accordance with 24 CFR §576.401(b).

In addition to the congressional eviction moratorium instituted through the CARES Act in early 2020, and the federal eviction moratorium established by the Centers for Disease Control, the Massachusetts Legislature established a statewide moratorium which expired on October 17, 2020. Due to these acts, ESG prevention programs were not enrolling and serving the expected number of households projected to be served by FFY20 renewal awards; preventions program largely targeted households who were at-risk of homelessness due to an eviction. ESG subrecipients have been instructed to refocus outreach efforts to households who meet other at-risk for homelessness criteria and are at a greater risk of infection due to those circumstances, such as living in the home of another due to economic hardship or having moved a certain number of times in the preceding year, according to HUD's definition of at-risk of homelessness. DHCD has provided training to homelessness prevention funded projects and technical assistance to CoCs around understanding and implementing the HUD waivers which impact homelessness prevention programming and will continue to make training and technical assistance throughout FFY20. DHCD encourages CoCs to update their homelessness prevention standards as applicable.

### Shelter Support

Subrecipients may utilize funding for emergency shelter under any or all of the three subcategories established by HUD.

#### Essential Services

Proposals requesting funding for emergency shelter essential services may include a variety of activities detailed in §576.102 of the interim rule. DHCD does not further limit eligible activities under ESG. However, we do prioritize applications requesting funding for services that are not, nor have historically been funded by other sources.

#### Renovation

Subrecipients requesting funding for renovations only, outside of minor or routine maintenance, are not a priority for DHCD under the Emergency Solutions Grant. Additionally, DHCD will not fund capital expenses. Request for one-time renovation costs necessary to create new shelter units, including family units, or to improve the quality of existing shelters, are considered.

#### Shelter Operations

DHCD continues to fund non-rehab, non-capital, and shelter operation expenses. Per the Interim Rule, shelter operations costs include:

- Maintenance (including minor or routine repairs);
- Rent;
- Security;
- Fuel;
- Furnishings;
- Supplies necessary for the operation of the emergency shelter.

Per HUD regulations, hotel or motel vouchers may be paid for by ESG only in the instance that no appropriate emergency shelter is available. Subrecipients may request funding to provide extremely short term hotel or motel vouchers provided that the proposal sufficiently demonstrates the need for such funding. Two possible examples of this include:

- Organizations already receiving EA diversion funding may request ESG funding to provide for very short term hotel/motel based emergency shelter services, to avoid the households being placed into traditional EA emergency shelter where they are no longer able to access diversion services.
- Temporary hotel stay for a person or household fleeing domestic violence that is not safely sheltered within an emergency shelter facility.

DHCD continues to reserve the right to negotiate hotel/motel expenses on a per contract basis with our subrecipients.

### Street Outreach

Subrecipients are asked to refer to 24 CFR §576.101 of the Interim Rule for a complete list of eligible program activities. ESG Street Outreach funding must be used to connect unsheltered, literally homeless, people to emergency shelter, housing, or critical services. Street Outreach funding may be used to serve individuals and/or families. DHCD does not wish to expand already existing street outreach programs, but does consider requests for street outreach funding in communities where there is none.

### HMIS

As the ESG recipient and the HMIS lead for several of our ESG subrecipients, DHCD allocates a portion of our annual ESG award to HMIS activities. This funding is used to help support the costs of contributing data to DHCD's HMIS.

Subrecipients may use a small portion of their ESG funding to support HMIS costs related to their approved ESG project. However, DHCD provides ample funding and support for HMIS related activities to many of our ESG subrecipients through other state resources. Therefore, HMIS costs paid for through ESG are minimal.

### Centralized or Coordinated Intake System

Continua of Care coordinated entry systems are fully operating in each CoC within Massachusetts. Subrecipients are required to share with DHCD how their projects will be incorporated into the coordinated entry system established within their CoC. Additionally, DHCD provides technical assistance and guidance to CoCs on how to best incorporate ESG funded projects into their system in accordance with HUD guidelines.

DHCD recognizes that CoCs are having strategic conversations about prioritizing services to residents of their continuum. DHCD, however, does not allow subrecipients to incorporate residency requirements into their eligibility criteria for ESG funded projects.

### Consultation with CoC

DHCD continues to meet this requirement through a variety of methods and strives to incorporate applicable feedback from CoCs into our administration of the Emergency Solutions Grant. In fact, many of the requests made through the consultation process have been implemented and many were incorporated into our 2016 ESG procurement process. To help support this effort and to continue to encourage conversations about the best use of funding at the local level, DHCD also requires that each subrecipient consult with their continua of care about their ESG projects.

DHCD continues to provide each CoC with detailed information about DHCD ESG funded projects within their jurisdiction including the subrecipient's success at meeting the proposed performance measurements and compliance with ESG rules and regulations.

State ESG officials distribute information about Federal and State policies relevant to homeless families and individuals to homeless services providers, Regional Networks, and CoCs on a regular basis. State officials attend and convene local and regional gatherings on occasion, and communicate with ESG Entitlement Communities to help coordinate ESG activities as appropriate throughout the Commonwealth.

During the COVID pandemic, DHCD has been in frequent contact with CoCs across Massachusetts and entitlement communities to understand and support local efforts to provide safe, socially distanced emergency shelter and re-housing services in accordance with HUD, CDC, and MA Dept. of Public Health (DPH) guidelines. ESG subrecipients must consult with their CoC before reallocating funding to other services. All ESG-CV funding is being distributed to

### Process for Allocation of Funds

After consulting with each CoC regarding their needs and priorities for ESG funding, DHCD released a request for responses (RFR), for new awards to be issued in FY16 (contract period 4/1/16-3/31/17). The RFR allows awards made through the procurement process to be renewed for up to four additional years. As part of the annual renewal process, each subrecipient is responsible for reviewing project outcomes with their CoC and negotiating necessary changes with DHCD in order to continuously meet the needs of homeless persons, and those at risk of homelessness, within their CoC.

ESG-CV funding was distributed through an emergency Notification of Funding Award (NOFA.)

#### ESG Performance Standards

In addition to advancing the Housing First philosophy and Rapid Re-Housing model, the Commonwealth has the following goals:

- Reduce the number of households becoming homeless and needing to be sheltered;
- Reduce the number of homeless households in shelters;
- Support capacity of emergency shelters; and
- Strengthen existing Continuum of Care (CoC) activities while increasing ESG coordination between the CoCs, the Commonwealth and state federal and local resources to reduce and end homelessness.

Specifically in FFY20, DHCD is focused on providing safe, socially distanced, emergency shelter in accordance with HUD, CDC, and MA Dept. of Public Health (DPH) guidelines. While COVID has changed the way subrecipients operate their projects and provide services, DHCD's funding directives remain the same for the FFY20 allocation.

DHCD uses following performance indicators for sub-recipients funded under ESG.

Proposed Outcomes					
ES Essential Services	ES Renovations	ES Operations	Street Outreach	Rapid Re-housing	Homelessness Prevention
# of persons to receive essential services.  Include a one to two sentence description of those services.	Please summarize renovation results	Total # of bed nights to be provided by the shelter  (Please include all shelter beds, not just those you are requesting ESG funding to support.)	# of persons to be connected to services	# of households to be placed into permanent housing	# of households to receive prevention assistance AND # of households expected to exit program to permanent housing

All ESG programs are evaluated on a quarterly basis for performance and extensive technical assistance is provided to programs which have demonstrated an inability to meet their projected performance measures. DHCD provides ongoing monitoring for each ESG funded program within the contract period

to help ensure performance measurements are met and that each ESG program is abiding by the written standards for operating ESG funding.

DHCD expects that performance standards will evolve and change over time based on ongoing consultations with CoC and Entitlement Communities and policy changes at the federal, state, regional, and local level.

#### Development of Funding, Policies, and Procedures for the administration and Operation of the HMIS

DHCD is the lead agency administering HMIS for five of the 13 CoCs in Massachusetts at no cost to user for participation. Policies, procedures, data sharing protocols, and written agreements are already in place. In accordance with guidance provided by HUD, DHCD encourages organizations to utilize the HMIS operated by their CoC.

In 2019, the Commonwealth of Massachusetts solicited bids and contracted with SHI International Corp for software and services to be provided by Green River Data Analysis, LLC to create a statewide homeless data warehouse. The warehouse, designed as an extension of HMIS, was implemented in 2019, and to date, 10 of the State's 13 CoCs have signed legal agreements to participate, and five of the CoCs are already uploading data into the warehouse. We anticipate that the remaining CoCs will be uploading data by the end of June 2021. Once all CoCs in the State are on-boarded, the homeless data warehouse will provide significant enhancements to our ability to evaluate the needs of people experiencing homelessness in Massachusetts, as well as our ability to report outcomes and measure systemic improvements.

Domestic violence and legal aid agencies which receive ESG funding are required to utilize an HMIS comparable database which can produce an APR. DHCD provides guidance to DV agencies, which receive ESG funding to help guide their planning process for implementing an HMIS comparable database. DHCD works closely with all DV and legal aid sub-recipients to help ensure that comparable HMIS systems are being utilized.

As agreed upon by each CoC, DHCD requires each ESG funded program to collect both universal and program level data on all eligible applicants receiving ESG services.

#### Match FFY2020

DHCD will provide the following state matching funds for the ESG program.

Component	Match Amount	Source: Use of Match
Shelter Support	SFY20 - \$1,194,369  SFY21 - \$3,583,107	DHCD: On July 31, 2019 Gov. Charlie Baker signed the MA GAA (budget) for SFY20, which allocated \$53M to DHCD for Homeless Individual Emergency Shelters program. DHCD will match a portion of our FFY20 ESG allocation with our SFY20 Homeless Individual Shelter Program. The remaining portion of our match will come from our SFY21 Homeless Individual Shelter Program. Gov. Baker's SFY21 budget includes a request for \$53M for this program. Funding for the Homeless Individual Emergency Shelters program supports the operating costs

Component	Match Amount	Source: Use of Match
		and shelter staffing for the approximately 2,000 individual shelter beds which DHCD funds. Note: the number of beds funded through the Individual Emergency Shelters program has been reduced due to depopulation of emergency shelters due to COVID-19.

## FY2020 HOMELESS FACILITIES

### Shelter Agency

Pine Street Inn  
Pine Street Inn  
Pine Street Inn  
Pine Street Inn  
Pine Street Inn  
Pine Street Inn  
Catholic Charities - Boston  
Heading Home  
Bay Cove  
Father Bill's  
Father Bill's  
Father Bill's  
Father Bill's  
Father Bill's  
CSS of Fall River  
CSS of Fall River  
CSS of Fall River  
Lifebridge Northshore  
Lifebridge Northshore  
Lifebridge Northshore  
Lifebridge Northshore  
Lifebridge Northshore  
Craig's Doors  
Craig's Doors  
Lynn Shelter Association  
Lynn Shelter Association  
Middlesex Human Service Agency  
Middlesex Human Service Agency  
Emmaus  
Action, Inc.  
Boston Rescue Mission  
Boston Rescue Mission  
Boston Rescue Mission  
Boston Rescue Mission  
Our Father's House  
BPHC  
BPHC

### Shelter Site

Boston hotel  
Men's Inn  
Women's Inn  
Shattuck Shelter  
Holy Family  
Shattuck Stabilization Units  
St. Patricks  
Cambridge Shelter  
Night Center  
Quincy  
Brockton  
Quincy hotel  
Brockton hotel  
Plymouth hotel  
Sister Rose  
Samaritan  
St. Joseph  
Salem  
Salem  
Beverly  
Salvation Army  
Christopher Columbus Club Overflow  
Craig's Place  
Amherst area hotel  
Shelter  
New hotel site - TBD  
Bristol Lodge (Men)  
Bristol Lodge (Women)  
Mitch's Place  
Action, Inc.  
Life Growth  
Safe & Healthy  
Women's Shelter  
Overflow  
Shelter  
112 Southampton  
Woods Mullen

Somerville Homeless Coalition	Shelter
First Church Cambridge	Shelter
Psychological Center	Shelter
Greater Westfield Committee for the Homeless	Samaritan Inn
Clinical & Support Options	Friends of the Homeless
Clinical & Support Options	Overflow / Liberty Street
Clinical & Support Options	Hotels
Clinical & Support Options	TBD Holyoke overflow (Temp hotel in Holyoke operational)
Salvation Army	Cambridge Shelter
ServiceNet	Pittsfield
ServiceNet	Northampton
ServiceNet	Greenfield
ServiceNet	Pittsfield COVID
ServiceNet	Northampton COVID
ServiceNet	Greenfield COVID
SMOC	Turning Point
SMOC	Rolands House
SMOC	Meadows
SMOC	Shadows
SMOC	Chandler
SMOC	Queen
Lowell Transitional Living Center	LTLC
Duffy Health Center	In From the Street Program
Duffy Health Center	In from the Street Program Winter Overflow
Community Teamwork	Life Connection Partnership
Community Teamwork	SRO's
Steppingstone	New Bedford Winter Hotel Response
Eliot Community Human Services	Greater Boston
Veterans Inc.	Worcester
Veterans Inc.	Worcester
Bridge Over Troubled Waters	Hostel
Catholic Charities Springfield	Hotels for Chronic
St. Francis House	Boston hotel
Loulson House	North Adams
Martha's Vineyard	Whaling Church
Y2Y	Cambridge Harvard Sq
Home for Little Wanderers	Mission Hill
Heading Home	Boston site



Solutions at Work	NE School of English
Alternative Home Healthcare	Methuen Hotel
Children's Services of Roxbury	Family Shelter
Citizens Inn	Family Shelter
Wayfinders	Family Shelter
New England Farm Workers	Family Shelter
Northshore Community Action	Family Shelter
Dimock Community Health Center	Family Shelter
Brookview House	Family Shelter
Economic Mobility Pathways	Family Shelter
SMCWC-Crossroads Housing	Family Shelter
House of Hope	Family Shelter
Phoenix House of NE	Family Shelter
St. Mary's Center for Women & Children	Family Shelter
FamilyAid Boston	Family Shelter
Central Massachusetts Housing	Family Shelter
Centerboard	Family Shelter
City of Cambridge	Family Shelter
Casa Nueva Vida	Family Shelter
Center for Human Development	Family Shelter
Hildebrand Family Self Help Center	Family Shelter
Victory Programs	Family Shelter
YMCA of Greater Boston	Family Shelter
Little Sisters (Project Hope)	Family Shelter
Community Action Committee of Cape Cod	Family Shelter
Justice Resource Institute	Family Shelter
Developmental Disabilities (Carolina Hill)	Family Shelter
Friends of the Homeless	Family Shelter
Heading Home	Family Shelter
Housing Assistance Corp	Family Shelter
Housing Families	Family Shelter
Old Colony Y	Family Shelter
Plymouth Area Coalition	Family Shelter
Southeast Family Services	Family Shelter
Somerville Homeless Coalition	Family Shelter
Wellspring House	Family Shelter
Sojourner House	Family Shelter
Emmaus	Family Shelter
South Middlesex Opportunity Council	Family Shelter

# ESG Recordkeeping and Reporting

STANDARDS FOR ADMINISTERING RAPID RE-HOUSING  
AND HOMELESSNESS PREVENTION PROJECTS  
DHCD, DIVISION OF HOUSING STABILIZATION

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## Introduction

This document offers guidance and clarity in the form of written policies and procedures for recordkeeping and reporting requirements to DHCD ESG subrecipients operating rapid re-housing (RRH) and homelessness prevention projects. DHCD subrecipients must adhere to all rules and regulations established by the Department of Housing and Urban Development (HUD) in the ESG Interim Rule, 24 CFR PART 576.

HUD is expected to release a final ESG rule and/or updated guidance at any time. Subrecipients are responsible for compliance with any future rules or guidance as they become effective. In addition to the Interim Rule, HUD has published several helpful documents related to administering ESG services. DHCD will provide ongoing technical assistance and training around HUD rules and regulations. However, subrecipients are encouraged to utilize available HUD resources.

## Intake Policies

Subrecipients must establish and maintain a formal intake process for determining ESG eligibility. The intake process should be in writing and applied consistently and fairly to each household requesting ESG services. It is expected that the initial intake will include screening for services funded through other sources and that, upon monitoring, case records will include documentation of an initial evaluation to determine eligibility for ESG services. When possible, subrecipients should coordinate their ESG intake process with the applicable CoC coordinated assessment.

## Recordkeeping Requirements for Ineligible Households

Subrecipients are required to maintain case records documenting the reason for ineligibility for households who apply for ESG services and are determined ineligible.

Subrecipients that are conducting an initial screening for eligibility for a variety of services, including ESG services, are not expected to keep a case record for each household that is referred to another service. The intent of this requirement is to ensure that households, who specifically request ESG-funded services and/or households who undergo a formal ESG application process, are treated fairly and equitably even if denied.

## Required Recordkeeping Requirements for Eligible Households

Prior to authorizing any ESG service, including non-financial housing relocation and stabilization services, eligibility criteria must be obtained and documented for the case record. The preferred order of documentation is:

1. Source documentation.
2. Third party documentation of income or benefit (Third party documentation may include a verbal statement from the third party. In such a case, the sub-recipient staff member who received the verbal statement is responsible for documenting the statement on agency letterhead).
3. Self-certification supplemented with a statement by the sub-recipient's staff member documenting efforts to obtain third party verification.

## Determining Eligibility for Homelessness Prevention and Rapid Re-housing

Subrecipients are responsible for screening and determining eligibility for homelessness prevention or rapid re-housing services. Eligibility for ESG services must be determined based on the eligibility criteria established by HUD which are listed in the following sections. Households who do not meet required ESG eligibility standards are not eligible for services.

Subrecipients are encouraged to develop written procedures for prioritizing ESG services to households most in need especially as ESG programs are incorporated into CoC Coordinated Entry. In the absence of written policy created by the subrecipient or the CoC, DHCD expects that ESG services will be offered on a first come, first serve basis.

### Homelessness Prevention

To receive ESG funded homelessness prevention services, participants must meet the HUD definition for at risk of homelessness OR meet the criteria in paragraph 2, 3, or 4 of the HUD definition for homelessness. Households that do not meet the HUD-required eligibility criteria are ineligible for services.

Eligibility Criteria	Required Documentation
Annual household income below 30% of area medium income (AMI) based on HUD HOME income limits. Income limits can be found at: <a href="https://www.hudexchange.info/programs/home-income-limits/">https://www.hudexchange.info/programs/home-income-limits/</a>	<p>Income documentation must be collected at intake and updated at each required quarterly re-certification (completed at minimum every three months), as long as the household is enrolled in an ESG project. Income documents for each period (intake, re-certification 1, 2, etc.) should be clearly documented as such.</p> <p>Subrecipients should utilize the CPD Income Eligibility Calculator found at: <a href="https://www.hudexchange.info/incomecalculator/">https://www.hudexchange.info/incomecalculator/</a>. If the CPD Income Eligibility Calculator is unavailable at the time of intake or re-certification, the case record must contain an annual income evaluation form which captures each participant's source of income, the frequency of that income, and the calculation method used to determine the estimated annual amount. Annual income must be calculated from current (at minimum the most recent 30-day period) and complete income information, for each member of the household. A full list of HUD income inclusions and exclusions can be found at: <a href="https://www.hudexchange.info/plugins/incomecalculator/assets/docs/HUD_P5_Inclusions_Exclusions.pdf">https://www.hudexchange.info/plugins/incomecalculator/assets/docs/HUD_P5_Inclusions_Exclusions.pdf</a></p> <p>Income documentation may include, but is not limited to: wage stubs, unemployment comp. statement, public benefits statement, bank statement(s), a letter from employer documenting approximate hours worked and compensation, and/or a self-certification from the household member documenting the income.</p> <p>Additional clarification regarding income documentation can be found in the</p>

	Interim Rule (§576.500(e)) and in the HUD webinar titled <u>At Risk Status and Income: Recordkeeping Requirements Webinar for ESG Grantees</u> . Slides and a recording of the webinar can be found at: <a href="https://www.hudexchange.info/resource/2017/at-risk-status-and-income-recordkeeping-requirements-webinar/">https://www.hudexchange.info/resource/2017/at-risk-status-and-income-recordkeeping-requirements-webinar/</a> .
Insufficient resources or support networks	<p>At minimum, documentation of insufficient resources or support networks must be documented on a DHCD-approved form which clearly states that the household does not have sufficient resources or support networks; e.g., family, friends, faith-based or other social networks immediately available to prevent eviction and maintain housing stability, and that 'but for' ESG services the household would become literally homeless according to HUD's definition. DHCD expects that case records will also include case notes and additional evidence documenting insufficient resources and support networks as applicable to each participant's circumstances.</p> <p>HUD provides the following examples of source documentation for insufficient resources:</p> <ul style="list-style-type: none"> <li>• notice of termination from employment</li> <li>• unemployment compensation statement</li> <li>• bank statement(s)</li> <li>• health-care bill showing arrears</li> <li>• utility bill showing arrears</li> </ul>
HUD regulations require households meet one of the following conditions to be eligible for ESG homelessness prevention services in addition to meeting the above income and resources criteria.	
Eligibility Criteria	Required Documentation
Moved because of economic reasons two or more times during the 60 days immediately preceding the application for ESG homelessness prevention assistance	<p>Evidence of moving includes, but is not limited to:</p> <ul style="list-style-type: none"> <li>• moving receipts</li> <li>• change of address documentation (utility bills, bank statements, pay stubs, etc.)</li> <li>• eviction notice</li> <li>• leasing documents</li> </ul> <p>In instances where the above documentation is unavailable, HUD allows for a written statement from the relevant third party to suffice. This may include a current or former employer, owner, primary lease holder, public administrator,</p>

	and hotel or motel manager. If verbal verification is provided, intake staff are expected to document the conversation on the subrecipient's letterhead.
Living in the home of another because of economic hardship	<p>Sufficient documentation may take different forms depending on each household's situation. However, DHCD expects subrecipients to gather evidence to document that a participant who lives in the home of another is living there due to <u>economic hardship</u> and that without ESG services, the household would have to leave the housing situation and become literally homeless according to HUD's definition. Sufficient documentation may include, but is not limited to:</p> <ul style="list-style-type: none"> <li>• documentation of past eviction</li> <li>• bank statements</li> <li>• documentation of loss of employment</li> <li>• expense receipts</li> <li>• verification from owner or primary leaseholder</li> </ul> <p>Supporting documentation should be supplemented with descriptive case notes explaining the circumstances which led the household to live in the home of another.</p> <p><u>A solitary letter from the owner or primary leasehold stating that the dependent household must leave the unit will not suffice.</u></p>
Written notification that their right to occupy their unit will be terminated within 21 days of their application for assistance	A court ordered <u>Execution Notice</u> which requires the household to vacate the premises within 21 days of their application for ESG assistance.
Lives in a hotel or motel <u>not</u> paid by a charitable organization or by Federal, State, or local government programs for low-income individuals	<ul style="list-style-type: none"> <li>• Hotel or motel receipts</li> <li>• Bank statements documenting hotel or motel charges</li> <li>• Letter from hotel or motel manager documenting length and cost of stay</li> </ul>

Lives in a SRO or efficiency apartment with more than two persons OR lives in a housing unit where more than 1.5 persons reside per room	<p>For eligibility purposes, 1.5 persons residing per room includes all rooms in the housing unit, including bedrooms, living rooms, dining rooms, kitchens, finished recreation rooms, enclosed porches suitable for year-round use, and lodger's rooms. A partially divided room is a separate room only if there is a partition from floor to ceiling, but not if the partition consists solely of shelves or cabinets. Rooms that are excluded from this definition are strip or pullman kitchens, bathrooms, open porches, balconies, halls or foyers, half-rooms, utility rooms, unfinished attics or basements, or other unfinished space used for storage.</p> <ul style="list-style-type: none"> <li>• Lease listing the number of persons residing in the unit and the number of rooms or size of the unit.</li> <li>• Third party verification from the landlord documenting the size of the unit and the number of people residing in that unit.</li> <li>• A written statement from caseworker or intake staff documenting that a home visit was conducted and that the unit is an SRO or efficiency apartment in which more than two persons reside.</li> </ul>
Exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or youth facility, or correction program or institution)	<p>HUD does not prescribe a minimum length of time during which a person or household must reside in a publicly funded institution or system of care in order to meet this criterion. However, DHCD expects that households will have resided in a publicly funded institution or system of care for such a period of time such that they have lost the ability to return to their previous housing situation OR that they have met the definition for at risk of homelessness prior to entering the publicly funded institution or system of care.</p> <p>Adequate documentation may include:</p> <ul style="list-style-type: none"> <li>• Discharge papers or other evidence documenting the time period the person or household was in a publicly funded institution or system of care</li> <li>• Letter from institution or system of care, including letters written by case workers and other direct care staff working within those institutions or systems of care</li> <li>• Notice of eviction which occurred during the period the participant was residing in a publicly funded institution or system of care</li> </ul>
Has a summary process notice	At a minimum, a Summons and Complaint served by a sheriff or constable is required. Households in between the Summons and Complaint and Execution



	<p>notice periods meet this criterion provided they have insufficient resources and support networks and would become literally homeless without ESG assistance.</p> <p>Households who have agreed in court to a payment plan and are able to meet the stipulations of that payment plan are not considered to be lacking sufficient financial resources to prevent homelessness.</p>
Notification that primary nighttime residence will be lost within 14 days	A court ordered Execution notice requiring the tenant to vacate the unit within 14 days of their application for assistance.
Fleeing or attempting to flee domestic violence or other instances of violence in the home, and/or life-threatening conditions as permitted by HUD, and/or have left and are fearful of returning to their home	<p>Documentation may include, but is not limited to:</p> <ul style="list-style-type: none"> <li>• A police report</li> <li>• Third party verification from a domestic violence provider</li> <li>• Lapsed or current restraining orders</li> <li>• Affidavits from restraining orders</li> <li>• Medical records (if DV was referenced or treated)</li> <li>• Written statement from social worker or mental health counselor</li> <li>• Psychiatrist letter</li> </ul> <p>In the instance where third party documentation is unavailable, subrecipients may accept a self-certification from the head of the household. The self-certification should clearly state that the household is fleeing, or attempting to flee domestic violence or other life-threatening violence and is unsafe remaining in or returning to their home.</p>

#### Rapid Re-housing

To receive ESG funded rapid re-housing services, participants must meet paragraph 1 of the HUD definition for homelessness. Households not meeting the HUD required eligibility criteria are ineligible for services.

Eligibility Criteria	Required Documentation
Sleeping in a place not meant for human habitation (i.e. car, park, abandoned building, bus station, airport, etc.)	<ul style="list-style-type: none"> <li>• A written statement from an outreach worker documenting the participants living conditions;</li> <li>• A written statement from a housing or service provider documenting the participants living conditions;</li> <li>• A self-certification from the participant documenting their living conditions. The self-certification must include a statement from the subrecipients intake worker documenting their attempt to obtain third party verification.</li> </ul>

In an a emergency shelter, i.e., congregate shelters, transitional housing, hotels/motels paid for by charitable organizations or government programs	A written statement from the emergency shelter provider documenting the participant's stay.
Exiting an institution where the participant resided for 90 days or less and resided in an emergency shelter or place not meant for habitation immediately before entering the institution	<p>Written verification from the institution documenting exit date and length of time in the institution AND one of the following:</p> <ul style="list-style-type: none"> <li>• A written statement from an outreach worker documenting the participants living conditions prior to entering the institution;</li> <li>• A written statement from a housing or service provider documenting the participants living conditions prior to entering the institution;</li> <li>• A self-certification from the participant documenting their living conditions prior to entering the institution. The self-certification must include a statement from the subrecipients intake worker documenting their attempt to obtain third party verification.</li> </ul>

#### Recordkeeping Requirements for All Eligible Households

Case records for households receiving homelessness prevention or rapid re-housing services must contain the following documentation.

Recordkeeping Requirement	Required Documentation
Services received	<p>Subrecipients must document the types of services and financial assistance provided to each household in a case record designated to that household. The case record should clearly list, in chronological order, the types of services provided (including financial assistance) and corresponding dates of services.</p> <p>DHCD has not placed additional restrictions on services aside from those established by HUD; this includes restrictions on financial services. However, subrecipients are expected to clearly document the need for each type of service provided. Documentation may take various forms depending on the participating household's situation, but may include any form of documentation included in this policies and procedures manual.</p> <p>If subrecipients choose to cap or restrict services to eligible participants, they must establish written policies outlining such restrictions and procedures for</p>

	<p>applying them fairly to eligible households. DHCD must approve these standards. Rather than establishing rigid formulas for financial assistance, DHCD encourages subrecipients to work with each eligible participant to determine what ESG services are necessary to resolve their immediate housing crisis. DHCD expects that ESG services, including financial assistance, be provided on an as-needed, case by case basis.</p>
Verification of participant sustainability	<p>Subrecipients must document that households receiving DHCD ESG services can reasonably be expected to maintain the housing assisted through ESG immediately following their exit from the ESG project. Housing sustainability need not be documented upon entry into an ESG project, but should be discussed in the participant's housing stabilization planning and case management sessions. A plan for sustainability should be documented as part of the participant's housing stabilization plan upon exit.</p>
Legal lease hold	<p>A legally binding, <u>written</u> lease for the unit assisted with ESG funding is required. The lease must be between the owner or owner's representative and the household and is required prior to a sub-recipient authorizing any payment for rental assistance, excluding rental arrears, to the property owner (including first month's rent or security deposit payments).</p> <p>The lease MUST include the following items:</p> <ul style="list-style-type: none"> <li>• Tenant name</li> <li>• Address of unit</li> <li>• Term of tenancy</li> <li>• Move in date</li> <li>• Rent amount</li> <li>• Responsibility for utilities</li> <li>• The lease must be signed and dated by all appropriate parties</li> </ul> <p>Only when the assistance is solely for rental arrears* may a verbal agreement be accepted in place of a written lease and only if the verbal agreement gives the household an enforceable leasehold interest under state law and the agreement and rent owed are sufficiently documented by the property owner's financial records, rent ledgers, or cancelled checks. The verbal agreement must be documented by the subrecipient on the organization or property owner's official letterhead detailing the address of the unit, rent amount, and term of occupancy.</p>

	<p>*A one-time payment of up to 6 months of rental arrears is an eligible cost under RRH. However, this service should only be provided if the participant would not be able to secure housing without it.</p>
Property ownership	<p>Proof of ownership of the unit must be obtained prior to making any financial payments to the property owner unless the property is owned by a local housing authority.</p> <p>Documentation of ownership may include a copy of a deed, water bill, mortgage payment, or tax bill.</p>
Rental assistance agreement	<p>A rental assistance agreement between the property owner/landlord and recipient or subrecipient must be in place prior to executing any service under the rental assistance component (including rental arrears). The agreement must set forth the terms under which assistance will be provided.</p> <p>The agreement must also provide that, during the period indicated, the property owner must give the ESG recipient or subrecipient a copy of any notice given to the household to vacate the unit used under state or local law to commence an eviction action against the household, including a 14 day notice to quit.</p>
Housing Standards	<p>Completion of a housing standards inspection checklist or a copy of an inspection report completed by a HUD-certified inspector must be in the case record for all households receiving <u>any type</u> of ESG service. The completed inspection must, at minimum, document compliance with the following standards:</p> <ul style="list-style-type: none"> <li>• Structural soundness</li> <li>• Adequate space &amp; security</li> <li>• Interior air quality free of pollutants</li> <li>• Contamination free water supply</li> <li>• Sufficient and private sanitary facilities in proper operating condition</li> <li>• Necessary heating and cooling facilities</li> <li>• Adequate and safe illumination and electricity</li> <li>• Adequate space for safe food preparation when such space is provided</li> <li>• Unit must be maintained in overall sanitary condition</li> <li>• Fire safety <ul style="list-style-type: none"> <li>○ Second means of egress</li> <li>○ Smoke detectors on each level (when applicable smoke detectors must be designed to alert hearing impaired tenants)</li> <li>○ Public areas of the facility must be equipped with smoke detectors</li> </ul> </li> </ul>

	<p><u>Housing and Lead Based Paint* standards apply for all households receiving services under ESG, including rental arrears only, or legal assistance only.</u></p> <p><u>*Lead Based Paint visual assessments must be completed on all units receiving assistance if constructed before 1978 AND have a child under 6 or a pregnant woman. Documentation of the visual inspection completed by qualified staff must be kept in the case record. All staff members responsible for completing visual assessments must be properly credentialed. HUD offers an online visual assessment training to be completed by staff members conducting inspections. The certification of completion by staff members should be kept with the subrecipients' ESG administrative records. The training can be found at: <a href="http://www.hud.gov/offices/lead/training/visualassessment/h00101.htm">http://www.hud.gov/offices/lead/training/visualassessment/h00101.htm</a>.</u></p>
FMR & rent reasonableness	<p>Housing units where participants receive ESG rental assistance must meet BOTH rent reasonableness standards AND HUD's published Fair Market Rent (FMR) standards. Rent reasonableness and FMR compliance must be recorded on a form showing both the calculation used to determine gross rent and listing comparable units used to determine rent reasonableness, documented in each case record.</p> <p>HUD guidelines for determining rent reasonableness and Fair Market Rent established by HUD may be found at: <a href="http://www.huduser.org/portal/datasets/fmr.html">http://www.huduser.org/portal/datasets/fmr.html</a></p> <p><i>Exceptions to rent reasonableness and FMR include assistance with last month's rent and/or assistance with rental arrears in absence of first month's rental assistance and short or medium term rental assistance.</i></p>

### Determining Services

Subrecipients are permitted to develop standards and policies for determining the level of services to provide to each household provided that those standards are not in conflict with DHCD's policies and/or HUD policies. In the absence of written standards developed by the subrecipient, the following standards for determining level of services to be provided applies.

The level of services provided to each eligible households in homelessness prevention or rapid re-housing programs should be based on the actual financial and non-financial needs of the household. The information used to determine the level of services to be provided should be documented in the participant case record and should at minimum include the households housing stabilization plan, income, and budget. The level of services to be provided (both financial and non-financial) should be made upon careful consideration of the household's barriers to housing stability and financial situation. Subrecipients are responsible for re-evaluating the level of services through monthly case management as long as the household is enrolled in the program.

## Termination Requirements

Each subrecipient must have a termination policy in place. The termination policy should be reserved for program participants who are enrolled in an ESG project, but refuse to comply with program requirements established by HUD (i.e. documenting eligibility and participating in housing stabilization case management). Termination policies must include:

- Written notice to the household containing a clear statement defining the reason for termination.
- An appeal process, in which the household has the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) responsible for the decision.
- Prompt written notice of the final decision to the household

Termination of ESG services does not bar the program participant from receiving further assistance at a later date if they again meet all ESG eligibility requirements.

The National Alliance to End Homelessness hosted a webinar on April 27, 2016 on closing a case. The webinar provided excellent guidance to programs on exiting and terminating assistance. The webinar slides are available at:  
<http://www.endhomelessness.org/library/entry/webinar-closing-a-case-knowing-when-to-end-rapid-re-housing-assistance>.

## Reporting Requirements

Required Quarterly	Required Annually
CAPER report	CAPER report
Actual outcomes for the reporting period (submitted on the projected outcomes table included in your contract.)	CAPER data (actual .CSV files to be uploaded into eCart.)

Please note: The process for running and submitting a CAPER report may change based on HUD reporting requirements and the HMIS vendor utilized by the subrecipient. Questions about the CAPER report should be submitted to DHCD or to your HMIS lead.

### Reporting Due Dates

Quarterly reports are due on the 10<sup>th</sup> of the month following each quarter. Annual reports are due on the 10<sup>th</sup> of the month following the contract expiration date. All reports should start on April 1<sup>st</sup> and end on the last day of the reporting period.

Quarter 1	July 10 <sup>th</sup>
Quarter 2	October 10 <sup>th</sup>
Quarter 3	January 10 <sup>th</sup>
Quarter 4 & final contract period	April 10 <sup>th</sup>

### Documentation of Coordination with CoC

Through the DHCD2016-11 ESG Request for Responses (RFR), DHCD requested that respondents consult with their continua of care about intended ESG responses. Successful awardees (subrecipients) should continue to consult and coordinate ESG services with their CoCs.

The coordination process should be documented through meeting minutes, emails, as well as other memoranda, and maintained for review by DHCD during monitoring visits.

### Documentation of CoC Centralized or Coordinated Assessment

DHCD is aware that continua of care are in various stages of implementing a coordinated entry system. As much as it is applicable, subrecipients should maintain documentation of planning processes related to incorporating their ESG projects into the coordinated entry system established within their CoC.

### HMIS

Subrecipients are required to collect and record all HUD required ESG data elements into an approved Homeless Management Information System (HMIS). Per HUD regulations, domestic violence and victim service providers or legal services providers must use a HMIS comparable database. Subrecipients are responsible for ensuring that all sub-contractors are complying with HMIS requirements. Additionally, subrecipients are responsible for ensuring that their chosen HMIS is able to produce the required CAPER report and csv data files.

Compliance with HMIS standards will be documented through timely submission of quarterly and annual CAPER reports to DHCD.

### Conflict of Interest

Subrecipients are required to maintain written conflict of interest policies ensuring compliance with HUD organizational and individual conflicts of interest. For additional information on what conflicts are required to be covered by such policies, please refer to the ESG Interim Rule (§576.404).

### Organizational Conflict of Interest

HUD prohibits ESG subrecipients operating homelessness prevention projects from using ESG funding to serve participants residing in housing owned by the subrecipient. DHCD requires that all subrecipients have a written plan in place to ensure that the organizational conflict of interest policy is adhered to.

HUD does not currently prohibit subrecipients operating RRH projects from providing housing stabilization and relocation financial services and/or rental assistance to participants moving into housing owned by the subrecipient. However, subrecipients operating RRH & homelessness prevention projects are prohibited from evaluating eligibility at intake and re-certifications for participants residing, or planning to reside, in housing owned and operated by the subrecipient. Accordingly, DHCD requires that subrecipients maintain written policies for referring participants which might violate the agencies' conflict of interest policies to other appropriate ESG providers.

Subrecipients concerned about adhering to the organizational conflict of interest requirements should confer with DHCD and consider submitting a request for a waiver to HUD.

#### **Individual Conflict of Interest**

Subrecipients are required to have written policies pertaining to individual conflicts of interest in place for all employees, agents, consultants, officers, or officials within their organization. Conflict of interest policies should include a written plan for ensuring that individuals associated with the subrecipient and their ESG project not obtain a benefit (financial or nonfinancial) from the DHCD ESG project.

#### **Confidentiality Requirements**

All subrecipients are required to adhere to Federal and State laws pertaining to confidentiality. Each subrecipient's DHCD contract obligates legal compliance with G.L. c. 93H and c. 66A and Executive Order 504 regarding confidentiality of the persons they serve. Additionally, DHCD requires that each organization keep written policies and procedures in place outlining organizational confidentiality policies. Such policies should be posted and made available to DHCD upon request.

#### **Sub-contracting Requirements**

Subrecipients chosen by DHCD are permitted to contract with other organizations to provide ESG services. Subrecipients who enter into a contract with DHCD are responsible for all ESG funding made available through that contract. Subrecipients who choose to contract with other organizations are held responsible for ensuring that funding is used in accordance with ESG rules and regulations; this includes, but is not limited to, recordkeeping and reporting requirements. Subrecipients are responsible for monitoring any and all sub ESG projects at least annually.

Subrecipients must retain copies and make available upon request:

- Procurements or solicitations for ESG funding contracted through DHCD
- Contracts, agreements, MOU's, etc. in which the subrecipient agrees to further disperse ESG funding
- Monitoring reports

#### **Record Retention**

Documentation of each household's qualification for ESG Rapid Re-Housing assistance must be retained for 5 years after the expenditure of all funds from the grant under which the household was served. Copies made by scanning, photocopying, or similar methods may be substituted for the original records.

#### **Additional Standards for Homelessness Prevention and Rapid Re-housing Programs**

The information contained within this document is largely drawn from 24 CFR 576. For further detail or clarification of ESG rules, regulations, and standards, please refer directly to HUD's Emergency Solutions Grant Interim Rule. The rule can be found at:



[https://www.hudexchange.info/resources/documents/HEARTH\\_ESGInterimRule&ConPlanConformingAmendments.pdf](https://www.hudexchange.info/resources/documents/HEARTH_ESGInterimRule&ConPlanConformingAmendments.pdf)

Much of the language and guidance within this document is verbatim from 24 CFR 576 and other HUD documents.

## Housing Opportunities for Persons with AIDS (HOPWA) Program

### MASSACHUSETTS HOPWA PROGRAM FOR FISCAL YEAR 2020

The Massachusetts Department of Public Health (MDPH) Bureau of Infectious Disease and Laboratory Sciences (BIDLS) Office of HIV/AIDS (OHA) administers HOPWA for the "balance of state." In fiscal year 2020, MDPH 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 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. This procurement included language to support the allocation of State, Ryan White Treatment Modernization Act, 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, routine programmatic and fiscal site visits,

monthly contract management calls, review of monthly client data submissions, and ongoing fiscal monitoring.

Housing Opportunities for Persons with AIDS (HOPWA) Program

The Massachusetts Department of Public Health (MDPH), Bureau of Infectious Disease and Laboratory Sciences (BIDLS), Office of HIV/AIDS (OHA) is responsible for the administration of "balance of state" HOPWA funds. In FFY 2020, the state anticipates receiving \$349,851 as a formula grantee. MDPH will use these resources to fund home-based HIV/AIDS Medical Case Management services and HIV Housing Search and Advocacy Services.

Additional information about the state's use of state HOPWA funds can be obtained by calling the Massachusetts Department of Public Health HIV/AIDS Bureau at (617) 624-5300.

Geographic Distribution of Funds for the HOPWA Programs

MDPH utilizes its resources to support the provision of Supportive Services primarily in Greater Boston, the Central Region, and the Southeast region of Massachusetts.

## Grantee SF-424's and Certification(s)

OMB Number: 43XX-4504  
Expiration Date: 12/31/2023

Application for Federal Assistance SF-424			
1. Type of Submission <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Change/Correction Application		2. Type of Application <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	
3. Form Number [Redacted]		4. Applicant Identifier [Redacted]	
5a. Federal Entry Identifier [Redacted]		5b. Federal Agency Identifier [Redacted]	
State Use Only:			
6. Data Received by State [Redacted]		7. State Application Identifier [Redacted]	
<b>B. APPLICANT INFORMATION:</b>			
8a. Legal Name Commonwealth of Massachusetts			
8b. Employer Taxpayer Identification Number (EIN/TIN) 04-1022-4		8c. Organizational DUNS 8248481620900	
<b>d. Address:</b>			
* Street: 100 Cambridge Street			
* Suite: Suite 100			
* City: Boston			
* County/Parish: Suffolk			
* State: MA; Massachusetts			
* Province:			
* Country: USA; UNITED STATES			
* Zip + Postal Code: 02114-2011			
<b>e. Organizational Unit:</b>			
Department Name Dept. Housing & Community Dev.		Division Name [Redacted]	
<b>f. Name and contact information of person to be contacted in matters involving this application:</b>			
Prefix [Redacted]		* First Name [Redacted]	
Middle Name [Redacted]		[Redacted]	
* Last Name [Redacted]		[Redacted]	
Suffix [Redacted]		[Redacted]	
Title: Community Development Manager			
Organizational Affiliation Dept. of Housing and Community Development			
* Telephone Number: 617-521-4333		* Fax Number:	
* Email: [Redacted]			

Application for Federal Assistance SF-424		
* 9. Type of Applicant 1: Select Applicant Type:		
A. State Government		
Type of Applicant 2: Select Applicant Type		
Type of Applicant 3: Select Applicant Type		
* Other (Specify):		
* 10. Name of Federal Agency:		
Dept. of Housing and Urban Development		
11. Catalog of Federal Domestic Assistance Number:		
14.376		
CFDA Title		
Community Development Block Grant (CDBG) Program		
* 12. Funding Opportunity Number:		
* Title		
13. Competition Identification Number:		
Title:		
14. Areas Affected by Project (City, County, State, etc.):		
<div>Add Attachment</div> <div>Delete All Attachments</div> <div>View Attachments</div>		
* 15. Descriptive Title of Applicant's Project:		
All Community Planning and Development 2020 One-Year Action Plan for the Commonwealth of Massachusetts' CDBG Program.		
Attach supporting documents as specified in agency instructions		
<div>Add Attachments</div> <div>Delete All Attachments</div> <div>View Attachments</div>		

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: MA-001	* b. Funding and Project: SF-001
Attach an electronic list of Program/Project Congressional Districts if needed.	
<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
17. Proposed Project:	
* a. Start Date: 04/01/2020	* b. End Date: 03/31/2021
18. Estimated Funding (\$):	
* a. Federal:	22,000,000.00
* b. Applicant:	
* c. State:	
* d. Local:	
* e. Other:	
* f. Program Income:	250,000.00
* g. TOTAL:	22,250,000.00
19. Is Application Subject To Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. The application was made available to the State under the Executive Order 12372 Process for review on:	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has no action selection by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach:	
<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
21. "By signing this application, I certify (1) to the statements contained in the list of certifications" and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances" and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1001)	
<input checked="" type="checkbox"/> I AGREE	
<small>* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.</small>	
Authorized Representative:	
Title: _____ Administrative: _____ Last Name: _____ Suffix: _____	First Name: _____ Last Name: _____
* Title: _____	
* Telephone Number: 508-551-1100	* Fax Number: _____
* Email: jennifer.n.siddons@mass.gov	
Signature of Authorized Representative:	Date Signed: 11/16/2020

# ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number 4240-0009  
Expiration Date 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0345-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutions, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 500, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4601 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title V of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-295), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-618), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd 3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.) as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Standard Form 424D (Rev. 7-87)  
Prescribed by GMB Circular A-102



1. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-345) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §275c, and 16 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-353) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 132(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (i) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190); and Executive Order (EO) 11514; (ii) notification of violating facilities pursuant to EO 11738; (iii) protection of wetlands pursuant to EO 11850; (iv) evaluation of flood hazards in floodplains in accordance with EO 11855; (v) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (vi) conformity with Federal actions in State (Clean Air) implementation Plans under Section 175(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (vii) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (viii) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133 "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 108(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL

*Jennifer Madley*

APPLICANT ORGANIZATION

Commonwealth of MA

TITLE

Undersecretary

DATE SUBMITTED

11/24/2020

GF 424D (Rev. 7-97) Back



Application for Federal Assistance SF-424			
1. Type of Submission:		2. Type of Application:	
<input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Change of Committee Application		<input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	
3. Date Received:		4. Applicant Identifier:	
[Redacted]		[Redacted]	
5a. Federal entity desired:		5b. Federal Award Identification:	
[Redacted]		[Redacted]	
State Use Only:			
6. Date Received by State:		7. State Application Identifier:	
[Redacted]		[Redacted]	
8. APPLICANT INFORMATION:			
9. Legal Name: Commonwealth of Massachusetts			
10. Employer/Corporate Identification Number (EIN):		11. Organization DUNS:	
05-54032-4		820618193000	
12. Address:			
Street 1: 600 Commonwealth Street Street 2: Suite 300 City: Boston County/Parish: Suffolk State: MA Massachusetts Province: Country: USA: UNITED STATES Zip + Postal Code: 02111-2011			
13. Organizational Unit:			
Department Name:		Division Name:	
Department of Housing & Community Development		Housing Development	
14. Name and contact information of person to be contacted on matters involving this application:			
Title: [Redacted] * First Name: [Redacted] Surname: [Redacted] Middle Name: [Redacted] Last Name: [Redacted] Office: [Redacted]			
15. Title: [Redacted]			
16. Organizational Affiliation:			
Department of Housing & Community Development			
17. Telephone Number:		18. Fax Number:	
617-725-1518		[Redacted]	
19. Email: [Redacted]			

Application for Federal Assistance SF-424	
* 8. Type of Applicant 1: Select Applicant Type: <input type="text" value="State Government"/>	
Type of Applicant 2: Select Applicant Type: <input type="text"/>	
Type of Applicant 3: Select Applicant Type: <input type="text"/>	
* Other (specify): <input type="text"/>	
* 10. Name of Federal Agency: <input type="text" value="Department of Housing and Urban Development"/>	
11. Catalog of Federal Domestic Assistance Number: <input type="text" value="14.104"/> CEFA Title: <input type="text" value="HOME Investment Stabilization Program"/>	
* 12. Funding Opportunity Number: <input type="text"/>	
* Title: <input type="text"/>	
13. Competition Identification Number: <input type="text"/> Title: <input type="text"/>	
14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/> <div> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachments"/> </div>	
* 15. Descriptive Title of Applicant's Project: <input type="text" value="HMA Community Planning and Development 2020 One-Year Action Plan for the Commonwealth of Massachusetts' HOME Program"/>	
Attach supporting documents as specified in agency instructions: <div> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachments"/> </div>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant	* b. Program/Project
Attach an additional list of Program/Project Congressional Districts if needed. <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View All Attachments"/>	
17. Proposed Project:	
* a. Start Date:	* b. End Date:
18. Estimated Funding (\$):	
* a. Federal	5,775,466.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	2,935,127.00
* g. TOTAL	8,710,593.00
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process? <input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review or <input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been reviewed by the State for review <input type="checkbox"/> c. Program is not covered by E.O. 12372	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment) <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes," provide explanation and attach: <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachments"/>	
21. By signing this application, I certify (1) to the statements contained in the list of certifications* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties (U.S. Code, Title 28, Section 1004). <input checked="" type="checkbox"/> I AGREE	
** The list of certifications and assurances is on the website where you get when this list is contained in the announcement or agency award instructions.	
Authorized Representative:	
First Name	Last Name
Middle Name	
Last Name	
Suffix	
Title	
Telephone Number	Fax Number
E-Mail	
Signature of Authorized Representative:	Date Signed

# ASSURANCES - CONSTRUCTION PROGRAMS

OMB Non-Let: 4340-0069  
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§522 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3501 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.


Previous Edition Usable

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Standard Form 424D (Rev. 7-97)  
Prescribed by OMB Circular A-102



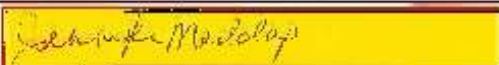
11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-845) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §275c and 16 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-353) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 152(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11852; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will ass at the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133 "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect; (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL		TITLE	
		Undersecretary	
APPLICANT ORGANIZATION		DATE SUBMITTED	
COMMONWEALTH OF MA		11/24/2020	

SI-424 (Rev. 7-97) Back

Application for Federal Assistance SF 424		
<div> <div> 1. Type of Submission: <input type="checkbox"/> Pre-application <input checked="" type="checkbox"/> Application <input type="checkbox"/> Change/Continued Application </div> <div> 2. Type of Application: <input type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision </div> <div> 3. If Box 2 on select appropriate effect(s): <input type="checkbox"/> Other (Specify): </div> </div>		
4. Date Received:		5. Applicant Identifier:
11/23/2023		
6a. Federal City Identifier:		6b. Federal Award Identifier:
State Use Only:		
7. Date Received by State:	7. State Applicant Identifier:	
8. APPLICANT INFORMATION:		
a. Legal Name: Commonwealth of Massachusetts		
b. Employer/ taxpayer Identification Number (EIN/TIN):		c. Organizational DUNS:
01-1100000		4246421600100
d. Address:		
Street:	100 Cambridge Street, Suite 300	
Street2:		
City:	Boston	
County/Parish:		
State:	MA: Massachusetts	
Province:		
Country:	USA: UNITED STATES	
ZIP/Post Code:	02114-2521	
e. Organization/Unit:		
Department Name:		Division Name:
Housing & Community Development		Housing Stabilization
f. Name and contact information of person to be contacted on matters involving this application:		
First Name:	Last Name:	First Name:
	Brennan	John
Middle Name:		
Last Name:	Brennan	
Suffix:		
Title:	BSO Contract Manager	
Organizational Affiliation:		
Dept. of Housing and Community Development		
Telephone Number:	Fax Number:	
617-573-1000	n/a	
Email: john.brennan@state.ma.gov		

Application for Federal Assistance SF-424	
<b>* 9. Type of Applicant 1: Select Applicant Type:</b> <input type="text" value="State Government"/> <b>Type of Applicant 2: Select Applicant Type</b> <input type="text"/> <b>Type of Applicant 3: Select Applicant Type</b> <input type="text"/> <b>* Other (specify):</b> <input type="text"/>	
<b>* 10. Name of Federal Agency:</b> <input type="text" value="U.S. Department of Housing &amp; Urban Development (HUD)"/>	
<b>11. Catalog of Federal Domestic Assistance Number:</b> <input type="text" value="14.241"/> <b>OPOR title:</b> <input type="text" value="Emergency Solutions Grant"/>	
<b>* 12. Funding Opportunity Number:</b> <input type="text" value=""/> <b>* Title:</b> <input type="text" value=""/>	
<b>13. Competition Identification Number:</b> <input type="text" value=""/> <b>Title:</b> <input type="text" value=""/>	
<b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b> <input type="text" value=""/> <div> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> </div>	
<b>* 15. Descriptive Title of Applicant's Project:</b> <input type="text" value="HUD Community Planning &amp; Development 2005 Consolidated Plan for the Commonwealth of Massachusetts"/>	
<b>Attach supporting documents as specified in agency instructions:</b> <div> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/> </div>	

<b>Application for Federal Assistance SF-424</b>	
<b>16. Congressional District Of</b>	
*a. Apportionment <input type="text" value="04-01"/>	*b. Program Project <input type="text" value="04-011"/>
Attach an additional list of Program/Project Congressional Districts if available: <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
<b>17. Proposed Project:</b>	
*a. Start Date <input type="text" value="04/01/2010"/>	*b. End Date <input type="text" value="03/31/2011"/>
<b>18. Estimated Funding (\$):</b>	
*a. Federal	<input type="text" value="4,777,455.00"/>
*b. Applicant	<input type="text" value=""/>
*c. State	<input type="text" value=""/>
*d. Local	<input type="text" value=""/>
*e. Other	<input type="text" value=""/>
*f. Program Income	<input type="text" value=""/>
*g. TOTAL	<input type="text" value="4,777,455.00"/>
<b>* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?</b> <input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text" value=""/> <input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review <input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372	
<b>* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in addendum.)</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes", provide explanation and attach <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
<b>21. "By signing this application, I certify (1) to the statements contained in the list of certifications" and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances" and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties (U.S. Code, Title 28, Section 1001)</b> <input checked="" type="checkbox"/> I, <input type="text" value="ARTHUR" },<br=""/> am the list of certifications and assurances, or an Internal site where you may obtain the list is contained in the correspondence of agency personnel to me.	
<b>Authorized Representative:</b>	
Prefix <input type="text" value=""/>	* First Name <input type="text" value="Arthuro"/>
Suffix <input type="text" value=""/>	
Last Name <input type="text" value="Rodriguez"/>	
Title <input type="text" value="Intersected"/>	
Telephone Number <input type="text" value="617-552-1111"/>	Fax Number <input type="text" value="617-552-1111"/>
* Email <input type="text" value="ARTHUR@intersected.com"/>	
* Signature of Authorized Representative: 	* Date Signed <input type="text" value="04/01/2010"/>



# ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0039  
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:


1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance, and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4720-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1686-1686b), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-615), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290dd-3 and 290ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Standard Form 424D (Rev. 7-97)  
Prescribed by OMB Circular A-102

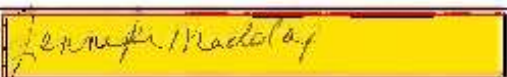
11. Will comply or has already complied, with the requirements of Titles I and II of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 1324-1328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 48 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-353) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 132(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190); and Executive Order (EO) 11814; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11980; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-323); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11590 (identification and protection of historic properties) and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§460a et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1998 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(c) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub recipient from: (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect; (2) Procuring a commercial sex act during the period of time that the award is in effect; or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Administrator
APPLICANT ORGANIZATION	DATE SUBMITTED
Commonwealth of MA	11/24/2020

OP-4240 (Rev. 7-97) Back

Application for Federal Assistance SF-424			
* 1. Type of Submission: <input type="checkbox"/> Pre-application <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	
* 3. Date Received: <div style="background-color: yellow; border: 1px solid black; padding: 2px;">01/14/2021</div>		* 4. Applicant Identifier: <div style="border: 1px solid black; height: 15px;"></div>	
5a. Federal Entity Identifier: <div style="border: 1px solid black; height: 15px;"></div>		5b. Federal Award Identifier: <div style="border: 1px solid black; height: 15px;"></div>	
State Use Only:			
6. Date Received by State: <div style="border: 1px solid black; height: 15px;"></div>		7. State Application Identifier: <div style="border: 1px solid black; height: 15px;"></div>	
<b>8. APPLICANT INFORMATION:</b>			
* a. Legal Name: <div style="border: 1px solid black; padding: 2px;">COMMONWEALTH OF MASSACHUSETTS</div>			
* b. Employer/Taxpayer Identification Number (EIN/TIN): <div style="border: 1px solid black; padding: 2px;">01-0000000</div>		* c. Organization's OUNS: <div style="border: 1px solid black; padding: 2px;">01-0000000</div>	
<b>d. Address:</b>			
* Street:	<div style="border: 1px solid black; padding: 2px;">100 Cambridge Street</div>		
* Street2:	<div style="border: 1px solid black; padding: 2px;">Suite 300</div>		
* City:	<div style="border: 1px solid black; padding: 2px;">Boston</div>		
* County/Parish:	<div style="border: 1px solid black; padding: 2px;">Suffolk</div>		
* State:	<div style="border: 1px solid black; padding: 2px;">MA: Massachusetts</div>		
* Province:	<div style="border: 1px solid black; padding: 2px;"></div>		
* Country:	<div style="border: 1px solid black; padding: 2px;">USA - UNITED STATES</div>		
* Zip/Postal Code:	<div style="border: 1px solid black; padding: 2px;">02114-2521</div>		
<b>e. Organizational Unit:</b>			
Departmental Name: <div style="border: 1px solid black; padding: 2px;">Dept. of Housing and Community Development</div>		Division Name: <div style="border: 1px solid black; padding: 2px;"></div>	
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>			
First Name:	<div style="border: 1px solid black; padding: 2px;">Diana</div>		
Last Name:	<div style="border: 1px solid black; padding: 2px;">Diana</div>		
Full Name:	<div style="border: 1px solid black; padding: 2px;">Diana Diana</div>		
Title:	<div style="border: 1px solid black; padding: 2px;">Director of Housing and Community Development</div>		
Organizational Affiliation: <div style="border: 1px solid black; padding: 2px;">Dept. of Housing and Community Development</div>			
* Telephone Number:	<div style="border: 1px solid black; padding: 2px;">(617) 725-1110</div>	* Fax Number:	<div style="border: 1px solid black; padding: 2px;"></div>
* Email:	<div style="border: 1px solid black; padding: 2px;">diana.diana@state.ma.us</div>		

Application for Federal Assistance SF-424		
* 9. Type of Applicant 1: Select Applicant Type		
As: State Government		
Type of Applicant 2: Select Applicant Type		
Type of Applicant 3: Select Applicant Type		
* Other (specify):		
* 10. Name of Federal Agency:		
Dept. of Housing and Urban Development		
11. Catalog of Federal Domestic Assistance Number:		
14-115		
CFDA Title		
Housing Trust Fund (HTF) Program		
* 12. Funding Opportunity Number:		
* Title:		
13. Competition Identification Number:		
Title:		
14. Areas Affected by Project (Cities, Counties, States, etc.):		
<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>		
* 15. Descriptive Title of Applicant's Project:		
16 Community Planning & Development 2020 Consolidated Plan for the Commonwealth of Massachusetts (COP) Program		
Add supporting documents as specified in agency instructions		
<input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>		

Application for Federal Assistance SF-424	
16. Congressional District Of:	
* a. Applicant: <input type="text" value="04-03"/>	* b. Program/Project: <input type="text" value="23-A-1"/>
Attach an additional list of Program/Project Congressional Districts if none:	
<input type="button" value="Add Attachment"/> <input type="button" value="Enter Attachment"/> <input type="button" value="View Attachment"/>	
17. Proposed Project:	
* a. Start Date: <input type="text" value="04/01/2020"/>	* b. End Date: <input type="text" value="03/31/2021"/>
18. Estimated Funding (\$):	
* a. Federal	<input type="text" value="7,630,758.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="7,630,758.00"/>
19. Is Application Subject to Review By State Under Executive Order 12872 Process?	
<input type="checkbox"/> a. This application was made available in the State under the Executive Order 12872 Process for review on <input type="text"/>	
<input type="checkbox"/> b. Program is subject to E.O. 12872 but has not been selected by the State for review	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12872	
20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes" provide explanation and attach <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
21. "By signing this application, I certify (1) to the statements contained in the list of certifications" and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances" and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1001)	
<input checked="" type="checkbox"/> I AGREE	
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.	
Authorized Representative	
Prefix	First Name Last Name
Middle Name:	
Full Name	<input type="text" value="Jennifer Madolay"/>
Suffix:	
* Title:	<input type="text" value="District Administrator"/>
Telephone Number <input type="text" value="508-747-1100"/>	Fax Number <input type="text" value="508-747-1100"/>
* Email <input type="text" value="jmadolay@mass.gov"/>	
* Signature of Authorized Representative: 	* Date Signed: <input type="text" value="4/14/2020"/>



# ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4340-0009  
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4768) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4901 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title V of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Standard Form 424D (Rev. 7-87)  
Prescribed by OMB Circular A-132

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§ 501-1506 and 7324-7329) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §§276a and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-335) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insured construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) installation of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (E.O.) 11514, (b) notification of existing facilities pursuant to E.O. 11738, (c) protection of wetlands pursuant to E.O. 11990, (d) evaluation of flood hazards in floodplains in accordance with E.O. 11985, (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§ 1601 et seq.), (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.), (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-525) and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1960, as amended (16 U.S.C. §470; E.O. 11593 (identification and protection of historic properties), and the Antiquities and Historic Preservation Act of 1974 (16 U.S.C. §§450a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133 "Audits of States, Local Governments, and Non Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub recipient from: (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect; (2) Procuring a commercial sex act during the period of time that the award is in effect; or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL

*[Signature]*

APPLICANT ORGANIZATION

Commonwealth of MA

TITLE

Undersecretary

DATE SUBMITTED


*[Signature]*

SF-424D (Rev. 7-97) Back

Application for Federal Assistance SF-424		
1. Type of Submission: <input type="checkbox"/> Pre-application <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		
2. Type of Assistance: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision		
3. If Revision, see correction leader(s): <input type="text"/>		
4. Applicant Identifier: <input type="text"/>		
5a. Federal Entry Identifier: <input type="text"/>		
5b. Federal Award Identifier: <input type="text"/>		
State Use Only: 6. Task Derived by State: <input type="text"/> 7. State Application Identifier: <input type="text"/>		
8. APPLICANT INFORMATION:		
a. Legal Name: Commonwealth of Massachusetts		
b. Employer/Taxpayer Identification Number (EIN/TIN): 045092284		c. Organizational OUN: 8248401670000
d. Address:		
Street1: 100 Cambridge Street		
Street2: Suite 300		
City: Boston		
County/Parish: Suffolk		
State: MA: Massachusetts		
Province:		
Country: USA: UNITED STATES		
ZIP/Postal Code: 02111		
e. Organizational Unit:		
Department Name: Dept. Housing & Community Dev.		Division Name: <input type="text"/>
f. Name and contact information of person to be contacted on matters involving this application:		
First Name:		Last Name:
Middle Name:		Suffix:
Title: Federal Grants Specialist		Organizational Affiliation:
Telephone Number: 617.725.8755		Fax Number:
Email: Mary.Tanguay-Federal@mass.gov		



Application for Federal Assistance SF-424		
<b>* 9. Type of Applicant 1: Select Applicant Type:</b> 9: State Government Type of Applicant 2: Select Applicant Type Type of Applicant 3: Select Applicant Type Other (specify):		
<b>* 10. Name of Federal Agency:</b> Department of Housing and Urban Development		
<b>11. Catalog of Federal Domestic Assistance Number:</b> Title: CFA Title: Housing Opportunities for Persons with AIDS (HOPWA) Program		
<b>* 12. Funding Opportunity Number:</b> Title:		
<b>13. Competition Identification Number:</b> Title:		
<b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b> Add Attachment    Delete Attachment    View Attachment		
<b>* 15. Descriptive Title of Applicant's Project:</b> HUD Community Planning & Development 2020 Consolidated Plan for the Commonwealth of Massachusetts HOPEW Program		
Attach supporting documents as specified in agency instructions. Add Attachments    Delete Attachment    View Attachment		

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: <input type="text" value="00000000"/>	* b. Program/Project: <input type="text" value="00000000"/>
Attach an additional list of Program/Project Congressional Districts, if needed. <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/>	
17. Proposed Project:	
* a. Start Date: <input type="text" value="04/01/2021"/>	* b. End Date: <input type="text" value="03/31/2021"/>
18. Estimated Funding (\$):	
* a. Federal:	<input type="text" value="149,850.00"/>
* b. Applicant:	<input type="text" value=""/>
* c. State:	<input type="text" value=""/>
* d. Local:	<input type="text" value=""/>
* e. Other:	<input type="text" value=""/>
* f. Program Income:	<input type="text" value=""/>
* g. TOTAL:	<input type="text" value="149,850.00"/>
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process? <input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on: <input type="text" value=""/> <input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been administered by the State the previous <input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes", provide explanation and attach: <input type="text" value=""/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/>	
21. "By signing this application, I certify (1) to the statements contained in the list of certifications" and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances" and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1361) <input checked="" type="checkbox"/> I AGREE * The list of certifications and assurances, on an internal site where you may obtain this list, is contained in the Announcement of Opportunity packet for this award.	
Authorized Representative:	
Profile: <input type="text" value=""/> Middle Name: <input type="text" value=""/> Last Name: <input type="text" value="Madhoo"/> Suffix: <input type="text" value=""/>	* First Name: <input type="text" value="Jai"/>
Title: <input type="text" value="Undersecretary"/>	
* Telephone Number: <input type="text" value="617-725-1111"/>	Fax Number: <input type="text" value="617-725-1100"/>
* E-mail: <input type="text" value="jai.madhoo@usdoj.gov"/>	
* Signature of Authorized Representative: 	* Date Signed: <input type="text" value="04/01/2021"/>

# ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0039  
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:


1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4729-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title V of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1686-1688), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§280 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Standard Form 121-D (Rev. 7-97)  
Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-846) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7326) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §275c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) rectification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11590; (d) evaluation of flood hazards in floodplains in accordance with EO 11990; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties) and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profits Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing the program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from: (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect; (2) Procuring a commercial sex act during the period of time that the award is in effect; or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Undersecretary
APPLICANT ORGANIZATION	DATE SUBMITTED
Commonwealth of MA	11/24/2020

SF 4240 (Rev. 7/97) Back

## STATE CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the State certifies that:

**Affirmatively Further Fair Housing** -- The State will affirmatively further fair housing.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

**Anti-Lobbying** -- To the best of the State's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraphs 1 and 2 of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

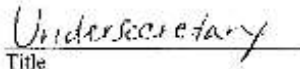
**Authority of State** -- The submission of the consolidated plan is authorized under State law and the State possesses the legal authority to carry out the programs under the consolidated plan for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** -- The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the State's consolidated plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.

  
Signature of Authorized Official

11/24/2020  
Date

  
Title



### **Specific Community Development Block Grant Certifications**

The State certifies that:

**Citizen Participation** -- It is following a detailed citizen participation plan that satisfies the requirements of 24 CFR §91.115 and each unit of general local government that receives assistance from the State is following a detailed citizen participation plan that satisfies the requirements of 24 CFR §570.486.

### **Consultation with Local Governments**

1. It has consulted with affected units of local government in the nonentitlement area of the State in determining the method of distribution of funding;
2. It engages in or will engage in planning for community development activities;
3. It provides or will provide technical assistance to units of local government in connection with community development programs; and
4. It will not refuse to distribute funds to any unit of general local government on the basis of the particular eligible activity selected by the unit of general local government to meet its community development needs, except that a State is not prevented from establishing priorities in distributing funding on the basis of the activities selected.

**Local Needs Identification** -- It will require each unit of general local government to be funded to identify its community development and housing needs, including the needs of low-income and moderate-income families, and the activities to be undertaken to meet these needs.

**Community Development Plan** -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

**Use of Funds** -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available.
2. Overall Benefit. In the aggregate, not less than 70 percent of the CDBG funds, including Section 108 guaranteed loans, received by the State during the following fiscal year(s) 2020, 2021 and 2022 [a period designated by the State of one, two, or three specific consecutive fiscal year(s)] will be used for activities that benefit persons of low and moderate income.

3. **Special Assessments.** It will not attempt to recover any capital costs of public improvements assisted with CDBG Funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

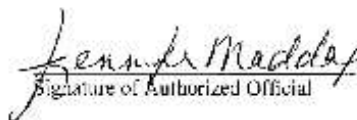
In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force --** It will require units of general local government that receive CDBG funds to certify that they have adopted and are enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

**Compliance with Anti-discrimination laws --** The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

**Compliance with Laws --** It will comply with applicable laws.

  
Signature of Authorized Official

11/24/2020  
Date

Undersecretary  
Title

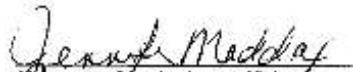
**Specific HOME Certifications**

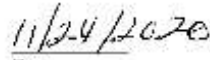
The State certifies that:

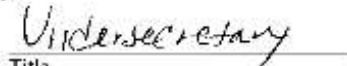
**Tenant Based Rental Assistance** -- If it plans to use HOME funds for tenant-based rental assistance, tenant-based rental assistance is an essential element of the State's consolidated plan.

**Eligible Activities and Costs** -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §92.205 through §92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

**Subsidy Layering** -- Before committing any funds to a project, the State or its recipients will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing.

  
Signature of Authorized Official

  
Date

  
Title



#### **Emergency Solutions Grant Certifications**

Each State that seeks funding under the Emergency Solutions Grants Program must provide the following certifications:

**Matching Funds** – The State will obtain any matching amounts required under 24 CFR 576.201 in a manner so that its subrecipients that are least capable of providing matching amounts receive the benefit of the exception under 24 CFR 576.201(a)(2).

**Discharge Policy** – The State will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

**Confidentiality** – The State will develop and implement procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

The State will ensure that its subrecipients comply with the following criteria:

**Major rehabilitation/conversion/renovation** – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the building will be maintained as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the building will be maintained as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion. In all other cases where ESG funds are used for renovation, the building will be maintained as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

**Essential Services and Operating Costs** – If ESG funds are used for shelter operations or essential services related to street outreach or emergency shelter, the subrecipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the applicant serves the same type of persons (e.g., families with children, unaccompanied youth, veterans, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

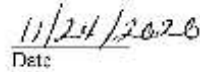
**Renovation** – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

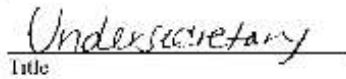
**Supportive Services** – The subrecipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for such individuals.

**Homeless Persons Involvement** – To the maximum extent practicable, the subrecipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under ESG, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted ESG.

**Consolidated Plan** – All activities the subrecipient undertakes with assistance under ESG are consistent with the State's current HUD approved consolidated plan.

  
Signature of Authorized Official

  
Date

  
Title

**Housing Opportunities for Persons With AIDS Certifications**

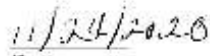
The State HOPWA grantee certifies that:

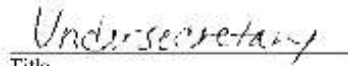
**Activities** -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

**Building** -- Any building or structure assisted under the program shall be operated for the purpose specified in the consolidated plan:

1. For a period of not less than 10 years, in the case of any building or structure purchased, leased, rehabilitated, renovated, or converted with HOPWA assistance,
2. For a period of not less than 3 years, in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

  
Signature of Authorized Official

  
Date

  
Title

## APPENDIX TO CERTIFICATIONS

### INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

#### **Lobbying Certification**

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

## Appendix - Alternate/Local Data Sources