

THE COMMONWEALTH OF MASSACHUSETTS

Draft Annual Consolidated Plan

Federal Fiscal Year 2026



Maura T. Healey, Governor

Kimberley Driscoll, Lieutenant Governor

Executive Office of Housing and Livable Communities

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Draft for public comment

Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The 2025 – 2029 Consolidated Plan identifies the housing and community development needs of Massachusetts and provides the framework for how Massachusetts intend to address and prioritize those needs over the next five years. The five-year plan and the 2026 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.

Massachusetts is expected to receive approximately \$55 million for the five programs in Federal Fiscal Year (FFY) 2026. The CDBG funds, which represent over half that amount (approximately \$34 million annually) may only be expended in the state’s “non-entitlement” communities. These are the 313 cities and towns that are not eligible to apply for community development funding directly from HUD. Thirty-eight other communities – mostly larger cities, will receive \$65 million in CDBG funds for FFY26 directly from HUD, for which they submit their own action plans. Funding under the other four programs may be allocated statewide, although EOHLC gives priority to requests from non-entitlement communities if they have priority needs and can demonstrate the ability to address them in a manner consistent with the state’s strategy.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The 2025-2029 Consolidated Plan provides the framework for the Commonwealth's continuing investment to help meet the housing and community development needs of its residents and 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 and other stakeholders in a variety of public forums, a formal public hearing, and an analysis of socioeconomic and housing market conditions.

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

The objectives of the 2025-2029 Massachusetts plan are:

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

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

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

Ninety days after the close of the state’s HUD program year (7/1 to 6/30), Massachusetts submits the Consolidated Annual Performance Evaluation Report for the programs covered by Consolidated Plan. Several non-federal efforts complement the resources available through the Plan.

The most recently submitted CAPER is found at the following link: [2024CAPER](#)

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

EOHLC 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. EOHLC is fortunate to enjoy collaborative relationships and partnerships with several organizations committed to addressing housing and community development needs in the Commonwealth. Prior to developing the 2025-2029 Consolidated Plan, and the 2026 Action Plan, EOHLC 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.

This participation and consultation takes place on an ongoing basis, not solely as a once a year event that coincides with the preparation and submission of the One-Year Action Plan. The fortunate result is a better-informed citizenry and considered Action Plans and programs.

Those ongoing efforts include but are not limited to the following, some of which go beyond the five programs included in the Consolidated Plan process but are complementary to the goals and objectives:

- ESG Individual homelessness System Virtual Teams meetings on: January 13, 2025; January 27, 2025; February 10, 2025; February 24, 2025; March 10, 2025; March 24, 2025; April 7, 2025; May 5, 2025; May 19, 2025; June 2, 2025; June 16, 2025; June 30, 2025; July 14, 2025; July 28, 2025; August 11, 2025; August 25, 2025; September 8, 2025; September 22, 2025; October 20, 2025; November 3, 2025; November 17, 2025; December 1, 2025; December 15, 2025
- Statewide Continuum of Care collaborative meetings (leads of every CoC for the purposes of coordination with one another and with ESG)on: March 5, 2025; March 12, 2025; April 9, 2025; May 14, 2025; May 21, 2025; June 11, 2025; July 9, 2025; July 16, 2025; October 22, 2025; November 19, 2025; December 10, 2025
- Winter shelter capacity listening session, August 11, 2025
- Supportive Housing Round Information Session #1, September 17, 2025, 27 participants
- Supportive Housing Round Information Session #2, September 25, 2025, 24 participants
- Winter Rental Round 2026 Pre-App Q & A with developer applicants held virtually on 11.6.2025

- CDBG, FFY 2026 Public Information Session, November 10, 2025, 41 participants
- CDBG, Quarterly “Office Hours”, February 2, 2026, 20 participants
- Winter Rental Round 2026 Application Q & As with developer applicants held virtually on 3.4.26 and 3.12.2026.
- QAP Amendment public hearing held virtually 2.10.2026
- Agency leadership engagement at CHAPA federal policy forums, 10.9.2025 and 2.25.2026

A hybrid public hearing will be held on May 19th, to provide in person and virtual opportunity for the public to comment on the FFY26 Annual Action Plan. This section will be updated once the citizen participation process has been completed.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

Pending citizen participation process

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

Pending citizen participation process

7. Summary

Pending citizen participation process

PR-05 Lead & Responsible Agencies - 91.300(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

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

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

Table 1 – Responsible Agencies

Narrative

Consolidated Plan Public Contact Information

Kathryn McNelis, Livable Communities Division, EOHLC kathryn.mcnelis@mass.gov

AP-10 Consultation - 91.110, 91.300(b); 91.315(l)

1. Introduction

EOHLC, the administering agency for the Commonwealth of Massachusetts, encourages broad citizen and stakeholder participation, especially from those low-income residents most affected by its programs. This consultation is important to the Commonwealth's ability to design and administer programs to best meet needs and serve intended beneficiaries and communities. Prior to developing the 2025-2029 Consolidated Plan and the 2026 Action Plan, EOHLC held program-specific public input meetings across each of the Annual Action Plan programs to solicit citizen and stakeholder feedback regarding housing and community development needs in their communities, and suggestions on how best to meet those needs. EOHLC also participated in other working groups, partnerships and collaborations as a matter of general operations. This Annual Action Plan was informed by the Five-Year Consolidated Plan which was also informed by the Commonwealth's recently completed 5 Year Statewide Housing Plan, undertaken per state statute by the newly constituted Housing Advisory Council prior to this effort, and extends well beyond the HUD programs and spending included herein. That initiative included 12 stakeholder and public sessions across the Commonwealth and 2 online sessions.

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

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

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

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

Massachusetts CoC continues to collaborate and find improved methods for coordination at a statewide level. As a result, mergers are frequent; there are currently 10 CoC across the Commonwealth, including the Balance of State which is led by EOHLC. As a state agency, we are invested in understanding the needs of the different regions and establishing goals and action steps that best meet the needs of the people of the Commonwealth. Specifically related to ESG funding, EOHLC connects with each CoC through one-on-one meetings, surveys, and monitoring visits (for existing ESG contracts) when applicable. EOHLC staff have been in regular communication with the CoCs about meeting the need for added temporary emergency shelter capacity, connecting highly vulnerable persons to shelter and housing; communication with local Veterans' agencies, and Executive Office of Health and Human Services (EOHHS) Youth Region Leads Staff is also ongoing. EOHLC will continue to work with local CoC to develop and improve policies around utilizing non-congregate settings for emergency shelter in response to communicable disease, winter planning, and other emergencies, rapid re-housing programming, coordinated entry, and access to permanent housing (including, but not limited to permanent supportive housing.)

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

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

2. Agencies, groups, organizations and others who participated in the process and consultations

Table 2 – Agencies, groups, organizations who participated

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

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	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. EOHLIC works closely with MHP to finance new housing, and to preserve existing affordable housing and secure long-term affordability extensions. MHP and EOHLIC also partner to provide housing-specific planning/zoning technical assistance to cities and towns to support the Commonwealth's housing / planning initiatives designed to encourage housing development.
3	Agency/Group/Organization	MassHousing
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	EOHLIC works closely with quasi-public agencies including MassHousing to finance new housing, and to preserve existing affordable housing and secure long-term affordability extensions. EOHLIC and MassHousing have also worked closely to coordinate specific roles in certain areas, with EOHLIC carrying out particular housing functions with MassHousing via contract, and vice versa, depending on which organization is better suited to do so. A recent example is the partnership forged to implement the State funds appropriated to EOHLIC for fire suppression systems in sober homes in the Commonwealth.

4	Agency/Group/Organization	CEDAC
	Agency/Group/Organization Type	Housing Services - Housing Services-Persons with Disabilities Services-Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Market Analysis Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Among other efforts, EOHLC works closely with the Community Economic Development Assistance Corporation (CEDAC), one of its primary technical assistance partners, on several fronts. One key role is to help preserve existing affordable housing and secure long-term affordability extensions. As such EOHLC meets regularly with CEDAC to assess needs, plan for and coordinate financial assistance, structure programs, and make funding awards. EOHLC and CEDAC also collaborate on other community and economic development needs assessment and program development.
5	Agency/Group/Organization	Massachusetts Technology Collaborative
	Agency/Group/Organization Type	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide
	What section of the Plan was addressed by Consultation?	Economic Development Anti-poverty Strategy Broadband Access

	<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>The Massachusetts Technology Collaborative, parent organization of the MA Broadband Initiative, is responsible for implementing the Last Mile program, which provides assistance to deliver high speed internet to residents and businesses in unserved communities. This program works in tandem with the Commonwealth network, the primary connection to internet hubs elsewhere in the Commonwealth as well as working with broadband internet service providers. That said, though EOHLC is not involved in the administration of those programs, broadband infrastructure is eligible through the MA CDBG Program, and specifically called out in the One Year Plan.</p>
6	<p>Agency/Group/Organization</p>	<p>Massachusetts Association of Community Development Corporations</p>
	<p>Agency/Group/Organization Type</p>	<p>Housing Services - Housing Services-Employment Regional organization</p>
	<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Homeless Needs - Families with children Economic Development</p>

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

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

9	Agency/Group/Organization	Regional Housing Network of Massachusetts
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-homeless Services - Victims Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Regional Housing Network is made up of nine regional organizations that can address or answer questions about all types of housing problems. Tenants, landlords, prospective buyers, and homeowners can access information designed to maximize housing stability, strengthen investments, and minimize disputes. The regional administering agencies (RAAs) administer several homeless prevention programs through contracts with EOHLC. As such EOHLC consults regularly with the organizations, defining program guidelines, problem solving, prioritizing and continually assessing need and ultimately the program design.

10	Agency/Group/Organization	MA Exec. Office of Economic Development
	Agency/Group/Organization Type	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Other government - State Grantee Department
	What section of the Plan was addressed by Consultation?	Economic Development Municipal & Community Economic Development Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	EOHLC and the Executive Office of Economic Development (EOED) collaborate to ensure community development programs offered by each agency complement one another. EOHLC is one of the several State agencies that assist EOED as it coordinates state-funded grant programs offered through the Community One Stop for Growth platform. Those programs provide a continuum of local project assistance from conception/ideation and planning through construction. The ongoing partnership and collaboration eliminate overlap and redundancy in program offerings, optimize available funding, and inform decision-making on grant awards across those programs and the community development and housing programs included in this Plan, and via other state-funded programs.
11	Agency/Group/Organization	Massachusetts Emergency Management Agency (MEMA)
	Agency/Group/Organization Type	Agency - Managing Flood Prone Areas Agency - Management of Public Land or Water Resources Agency - Emergency Management Other government - State
	What section of the Plan was addressed by Consultation?	Municipal and Community Development Needs

	<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>The Massachusetts Emergency Management Agency (MEMA) and the Executive Office of Energy and Environmental Affairs (EOEEA) serve as leads / coordinators of the ResilientMass Action Team (RMAT). EOHLA is a participant member of the RMAT, which includes representatives from each Secretariat, who are supported by agency staff, stakeholders, and subject matter experts. The ResilientMass Plan is the Commonwealth's innovative State Hazard Mitigation and Adaptation Plan, developed through engagement with state and local government agencies, subject matter experts, community focus groups, and other key stakeholders. With that input, State agencies identified initial priority actions to increase resilience and reduce the Commonwealth's risks and vulnerabilities related to natural hazards.</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	EOHLC	The goals work with one another; the priorities and funding allocation decisions are designed to optimize available funds and leverage other resources. The recent ESG procurement was co-procured with state resources to support emergency shelter, street outreach, Rapid Rehousing, Permanent Supported Housing, Triage, and Diversion, etc.
Moving to Work	EOHLC	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

Narrative

AP-12 Participation - 91.115, 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**

Pending public process

Citizen Participation Outreach

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

Table 4 – Citizen Participation Outreach

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	34,632,226.00	50,000.00	300,000.00	34,982,226.00	103,896,678.00	Funds allocated through annual application process for a variety of community determined activities.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	10,525,910.00	4,000,000.00	0.00	14,525,910.00	44,800,000.00	HOME Program Income (PI) is not precisely determinable, as our rental loans are largely deferred payment loans. HOME PI collected during each program year is estimated to be approximately \$4,000,000.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	2,047,303.00	0.00	756,772.00	2,804,075.00	6,141,909.00	It is estimated that the Massachusetts Department of Public Health (DPH) will receive \$2,047,303 as a formula grantee. DPH contracts with community-based organizations and two cities to provide services.

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	5,058,316.00	0.00	5,020,575.00	10,078,891.00	15,174,948.00	Funds used for RRH and SO projects

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HTF	public - federal	Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership	4,000,000.00	0.00	4,595,705.43	8,595,705.43	24,000,000.00	HTF allocations fluctuate based on lending activity at Freddie Mac and Fannie Mae. The expected amount to be made available over the remaining four years of the consolidated plan s based on an average award of \$8 million per year. In the past six years, the annual allocation peaked at \$18M and reached it lowest point in 2024 at \$4.2M.

Table 5 - Expected Resources – Priority Table

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

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

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

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

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

If appropriate, describe 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.

Discussion

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

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

Annual Goals and Objectives

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

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Reduce homelessness	2025	2029	Homeless			ESG: \$5,020,575.00	Tenant-based rental assistance / Rapid Rehousing: 400 Households Assisted
2	Access to housing opportunities	2025	2029	Affordable Housing			HOPWA: \$2,047,303.00	Public service activities for Low/Moderate Income Housing Benefit: 320 Households Assisted
3	Preserve and create affordable rental housing	2025	2029	Affordable Housing		Production of new rental Units Preservation of affordable rental housing	HOME: \$10,525,910.00 HTF: \$4,000,000.00	Rental units constructed: 145 Household Housing Unit Rental units rehabilitated: 13 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Promote Strong Sustainable Communities	2025	2029	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development		Community development and local priorities Rehabilitation of existing units	CDBG: \$34,632,226.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 25000 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 25 Households Assisted Public service activities other than Low/Moderate Income Housing Benefit: 25000 Persons Assisted Facade treatment/business building rehabilitation: 20 Business Rental units rehabilitated: 40 Household Housing Unit Homeowner Housing Rehabilitated: 300 Household Housing Unit Direct Financial Assistance to Homebuyers: 20 Households Assisted Homelessness Prevention: 1100 Persons Assisted Businesses assisted: 25 Businesses Assisted Housing Code Enforcement/Foreclosed Property Care: 150 Household Housing Unit

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Reduce homelessness
	Goal Description	
2	Goal Name	Access to housing opportunities
	Goal Description	
3	Goal Name	Preserve and create affordable rental housing
	Goal Description	The HTF program will preserve and create affordable rental housing for ELI individuals and families, including the creation of 50 new units and the renovation of ten existing units.
4	Goal Name	Promote Strong Sustainable Communities
	Goal Description	

AP-25 Allocation Priorities – 91.320(d)

Introduction:

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

Funding Allocation Priorities

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

Table 7 – Funding Allocation Priorities

Reason for Allocation Priorities

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

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

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

Introduction:

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

Distribution Methods

Table 8 - Distribution Methods by State Program

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

<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>The CDBG FFY2026 One-Year Action is attached to this Annual Action Plan and is posted separately on EOHLC's website where additional application materials are available.</p>
<p>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)</p>	
<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	

<p>Describe how resources will be allocated among funding categories.</p>	<p>An initial allocation of \$250,000 will be available for the Reserves component. Funds may be recaptured by or returned to EOHLC at any time during the program year, or reallocated to and from program components including the Reserves component. This may result in an increase or decrease to the initial allocation.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>All Projects funded under Reserves must meet, at a minimum, CDBG national objective and eligibility requirements, applicable rules and regulations, and project feasibility thresholds.</p>
<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>See the attached appendix for the FFY2026 CDBG Action Plan and program specifics.</p>

2	State Program Name:	Community Development Fund
	Funding Sources:	CDBG
	Describe the state program addressed by the Method of Distribution.	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.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	The Community Development Fund (CDF), representing the bulk of the state’s CDBG allocation, will be distributed through an annual competitive application process. CDF supports revitalization efforts and addresses the needs of low and moderate income residents by supporting housing as well as community and economic development activities in Massachusetts cities and towns. The funds allocation is available to all applicants though communities with higher percentage of low and moderate income persons will have an advantage. We expect to award \$24,206,638 for CDF grants.
	If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	The CDBG FFY2026 One-Year Action is attached to this Annual Action Plan and is posted separately on EOHLC's website.

<p>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)</p>	
<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	
<p>Describe how resources will be allocated among funding categories.</p>	<p>All CDBG program funds will be available to eligible grant recipients based on applications for Massachusetts Community Development Block Grant funds and/or Notices of Funding Availability that will be distributed on a regular basis. These documents will make communities aware of the requirements of each particular component and will be available to allow communities adequate time to prepare grant applications for each program. A single community may receive no more than \$1.3 million from any combination of federal FFY 2026 Community Development Fund or Mini-Entitlement grant funds. Awards not subject to the \$1.3 million cap per community include the Reserves.</p>

<p>Describe threshold factors and grant size limits.</p>	<p>See attached FFY2026 CDBG One-Year Action Plan for specifics. A single community may receive up to \$950,000 in grant funds for a single or multiple activities. Two municipalities (regional) may receive an award up to \$1,150,000 and three municipalities (regional) may receive an award up to \$1,350,000. There is a minimum grant amount of \$100,000 except \$10,000 for planning or design-only grants.</p>
<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>See the attached appendix for the FFY2026 CDBG Action Plan and program specifics.</p>
<p>3</p>	<p>State Program Name: ESG</p>
<p>Funding Sources:</p>	<p>ESG</p>
<p>Describe the state program addressed by the Method of Distribution.</p>	<p>The Emergency Solutions Grant Program (ESG) funds eligible activities designed to prevent homelessness, support basic shelter operations and provide essential rapid re-housing services for homeless individuals and families currently in the shelter system or living in a place not meant for habitation. ESG funding will be used for rapid rehousing and street outreach services.</p>

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>EOHLC currently contracts with sub-recipients to offer ESG services. A 10 year procurement was conducted in 2023.</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	
<p>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)</p>	<p>EOHLC procured our ESG funds along with state dollars geared toward Homeless Individual Shelters and homeless services. All of these funding sources were targets towards individuals without children and could renewed for up to 10 years. From this procurement ESG funds were used for RRH and Street Outreach projects. Throughout the contract period, EOHLC continues to consult with each CoC and sub-recipient about the needs of their community and their use of ESG funding.</p>

<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	
<p>Describe how resources will be allocated among funding categories.</p>	<p>All ESG funds went towards RRH and Street Outreach projects. Emergency Shelter and Homeless Prevention programs are not being funded with ESG dollars.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>The agencies providing services through ESG funding have cost-reimbursement contracts. Each agency submits monthly invoices that are reviewed and monitored by the ESG contract managers and fiscal staff. Agencies shall not exceed their grant limits as outlined in provider contract language.</p>

	What are the outcome measures expected as a result of the method of distribution?	Each contract year 400 homeless individuals will be rapidly rehoused and 1000 individuals sleeping in places not meant for habitation will be engaged and provided services
4	State Program Name:	HOME
	Funding Sources:	HOME
	Describe the state program addressed by the Method of Distribution.	EOHLC will competitively and contingently award HOME funds for Rental Loan development activities. This includes the HOME PI collected during each respective HOME program year. See HOME Annual Action Plan Appendix for additional detail.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	See HOME Annual Action Plan Appendix for detail. We also note, EOHLC will continue its past practice of seeking to competitively award HOME funds in those areas of the Commonwealth that do not receive HOME funds as a result of entitlement community or HOME consortium designation. EOHLC also will competitively award HOME funds for rental loan development projects in entitlement communities that provide a match for EOHLC administered HOME funds.

<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	
<p>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)</p>	
<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	

<p>Describe how resources will be allocated among funding categories.</p>	<p>During federal FY 2026, EOHLC anticipates the following approximate amounts will be awarded through a competitive RFP process, depending upon the level of demand in each program category:</p> <ol style="list-style-type: none"> 1. \$9,473,319.23 - rental development loan program (plus HOME Program Income as collected) 2. n/a - project-based first-time homebuyer program 3. n/a - purchaser-based first-time homebuyer program
<p>Describe threshold factors and grant size limits.</p>	<p>Typically, EOHLC will award up to \$1,000,000 to \$2,000,000 per project and up to \$100,00 per HOME-assisted unit in HOME entitlement/consortium communities. In non-entitlement or non-consortium communities, the maximum loan is up to \$200,000 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. HLC reserves the option to increase the per unit and per project amounts to align with HOME per-unit subsidy limits.</p> <p>See attached HOME Annual Action Plan Appendix for FY 2026 HOME program details.</p>
<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>EOHLC's HOME rental activities meet the HUD objective: Provide decent affordable housing. The HUD outcome for our completed activities is: Affordability.</p> <p>See attached HOME Annual Action Plan Appendix for FY 2026 HOME program specifics.</p>

5	State Program Name:	HTF
	Funding Sources:	HTF
	Describe the state program addressed by the Method of Distribution.	The National Housing Trust Fund (HTF) is a federal program to support the development of affordable housing for low-income individuals and households. In Massachusetts, we have prioritized HTF funds for projects that provide service-enriched housing and housing for homeless families and individuals. Low-income individuals often face other economic challenges beyond accessing affordable housing. These include difficulties paying for food, health care, transportation, child care and other critical expenses often leading to food insecurity, untreated medical conditions, and barriers to secure job training, education and permanent employment. Permanent supportive housing can become a firm foundation from which to address other critical economic and social challenges.

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>EOHLC accepts applications for HTF funds from qualified and experienced sponsors whose projects are highly ready to proceed. Sponsors must be non-profit entities or developers partnering with non-profit entities that receive funding for supportive services from federal sources, private foundations and/or from state agencies within the Executive Office of Health and Human Services, including the Executive Office of Aging and Independence, formerly Elder Affairs.</p> <p>Applicants must have the demonstrated capacity to develop housing and provide necessary supportive services and must be in good standing with EOHLC. Sponsors who lack experience in supportive housing are ineligible to apply.</p> <p>In general, the evaluation criteria for all applications will include, but will not be limited to, the following:</p> <ul style="list-style-type: none"> • Strength of the overall concept • Percentage of units to be reserved for homeless families or individuals • Strength of the development team • Appropriateness of the tenant selection plan • Evidence of market feasibility • Demonstrated need for the project • Degree of local support, including local funding commitments • Degree to which the project maximizes energy efficiency standards and design 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
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	<ul style="list-style-type: none"> • Geographic location • Degree to which project rents are affordable to ELI/VLI households • Minimum term of affordability: at least 30 years.
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	
<p>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)</p>	
<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	

<p>Describe how resources will be allocated among funding categories.</p>	<p>During federal FY2026, HLC anticipates awarding approximately [insert allocation amount] in HTF funds through a competitive NOFA process to rental housing projects. HLC's HTF program does not fund any homeownership activities.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>Please see attached appendix for HTF Program Details.</p>
<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>The main HUD objective will be to provide decent affordable housing. The HUD outcome for our completed activities is: Affordability. Please see attached appendix for HTF Program Details.</p>

6	State Program Name:	Massachusetts HOPWA
	Funding Sources:	HOPWA
	Describe the state program addressed by the Method of Distribution.	The Massachusetts Department of Public Health (DPH) Bureau of Infectious Disease and Laboratory Sciences (BIDLS) administers HOPWA funds for the "balance of the state".
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	DPH conducts procurement processes consistent with State requirements. Criteria for selection include, in order of importance, responsiveness to procurement requirements, experience and expertise providing services and serving relevant populations, strength of proposed service model and staffing plan, proposed budget, and use of data to inform proposals.
	If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	

<p>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)</p>	
<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>DPH awarded AIDS Project Worcester, Community Counseling of Bristol County, Commonwealth Land Trust, and Victory Programs grants to provide services during a statewide procurement which resulted in contracts that began on November 1, 2017. These contracts will end as of June 30, 2026, and DPH is procuring these services again for a contract start date of July 1, 2026. OHA anticipates that these four organizations will maintain HOPWA funding in order to sustain current service provision. On February 18, 2026, DPH issued a Notice of Intent regarding plans to provide HOPWA resources to the City of Springfield and the City of Worcester to fund services in their respective Metropolitan Statistical Areas (MSAs) as of July 1, 2026, pending receipt of sufficient funds from HUD in its federal fiscal year 2026 (FFY26) grant agreement. These MSAs are no longer eligible to receive HOPWA formula funding directly from HUD. In its FFY26 award provided to DPH, HUD plans to provide DPH with approximately the same amount of funding that HUD previously had awarded to the Springfield and Worcester MSAs. By implementing this plan, DPH intends to support the City of Springfield and the City of Worcester in preserving stability in access to services for people living with HIV in these MSAs. DPH acknowledges that either or both MSAs may become eligible for HOPWA formula grants in the future, at which time DPH will re-visit this plan.</p>

<p>Describe how resources will be allocated among funding categories.</p>	<p>Resources are allocated during each procurement process, though minor adjustments may occur during the course of a procurement period.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>Each HOPWA sponsor has a cost-reimbursement contract with DPH that specifies an annual maximum obligation that cannot be exceeded. Sponsors submit monthly invoices that are reviewed and monitored by DPH staff to assess compliance with relevant contract requirements.</p>

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

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>EOHLC expects to award up to \$8,750,000 from the FFY 2026 Mini-Entitlement Program allocation to ten (10) designated Mini-Entitlement municipalities: Amherst, Beverly, Chelsea, Gardner, Greenfield, North Adams, Southbridge, Wareham, Webster, and West Springfield. EOHLC requires Mini Entitlement communities to approach CDBG projects in a comprehensive and integrated manner and is directing these communities to target their CDBG funds to particular geographic areas in order to impact and effect change within neighborhoods.</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>The CDBG FFY2026 One-Year Action is attached to this Annual Action Plan and is posted separately on EOHLC's website.</p>
<p>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)</p>	

<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	
<p>Describe how resources will be allocated among funding categories.</p>	<p>All CDBG program funds will be available to eligible grant recipients based on applications for Massachusetts Community Development Block Grant funds and/or Notices of Funding Availability that will be distributed on a regular basis. These documents will make communities aware of the requirements of each particular component and will be available to allow communities adequate time to prepare grant applications for each program. A single community may receive no more than \$1.3 million from any combination of federal FFY 2026 Community Development Fund or Mini-Entitlement grant funds. Awards not subject to the \$1.3 million cap per community include the Reserves. Reserves awards are not subject to the cap.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>The maximum grant award is up to \$875,000. Mini-Entitlement applications will contain an 18-month implementation and cash flow plan. Mini-entitlement grantees must comply with standards for timely expenditure and available program income. FFY 2026 Mini-entitlement awards to Grantees that do not meet the required standards will be reduced by an amount necessary to bring the grantee into compliance.</p>

What are the outcome measures expected as a result of the method of distribution?	See attached appendix that includes the FFY2026 CDBG Action Plan and program specifics.
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Discussion:

AP-35 Projects – (Optional)

Introduction:

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

#	Project Name
1	2026 HOME Rental EN
2	2026 HOME Rental CR
3	HOPWA Housing Information Services - AIDS Project Worcester
4	HOPWA Housing Information Services - Community Counseling Bristol County
5	HOPWA Housing - City of Springfield
6	HOPWA Housing - City of Worcester
7	HOPWA Supportive Services - Commonwealth Land Trust
8	HOPWA Supportive Services - Victory Programs

Table 9 – Project Information

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

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

AP-38 Project Summary

Project Summary Information

1	Project Name	2026 HOME Rental EN
	Target Area	
	Goals Supported	Preserve and create affordable rental housing
	Needs Addressed	Rehabilitation of existing units Production of new rental Units
	Funding	HOME: \$7,894,432.69
	Description	The HOME rental development activities funded with EN. This will include estimated \$4mil in gross HOME PI receipts, as funds are received.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	An estimated eighty-four (84) households will benefit from proposed activities, of which approximately seven (7) households are unhoused at the time of placement.
	Location Description	We estimate that HOME rental development activities will be in various parts of the Commonwealth.
	Planned Activities	Rental development activities will be created in IDIS at the time of HOME commitment.
2	Project Name	2026 HOME Rental CR
	Target Area	
	Goals Supported	Preserve and create affordable rental housing
	Needs Addressed	Rehabilitation of existing units Production of new rental Units

	Funding	HOME: \$1,578,886.54
	Description	HOME CHDO rental development activities funded with CR.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 14 households will benefit from the proposed rental development activities.
	Location Description	We estimate that HOME rental development activities will be in various parts of the Commonwealth.
	Planned Activities	Rental development activities will be created in IDIS at the time of HOME commitment.
3	Project Name	HOPWA Housing Information Services - AIDS Project Worcester
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	:
	Description	Housing Information Services
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
4	Project Name	HOPWA Housing Information Services - Community Counseling Bristol County
	Target Area	
	Goals Supported	

	Needs Addressed	
	Funding	:
	Description	
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
5	Project Name	HOPWA Housing - City of Springfield
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	:
	Description	Permanent Housing Placement, Short-term Rent, Mortgage, and Utilities Assistance; Supportive Services; Tenant Based Rental Assistance
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
6	Project Name	HOPWA Housing - City of Worcester
	Target Area	

	Goals Supported	
	Needs Addressed	
	Funding	:
	Description	Short-term Rent, Mortgage, and Utilities Assistance; Supportive Services; Tenant Based Rental Assistance
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
7	Project Name	HOPWA Supportive Services - Commonwealth Land Trust
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	:
	Description	Case Management Services
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
	Project Name	HOPWA Supportive Services - Victory Programs

8	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	:
	Description	Housing and services
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	

AP-40 Section 108 Loan Guarantee – 91.320(k)(1)(ii)

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

Yes

Available Grant Amounts

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

Acceptance process of applications

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

applications must meet all applicable criteria outlined for economic development community grants. However, the format of any final loan application will be determined by HUD. See attached FFY2026 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

N/A

AP-50 Geographic Distribution – 91.320(f)

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

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

DPH utilizes its HOPWA resources to support service provision primarily in Greater Boston, Hampden County, Hampshire County, Worcester County, the Taunton area, and the City of Lawrence, Massachusetts. AIDS Project Worcester, Inc. is an organization in Central Massachusetts that provides a comprehensive range of services for persons living with HIV and those at risk for HIV. The City of Springfield Community Development Department manages HUD funds and will allocate HOPWA resources in Hampden County and Hampshire County. The City of Worcester Housing and Neighborhood Development office manages HUD funds, and as a HOPWA sponsor, will contract with organizations in Worcester County to implement HOPWA-funded services. 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. Commonwealth Land Trust is a non-profit organization based in Boston that owns and manages affordable housing in Greater Boston and in the city of Lawrence, Massachusetts. The agency provides on-site case management services to individuals living with HIV, substance use disorders, and/or mental health issues. Victory Programs is a multi-service organization based in Boston that provides housing and services to individuals living with HIV, substance use disorders, and/or mental health issues.

Geographic Distribution

Target Area	Percentage of Funds

Table 10 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Though Massachusetts does not specifically identify target areas, allocating a significant portion of CDBG resources toward the areas of greatest need as described above results in the greatest potential impact

of the limited funds. Allowing multiple communities to apply in a single regional application provides more impact in rural areas of the state where needs are often greater.

Discussion

Affordable Housing

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

Introduction:

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

One Year Goals for the Number of Households to be Supported	
Homeless	17
Non-Homeless	141
Special-Needs	0
Total	158

Table 11 - 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	145
Rehab of Existing Units	13
Acquisition of Existing Units	0
Total	158

Table 12 - One Year Goals for Affordable Housing by Support Type

Discussion:

HOME assisted units:

Homeless: 7

Non-homeless: 91

Total: 98

Production of new units: 95

Rehab of existing units: 3

Total: 98

We note that the HOME numbers in the table above reflect HOME-assisted units only. Typically, HOME projects have a far greater number of total units. We anticipate that the sum of HOME projects

supported in an average year under this plan will include over 315 total units.

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

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

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

Introduction:

EOHLC oversees approximately 43,400 units of state-aided public housing at 230 Local Housing Authorities (LHAs). The state provides these developments with both capital and operating subsidy, technical assistance, resident services funds, and regulatory oversight. EOHLC periodically issues competitive grant funding rounds for capital projects and resident services funding.

EOHLC has made great strides in the area of administrative efficiency and improvement. EOHLC is implementing a modernized financial management system that streamlines budget submissions by LHAs, building an enhanced vacancy management module within the CHAMP online application system, and implementing improvements to our capital management systems. Taken together, these improvements are streamlining business processes, enhancing accountability, and enabling better tracking of outcomes through improved access to data.

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

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

- Salem Lee Fort Terrace – replacing 50 units of elderly housing with 147-unit affordable development open to all ages. Project to include substantial resiliency investments to protect this coastal property from sea level rise. In construction starting summer 2024;
- Medford Walking Court - replacing 144 units of elderly housing through a Faircloth-to-Rad conversion while adding 54 additional deeply affordable units. Closing is expected in May of 2026, construction to proceed immediately afterward;
- Somerville Clarendon Hills Phase 2 - completing affordable redevelopment of 1950-built family development. Second phase will replace 71 PH units and add 21 new affordable units. Funding awarded 2024, expected closing 2026;
- Curtis Apartments Phase 2 - second of four planned phases to reposition 1950-built family development will replace 114 PH units while adding 36 units and an Economic Opportunity Center. Project is currently under construction.
- Boston Faneuil Gardens Phase 1 - The first of 5 phases to redevelop 81 existing BHA state-aided PH units and add an additional 33 affordable units. The project is currently considering adding 12 additional affordable units for a total of 126 total units. This project was funded in 2025 and is expected to close in

2027.

- Stoughton and Bridgewater Repositioning Projects - Bridgewater HA is working through construction plans to replace 12 scattered site PH units with 6 new duplexes (12 units) on vacant land at its Heritage Circle development. Stoughton HA is also replacing 7 scattered site units with 4 new duplexes (8 total units) at its Veterans development.

- EOHLC will continue to meet the complex needs of our state-aided public housing residents, which are majority elderly or non-elderly disabled. This includes funding 107 Resident Service Coordinator (RSC) awards across the state. RSCs connect residents with services they need to stabilize their tenancies, reduce social isolation, and address basic needs. Last year, RSCs made 46,526 referrals and helped 3,393 households stay in public housing and safely age in place.

EOHLC will continue its TA and funding to LHAs to reduce vacancy rates in state-aided public housing. EOHLC and its partner LHAs have reduced total units vacant at a given time by about 4.2% since summer 2023, with a 32.7% reduction in vacant units without significant capital needs. EOHLC has streamlined processes and offered additional targeted technical assistance for LHAs with high vacancy rates. The Agency has also achieved efficiencies in tenant selection via the Centralized Screening Office (CSO), with a reduction in waitlists pulled, mailings sent, and applicants screened to fill a vacancy.

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

EOHLC will continue to oversee implementation of legislation that requires every LHA in a town to have a tenant board member on the board (cities have had this requirement for many years). EOHLC also mandated an increase in tenant participation funds from \$6 to \$25 a unit, matching HUD housing. HLC provides \$100,000 to the Massachusetts Union of Public Housing Tenants (MUPHT) to provide training to tenants and help develop and support Local Tenant Organizations (LTO). HLC also provides \$100,000 to the Mel King Institute for training tenant board members. In terms of homeownership, the state Self Sufficiency Program (SSP) provides coaching to residents and allows them to escrow the value of rent increases resulting from increases in earned income. The SSP program requires residents to select goals for themselves, and some participants have been able to leverage their escrow accounts to help transition to homeownership.

If the PHA is designated as troubled, describe the manner in which financial assistance will be

provided or other assistance

N/A

Discussion:

N/A

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

Introduction

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

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

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

Addressing the emergency shelter and transitional housing needs of homeless persons

To improve access to emergency shelter, EOHLC conducted system wide procurements for emergency shelter services funded through state appropriation in 2023. These procurements resulted in increased numbers of shelter beds for both individuals and households with children. Additionally, the procurements provided funding for temporary emergency shelter in congregate and non-congregate settings in preparation for winter weather. One year after this procurement we also held Need Assessment listening sections to see what areas still need improvement. Scopes of Services are being reviewed and updated to better reflect the needs of those experiencing homelessness.

ESG and state funded street outreach services as well as state funded triage and assessment efforts were increased dramatically through these procurements, which is expected to result in more cohesive access to shelter. An increase in shelter beds and housing is still needed and will continue to be advocated for.

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

EOHLC has chosen to utilize a majority of its ESG dollars to fund Rapid Rehousing projects aimed at

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

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

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

Discussion

AP-70 HOPWA Goals – 91.320(k)(4)

One year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	81
Tenant-based rental assistance	65
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	146

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

Introduction:

Insufficient resources to meet the growing gap between the cost of creating and maintaining decent housing and the incomes of very low-income households is, of course, the primary obstacle. Lack of housing supply across the Commonwealth is also a major factor. Building new housing has become more costly and challenging in Massachusetts, making it difficult for the private market to meet the needs of moderate and middle-income residents. Some of the obstacles to production are unique to affordable housing, but many apply to housing development generally. Barriers include: high construction costs, high labor costs; high cost and scarcity of land available and zoned for multi-family housing, especially in the eastern part of the state, limited infrastructure in many communities with little incentive to improve water and sewer systems; restrictive local zoning and land use controls that severely limit multi-family uses and lengthy discretionary permitting processes; and 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 community development staff; and are reluctant to zone for residential development, especially affordable and/or multi-family housing. The ability of the State to eliminate, or even mitigate, some of these barriers is limited. For example, while materials cost roughly the same here as in other parts of the country, labor is considerably more expensive.

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

While the 351 municipalities control local zoning, MA has undertaken initiatives to help communities encourage housing development, especially affordable. The Housing Choice Initiative (HCI) provides policy levers, incentives, rewards, technical assistance, to encourage and empower municipalities to plan and zone for diverse housing stock. High housing producing communities, or those with adopted HCI best practices, can seek designation as a Housing Choice Community (HCC). HCCs have exclusive access to the Housing Choice Grant Program and bonus points or special considerations to various grants and interest rate reductions to water infrastructure loans offered by the State. From FY19-FY25 EOHLIC provided 209 awards totaling over \$32M, directly creating an estimated 1049 new housing units (564 of which were affordable) and supported over 4,660 units of existing housing while unlocking potential for thousands of future units via local policy changes. The Massachusetts legislature and EOHLIC have made it easier for communities to adopt "housing production friendly" zoning by reducing the required vote from 2/3 "supermajority" to a simple majority for certain zoning changes, more consistent with practice in most other states. HCCs have collectively produced over 77% of all housing in the Commonwealth and continue to lead the way in housing production. EOHLIC created a 5-year Statewide Housing Plan to assess state housing needs, develop strategies to solve the challenges, inform

data-driven decisions, and guide local, regional, and statewide actions that promote housing.

- The 2024 Affordable Homes Act authorizes \$5.16 billion in spending over five years along with 50 policy initiatives to counter rising housing costs. The bill includes unprecedented funding to modernize the state’s public housing stock, boosts programs to support first-time homebuyers and homeownership, and resources to build more housing for low to moderate-income residents.
- It includes policy changes to allow accessory dwelling units in all single-family zoning districts across 350 cities and towns.
- The Healey –Driscoll administration created the HousingWorks Infrastructure Program in 2023 as a flagship grant program to fund infrastructure improvements to unlock housing.
- The 2022 Starter Home Zoning Districts Act sets up a process for communities to create Starter Home Zoning Districts, where starter homes can be built and provides incentives to promote this new zoning tool.
- The 2021 MBTA Communities Law requires that 177 municipalities designated as MBTA Communities enact at least one zoning district of reasonable size in which multi-family housing is permitted as of right and meets other criteria. To date 166 (over 90%) of municipalities have adopted as of right multi-family zoning districts and we estimate that approximately 9,000 new units are in the development pipeline.

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

Discussion:

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

AP-85 Other Actions – 91.320(j)

Introduction:

Dozens of programs and activities are carried out in addition to those covered by the 2025-2029 Consolidated Plan and this 2026 Action Plan that support the state's broad housing and community development objectives. Through these programs, the Commonwealth will seek to create and preserve an adequate supply of housing; to expand homeownership; reduce homelessness; ensure that persons with special needs have access to appropriate services and accessible housing; and to enhance the prosperity and economic competitiveness of all regions, compatible with community and the environment. The recently enacted \$5.16B Affordable Homes Act provides an important resource and foundation that the programs funded are designed to complement.

Actions planned to address obstacles to meeting underserved needs

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

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

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

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

- A statewide advisory council to oversee and advise the development of a statewide housing plan every 5 years.
- Addition of inclusionary zoning ordinances and bylaws to the list of zoning changes municipalities can pass by a simple majority instead of a 2/3 super majority vote of city/town

legislative body.

Actions planned to foster and maintain affordable housing

The Housing Choice Initiative promotes a slate of housing best practices including many that are related to the production of affordable housing. In 2025 EOHLC launched Housing Choice 2.0 which included updates to best practices and continue to foster additional affordable housing producing best practice. To date the Initiative and its related Housing Choice Grant program have helped directly produce 564 units of new affordable housing while unlocking the potential for thousands of other future units through local policy changes. In the spring of 2026 HCI added a new category of “Rural and Small Town Housing Choice Communities and designated 15 municipalities for their best practices and modest housing production recognizing the challenges faced by rural communities.

Enacted in 2021, the MBTA Communities Law (M.G.L. Chapter 40A Section 3A) requires that 177 municipalities designated as MBTA Communities enact at least one zoning district of reasonable size in which multi-family housing is permitted as of right and meets other criteria. 66 of these districts have been created and added almost 9000 new permitted units to the housing production pipeline, over 1400 of which are deed restricted affordable housing units.

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

Actions planned to reduce lead-based paint hazards

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

Actions planned to reduce the number of poverty-level families

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

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

Actions planned to develop institutional structure

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

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

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

Discussion:

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

Program Specific Requirements

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

Introduction:

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

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

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

Other CDBG Requirements

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

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

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

as follows:

EOHLC's forms of HOME investment fall within 92.205.

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

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

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

n/a

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

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

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

n/a

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

n/a

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that

limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

n/a

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

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

ESG Written Standards are attached

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

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

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).
4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

N/A

5. Describe performance standards for evaluating ESG.

EOHLC expects to move 400 people per year into permanent housing through RRH and provide street outreach services to 1000 people.

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

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

Applications submitted by eligible recipients

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

N/A

3. If distributing HTF funds by selecting applications submitted by eligible recipients,

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

EOHLC accepts applications for HTF funds from qualified and experienced sponsors whose projects are highly ready to proceed. Sponsors must be non-profit entities or for-profit entities partnered with non-profit entities that receive support service funds from federal sources, private foundations or sources, from the Executive Office of Health and Human Services and/or the Executive Office of Aging and Independence, formerly named the Executive Office of Elder Affairs. Applicants must have the demonstrated capacity to develop housing and provide the necessary supportive services, and must be in good standing with HLC. Sponsors who lack experience in developing and operating supportive housing are ineligible to apply.

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

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

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

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

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

maintain successful tenancies

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

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

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

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

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

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

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

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

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

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

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

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

N/A

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

Yes

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

Yes

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

Yes

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

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

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

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

See HTF Appendix in Grantee Unique Appendices.

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

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

Rehabilitation Standards are included in the HTF FY 2026 Allocation Plan in the Grantee Unique Appendices.

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

N/A

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

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

See attached appendix for HTF Program Specifics.

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

See attached appendix for HTF Program Specifics.

Discussion:

Unique Appendices

FFY 2026 Action Plan Appendix

- CDBG One Year Annual Action Plan
-2026 Locally Held CDBG Program Income
- ESG Annual Action Plan
- HOME Annual Action Plan
- HOPWA Annual Action Plan
- HTF Annual Action Plan

Draft One Year Action Plan FFY 2026



Massachusetts Community Development Block Grant Program

Commonwealth of Massachusetts

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

Executive Office of Housing and Livable Communities

Juana B. Matias, Secretary

FFY 2026 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 Solutions Grant (ESG), Housing Trust Fund (HTF) and Housing Opportunities for People with AIDS (HOPWA) programs, and from other state and federal sources.

The preparation of this One Year Action Plan has considered and been informed by the development of the FFY 2025-2029 Five-Year Consolidated Plan. EOHLC posted a proposed changes memo on October 21, 2025, and widely disseminated to interested parties and potential stakeholders thereafter. A public information session occurred on November 10, 2025. Interested parties were encouraged to submit comments, in writing or via email, in advance of the public session and also by November 24, 2025. A formal public hearing on the annual update to the One Year Action Plan will be held on May 19, 2026.

Massachusetts CDBG

One-Year Action Plan for Federal Fiscal Year 2026

INTRODUCTION:

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

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

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

For FFY 2026 EOHLC will continue to implement HUD's Outcome Performance Measurement System. The proposed system incorporates the following three Objectives set forth in the Housing and Community Development Act of 1974: 1) create suitable living environments, 2) provide decent housing, and 3) create economic opportunities. The system directs applicants/grantees to select an Objective coupled with one of the following three Outcomes to help define the intent of the activity: 1) availability/accessibility, 2) affordability, 3) promoting livable or viable communities. Therefore, for each proposed activity the applicant will select one of nine Outcome Statements. The proposed system will not change the nature of the program or its regulations. The Massachusetts CDBG Program currently asks applicants to describe the need the activity addresses, as well as the anticipated impact. This system creates a framework that allows consistent reporting to HUD on a national level.

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

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

A. Massachusetts CDBG Priorities

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

EOHLC encourages:

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

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

number of municipalities.

B. Eligible Municipalities

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

C. Eligible Projects

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

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

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

LIMITATIONS ON THE USE OF PROGRAM FUNDS

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

❖ Public Social Services

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

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

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

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

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

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

EOHLC will fund public social service projects that are not provided by other state or federal agencies or are currently provided but are not available to CDBG-eligible residents in the applicant municipalities.

Applicants proposing projects for the modernization of public housing facilities must provide evidence that the project has been reviewed and approved as it is described in the application by staff of the Bureau of Public Housing and Construction at EOHLC.

Planning funds may not be used to plan for public social service programs except as part of a broader community development planning project.

- ❖ **Downtown/commercial target area related projects** – Municipalities may apply for funds for downtown or commercial district related projects under the Community Development Fund or the Mini Entitlement Program. Such projects may include sign/facade programs and streetscape improvements, or other infrastructure improvements located in a downtown or commercial district delineated in the slums and blight documentation. Municipalities may also apply through the Community Development Fund and Mini Entitlement Program for funds for rehabilitation or adaptive re-use of mixed-use buildings located in downtown or commercial center areas. Applicants should contact CDBG staff prior to applying for these types of projects. Funds may be used for acquisition, demolition, and building rehabilitation activities when clearly linked to economic development and jobs.

EOHLC may fund projects that support physical downtown and commercial area revitalization efforts; however, municipalities may apply to Mass CDBG for downtown/commercial target area related projects in their downtown or commercial target areas only if they have satisfactorily demonstrated to EOHLC that the proposed project is located in an area meeting National Objective compliance requirements set forth in the Application Guidance.

CDBG funds **cannot** be used to fund overhead costs or management salaries related to the operation of a downtown organization, nor can they be used for any organizational development for a downtown organization or committee.

- ❖ **15 Year Housing Affordability Term** – In an effort to increase the supply of affordable housing, all projects supporting the creation, preservation, and rehabilitation of rental and owner-occupied housing units must be affordable to low- and moderate- income households for a 15-year period. Rehabilitation assistance for owner-occupied properties must be secured by a mortgage or lien on the subject property that includes language restricting rent levels in low- and moderate- income units for a period of fifteen years. Rehabilitation assistance for investor-owned properties must be secured by a mortgage or lien, and the affordability requirements must be secured by an **Affordable Housing Restriction** [provided by EOHLC] on the subject property that runs with the land, and that includes language restricting rent levels in low- and moderate- income units for fifteen years. “Owner-occupied” is defined as a property of no more than four (4) units, one of which is occupied by the owner. All other properties are considered “investor owned.”
- ❖ **Lead Remediation up to \$25,000 as grant** – lead remediation work in the amount up to \$25,000 may be offered as a grant as part of a Housing Rehabilitation Program. The grant is based on the work write-up and cost estimate for remediation. Any lead work exceeding \$25,000 must be part of the standard lien that applies to other state sanitary code violation corrections. Please note, the grant cannot be applied to the cost of lead testing.
- ❖ **Build America Buy America requirements** – Build America, Buy America Act (BABA) Requirements under Title IX of the Infrastructure Investment and Jobs Act (“IIJA”), Pub. L. 177-58. Absent a waiver, and provided this project is receiving more than \$250,000 in total project costs from all sources, all iron and steel products, all construction materials, including metals, PVC pipe, lumber and drywall, not listed construction materials (all other plastic- and polymer-based products, glass, fiber optic cable, optical fiber, engineered wood, and drywall) and manufactured products used must be produced in the United States, as further outlined by the Office of Management and Budget’s

Memorandum M-22-11, Initial Implementation Guidance on Application of Buy America Preference in Federal Financial Assistance Programs for Infrastructure, April 18, 2022. Municipalities must include BABA language in contracts for projects and factor the requirement into the cost estimate, as applicable. More information can be found in [CPD-25-01: Implementation Guidance for BABA](#).

D. Applicant/Project Thresholds

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 1 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** –

MA CDBG requires that all lead applicants with open CDBG grants comply with a timely expenditure threshold. To apply for FFY 2026 CDBG¹ funding, a municipality must demonstrate, using the most recent financial status report produced by EOHLIC's grant management system, at the time of submission of application for FFY 2026 funds that:

1. 90% of all grant funds awarded to the municipality for FFY 2022/2023 and earlier FFYs have been fully expended;
2. 40% of all grant funds awarded to the municipality for FFY 2024 have been fully expended.

On a case-by-case basis, EOHLIC reserves the right to waive strict compliance with the threshold standards for events beyond the control of applicants, which the applicants have the burden to demonstrate. Please note, however, that for this grant round, if a municipality is less than 75% expended in the FFY21 award, a waiver will not be granted unless good cause and a plan for expenditure of funds can be demonstrated. EOHLIC is not inclined to grant a waiver unless a strong case is presented.

¹CDBG includes CDF, Mini-Entitlement, and Reserves, but for the purposes of this calculation excludes Section 108 guarantees. Planning-only grants of \$50,000 or less are also excluded from this calculation. This includes regional applicants.

Municipalities must contact their program representative to find learn how to apply for a waiver. Waiver requests should be submitted no later than February 27, 2026, otherwise, it may not be considered. EOHLC may at its discretion review waiver requests submitted after, February 27, 2026, if the municipality demonstrates good cause for not submitting its request to EOHLC by such date.

All lead applicants must meet this threshold at the time of application for all MA CDBG components. Municipalities that do not meet this threshold will be eliminated from further MA CDBG funding consideration. *Active grants* include those for which project activities have yet to be completed and payments are outstanding. *Unexpended CDBG funds* are defined as funds awarded for eligible Massachusetts CDBG program costs but not expended.

A Mini-Entitlement community that cannot meet these threshold standards may have its award amount reduced based on defined grant limitations. EOHLC also reserves the right to limit the number of activities that a Mini-Entitlement can apply for beginning with the FFY27 round if this threshold is not met for the FFY26 round.

4. **Displacement of Non-CDBG Funds** – Applicants shall certify in the application that CDBG funds will not be used to displace non-CDBG funds already appropriated by or to the community for a specific project. EOHLC will reduce an award, deny a grant, or impose special conditions in a grant contract with that community to assure compliance with this requirement.
5. **Community-Based Planning Requirement** – The Executive Office supports municipal efforts to engage in community-based planning, conduct needs assessments and identify strategies for addressing those needs. EOHLC seeks to fund projects identified through meaningful, public community-based planning and priority setting processes. Therefore, projects must be consistent with community efforts to identify needs and engage in strategic planning for addressing those needs. This helps to ensure that local needs have been identified, and priorities determined in a comprehensive manner, and public resources are directed toward projects that address needs the community has identified as high priority. All applicants and participants should have engaged in a community-based planning process and be able to demonstrate project development as a result of this process. Applicants will be asked to address community planning through responses to scored questions in the application.

Mini-Entitlement communities must have Community Development Strategies (CDS) and be able to demonstrate proposed application project's consistency with the CDS. The Strategy (not to exceed three pages) is based on various planning documents used by a community and outlines a plan of action intended to accomplish specific community development goals that will have an impact on the community. The CDS identifies the goals and objectives of community development efforts over a 3-to-5-year period and explains how the community expects to address the priorities with CDBG and non-CDBG funds.

Each activity included in a Massachusetts CDBG Mini- Entitlement application must relate to and be reflected in the Strategy. The CDS is valid for three application rounds beginning with the strategy that was submitted with the FFY 2024 application. Note: as a newly added Mini-Entitlement, Beverly must submit their first Community Development Strategy (CDS) with their FFY26 application. All other Mini-Entitlements must submit an updated CDS for the FFY27 CDBG application round:

- a. The CD Strategy must clearly identify the goals for community development and describe the way a community will accomplish projects and activities which include but are not limited to those in the CDBG Mini-Entitlement application. All activities in the CDBG Mini-Entitlement application must be identified in the Strategy.
 - b. The Strategy must conclude with a list of projects and activities in order of the priority in which the community intends to undertake them and provide specific goals and annual timelines for accomplishing its goals.
 - c. Strategies may be amended. Any substantial change to the CDS must be presented in a public municipal forum, meeting, or hearing held at least two (2) months prior to the submission of a Mass CDBG application.
6. **Outcome Performance Measurement System** – HUD issued a Final Notice on March 7, 2006, on its Outcome Performance Measurement System. Through the system HUD will collect information on activities undertaken in the following programs: HOME, CDBG, HOPWA and ESG, and aggregate that data at the national, state, and local level. The outcome measures framework contained herein will satisfy the requirements contained in the HUD notice, along with any revisions adopted by HUD.

The system incorporates the following three objectives set forth in the Housing and Community Development Act of 1974: 1) create suitable living environments, 2) provide decent housing, and 3) create economic opportunities. Beyond that, the system directs applicants/grantees to select from one of the following three outcomes to help define the intent of the activity: 1) availability/accessibility, 2) affordability, and 3) promoting livable or viable communities.

Based on the applicant's purpose for undertaking a project or activity, the applicant will determine and state in the application what the intent of the project is with one of the nine Outcome Statements.

The system will not change the nature of the program or its regulations. The Massachusetts CDBG Program currently asks applicants to describe the need the activity addresses, as well as the anticipated impact. This system creates a framework that allows consistent reporting to HUD on a national level.

Each outcome category can be connected to each of the overarching statutory objectives, resulting in a total of nine groups of outcomes/objective statements under which the grantees would report the activity or project data to document the results of their activities or projects. Each activity will provide one of the following statements, although sometimes an adjective such as new, improved, or corrective may be appropriate to refine the outcome statement.

- Accessibility for the purpose of creating suitable living environments
- Accessibility for the purpose of providing decent affordable housing
- Accessibility for the purpose of creating economic opportunities
- Affordability for the purpose of creating suitable living environments
- Affordability for the purpose of providing decent affordable housing
- Affordability for the purpose of creating economic opportunities
- Livable communities for the purpose of creating suitable living environments

- Livable communities for the purpose of providing decent affordable housing
- Livable communities for the purpose of creating economic opportunities

In addition, there are certain data elements commonly reported by all programs, although each of the four programs may require different specificity or may not require each element listed below. Grantees will only report the information required for each program, as currently required. No new reporting elements have been imposed for program activities that do not currently collect these data elements. The elements include:

- Amount of money leveraged (from other federal, state, local, and private sources) per activity;
- Number of persons, households, units, or beds assisted, as appropriate;
- Income levels of persons or households by 30 percent, 50 percent, 60 percent, or 80 percent of area median income, per applicable program requirements. However, if a CDBG activity benefits a target area, that activity will show the total number of persons served and the percentage of low/mod persons served. Note that this requirement is not applicable for economic development activities awarding funding on a “made available basis;”
- Race, ethnicity, and disability (for activities in programs that currently report these data elements)

Finally, grantees will report on several other indicators, required as applicable for each activity type. These will be established in each program component application, and within the grant management system.

HUD will combine the objectives, outcomes, and data reported for the indicators to produce outcome narratives that will be comprehensive and will demonstrate the benefits that result from the expenditure of these federal funds.

7. **Regional Applications** – Each community in a regional application must comply with the same requirements as individual municipalities in individual applications, to participate in a regional grant. For example, each participating municipality must have been identified and be part of the required public participation/hearing process and the community must submit all required signatures. **The exception to this is the timely expenditure requirements under D (3) above, which just applies to lead municipalities.** Municipalities that fail to comply will be dropped from consideration as a regional participant and the application will be reviewed based on those municipalities that have complied with the requirements. As a result, the number of participating municipalities and/or the dollar amount requested in a regional application may be reduced during the review process.

Additional threshold criteria #9 through #12 apply to specific program applications or types of projects.

8. **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.
9. **Senior Center Projects** – Applicants for Senior Center projects must meet the following threshold requirements to have their applications reviewed and scored:

- (i) provide evidence of site control² by the municipality, as attested to by the Mayor or Select Board/Board of Selectmen,
- (ii) provide documentation of the availability and commitment of any other funds necessary to complete the project, and
- (iii) provide one copy of the bid-ready plans³ prepared by a licensed architect or engineer, a table of contents for the bid specifications and a letter signed by the project architect or engineer attesting to the fact that a complete set of specifications has been prepared and is bid-ready (modular construction may require a lesser standard – see Project Threshold Criteria #12).

CDBG-assisted senior center projects may not receive subsequent CDBG assistance for additional construction or reconstruction if the work substantially disrupts the use, until five (5) years have passed since the grant closeout.

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

10. **ADA Self Evaluation Survey and Transition Plan and Architectural Barrier Removal** – All municipalities applying for CDBG funds must submit a copy of its ADA Transition Plan or provide a statement that the municipality does not have one. If a municipality does not have a current ADA Transition Plan, it will be referred to the Massachusetts Office on Disability (MOD) for execution of an MOU towards development of a Plan; all lead applicants and joint applicants that applied to 2017, 2018, 2019, 2020, 2021, 2021,2022/2023, 2024 and 2025 CDBG funding rounds have met this requirement.

A municipality applying for assistance with an architectural barrier removal (ABR) project must submit a copy of its locally approved Americans with Disabilities Act (ADA) Self Evaluation Survey and Transition plan that identifies the proposed ABR activity. If a municipality does not have an approved Transition Plan, it may not receive funding for an ABR project. The ADA was enacted in 1990 and requires local governments to evaluate for accessibility all of its programs and services that had not previously been reviewed under Section 504 of the Rehabilitation Act of 1973. The Act also required preparation of a Transition Plan for removal of programmatic and structural barriers to its programs and services and set forth a process for involving the community in the development of the Self Evaluation Survey and Transition Plan. Programmatic removal of barriers must be fully explored before considering CDBG funding for structural barrier removal. This requirement should

² 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.

³ 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.

be addressed in the application's project description for the ABR project. Submission of the Transition Plan is a required threshold for Architectural Barrier Removal applications.

It is the responsibility of each community to ensure that its Transition Plan is consistent with federal regulations. A community request for Mass CDBG funding must be consistent with the priorities set forth in these locally developed documents. Municipalities may wish to contact the Massachusetts Office on Disability or the U.S. Department of Justice for specific questions regarding the ADA and the Rehabilitation Act of 1973.

Applications for **Architectural Barrier Removal projects** with a total construction cost of \$200,000 or more require bid-ready plans and a letter signed by the project architect or engineer attesting to the fact that a complete set of specifications has been prepared and is bid-ready in each copy of the application. Projects less than \$200,000 but more than \$25,000, require design development drawings.

Finally, when used for Architectural Barrier Removal, CDBG funds may be used only for the relevant barrier removal work (i.e. -directly related and required for ABR). CDBG funds cannot be used to address building code or local requirements that are not directly part of the removal of the architectural barrier.

11. **Bid-ready Plans and Specifications** - Bid-ready plans and a letter signed by the project architect or engineer attesting to the fact that a complete set of specifications has been prepared and is bid-ready *are required* for **all public facilities (including parks/playgrounds) and architectural barrier removal projects with a construction cost of \$200,000 or more** (see definition in footnote #4). Design development drawings are required for public facilities and architectural barrier removal projects, with a total construction cost of more than \$25,000 but less than \$200,000.

In addition, EOHLC recognizes that this requirement may be problematic for municipalities considering modular construction projects. To satisfy these concerns, to apply for assistance to undertake modular construction a community may instead provide EOHLC with a reasonable cost estimate for the project. Detailed backup for the total costs for modular construction projects must include the cost of site preparation, off-site construction of the modular unit, and the cost of delivering and assembling the modular unit including all work necessary - including but not limited to all utility work and sub-trades - to result in the issuance of an occupancy permit. To accomplish this, the community must provide the following: the program for the building; plans, specs, and prices of comparable unit(s) from a manufacturer; evidence of the manufacturer's ability to deliver the unit during the timeframe for construction identified in the grant application; and a site plan.

12. **Project Consistency with Application** - All municipalities (including both CDF and Mini-Entitlements), upon award and subject to applicable clearances, should proceed with the projects that were submitted and reviewed as part of the application submission. EOHLC reserves the right to waive this requirement if there are extenuating circumstances, such as feasibility or funding issues that were discovered post-submission. EOHLC will consider the level of citizen participation and feedback from community stakeholders in determining need before approving any new proposed project. If a new activity is added to a grant, it must comply with all application requirements.

13. **Housing Rehabilitation Funds – Prior Performance -**

Applicants must provide a one-page rationale, including status update of recent HR programs⁴ if applicable, to justify requested amount. The rationale should be uploaded as an attachment to the Other Attachments link. Applicants should ensure that the amount requested does not exceed the funding required for an 18-month implementation period and that the amount of funding identified connects to an existing, defined need.

If an applicant is applying for a Housing Rehabilitation activity, EOHLC reserves the right to reduce the amount requested. EOHLC will consider the past performance in the management of state grants, including but not limited to CDBG, by the applicant community and its administering agency or project sponsor, including continuing prior performance issues such program extension requests, program amendments and requests to re- program past grant funds due to inability to complete the originally awarded activities. EOHLC may also reduce an award based on the amount of HR funds remaining in previous grants. Please note, if the municipality is less than 40% expended as reflected in GMS for their housing rehabilitation activity from a FFY22/23 CDF grant at the time the application opens, the municipality may not apply for this activity either as a lead or participating community in this application round.

⁴ The status update should be organized by grant year (if multiple years of funding remain) and include original budget, commitments, expenditures, original goals, status of projects to date, reasons for any delays in implementation, revised timeline for completion and approach to resolve if delayed.

E. Allocation of CDBG Funds to the Commonwealth

EOHLC proposes the following allocation of 2026 funds based on an agreement with HUD.

The federal Fiscal Year 2025 HUD allocation to the Commonwealth of Massachusetts was \$34,632,226. In addition to the HUD allocation, EOHLC expects to receive approximately \$50,000 in program income, for a total of \$34,682,226 available for FFY2026. These funds will be distributed during the program year to eligible cities and towns in accordance with the allocation among program components outlined below.

MA CDBG PROGRAM COMPONENT	FFY 2026 ALLOCATION
Community Development Fund	\$24,206,638
Mini-Entitlement Program	\$8,750,000
-Section 108 Loan Guarantee*	<i>\$10,000,000</i>
Reserves	\$250,000
Section 108 Loan Repayments** (No. Adams, Everett)	\$336,622
Administration and Technical Assistance	\$1,138,966
TOTAL AVAILABLE (includes \$ 34,632,226 allocation plus \$50,000 in program income)	\$34,682,226
*Section 108 Loan Program allocation does not impact the FFY 2026 Allocation **Section 108 Loan Repayments are budgeted but not necessarily required. This is an "up to" amount. Amounts not required for repayment to HUD will be reallocated to other components.	

Reallocation of funds among program components: During the year, EOHLC may have cause to recapture earlier program year funds from non-performing grantees; or there may be small amounts of program funds from prior years that have yet to be used; or there may be opportunities to recapture program income generated by municipalities from earlier projects; or there may be extreme demand for one program component; or there may be minimal demand for one component. Funds will be reallocated depending on the timing of other components and the apparent demand for funds or to address emergency situations during the program year. When awarding those funds EOHLC will use current program guidelines as established in the most recent One Year Plan. EOHLC reserves the right to increase or decrease the allocation of a program component. When these cumulative changes meet the threshold

criteria of an amendment, EOHLC will follow the process in accordance with the State’s Consolidated Plan and regulations at 24 CFR 91.505. EOHLC may also have cause to fund from any allocation or resources to respond to corrective actions after program closeouts or because of other administrative errors.

EOHLC estimates that it will receive approximately \$300,000 in funds returned from prior years activities. These funds will be allocated through the Community Development Fund. In addition, EOHLC estimates that up to \$500,000 in locally held program income will be applied to activities including housing rehabilitation and infrastructure improvements.

Prior to the award of FFY 2026 funds, EOHLC may have the opportunity to transfer program income funds from NSP grantees to the State CDBG Program. It is EOHLC’s intent to add these funds, if they become available, to the FFY 2026 allocation and make them available to FFY 2026 applicants. At this time, EOHLC does not have an estimate of the amount of funds that may become available.

F. Availability of CDBG Program Funds

All CDBG program funds will be available to eligible grant recipients based on application guidance for Massachusetts Community Development Block Grant funds and/or Notices of Funding Availability. These documents will make municipalities aware of the requirements of each component and will be available to allow municipalities adequate time to prepare grant applications for each program.

The policy that a single community may receive no more than \$1.35 million from the Community Development Fund within two successive years is waived for FFY 2026. Applicants to the FFY 2026 program will not have the two-year limitation applied based on FFY 2025 awards. EOHLC will review the policy going forward in subsequent One Year Plans.

Listed below are application distribution dates for each program and the corresponding due dates. A Notice of Availability of Funds will be issued, as appropriate, prior to the release of each Application subject to the availability of federal funds. Updates will be provided on the CDBG webpage on Mass.Gov [Community Development Block Grant \(CDBG\) | Mass.gov](#).

Program Components⁵	Application Issued	Application Deadline
Community Development	Tuesday February 17, 2026	Tuesday April 21, 2026
Mini Entitlement Program	Tuesday February 17, 2026	Tuesday April 21, 2026

⁵ The FFY 2026 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.

G. Evaluation Criteria Applicable to All CDBG Programs

EOHLC reserves the right to incorporate any or all of the following Evaluation, Regulatory and Performance criteria in its award decisions:

Evaluation:

- solicit and verify information from any local, state or federal agencies and other entities, and based on that information, reduce, increase or deny an award to a community.
- conduct site visits for any proposed CDBG project or solicit additional information from applicants to confirm or clarify factual or procedural responses to application requirements such as copies of legal advertisements, minutes, survey instruments, letters, etc. Acceptance of these materials is subject to EOHLC's satisfaction that the omitted material was in existence at the time of application and submission of the requested documents within a specified timeframe. Additional information regarding responses to competitive questions will not be accepted.
- reduce or increase an award to a community to assure that a grant budget is reasonable.
- fund, fully or partially, a project from other state resources.
- reduce or deny a grant, or place special conditions on a grant, based on the management capacity of the municipality or the current or proposed administering agency.
- reduce an award to a community with an uncommitted program income balance. The program income account balance in EOHLC's Grant Management System must be maintained to match the bank program income account statement balances. Grantees must update the program income account on a regular basis and at a minimum quarterly. Upon award, grantees must add the committed program income funds to the cited grant activity(ies) through the grant amendment process.
- resolve tie scores in a competitive fund by applying the criteria below in the following order:
 1. Applications from municipalities that have not received funding in the prior three funding cycles;
 2. Applications for projects that increase the community's supply of affordable housing units;
 3. Regional applications;
 4. Applications for housing and/or economic development projects that are consistent with the goals of the Administration; and
 5. If scores remain tied after the application of steps #1 through 4, EOHLC will conduct a lottery at which a representative from HUD will be present.

Regulatory:

- ensure that at least 70 percent of CDBG assistance, as per federal statute, is used to support projects that directly benefit low- and moderate-income persons of the Commonwealth.
- ensure that no more than 15 percent of the FFY 2026 Massachusetts CDBG allocation is for public social service activities as per federal regulation.
- deny a grant, or a portion thereof, to ensure that no more than 20 percent of the FFY 2026 Massachusetts CDBG allocation is for planning and administration as per federal regulation.
- not review an application unless signed by the municipality's Chief Elected Official.

Performance:

- reduce an award, deny a grant, or impose special conditions on a community with prior year grants with a low rate of committed or expended dollars. This includes reductions in awards for projects funded in previous rounds for which unexpended funds remain.
- reduce an award, deny a grant, or impose special conditions on a community with outstanding, major findings that are unresolved at the time application decisions are being made; or which have otherwise had a history of significant, repeat findings. These findings could have resulted from any grant program offered by EOHLC.

Major findings mean non-compliance with a statutory requirement which, if not satisfactorily resolved by the community, would require that the federal funds be repaid by the municipality, or result in other serious sanctions.

History of significant, repeat findings means non-compliance with statutory or regulatory requirements in more than one grant cycle, where the community may have resolved those findings but with an unacceptably slow response.

- consider the past performance in the management of state grants, including but not limited to CDBG, by the applicant community and its administering agency or project sponsor, including continuing prior performance issues such as program extension requests, program amendments and requests to re-program past grant funds due to inability to complete the originally awarded activities.

Awarding of Grants

Based on the scores produced through the review process, grant award recommendations are made to the Secretary of EOHLC, whose decision is final. In the competitive program, grants are awarded for projects to municipalities that receive the highest activity scores, and which meet applicable thresholds until all available funds are distributed. EOHLC reserves the right to award a grant in whole or in part, or to reject any and all proposals received.

Grievance Procedure

Within forty-five (45) days of the date of the Secretary's written notice of grant determinations to applicant cities and towns, any municipality aggrieved by EOHLC's decision may challenge the denial of its grant by submitting a letter of appeal from the Chief Elected Official of the municipality to the Secretary, who shall respond no later than forty-five (45) days from the date of receipt of the municipality's appeal.

H. Program Sanctions

EOHLC reserves the right to suspend payments under this contract or to terminate grant awards upon a finding by EOHLC, at its sole discretion 1) of any noncompliance, fraud, abuse, poor performance, misrepresentation, or extreme mismanagement, by the municipality or its subcontractors; or 2) that the municipality, or any of its subcontractors including any entities hired to perform grant management activities on its behalf, is unable to carry out its obligations under the award contract or its application. Prohibited or unauthorized expenses may be subject to requests to refund such expenses to HUD. Further, in the event that EOHLC finds that a project's budget is inadequate to fully implement any project as approved, EOHLC reserves the right to review and to either require a change in project scope to make such project fundable or to otherwise recapture the project's funds. In addition, if excess funds remain unspent from an activity prior to the end of period of performance, either due to budgetary reasons or because of less demand for the activity than projected, the Municipality must return the funds upon EOHLC's demand, unless EOHLC otherwise approves reprogramming of the awarded funds. In the event that a new activity is added to a grant, it must comply with all application requirements.

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

- Funds will be used for eligible housing activities, including, but not limited to, housing rehabilitation, aging in place programs, code enforcement and first-time homebuyer assistance
- Other existing CDBG-funded, eligible activities

If the excess funds cannot be used consistent with these preferences, EOHLC will require a detailed request describing the reprogramming and may require that the funds be returned. Requests to reprogram funds should be submitted in a timely manner and meet all application requirements. EOHLC will not be inclined to extend grants beyond a three- year period.

The community staff and Chief Elected Officials will have the opportunity to discuss possible sanctions prior to any formal action. If formal sanctions are recommended, grantees will be provided with a full opportunity to appeal such decisions to the Secretary of EOHLC before any final action is taken.

All program funds recaptured through the sanctions process will be re-programmed consistent with the procedures in (E) *Allocation of CDBG Funds* and (J) *CDBG Program Components*. Based on the significance of the issues involved in any such determination, EOHLC may suspend, for a period of up to three (3) years or until final resolution is achieved, a community's eligibility to participate in any Massachusetts CDBG component. Such action will only be taken in extreme circumstances and only after all alternatives have been exhausted.

I. Citizen Participation Requirements for Applicants and Grantees

All applicants for funding under the FFY 2026 Massachusetts CDBG Program must comply with the citizen participation requirements contained in Section 508 of the Housing and Community Development Act of 1987. EOHLC expects citizen involvement in the identification of community development needs, the development of applications, program assessment and evaluation. Municipalities must include in their Massachusetts CDBG application a local citizen participation plan detailing how the community will provide:

1. citizen participation, with particular emphasis on participation by persons of low- and moderate-income, residents of slums and blighted areas and of areas in the state where CDBG funds are proposed to be used, particularly residents of a proposed target area.
2. reasonable and timely access to local meetings, information, and records relating to the grantee's proposed use of funds and relating to the actual use of funds.
3. information on the amount of state CDBG funds available during the year; the range of eligible CDBG activities; and how activities will benefit low- and moderate-income persons.
4. technical assistance to groups representative of persons of low- and moderate-income that request such assistance in developing proposals.
5. **a minimum of 2 public hearings**, each at a different stage of the program (development and implementation), to obtain citizen views and to respond to proposals and questions at all stages of the community development program, including at *a minimum* (a) the development of needs, (b) the review of proposed activities, and (c) review of program performance. These hearings shall be held after adequate notice (minimum of 15 days, per HUD), at times and accessible locations convenient to potential or actual beneficiaries, and with accommodations for persons with disabilities, and allow for written comments to be submitted. In cases of joint applications, all applicant municipalities must be included in the notice and participate in the public hearing. At least one public hearing must be held at least 14 days prior to the submission of an application; a second must be held during the course of the grant year; both **must provide the process for the submission of written comments**;

6. a timely written answer to written complaints and grievances, within 15 business days of receipt where practical; and
7. the plan must also identify how all residents and beneficiaries, including minorities and non-English speaking persons, as well as persons with disabilities can be reasonably expected to participate in the program in general, and at public hearings in particular.

J. CDBG Program Components

This section briefly describes the components of the Massachusetts CDBG Program. Each program component description includes eligible uses, grant award amounts, and evaluation and award criteria. In the event of conflicting language, this One Year Action Plan takes precedence over language in all program component applications. The program components are:

1. Community Development Fund
2. Mini-Entitlement Program
3. Section 108 Loan Guarantees
4. Reserves
5. Administration and Technical Assistance by EOHLC

➤ **All applications to MA CDBG are submitted online and** will only be accepted using EOHLC's web-based system. Further details and training information will be available as application materials and details are released.

1. *COMMUNITY DEVELOPMENT FUND*

Program Description

The Community Development Fund (CDF) awards grants to municipalities throughout the Commonwealth. This program helps eligible cities and towns to meet a broad range of community development needs in housing, infrastructure, downtown revitalization, economic development and public social services. It supports CDBG- eligible activities and encourages applicants to develop coordinated, integrated and creative solutions to local problems. The CDF is available to all municipalities and will make all CDBG eligible activities available.

For FFY26, EOHLC expects to award approximately \$24,206,638 in CDF grant funds and approximately an additional \$300,000 in funds returned from prior year activities.

Grant Award Amounts

EOHLC proposes the following grant limits below for the FFY 2026 program.

Applicants for a CDBG grant will be eligible to receive up to the following amounts based on the type of application submitted:

Category	Minimum Grant from Competitive Round:	Maximum Grant from Competitive Round:
Single Municipality	\$ 100,000	\$950,000
Two Municipalities (Regional)	\$ 100,000	\$1,150,000
Three or More Municipalities (Regional)	\$ 100,000	\$1,350,000
Planning- or Design-only grants	\$ 10,000	-----

Requirements:

1. CDF grants are **Single Year Grants that have historically been** based on an 18-month implementation period. There will be an 18-month implementation period for the FFY 2026 grants. For FFY 2026 grants, it is anticipated that the period will be from 7/01/2026 to 12/31/2027. Municipalities **must** perform due diligence regarding all critical consultations and feasibility determinations prior to an application submission.

2. Two or more municipalities may apply **regionally**. *"Regional" is not limited to geographically contiguous cities and towns.* In order to comply with federal requirements governing such applications, each participating community would:
 - enter into an inter-local agreement that will allow a lead community to conduct grant activities within other municipalities.
 - sign the joint authorization form; and
 - demonstrate in the application how the requested funds will be allocated among all participants.

3. A community may apply in either one individual CDF application or in one regional application (including as a lead applicant), or in one of each for a maximum amount of assistance of \$1.3m per community. In addition, a municipality may not receive funds for the same activity in two different applications for the FFY 2026 round.

4. All CDBG applications must be received by EOHLIC's web-based application system by **Tuesday, April 21, 2026**, at 3:00 PM. A signed copy of the Application Cover Page must be attached in the Other Attachments link of the application. EOHLIC **does not** require a hard copy of the cover page to be submitted by mail.

Evaluation and Award Criteria

Application review and awards will be governed by the criteria and procedures as described above (Sections A through I), and the following criteria, process rules and special requirements. Additional details on evaluation criteria and the review process will be in the FFY 2026 Application Guidance.

Each criterion is described below. Please be advised that applicants must meet a minimum threshold for **Project Feasibility -- i.e., each project must appear to be feasible to undertake and complete in the 18-**

month grant period, or the other criteria will not be scored. Projects must demonstrate financial feasibility, including adequate sources available for all costs based on reasonable cost estimates and financial need. Sources and uses of funds are limited to actual documented cash/expenditures specific to the proposed project. Proposals must also demonstrate site control, major permit approval, and other information that demonstrates the project is feasible and ready to go forward upon grant award.

Project Need - requires applicants to document and describe the particular needs that will be addressed by each proposed project and the severity of those needs. Applicants will also be asked to describe community input into the determination of the needs and projects identified to satisfy the need. Project Need will be evaluated based on the documented severity of need and the impact the project will have on those needs, as well as the community's efforts to include beneficiaries and other residents in the application and project development process. EOHLC will be deducting points if the involvement of stakeholders (especially those who are low-and-moderate income) in the development of projects prior to application submission is insufficient.

Project Feasibility - requires applicants to document and describe an understanding of the permitting and project management tasks necessary for the project, the procurement processes required of the project, the status of design and site control, the availability of all necessary funds and the readiness of the project to proceed, including completeness of environmental review requirements, and completeness and reasonableness of timeline. Project Feasibility will be evaluated on the applicant's ability to demonstrate the overall readiness of the project, management capacity and the ability of the applicant to complete the project within the 18-month grant implementation period. For this round, EOHLC will not deduct points for projects that do not have bid-ready plans and specifications. However, please note, there are certain projects that have bid ready plans and specifications as a threshold requirement, such as public facilities and architectural barrier removal projects with construction costs of \$200,000 or more.

Bonus Point - For this application round there will be one bonus point awarded for applicants that did not have to submit a timely expenditure waiver by February 27, 2026.

2. MINI-ENTITLEMENT PROGRAM

Program Description

Municipalities were selected to be Mini-Entitlement communities if they met the three following criteria: (1) The percentage of low- and moderate-income residents is 40% or greater; (2) a poverty rate higher than the state average and (3) population over 12,000. This program helps larger non-entitlement urban communities with the highest needs improve conditions for their low- and moderate-income residents through comprehensive planning and predictable funding. Through this program, identified cities and towns can meet a broad range of community development needs in housing, business development, physical development, downtown revitalization, and public social services. It supports all CDBG-eligible activities and encourages applicants to develop comprehensive, creative solutions to local problems.

Mini-Entitlement communities were guaranteed an annual commitment of funds for a three-funding

cycle period that ended with FFY 2025. The Mini Entitlement program and the formula to determine communities selected for the program were re-evaluated for the FFY 2026 program. As a result of this process, Beverly now qualifies to be added to the Mini-Entitlement list. This list will be in place for the FFY 2026, 2027 and 2028 CDBG application rounds. We will recalculate for the FFY 2029 program year.

EOHLC expects to award up to \$ \$8,750,000 from the FFY 2026 Mini-Entitlement Program allocation to 10 (ten) designated Mini-Entitlement municipalities, listed below:

Amherst
Beverly
Chelsea
Gardner
Greenfield
North Adams
Southbridge
Wareham
Webster
West Springfield

EOHLC requires Mini-Entitlement communities to approach CDBG projects in a comprehensive and integrated manner and is directing these communities to target their CDBG funds to particular geographic areas in order to impact and effect change within neighborhoods. Please note, one exception beginning with the FFY26 is that Housing Rehabilitation programs may be completed throughout the municipality and no longer require a target area.

EOHLC will offer technical assistance to Mini-Entitlement communities, including planning, priority setting, and project evaluation and development.

Grant Award Amounts and Requirements

Mini-Entitlement communities are eligible for a minimum award of \$875,000 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 directly below). FFY 2026 Mini-Entitlement awards to Grantees that do not meet the required standards will be reduced by the amount necessary to bring the grantee into compliance.

Evaluation and Award Criteria

The following requirements apply to the Mini-Entitlement Program:

1. Mini-Entitlement grants are Single Year Grants that have historically been based on an 18-month implementation period. There will be an 18-month implementation period for the FFY 2026

grants. For FFY 2026 grants it is anticipated that the period will be from 7/1/2026 to 12/31/2027. Communities must perform due diligence regarding all critical consultations and feasibility determinations prior to an application submission.

2. Mini-Entitlement communities are eligible for a minimum award of \$875,000 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. FFY 2026 Mini-Entitlement awards to Grantees that do not meet the required standards will be reduced by an amount necessary to bring the grantee into compliance.
3. In accordance with the Massachusetts CDBG Priorities listed in Section A, EOHLC seeks to fund projects identified through meaningful community-based planning and priority setting processes as described in SECTION D. 6. Mini-Entitlement communities will be required to submit a Community Development Strategy with the application (refer to section D.6 for more detail)
4. Activity packets must be completed and will be scored to ensure that activities are feasible and ready to proceed at the time of the award. Activities will be scored in accordance with the project feasibility question of the application as detailed above in the CDF section. Activity packets must receive a minimum 50% score for the feasibility question. All FFY 2026 Mini-Entitlement applications must describe how CDBG funds will be allocated; include goals and performance measures for each activity; demonstrate compliance with a federal national objective and all federal/state requirements; and provide a management plan. The project packets will be reviewed for compliance with these evaluation criteria.
5. Mini-Entitlement applicants that can't comply with the timely expenditure threshold as described above will have a 2026 award reduced by the amount over the threshold.
6. All activities that are eligible under Section 105(a) of Title I of the Housing and Community Development Act of 1974, as amended, will be considered for funding except for organizational activities of downtown partnerships.
7. Mini-Entitlement communities may not join with other communities as joint applicants.
8. For FFY 2026, Mini-Entitlement Communities will submit a list of proposed activities to EOHLC within one week after the application has been made available. Applicants will provide the name of the activity, demonstration of eligibility including national objective, a brief description, proposed accomplishments and proposed budget. There will be a meeting with EOHLC to discuss this proposed list.
9. Mini-Entitlement communities may not request funding for more than three activities in addition to public social services.
10. Mini-Entitlement communities must proceed with the projects submitted in the application, subject to feasibility and grant clearance considerations. The community cannot propose a new

activity to replace an already approved activity except in limited circumstances.

- II. All Mini-Entitlement applications must be received by EOHLIC's web-based application system by no later than **Tuesday, April 21 at 3:00 PM**. A signed copy of the Application Cover Page must be attached in the Other Attachments link of the application. EOHLIC **no longer requires** a hard copy of the cover page to be submitted by mail.

3. *SECTION 108 LOAN GUARANTEES*

Section 108 Loan Guarantees allow eligible communities to access federal loan funds for the purpose of aiding revenue-producing development activities. The Massachusetts program provides communities with a source of loan financing for a specific range of community and economic development activities. Funding is provided to the community to loan to a business or other entity. The Commonwealth guarantees repayment of the HUD loan and pledges its future CDBG allocation as collateral. Actual funding will be provided through the sale of notes by the federal Department of Housing and Urban Development.

Loan Guarantees will be available to support the rehabilitation of, or conversion to, mixed-use or investor owner- residential buildings (5 or more units) located in downtown or commercial center areas. Residential projects should include mixed-income, affordable and market rate units. Housing unit rehabilitation will be limited to a maximum per unit CDBG cost of \$125,000. The entire building façade must be appropriately addressed, regardless of the portions of the building assisted. Section 108 loan assistance of \$1 million to \$5 million will be available for residential or mixed-use projects meeting these qualifications. For most housing project components, Section 108 loan funds plus all federal and state grants combined shall not exceed 75 percent of total actual project costs. Section 108 loans may also assist public facilities/infrastructure improvements that generate sufficient revenues and support downtown mixed-use or investor-owned, mixed-income residential projects.

Assistance to non-profit organizations for public services, capitalization of loan funds or business technical assistance, or direct assistance to individual businesses or other entities will also not be considered in Section 108.

This year the Commonwealth will pledge up to \$10 million in future CDBG allocations in support of these eligible activities.

Grant Award Amounts and Requirements

- The minimum award is \$1,000,000 and the maximum is \$5 million. The loan amount will not be included in the \$1 million annual limit that grantees may receive from the Commonwealth's annual CDBG allocation.
- In general, awards from the Section 108 Loan cannot exceed 40% of the total project costs. However, EOHLIC will consider guaranteeing public infrastructure projects to a percentage greater than 40% on a case-by-case basis;

- Privately owned, non-residential real estate activities where the scope exceeds exterior façade improvements must be undertaken as economic development activities and must meet CDBG underwriting criteria. These criteria limit assistance to gap financing, which may be less than the 40% program limit;

- All Section 108 applications must include evidence that the proposed project needs grant assistance to be feasible; EOHLC is willing to consider phased projects, with the caveat that the time frame for full implementation is a maximum of five years or less;
- EOHLC or HUD may disapprove applications, or approve a reduced guarantee or approve the request with conditions, such as but not limited to additional collateral and guarantees depending on the structure of the proposal; and
- Depending on the nature of the project, the community may be required to pledge its full faith and credit.

Evaluation and Award Criteria for Section 108 Applications

Applicants must contact EOHLC prior to submission of an application. A two-stage process for evaluating potential applications is in effect, consisting of a preliminary screening and a formal application. EOHLC staff will provide information on the evaluation and review process at the appropriate time. Applications will be reviewed on a first- come, first-served basis, provided that threshold criteria are met and funds are available.

Successful applicants will receive a loan from HUD, but the Commonwealth guarantees the repayment of the loan. The Commonwealth pledges its future CDBG grant funds to repay the federal government should be a non-entitlement recipient of a Section 108 Loan default. EOHLC will not pledge other collateral of the Commonwealth in support of proposals. Any additional security required by HUD must come from another source.

EOHLC will provide guidance to applicants on how to submit preliminary and formal applications. However, the format of any final loan application will be determined by HUD.

Active Section 108 Loan Activities

Everett – \$1 million Section 108 loan for roadwork (right-of-way & construction) for the Norman St./Internet Dr. intersection and entryway into the Rivers Edge (previously Telecom City) project area. The debt service for years 1-8 (FFY 2007 – 2014) is funded with a \$1.2 million Brownfield’s Economic Development Initiative (BEDI) grant.

North Adams - Massachusetts Museum of Contemporary Art (MASS MoCA): Approximate \$4.3 million loan to partially fund real estate development by the non-profit museum foundation. The \$13 million project involved rehabilitation of two buildings. This project was Phase II of the City and MASS MoCA’s revitalization plan for one of North Adams’ most distressed neighborhoods.

Loan Default

In the event of loan default, EOHLC must be prepared to repay the Section 108 loans to HUD out of the

Commonwealth's annual CDBG allocation. In addition to a pledge of future CDBG funds, collateral is provided from other sources. The possibility exists, however, that the loan defaults and will need to be repaid from the annual allocation. In FFY 2026 the potential liability, or repayment total, could be up to \$336,662 in the event of loan default.

If the loans do not default, or if there is default but the collateral is sufficient to cover the loan repayment (or a portion thereof), then EOHLC will reallocate the budgeted default amount among other program components.

Please note that EOHLC and HUD scrutinize Section 108 projects very carefully since any loan defaults are guaranteed by future CDBG funds and therefore could significantly affect availability of funds in future years.

4. RESERVES

An initial combined allocation of \$250,000 will be available for the Reserves component. Consistent with *Section E. ALLOCATION OF CDBG FUNDS TO THE COMMONWEALTH*, funds may be recaptured by or returned to EOHLC at any time during the program year or reallocated to and from program components including the Reserves component. This may result in an increase or decrease to the initial allocation.

On occasion applications, or portions thereof, that were not funded during a competitive process, including direct technical assistance to eligible communities, may be considered by the Secretary of EOHLC to be particularly worthy, innovative, or address an overarching local, regional, or statewide need. Such projects may be funded through the Reserves.

Funds may also be made available for projects throughout the program year that are consistent with Massachusetts' CDBG priorities, as outlined in *Section A.*, particularly those that address the Administration's goals of developing and/or preserving affordable workforce housing opportunities, infrastructure improvements in support of the development of new housing and projects that seek to return vacant and blighted properties to a viable use.

The application materials for Reserves will provide guidance to potential grantees on how to structure their applications. EOHLC's interest in providing Reserve's funding for projects will be determined by a review of the proposed project to determine consistency with the goals and priorities cited above and that the activity is eligible, feasible and ready to proceed. Once complete, applications will be funded in the order in which they are received.

All Projects funded under Reserves must meet, at a minimum, CDBG national objective and eligibility requirements, applicable rules and regulations, and project feasibility thresholds. Please contact Chris Kluchman, Director of the Livable Communities Division, at chris.kluchman@mass.gov with any inquiries about Reserves.

5. ADMINISTRATION AND TECHNICAL ASSISTANCE BY EOHLC

The Commonwealth of Massachusetts uses CDBG funds for administrative and technical assistance costs incurred by EOHLC during the operation of the Massachusetts CDBG Program. As allowed by the federal statute, this amount will equal three percent (3%) of the entire annual grant allocation, plus \$100,000.

Direct technical assistance will be provided to eligible municipalities for guidance relating to housing, economic development, including downtown revitalization, community development strategy and plan preparation and use, technical assistance training for non-entitlement communities, and additional assistance determined necessary during the program year.

During this fiscal year EOHLC will continue to support and upgrade its software and reporting systems.

In addition, two percent (2%) of program income generated by state CDBG grantees shall be returned to the MA CDBG Program on a bi-annual basis.

A review of all users accessing EOHLC program grant management systems shall be conducted annually to determine the accuracy of user access designations. If necessary, action shall be taken to change, revoke, or grant user access to reflect the appropriate designation.

ONE-YEAR ACTION PLAN FOR FEDERAL FISCAL YEAR 2026 EXHIBITS

1. LIST OF ENTITLEMENT COMMUNITIES IN MASSACHUSETTS
2. MUNICIPAL ELIGIBILITY TO APPLY TO COMMUNITY DEVELOPMENT FUND (CDF) IN FFY 2026

EXHIBIT 1

LIST OF ENTITLEMENT COMMUNITIES IN MASSACHUSETTS

as of Federal Fiscal Year 2026

ARLINGTON	MALDEN
ATTLEBORO	MEDFORD
BARNSTABLE	NEW BEDFORD
BOSTON	NEWTON
BROCKTON	NORTHAMPTON
BROOKLINE	PEABODY
CAMBRIDGE	PITTSFIELD
CHICOPEE	PLYMOUTH
EVERETT	
FALL RIVER	QUINCY
FITCHBURG	REVERE
FRAMINGHAM	SALEM
GLOUCESTER	SOMERVILLE
HAVERHILL	SPRINGFIELD
HOLYOKE	TAUNTON
LAWRENCE	WALTHAM
LEOMINSTER	WESTFIELD
LOWELL	WEYMOUTH
LYNN	WORCESTER
	YARMOUTH

EXHIBIT 2

MUNICIPAL ELIGIBILITY TO APPLY FOR CDBG PROGRAM FUNDS IN FFY 2026

Historically, a single Community Development Fund community may receive no more than \$1.35 million from two successive years. This limit was waived for the FFY 2025 program and EOHLC is waiving it again for the FFY 2026 program. As a result, applicants to the FFY 2026 program will not be limited by FFY 2025 awards.

Locally Held CDBG Program Income
FFY 2026 One Year Action Plan

Program Income to be included in Final Plan with most current data.

Emergency Solutions Grant (ESG) Program One Year Plan

HLC plans to use MA non-entitlement Emergency Solutions Grant to fund projects procured in 2023 designed to provide Rapid Rehousing services and Street Outreach essential services to homeless individuals across the Commonwealth.

Proposed Activities and Overall Budget

Current awarded grant funded allocations to be:

Component	Planned Allocation
Street Outreach	\$1,264,579.00
Emergency Shelter Operations	\$0
Rapid Rehousing	\$3,414,363.30
Homeless Prevention	\$0
Admin (split between recipient and subrecipients)	\$379,373.70
Emergency Solutions Grant FFY26	\$5,058,316.00

Written Standards

HLC, with support through HUD assigned technical assistance has implemented the following standards entitled [“Written Standards and Policies and Procedures for ESG”](#). Please see the link to review them.

HLC requires all ESG respondents to clearly demonstrate how the project supports HUD’s overall vision for the Emergency Solutions Grant program. Rather than utilizing ESG funding to create separate or distinct programs, HLC and subrecipients will think strategically about how ESG funding can be leveraged with other co- procured state resources for shelter, street outreach and rapid rehousing. This strategy is intended to ensure that all projects receiving ESG resources, regardless of component, will be part of a larger network of integrated homeless services.

Match

HLC expects to utilize state funding for emergency shelter for individuals as a match.

The MA GAA (budget) shall allocate not less than \$113,327,398 to HLC for Homeless Individual Emergency Shelters, Rapid Rehousing and other programming. HLC will match our ESG allocation with \$5,058,316.00 of these resources which support approximately 2400 individual shelter beds with HLC funds.

Homeless Facilities Funded with ESG

Awards are based on responses from this [procurement](#).

Agency	Program Name	Component
Action, Inc.	AI - ESG RRH	RRH
Catholic Charities Diocese of Fall River	DHCD GB CATCH RRH	RRH
Catholic Charities Diocese of Fall River	DHCD Fall River RRH	RRH
Center for Human Development, Inc.	Outreach	Outreach
Center for Human Development, Inc.	CHD ESG Outreach	Outreach
Clinical and Support Options, Inc.	STAT ESG RRH	RRH
Clinical and Support Options, Inc.	STATE ESG RRH	RRH
Father Bill's & MainSpring, Inc.	Brockton Street Outreach	Outreach
Father Bill's & MainSpring, Inc.	Plymouth Street Outreach	Outreach
Father Bill's & MainSpring, Inc.	Warham Street Outreach	Outreach
Father Bill's & MainSpring, Inc.	Quincy-Weymouth Street Outreach	Outreach
Greater Lawrence Community Action	Housing 60	RRH
HomeStart, Inc.	DHCD ESG RRH	RRH
Lynn Shelter Association, Inc.	LSA ESG Street Outreach	Outreach
Pine Street Inn, Inc.	OPHP - RRHHI	RRH
Pine Street Inn, Inc.	OPHP - Housing Engagement Center	RRH
Respond, Inc.	RESPOND- *ESG RRH	RRH
ServiceNet, Inc.	ServiceNet Outreach	Outreach
Somerville Homeless Coalition	SHC - DHCD ESG Rapid Rehousing	RRH
Somerville Homeless Coalition	SHC - Somerville ESG Street Outreach	Outreach
South Middlesex Opportunity Council, Inc.	SMOC - ESG Street Outreach	Outreach
South Middlesex Opportunity Council, Inc.	Worcester Street Outreach	Outreach
Steppingstone Inc.	Steppingstone DHCD Street Outreach Program	Outreach
The Psychological Center, Inc.	TPCI - Street Outreach	Outreach

Written Standards and Policies and Procedures for ESG and CoC Funded Programs January 2026*

**Commonwealth of Massachusetts
Executive Office of Housing and Livable Communities,
Division of Housing Stabilization (*Updated June '23)**

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INTRODUCTION

The Executive Office of Housing and Livable Communities (EOHLC), the ESG recipient for the Commonwealth of Massachusetts, along with the Massachusetts Balance of State CoC, have developed the following written standards, which are applicable to all rapid re-housing projects that receive Continuum of Care (CoC) or Emergency Solutions Grant (ESG) funds, as well as other EOHLC ESG-funded programs. These written standards are intended to set basic, minimum requirements. Providers are permitted to build upon these expectations and establish more specific standards applicable to their own projects, so long as those standards are informed by equity and maintain a Housing First philosophy. Projects remain bound by the terms of the programs under which they are funded and nothing in these standards should be construed to relieve projects of this responsibility. In addition, all rapid re-housing projects must comply with the applicable Notice of Funding Availability (NOFA) under which the project was originally awarded.

The goal of these standards is to synthesize key regulatory elements with the processes and priorities of EOHLC and to ensure that rapid re-housing and homelessness prevention projects are administered fairly and methodically. Note that rapid re-housing programs are subject to differing requirements, depending upon the funding source of the program, and this document points out the details of these programmatic differences. EOHLC will continue to build upon and refine this document through regular, publicly released updates.

STATE CONTACTS

Name	Contact	Title
Tyler McEachron	tyler.mceachron@mass.gov	ESG Contract Manager
Gordon Calkins	gordon.calkins@mass.gov	Director of Individual Homelessness
Karen Byron	karen.byron@mass.gov	Balance of State CoC Supervisor

EXTERNAL COMMUNICATIONS

It is important to Map out communication channels with external parties. Much of the routine communications has been mapped out in the processes above, but situations arise that require communication that are not delineated above.

External Party	Reason for Communication	Primary Communicator	Back-up / Communicator
Subrecipient / Provider	PVs or Contracts	ESG Contract Manager	Director of Individual Homelessness

HUD	Reporting, Grants	ESG Contract Manager	Director of Individual Homelessness
State Agency Partner	All	ESG Contract Manager	Director of Individual Homelessness

*Communications may be delegated by the Primary Communicator in specific situations.

PREFACE: GLOSSARY OF TERMS USED IN THIS DOCUMENT

Coordinated Entry

Coordinated entry is a process developed to ensure that all people experiencing a housing crisis have fair and equal access and are quickly identified, assessed for, referred, and connected to housing and assistance based on their strengths and needs.

Family

Family is any self-identified family unit regardless of marital status, actual or perceived sexual orientation, or gender identity, any group of persons presenting for assistance together with or without children and irrespective of age, relationship, or whether or not a member of the household has a disability. A child who is temporarily away from the home because of placement in foster care is considered a member of the family. Section 576.102(b) of the ESG interim rule prohibits ESG-funded programs from denying a family admission to an ESG-funded program or ESG-funded services based on the age of a child under the age of 18 if the program provides services to families with children. Similar requirements for CoC programs can be found in Section 578.93(e) of the CoC Program Interim Rule.

Homelessness Prevention

Homelessness Prevention refers to activities designed to keep households that are at-risk of losing their housing from becoming homeless. Homelessness prevention services include housing relocation and stabilization services and/or short- and/or medium-term rental assistance as necessary to prevent the individual or family from moving to an emergency shelter, a place not meant for human habitation, or another place described in “category one” (literally homeless) of the homeless definition. It is most efficiently implemented when targeted to those at greatest risk of losing housing. Refer to the Documentation and Recordkeeping section of this document for the at-risk definition, and documentation requirements.

Household Types

HUD categorizes households into three separate groups regardless of marital status, actual or perceived sexual orientation, or gender identity and irrespective of age or relationship.

1. Household without Children
2. Household with Adults and Children
3. Household with ONLY Children

Housing First

Housing First emerged as an alternative to the linear approach in which people experiencing homelessness were required to first participate in and graduate from short-term residential and treatment programs before obtaining permanent housing. In the linear approach, permanent housing was offered only after a person experiencing homelessness could demonstrate that they were “ready” for housing. By contrast, Housing First is premised on the following principles:

- Homelessness is first and foremost a housing crisis and can be addressed through the provision of safe and affordable housing.
- All people experiencing homelessness, regardless of their housing history and duration of homelessness, can achieve housing stability in permanent housing. Some may need very little support for a brief period of time, while others may need more intensive and long-term supports.
- Everyone is “housing ready”, regardless of drug or alcohol use, compliance in behavioral health treatment, or criminal history. Homelessness programs and housing providers must be “consumer ready.”
- Many people experience improvements in quality of life as a result of obtaining housing.
- People experiencing homelessness have the right to self-determination and should be treated with dignity and respect.
- The exact configuration of housing and services depends upon the needs and preferences of the individual household.

Permanent Housing

Permanent housing is community-based housing without a designated length of stay and can include permanent supportive housing and rapid re-housing.

Progressive Engagement

Progressive Engagement is a service approach to helping households end their homelessness as rapidly as possible, despite barriers, with minimal financial and support resources. More supports are offered to those households who struggle to stabilize and cannot maintain their housing without assistance.

Rapid Re-Housing

Rapid Re-Housing is a short-term intervention to help individuals and families exit homelessness as quickly as possible, move into permanent housing, and achieve stability in housing. Refer to the Documentation and Recordkeeping section of this document for detailed rapid re-housing program eligibility. To be defined as rapid re-housing, a project must be comprised of the following three core components: housing identification assistance, financial assistance, and case management and supportive services. High quality rapid re-housing programs help increase the number of people communities can serve by reducing the length of shelter stays, which frees up crisis beds for others in need, reduces the negative impacts of

long-term homelessness, and connects people to other community assistance to improve overall well-being and increase self-sufficiency.

Rent Reasonableness and Fair Market Rent (FMR)

Rental assistance cannot be provided for a housing unit unless total rent for the unit is at or under the fair market rent (FMR) established by HUD, as provided under 24 CFR 982.503. The total rent for the unit must also comply with HUD's standard of rent reasonableness, as established under 24 CFR 982.507. These rent restrictions are intended to ensure that program participants can remain in their housing after their assistance ends. In many areas, the easiest way to determine rent reasonableness is to use a housing database search engine that will compare units and rents against one another. Other local resources may also be used to obtain information, such as market surveys, classified ads, and information from real estate agents. When comparing rent reasonableness, the proposed unit must be compared to three other units. Rent reasonableness and FMR requirements do not apply when a program participant receives only financial assistance or services under Housing Stabilization and Relocation Services. This includes rental application fees, security deposits, an initial payment of last month's rent, utility payments/deposits, moving costs, housing search and placement, housing stability case management, landlord-tenant mediation, legal services, credit repair. Note that this guidance only applies to ESG homelessness prevention and rapid re-housing. For CoC rapid re-housing, rent reasonableness applies, but FMR does not. Please consult the following [HUD Exchange resource](#) for more information.

Recipient

EOHLC, the ESG recipient for the Commonwealth of Massachusetts.

Provider/ Subrecipient

A local government or private nonprofit organization to which the recipient, EOHLC, awards ESG grant funds. **For the purposes of this document, the term provider refers to any agency administering rapid re-housing or homelessness prevention, regardless of funding source.**

Sub-provider

For the purposes of this manual and guidance, when providers enter into formal partnerships with another agency to provide some or all of the services identified in the project application, the partner agency is referred to as a Sub-provider. For sub-provider relationships, all required processes, policies and documentation outlined here are still required. Because the provider is responsible for ensuring adherence to program rules, providers are encouraged to clearly outline responsibilities via MOU or other written documentation for all partnerships. Sub-provider partnerships must be reviewed and approved by EOHLC.

Trauma Informed Care

A trauma-informed approach begins with understanding the physical, social, and emotional impact of trauma on the individual, as well as on the professionals who partner with them. It incorporates three elements: 1. Realizing the prevalence of trauma. 2. Recognizing how trauma affects all individuals involved with the program, organization, or system, including its own workforce. 3. Responding by putting this knowledge into practice. Because homelessness and the threat of becoming homeless can be a crisis of major significance, stabilizing a person in housing requires case managers who understand the impact of trauma and stress on participants' emotional, behavioral, and cognitive capacity. Until the housing crisis is resolved and the participant's stress is decreased, case managers should support the household in setting short-term, achievable, and appropriate goals instead of focusing on longer-term goals. While many of these symptoms of stress will subside once the crisis is resolved, the case manager must be skilled at assessing participants' various and changing levels of ability to carry out goals and action steps. The case manager should focus on the essential steps required to end the housing crisis.

Victim Service Provider

A victim service provider is a private nonprofit organization whose primary mission is to provide direct services to victims of domestic violence, dating violence, sexual assault, or stalking. This term includes permanent housing providers—including rapid re-housing, as well as other domestic violence programs and related advocacy and supportive services programs.

EOHLC PROGRAM BACKGROUND, PURPOSE AND PHILOSOPHY

The US Department of Housing and Urban Development (HUD), via its Emergency Solutions Grant Rules and Regulations (ESG) and the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Continuum of Care Program Interim Rules, requires that Continuum of Care (CoC) establish and consistently follow written standards for providing CoC and ESG assistance. The Commonwealth of Massachusetts, through the Department of Housing and Community Development, has developed these Program Standards to help fulfill these requirements and to support HUD's goal of reducing and ending homelessness across the United States. In addition to meeting federal requirements, these standards will also help ensure more consistent use of best practices and help to standardize program design and implementation of our rapid re-housing projects across the statewide homeless response system. This manual is intended to provide both written standards and further clarify policies and procedures that inform service expectations for EOHLC providers.

PROGRAM ELIGIBILITY (SEE RECORDKEEPING SECTION FOR NECESSARY DOCUMENTATION PROCEDURES)

It is the responsibility of the provider to confirm and document eligibility for ESG and CoC programs prior to providing services. The recordkeeping section of this manual further outlines documentation expectations.

Component	Serving	
	Literally Homeless Individuals and Families	Homeless Individuals and Families at Risk of Homelessness
Street Outreach	X	
Emergency Shelter	X	
Rapid Rehousing	X	
Homeless Prevention		X
Permanent Supportive Housing	X	X
TH-RRH Component Projects	X	
Transitional Housing	X	

Street Outreach

To receive ESG funded emergency shelter services, participants must meet paragraph 1 of the [HUD definition for homelessness](#).

Emergency Shelter

To receive ESG funded emergency shelter services, participants must meet paragraph 1 of the [HUD definition for homelessness](#).

Rapid Re-housing

To receive ESG or CoC funded rapid re-housing services, participants must meet paragraph 1 of the [HUD definition for homelessness](#). May also qualify under Category 4 if living in emergency shelter or other place described in Category 1 of the HUD homeless definition.

Homelessness Prevention

To receive ESG funded homelessness prevention services, participants must meet the criteria under the “at risk of homelessness” definition, or meet the criteria in paragraph (2), (3), or (4) of the “homeless” definition in 24 CFR §576.2 **and** have an annual income below 30 percent of median family income for the area, as determined by HUD and found [here](#). Costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant's current permanent housing or move into other permanent housing and achieve stability in that housing.

ACCESS TO SERVICES

It is required that ESG and CoC-funded programs or projects within the Continuum of Care's area use that system's coordinated entry process and structure. EOHLC and the provider must work with the Continuum of Care to ensure the screening, assessment and referral of program participants are consistent with the written standards established by the EOHLC and the requirements outlined by the U.S. Department of Housing and Urban Development via Notice [CPD-17-01](#). A victim service provider (VSP) may choose not to use the Continuum of Care's coordinated entry system so long as the established alternative process meets HUD's requirements. Services and housing options should be made available in a way that ensures equitable access by all eligible participants. Providers should actively market available resources to populations least likely to access services and in a way that ensures the information is accessible to all people in the geographic area. When bringing clients into the housing programs, the immediate services delivery should follow a Housing First philosophy. Eliminating or limiting barriers to program entry will help the provider serve the clients with the highest housing needs. In situations where the local coordinated entry system is not functioning, or there is not clearly defined processes and structures, subrecipients are expected to follow the prioritization guidance included in Notice [CPD-16-11](#) to ensure effective targeting of rapid re-housing and prevention resources.

Prioritization

Coordinated Entry assists the CoC in matching participants to appropriate resources based on individual needs and preferences. Priority for housing opportunities are determined through the use of the Coordinated Entry Quick Screen, Coordinated Entry Assessment, and Housing

Preference Form built into the CoC's HMIS, VESTA. The system prioritizes by screening for basic eligibility and housing preferences and then prioritizes participants for housing openings based on their vulnerability score and the region of their choice. Referrals for permanent supportive housing, transitional housing, and rapid rehousing are governed by the outcome of this assessment which provides a vulnerability score based on the answers to a series of standardized questions.

1. CE Quick Screen only refers homeless households who are the most vulnerable and the least likely to self-resolve into the CES. By not requiring all interested parties to complete a full CE Assessment, this step saves staff and participant's time.
2. Participants with the highest CE Assessment scores are deemed to be the most vulnerable and will be prioritized for all Permanent Supportive Housing opportunities. This approach ensures an appropriate match between the most intensive services and the people least likely to succeed with a less intensive intervention.
3. Participants with mid-range CE Assessment scores will be prioritized for CoC and ESG-funded Rapid Re-Housing projects that provide moderate to intensive services and/or a longer enrollment period.
4. Participants may be eligible to receive Emergency Solutions Grant (ESG)-funded "Light Touch" Rapid Re-Housing resources based on their need for short-term housing resources as indicated in their CE Assessment and prioritized based on having secured housing. If there are not enough ESG resources to accommodate all eligible applicants, the remaining resources are targeted to those with the highest CE score.
5. If two or more homeless households within the same geographic area are identically prioritized for the next available unit, the CoC selects the household with the greatest length of time homeless in the determination of which household receives a referral to the next available unit. The CoC's selection would also be based on the household who is document ready and respond first.

This comprehensive approach to the targeting of housing resources is designed to reduce the average length of episodes of homelessness and result in better housing outcomes for all. Participants targeted for Permanent Supportive Housing based on their CE score may be offered a less service intensive housing resource (e.g., transitional housing or Rapid Rehousing) if deemed appropriate to address concerns over the excessive length of the waitlist for Permanent Supportive Housing.

Use of Coordinated Entry for Homelessness Prevention Services

The coordinated entry process may include separate access point(s) for homelessness prevention so that people at risk of homelessness can receive urgent services when and where they are needed. Written policies and procedures must describe the process by which persons will be prioritized for referrals to homelessness prevention services.

HUD uses information gathered from CoC's, ESG Recipients, and HMIS Lead Agencies to make funding decisions, set performance goals for projects assisting the homeless or those at risk of becoming homeless, and to report to Congress on the progress of ending homelessness.

A Homeless Management Information System (HMIS) is a local information technology system used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness. HUD does not prescribe which system to use, but through guidance documents such as the [HMIS Data and Technical Standards](#), it spells out what a system must be capable of doing to be considered an HMIS or a comparable database. Each CoC is responsible for selecting an HMIS software solution that complies with HUD's data collection, management, and reporting standards.

Recipients and providers of ESG or CoC funding are required to collect and record all HUD required data elements into the CoC designated HMIS. Per HUD regulations, domestic violence and victim service providers (VSP) or legal services providers (LSP) must use a HMIS comparable database. Providers using a comparable database are responsible for ensuring that their chosen HMIS is able to produce the required HUD reports (CAPER or APR) and csv data files for submission to HUD.

For ESG providers, compliance with HMIS standards will be documented through timely and accurate submission of quarterly and annual reports to EOHLC.

Please also refer to your local CoC HMIS Policies and Procedures to make sure your project is in compliance with system security, training, licensing, data quality and any other required elements for participating in HMIS. Costs for participating in the local HMIS are eligible grant expenditures if included in the project budget.

Annual Performance Reports (CoC Only)

CoC programs are required to submit Annual Performance Reports (APR) to HUD at the end of each operating year. APRs combine financial and client-level (HMIS) data to demonstrate the outcomes and success of each project. Reports are due within 90 days after the end of the operating year in a format and program designated by HUD.

Caper Reporting (ESG Only)

The Consolidated Annual Performance and Evaluation Report (CAPER) is filed annually with HUD by EOHLC using data submitted by ESG providers. The CAPER reports program outcomes to HUD for both expenditures and clients served.

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 Sage.)
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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 provider. Questions about the CAPER report should be submitted to EOHLC or to your HMIS lead agency.

CAPER Reporting Due Dates

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

Quarter 1	October 15th
Quarter 2	January 15th
Quarter 3	April 15th
Quarter 4 & final contract period	July 10th

Program Outcomes/System Performance Measures (RRH Only)

Each CoC is responsible for submitting System Performance Measures (SPM) data to HUD annually. At this time, all RRH projects within a CoC contribute to the overall outcomes for the CoC as a whole. While HUD has not set specific SPM goals for RRH projects, the two primary areas that will improve the CoC SPMs are:

- reducing the length of time between when a client enters the RRH program and when they are able to move to a RRH unit, and
- providing sufficient stabilization services to households so they do not return to homelessness once the assistance ends.

ORGANIZATIONAL POLICIES AND OTHER HUD REQUIREMENTS

In addition to program specific documentation Agency Recordkeeping and Reporting Requirements, providers must implement appropriate recordkeeping and reporting procedures to document that ESG funds are used in accordance with the requirements. These records must allow EOHLC and HUD to determine whether ESG requirements are being met. For a full list of required policies and documentation refer to Appendix B.

Period of Record Retention

Records related to each fiscal year of funds must be retained for six years. Documentation of each program participant's qualification as a family or individual at risk of homelessness or as a homeless family or individual as well as other program participant records must generally be

retained for six years after the expenditure of all funds from the grant under which the program participant was served.

Where the ESG funds that are used for the renovation of an emergency shelter exceed 75 percent of the value of the building before renovation, records must be retained until 10 years after the date that ESG funds are first obligated for the renovation.

Where the ESG funds that are used to convert a building into an emergency shelter exceed 75 percent of the value of the building after conversion, records must be retained until 10 years after the date that ESG funds are first obligated for the conversion.

Provider Monitoring

Monitoring should be viewed, not as an annual or periodic exercise, but as an ongoing process involving continuous communication and evaluation. Such a process involves frequent telephone/email contacts, written communications, analysis of reports and audits, and periodic meetings. It is the responsibility of EOHLC or HUD reviewers to keep fully informed concerning participant compliance with program requirements and the extent to which technical assistance is needed.

The goal of monitoring is to determine compliance, prevent/identify deficiencies and design corrective actions to improve or reinforce program participant performance. Monitoring also provides opportunities to identify program participant accomplishments as well as successful management/ implementation/evaluation techniques that might be replicated by other program participants.

Using a risk analysis tool, EOHLC determines which providers need to be monitored and what type of monitoring is necessary. The risk analysis relies on information related to provider past performance, staffing changes, or reported concerns from technical assistance communications. Other data related to expenditures and CAPER outcomes are also utilized to inform the risk analysis process.

EOHLC performs three types of formal monitoring (desk review, on-site review, combination) depending on the level of risk identified for the provider each year. In addition, reviews are conducted with each invoice submission by the provider. Providers are encouraged to reach out to EOHLC at any time for program clarification or interpretation. It is not necessary to wait for a program monitoring to address issues of concern. For more information on monitoring, see [Monitoring Section](#) of this document.

Lead-Based Paint Requirements [24 CFR 35.700-730 (PBRA); 24 CFR 35.1000-1020 (Supportive Services); 24 CFR 35.1200-1225 (TBRA); 24 CFR 576.403(a).

All HUD-funded programs with housing units occupied by participants are required to incorporate lead-based paint remediation and disclosure requirements. Generally, these

provisions require the provider to screen for, disclose the existence of, and take reasonable precautions regarding the presence of lead-based paint in leased or assisted units constructed prior to 1978.

CoC-funded units are required to incorporate HUD regulations in 24 CFR part 35, subparts A, B, K, and R. ESG-funded projects are required to incorporate the Lead-Based Paint Poisoning Prevention Act (42 USC 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 USC 4851-4846), and 24 CFR part 35, subparts A, B, H, J, K, M, and R in the unit.

Habitability Standards (Emergency Shelter) [24 CFR 576.403(b)] (ESG Rapid Re-Housing and Homeless Prevention) [24 CFR 576.403(c); 24 CFR 576.500(j)]

The Emergency Solutions Grants (ESG) Program interim rule, at 24 CFR 576.403, establishes minimum standards for safety, sanitation, and privacy in emergency shelters funded with ESG, and minimum habitability standards for permanent housing funded under the Rapid Re-housing and Homelessness Prevention components of ESG.

Note: The same standards apply regardless of the amount of ESG funds involved. Providers should use the [ESG Minimum Habitability Standards for Emergency Shelters and Permanent Housing Checklist](#).

Emergency Shelter [24 CFR 576.403(b)]

Any emergency shelter that receives ESG funds for shelter operations (including maintenance or minor or routine repairs) must meet the minimum safety, sanitation, and privacy standards as indicated in 24 CFR 576.403(b). Documentation of compliance with the minimum standards for emergency shelter activities must be maintained.

ESG Rapid Re-Housing and Homeless Prevention [24 CFR 576.403(c); 24 CFR 576.500(j)]

Housing for all ESG program participants receiving rental assistance must meet HUD minimum habitability standards for permanent housing. Providers must document compliance with this standard by signing and completing a Habitability Standards Checklist before the participant signs the lease and before the provider provides any ESG rental assistance or services specific to the unit. In addition, subrecipients must inspect all units at least annually to ensure that the units continue to meet habitability standards.

If an eligible household needs homelessness prevention assistance to remain in its **existing unit**, the assistance can only be provided if that unit meets the minimum standards.

If an eligible household needs homelessness prevention or rapid re-housing assistance to move to a **new unit**, the assistance can only be provided if the new unit meets the minimum standards. The unit the household is leaving does not need to be inspected.

Federal Fair Housing Act and Affirmative Outreach Disabilities Act

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, as well as in other housing related transactions based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and disability. Agencies must comply with all applicable fair housing and civil rights requirements in 24 CFR 5.105(a). For additional information, please see the HUD page on the [Fair Housing Act](#).

Agencies must make known that ESG rental assistance and services are available to all on a nondiscriminatory basis and ensure that all citizens have equal access to information about ESG and equal access to the financial assistance and services provided under this program.

Each provider must take reasonable steps to ensure meaningful access to programs to persons with limited English proficiency (LEP), pursuant to Title VI of the Civil Rights Act of 1964. This may mean providing language assistance or ensuring that program information is available in the appropriate languages for the geographic area served by the jurisdiction and that limited English proficient persons have meaningful access to ESG assistance.

To assist the agencies, HUD published the “Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons” (72 42 Federal Register 2732; January 22, 2007). This document can be accessed at the following website:

[https://www.nhlp.org/files/Limited%20English%20Proficiency%20Outline%20%20\(2--6.17.09\).pdf](https://www.nhlp.org/files/Limited%20English%20Proficiency%20Outline%20%20(2--6.17.09).pdf).

In addition, all notices and communications shall be provided in a manner that is effective for persons with hearing, visual, and other communication-related disabilities consistent with section 504 of the Rehabilitation Act of 1973 and implementing regulations at 24 CFR 8.6.

If the procedures that the provider intends to use to make known the availability of the rental assistance and services are unlikely to reach persons of any particular race, color, religion, sex, age, national origin, familial status, or disability who may qualify for such rental assistance and services, the provider must establish additional procedures that will ensure that such persons are made aware of the rental assistance and services.

In addition to the policies outlined above subrecipients must also comply with the following other federal requirements:

- Uniform Administrative Requirements
- Equal Employment Opportunity Programs
- Minority Business Enterprises
- Nondiscrimination in Federally Assisted Programs
- Age Discrimination
- Women’s Business Enterprise

- Drug Free Workplace Act
- Debarred Suspended
- Section 504 of the Rehabilitation Act
- Americans with Debarred, Suspended, Ineligible Contractors
- Section 6002 of the Solid Waste
- Disposal Act, as amended by the Resource Conservation and Recovery Act

Environmental Review

Per 24 CFR 576.407(d), HUD-assisted projects are required to comply with the National Environmental Policy Act (NEPA) by conducting an environmental review to determine the potential environmental impacts of a project or, if applicable, by documenting its categorical exclusion or exemption from this requirement.

Environmental reviews will be conducted by the ESG Program Coordinator, or other staff designated by the Federal Grants Manager. Environmental reviews will be completed upon the issuance of new contracts for projects established through an ESG procurement cycle or every five years, whichever comes first. The environmental review form can be located at

<https://www.hudexchange.info/resource/3141/part-58-environmental-review-exempt-or-censt-format/>.

For more information on ESG Environmental Reviews.

- [Levels of Environmental Review of ESG Components](#)
- [CoC and ESG Environmental Review Overview](#)

Violence Against Women Act (VAWA)

On November 16, 2016, HUD published the Violence Against Women Act (VAWA) final rule regarding housing protections for victims of domestic violence, dating violence, sexual assault, or stalking. This final rule prohibits an applicant for assistance or tenant assisted with ESG from being denied assistance under, denied admission to, terminated from participation in, or evicted from housing on the basis or as a direct result of the fact that the applicant or tenant is or has been a victim of domestic violence, dating violence, sexual assault or stalking, so long as the applicant otherwise qualifies for admission, assistance, participation or occupation ([24 CFR 5.2005 \(b\)\(1\)](#)).

In addition, the VAWA Final Rule requires that each housing provider produce a detailed emergency transfer plan, which ensures that a tenant receiving rental assistance through or residing in a unit subsidized under an ESG housing program who is a victim of domestic violence, dating violence, sexual assault, or stalking qualifies for an emergency transfer within

the criteria stated in [24 CFR 5.2005 \(e\)\(2\)](#). Local CoC Emergency Transfer Plans should be utilized when available.

All EOHLC ESG housing providers must maintain records on emergency transfers requested under 24 CFR 5.2005(e). Documentation of emergency transfer requests can be completed using the optional [HUD Form 5383](#). ESG housing providers are responsible to track data on the outcomes of each request and must be able to provide to ESG program staff upon request.

All EOHLC ESG rental assistance activities must provide applicants and participants the ESG [Notice of Occupancy Rights Under the Violence Against Women Act \(VAWA\) Form](#). Along with the HUD VAWA Lease Addendum in all cases where rental assistance funds are used.

Rental assistance programs must provide copies of the HUD Forms to the property owner or manager at the time of lease-up.

Involuntary Family Separation 24 CFR 576.102 4(b)

Prohibition against involuntary family separation. The age, of a child under age 18 must not be used as a basis for denying any family's admission to an emergency shelter that uses ESG funding or services and provides shelter to families with children under age 18.

EMERGENCY SHELTER

EMERGENCY SHELTER CASE MANAGEMENT AND SERVICE DELIVERY

Emergency shelter means any appropriate facility that has the primary use of providing temporary shelter for the homeless in general or for specific populations of the homeless and the use of which does not require occupants to sign leases or occupancy agreements. ESG funds may be used for the costs of operating an emergency shelter and providing essential services to sheltered homeless people (24 CFR Part 576.102).

Trauma-Informed Care

Case managers should use a trauma-informed and strengths-based approach. Because homelessness and the threat of becoming homeless can be a crisis of major significance, stabilizing a person in housing requires case managers who understand the impact of trauma and stress on participants' emotional, behavioral, and cognitive capacity. Until the housing crisis is resolved and the participant's stress is decreased, case managers should support the household in setting short-term, achievable, and appropriate goals instead of focusing on longer-term goals. While many of these symptoms of stress will subside once the crisis is resolved, the case manager must be skilled at assessing participants' various and changing levels of ability to carry out goals and action steps. The case manager should focus on the essential steps required to end the housing crisis.

Housing-Focused

To effectively assist participant households in achieving housing stability, recipients and sub-recipients must provide ongoing housing-focused case management services. The primary objective of housing-focused case management is to extend support to participants, through an individualized case management relationship, that will ultimately translate to increased housing stability. Housing-focused case management delivery should include regular consultations with participants in individualized meetings, dedicated to assessing and reassessing needs, educating participants on program and community resource opportunities, developing housing stability plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed. Meetings should occur in a participant's home and/or in a location of the participant's choosing whenever possible. Structurally, housing-focused case management is central to the provider's array of supportive services. Case managers should help to develop a plan to assist the participant retain permanent housing after the assistance ends, taking into account all relevant considerations, such as the participant's current or expected income and expenses, other public or private assistance for which the participant will be eligible and likely to receive, and the relative affordability of available housing in the area.

Evolving Focus

Initially, case management should be primarily focused on assisting a participant in obtaining and moving into a new housing unit or maintaining stability in their current housing. Case managers should help participants resolve or mitigate tenant barriers like rental and utility arrears or multiple evictions; obtain necessary identification if needed; and prepare participants for successful tenancy by reviewing lease provisions. Case management may then shift to home-based and help participants stabilize in housing. Based upon their needs and requests, it should help participants identify and access supports, including family and friend networks, mainstream and community services, and employment and income.

ALLOWABLE ACTIVITIES FOR EMERGENCY SHELTER

The chart below outlines the allowable activities for ESG funded programs.

EMERGENCY SHELTER
<p>Essential Services</p> <ul style="list-style-type: none"> • Case management • Child Care • Education Services • Employment Assistance and Job Training • Outpatient Health Services • Legal Services • Life Skills Training • Mental Health Services • Substance Abuse Treatment Services • Transportation • Services for Special Populations
<p>Shelter Operations</p> <ul style="list-style-type: none"> • Maintenance • Rent • Security • Fuel • Equipment • Insurance • Utilities • Food • Furnishings • Supplies necessary for shelter operation • Hotel/Motel Voucher
<p>Renovation, rehabilitation, or conversion</p> <ul style="list-style-type: none"> • Labor • Materials • Tools • Other costs for renovation (including rehab or conversion)
<p>Assistance Required Under the Uniform Relocation and Real Property Acquisition Act of 1970 (URA)</p> <ul style="list-style-type: none"> • Relocation Payments • Other Assistance to displaced persons

See Regulations at 24 CFR 576.102 for additional details on allowable expenditures.

Minimum Period of Use

ESG funds can be used for the renovation, rehabilitation or conversion of buildings to provide emergency shelter. The Minimum Period of Use may be 3 or 10 years, depending on the cost and type of renovation (major rehabilitation, conversion, or other renovation). (See 576.102(c)).

Activity	Use Requirement	Building Valuation
Major Rehabilitation	10 years*	If rehabilitation costs exceed 75% of the value of the building before rehab
Conversion	10 years*	If rehabilitation costs exceed 75% of the value of the building after rehab
Other Renovation	3 years	If rehabilitation costs are 75% or less of the value of the building before rehab

*Recorded deed or use restriction required.

DOCUMENTATION AND RECORDKEEPING REQUIREMENTS

Providers must establish and follow written intake procedures to ensure compliance with relevant homeless definition and recordkeeping requirements. Providers may be subject to program monitoring and must make documentation available as requested to ensure eligibility for program participation is clearly demonstrated. For additional details and required supporting documentation on all the of the requirements outlined in this section, please refer to Appendix A.

Homelessness

The provider must maintain and follow written intake procedures to ensure compliance with the homeless definition in 24 CFR §576.2 and 24 CFR §578.3. The procedures must require documentation at intake of the evidence relied upon to establish and verify homeless status.

EMERGENCY SHELTER PROGRAM TERMINATION AND OPPORTUNITY FOR APPEAL

Each provider must have a termination policy in place. EOHLC fully endorses the use of a Housing First approach and encourages providers to target assistance to households in most need. As such, dismissal or termination policies should avoid unnecessarily terminating assistance due to program violations, except in extreme cases. Providers should not terminate assistance due to program rule infractions if such termination can be avoided. Such instances provide an opportunity for further proactive, progressive engagement and service delivery. For example, terminating assistance solely because a household is using substances, refuses treatment or is not fully implementing their housing plan would not be consistent with a Housing

First approach. Providers must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases. Termination does not bar the provider from providing further assistance later to the same family or individual.

It is important that providers effectively communicate termination and grievance procedures to participants and ensure that the procedures are fully understood. All subrecipients must include termination policies and procedures in their agency regulations and manuals. Documentation of termination of assistance must comply with the requirements in 24 CFR 576.402.

To ensure effective communication for emergency shelter agencies and participants, EOHLC requires the following actions prior to program termination:

- At least one meeting (can occur virtually or via phone) with the participating household discussing program violations
- A written plan for rectifying program violations including action steps for both agency staff and program participants

Grievance Policy

All participating provider agencies must have a client grievance policy in place, a copy of which should be made available to clients. This policy should be available to address grievances involving a provider's internal policies, services or activities. In the event a grievance is received regarding a provider's internal policies, services or activities, the grievance will be referred to the appropriate agency for resolution under the provider's internal grievance policy. Each provider must make a good faith effort to resolve client grievances as best they can in the moment.

Complaints that should be addressed directly by the provider staff member or supervisor include complaints about agency conditions, how the client was treated by provider staff, and violations of confidentiality agreements. If the client feels the complaint was not adequately addressed, the client should then follow the provider's internal grievance procedure.

All projects must comply with the Fair Housing Act (including Equal Access and Family Separation), the Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity regulations, and the Americans with Disabilities Act regulations. All providers should establish organizational policies to ensure that all federal laws are followed in the administration of homelessness prevention and rapid re-housing services. Refer to the section entitled Organizational Policies and Other HUD Requirements for further details.

RAPID REHOUSING AND PREVENTION

HOUSING PLACEMENT AND LANDLORD ENGAGEMENT

This section provides guidance and best practices for housing placement and landlord engagement and mediation. These activities are essential parts of a successful homelessness prevention or rapid re-housing program.

Housing Placement

Regardless of program structure, program staff are expected to be an active partner in housing search, providing the level of support necessary to help participant households obtain housing. For households experiencing homelessness, the process of locating housing should be supported by staff unless the program participant does not want support. Providers can determine how best to align staffing to meet local needs so long as they include housing placement activities in their program implementation and budget. Utilizing grant funds for broker fees is one way to expand services to clients without increasing staff numbers. Programs are encouraged to establish a housing navigator role that can help support efficient and effective housing placement.

Program staff should discuss tenants' housing needs, location preferences and other details upon program entry. Staff should consider tenant screening barriers, which reduce a person's ability to obtain housing because of landlord criteria and screening. Examples may be poor credit, a history of evictions, household size and criminal history. In addition, housing retention barriers, which reduce a household's ability to retain housing must also be considered. Examples of retention barriers include paying the rent in full and on time, caring for the unit, following the lease and interacting with the landlord. Housing placement staff can assist participants by educating them on landlord tenant law and discussing quiet enjoyment. Identifying needs and addressing potential barriers are the best way to ensure a successful housing placement.

Landlord Engagement

In order to successfully place program participants in housing, programs are encouraged to do assertive landlord engagement. Where possible, a coordinated landlord engagement strategy across the CoC or community is encouraged to reduce duplication and increase the speed at which program participants can be placed in housing. However, landlord engagement does not stop at placement. Services need to be responsive not only to tenants but also to address landlord concerns if they arise. Ensuring open communication and helping to mediate is essential to maintain landlord relationships. In situations where the tenant is facing a threat of eviction, whether this be for homelessness prevention participants or those placed in housing

through rapid re-housing, the agency should intervene to create a landlord mediation plan/stabilization plan to prevent eviction.

RRH AND PREVENTION CASE MANAGEMENT AND SERVICE DELIVERY

Supportive Services are an essential element of a successful rapid re-housing and/or homelessness prevention program. The goal of services is to help households stabilize and, provide tenancy supports and connect them to services to ensure long-term housing stability. As much as possible, programs should determine how to seek and integrate feedback from program participants and others with lived experience into the program model. Specifically, programs should aim to incorporate the following service elements and best practices.

Trauma-Informed Care

Case managers should use a trauma-informed and strengths-based approach. Because homelessness and the threat of becoming homeless can be a crisis of major significance, stabilizing a person in housing requires case managers who understand the impact of trauma and stress on participants' emotional, behavioral, and cognitive capacity. Until the housing crisis is resolved and the participant's stress is decreased, case managers should support the household in setting short-term, achievable, and appropriate goals instead of focusing on longer-term goals. While many of these symptoms of stress will subside once the crisis is resolved, the case manager must be skilled at assessing participants' various and changing levels of ability to carry out goals and action steps. The case manager should focus on the essential steps required to end the housing crisis.

Housing-Focused

To effectively assist participant households in achieving housing stability, recipients and sub-recipients must provide ongoing housing-focused case management services. The primary objective of housing-focused case management is to extend support to participants, through an individualized case management relationship, that will ultimately translate to increased housing stability. Housing-focused case management delivery should include regular consultations with participants in individualized meetings, dedicated to assessing and reassessing needs, educating participants on program and community resource opportunities, developing housing stability plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed. Meetings should occur in a participant's home and/or in a location of the participant's choosing whenever possible. Structurally, housing-focused case management is central to the provider's array of supportive services. Case managers should help to develop a plan to assist the participant retain permanent housing after the assistance ends, taking into account all relevant considerations, such as the participant's current or expected income and expenses, other public or private assistance for which the participant will be eligible and likely to receive, and the relative affordability of available housing in the area.

Progressive Engagement

To best meet the needs and build on the strengths of each household, serve as many households as possible, and achieve strong housing outcomes, it is recommended that programs also use a progressive engagement approach when offering services or financial assistance. Progressive Engagement is an approach to helping households end their homelessness as rapidly as possible, despite barriers, with minimal financial and support resources. In this approach, participants are initially offered “light-touch” assistance, including help creating a reasonable housing placement/stabilization plan, housing information and search assistance, and limited financial assistance. More supports are offered to those households who struggle to stabilize and cannot maintain their housing without assistance.

Programs should initially provide a basic amount of financial assistance that is just enough to help a household obtain or maintain, and eventually sustain housing on its own.

The program will periodically assess if the household is on the path to self-sufficiency or needs more assistance. If the household needs more assistance than what was initially provided, the program can extend financial assistance as needed and provide proactive case management to help the household stabilize in housing until they are no longer at risk of becoming homeless. When using a progressive approach to providing rental assistance, the program periodically assesses the household’s progress toward assuming full rental payments. This assessment should determine whether financial assistance should be increased, extended, or tapered off. If assistance has been extended to the maximum amount and the program has provided as many services and linkages to the household as possible, and the household still does not seem on a path to housing stability, it may be appropriate to help the household get a more permanent subsidy such as a Housing Choice voucher or a permanent supportive housing placement, if they are eligible.

Providing services and financial assistance in a progressive way allows the program to be flexible enough to adjust to each household’s unique strengths, needs, and resources, especially as their financial circumstances or service needs change.

Client-Driven and Flexible

Case management should be client-driven. Case managers should actively engage participants in voluntary case management and service participation by creating an environment in which the participant is driving the case planning and goal-setting based on what they want from the program and services, rather than on what the case manager decides they need to do to be successful. Case managers should use a strengths-based approach to empower clients, identifying inherent strengths of a person or family instead of diagnoses or deficits, then building on those strengths to empower the household to succeed. Case management should be flexible in intensity – offering only essential assistance until or unless the participant demonstrates the need for or requests additional help.

Evolving Focus

Initially, case management should be primarily focused on assisting a participant in obtaining and moving into a new housing unit or maintaining stability in their current housing. Case managers should help participants resolve or mitigate tenant barriers like rental and utility arrears or multiple evictions; obtain necessary identification if needed; and prepare participants for successful tenancy by reviewing lease provisions. Case management may then shift to home-based and help participants stabilize in housing. Based upon their needs and requests, it should help participants identify and access supports, including family and friend networks, mainstream and community services, and employment and income.

Case managers should be available to help resolve issues or conflicts that may lead to tenancy problems while also helping participants develop skills they will use to retain housing once they are no longer in the program.

Recipients and sub-recipients must have clear safety procedures for home visits that staff are trained on and that are posted and clearly visible in office space and shared with program participants at intake and shared with participants and staff whenever changes are made. Rapid re-housing or homelessness prevention assistance should end and the case should be closed when the participant is no longer going to be imminently homeless. In some instances, case management may continue after financial assistance ends if appropriate or requested by the household. Being mindful of regulatory time limits for service and rental assistance, the expectation is that a provider will assist someone reaching their maximum time of assistance to identify other resources to maintain stability or find alternative housing.

ALLOWABLE ACTIVITIES FOR RAPID RE-HOUSING AND PREVENTION

The chart below outlines the allowable activities for CoC and ESG funded programs. Providers are encouraged to familiarize themselves with the differences between CoC and ESG-funded rapid rehousing projects.

COC-RRH	ESG-RRH AND HOMELESSNESS PREVENTION
Rental Assistance <ul style="list-style-type: none">• Short-term rental assistance (up to 3 months)• Medium-term rental assistance (4-24 months)	Rental Assistance <ul style="list-style-type: none">• Short-term rental assistance (up to 3 months)• Medium-term rental assistance (4-24 months)• Rental arrears (one-time payment of up to 6 months of rent in arrears, including any late fees on those arrears)

<p>Financial Assistance</p> <ul style="list-style-type: none"> • Security deposits (up to 1 month) • First and last month’s rent • Property damage • VAWA emergency transfer plan costs 	<p>Financial Assistance</p> <ul style="list-style-type: none"> • Security deposits (up to 1 month) • Last month’s rent (up to 1 month) • Rental application fees • Utility deposits and payments (up to 24 months, including up to 6 months of arrears) • Moving costs • VAWA emergency transfer plan costs These costs are not subject to the 24-month limit on rental assistance.
<p>Supportive Services</p> <ul style="list-style-type: none"> • Annual assessment of service needs • Assistance with moving costs • Case management • Childcare • Education services • Employment assistance and job training • Food • Housing search and counseling services • Legal services • Life skills training • Mental health services • Outpatient health services • Outreach services • Substance abuse treatment services • Transportation • Utility deposits 	<p>Supportive Services</p> <ul style="list-style-type: none"> • Housing search and placement • Housing stability case management • Mediation • Legal services • Credit repair

See Regulations at 24 CFR 576, subpart B (ESG) or 578, subpart D (CoC) for additional details on allowable expenditures.

Time Limits for Assistance

Assistance type	CoC	ESG
Moving Costs	1 time assistance per Household	3 Month Limit on Storage Fees
Security Deposits	Not to exceed 1 month rent based on MA state law	Not to exceed 1 month rent based on MA state law
Rental Arrears	Not Allowable	1 time payment of up to 6 months (does not count toward the rental assistance limit)
Utility Deposits	1 time fee	1 time fee
Rental Assistance	Not to exceed 24 months per Household	Including Utility Payments, not to exceed 24 months in 3 years.
Housing Stabilization Case Management/Supportive Services	Up to 6 months after rental assistance ends	30 days prior to move in + up to 24 months in 3 years

For additional information about the differences between ESG and CoC rapid rehousing programs, please refer to the following comparison [document](#) created by HUD.

DOCUMENTATION AND RECORDKEEPING REQUIREMENTS

Providers must establish and follow written intake procedures to ensure compliance with relevant homeless definition and recordkeeping requirements. Providers may be subject to program monitoring and must make documentation available as requested to ensure eligibility for program participation is clearly demonstrated. For additional details and required supporting documentation on all the of the requirements outlined in this section, please refer to Appendix A.

Homelessness or At-Risk Status

The provider must maintain and follow written intake procedures to ensure compliance with the homeless definition in 24 CFR §576.2 and CFR §578.3 . The procedures must require documentation at intake of the evidence relied upon to establish and verify homeless status.

Income

All programs should review income at intake to evaluate a client’s resources and determine the level of assistance that will be the most helpful.

When providing Homelessness Prevention assistance, at initial entry to the program a household must have income below 30 percent of median family income for the area to be eligible for assistance. Income is also reviewed at time of program re-evaluation for both homelessness prevention and ESG rapid re-housing.

When determining the annual income of an individual or family, the provider must use the standard for calculating annual income under 24 CFR 5.609.

An income calculator can be found here: <https://www.hudexchange.info/incomecalculator/>

Inspections

CoC Rapid Re-Housing

Housing for which rental assistance payments are made with CoC program funds, must meet the applicable housing quality standards (HQS) under 24 CFR 982.401. Before any assistance will be provided on behalf of a program participant, the provider, must physically inspect each unit to assure that the unit meets HQS. Assistance will not be provided for units that fail to meet HQS, unless the owner corrects any deficiencies within 30 days from the date of the initial inspection and the provider verifies that all deficiencies have been corrected. Recipients or Providers must inspect all units at least annually during the grant period to ensure that the units continue to meet HQS.

ESG Rapid Re-Housing and Homelessness Prevention

The provider cannot use ESG funds to help a program participant remain or move into housing that does not meet minimum habitability standards (see Appendix A). Best practice is to inspect units annually for clients receiving medium term rental assistance.

Occupancy Standards

Rapid Re-Housing and Homelessness Prevention

ESG and CoC rapid re-housing programs should defer to the guidelines in the CoC regulations regarding occupancy standards. As outlined in 578.75 (c) The dwelling unit must have at least one bedroom or living/sleeping room for each two persons. Children of opposite sex, other than very young children, may not be required to occupy the same bedroom or living/sleeping room. If household composition changes during the term of assistance, subrecipients and/or sub-providers may relocate the household to a more appropriately sized unit. The household must still have access to appropriate supportive services.

Fair Market Rent and Rent Reasonableness

CoC Rapid Re-Housing

Rental assistance can only be provided to units where the rent meets HUD's rent reasonableness standards.

ESG Rapid Re-Housing and Homelessness Prevention

Housing units where participants receive ESG rental assistance must meet BOTH rent reasonableness standards AND HUD's published Fair Market Rent (FMR) standards. FMRs established by HUD may be found at: <http://www.huduser.org/portal/datasets/fmr.html>

Note: Exceptions to rent reasonableness and FMR for ESG include assistance with last month's rent and/or assistance with rental arrears in absence of first month's rent and short- or medium-term rental assistance.

Re-evaluation Requirements

CoC Rapid Re-Housing

Each provider of assistance under this part must conduct an ongoing assessment of the supportive services needed by the participants enrolled in the project, the availability of such services, and the coordination of services needed to ensure long-term housing stability and must adjust, as appropriate. The assessment is recommended to be completed regularly, but at a minimum, must be done annually.

ESG Rapid Re-Housing and Homelessness Prevention

ESG sub-recipients must re-evaluate the program participant's eligibility and the types and amounts of assistance the program participant needs not less than once every three months for program participants receiving homelessness prevention assistance, and not less than once annually for program participants receiving rapid re-housing assistance.

At a minimum, each reevaluation of eligibility must establish that the program participant does not have an annual income that exceeds 30 percent of median family income for the area, as determined by HUD, and that the program participant lacks the resources and support networks necessary to retain housing without ESG assistance.

Re-evaluation Waiver for ESG Homelessness Prevention

The required frequency of re-evaluations for all homelessness prevention assistance under section 576.401(b) is waived until April 1, 2022 so long as the provider conducts the required re-evaluations not less than once every 6 months.

RAPID RE-HOUSING AND HOMELESSNESS PREVENTION PROGRAM TERMINATION AND OPPORTUNITY FOR APPEAL

Each provider must have a termination policy in place. EOHLC fully endorses the use of a Housing First approach and encourages providers to target assistance to households in most need. As such, dismissal or termination policies should avoid unnecessarily terminating assistance due to program violations, except in extreme cases. Providers should not terminate assistance due to program rule infractions if such termination can be avoided. Such instances provide an opportunity for further proactive, progressive engagement and service delivery. For

example, terminating assistance solely because a household is using substances, refuses treatment or is not fully implementing their housing plan would not be consistent with a Housing First approach. Providers must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases. Termination does not bar the provider from providing further assistance later to the same family or individual.

It is important that providers effectively communicate termination and grievance procedures to participants and ensure that the procedures are fully understood. All subrecipients must include termination policies and procedures in their agency regulations and manuals. Documentation of termination of assistance must comply with the requirements in 24 CFR 576.402. CoC rapid re-housing programs must ensure their termination policy follows the regulations at 24 CFR 578.91.

To ensure effective communication for homelessness prevention and rapid re-housing agencies and participants, EOHLC requires the following actions prior to program termination:

- At least one meeting (can occur virtually or via phone) with the participating household discussing program violations
- A written plan for rectifying program violations including action steps for both agency staff and program participants

If termination is due to an inability to contact the client, a letter to client and landlord notifying the intent to terminate rental assistance must be sent and documented in the file. In all situations, case notes should demonstrate documented efforts made to contact and connect with client.

Grievance Policy

All participating provider agencies must have a client grievance policy in place, a copy of which should be made available to clients. This policy should be available to address grievances involving a provider's internal policies, services or activities. In the event a grievance is received regarding a provider's internal policies, services or activities, the grievance will be referred to the appropriate agency for resolution under the provider's internal grievance policy. Each provider must make a good faith effort to resolve client grievances as best they can in the moment. Complaints that should be addressed directly by the provider staff member or supervisor include complaints about agency conditions, how the client was treated by provider staff, and violations of confidentiality agreements. If the client feels the complaint was not adequately addressed, the client should then follow the provider's internal grievance procedure.

All projects must comply with the Fair Housing Act (including Equal Access and Family Separation), the Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity regulations, and the Americans with Disabilities Act regulations. All providers should establish organizational policies to ensure that all federal laws are followed in the

administration of homelessness prevention and rapid re-housing services. Refer to the section entitled Organizational Policies and Other HUD Requirements for further details.

APPENDIX A DOCUMENTATION REFERENCE CHART

STREET OUTREACH, EMERGENCY SHELTER RAPID REHOUSING, and PERMANENT SUPPORTIVE HOUSING (ESG and CoC)

Homeless Status Eligibility Criteria	Required Documentation
<p>Sleeping in a place not meant for human habitation (i.e., car, park, abandoned building, bus station, airport, etc.)</p> <p>Note that the documentation is ordered in order of preference. Whenever possible, third party documentation should be obtained.</p>	<ul style="list-style-type: none"> • A written statement from a housing or service provider documenting the participants living conditions; • A written statement from an outreach worker observing the participants living conditions; • 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.
<p>In an emergency shelter, i.e., congregate shelters, transitional housing, hotels/motels paid for by charitable organizations or government programs</p>	<ul style="list-style-type: none"> • HMIS bed stay documentation • A written statement from the emergency shelter provider documenting the participant's stay.
<p>Exiting an institution where the participant resided for 90 days or less and resided in an emergency shelter or place not meant for habitation</p>	<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"> • A written statement from an outreach worker documenting the participants living conditions prior to entering the institution; • A written statement from a housing or service provider documenting the participants living conditions prior to entering the institution; • A self-certification from the participant documenting their living conditions prior to entering the institution. The self-certification must

immediately before entering the institution	include a statement from the subrecipients intake worker documenting their attempt to obtain third party verification.
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HOMELESSNESS PREVENTION (ESG ONLY)

Income/Resources Eligibility Criteria	Required Documentation
<p>Annual household income below 30% of area medium income (AMI) based on HUD HOME income limits. Income limits can be found at: https://www.hudexchange.info/programs/home/home-income-limits/</p>	<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 Homelessness Prevention project. Income documents for each period (intake, re-certification 1, 2, etc.) should be clearly documented as such.</p> <p>Providers should utilize the CPD Income Eligibility Calculator found at: https://www.hudexchange.info/incomecalculator/. 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 (<u>at minimum the most recent 30-day period</u>) and complete income information, for each member of the household. A full list of HUD income inclusions and exclusions can be found at: https://www.hud.gov/sites/documents/DOC_35699.PDF</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 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: https://www.hudexchange.info/trainings/courses/at-risk-status-and-income-recordkeeping-requirements-webinar-for-esg-grantees1/</p>

<p>Insufficient resources or support networks</p>	<p>At minimum, documentation of insufficient resources or support networks must be documented on a EOHLC-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. <u>EOHLC 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.</u></p> <p>HUD provides the following examples of source documentation for insufficient resources:</p> <ul style="list-style-type: none"> • notice of termination from employment • unemployment compensation statement • bank statement(s) • health-care bill showing arrears • utility bill showing arrears
<p>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.</p>	
<p>Homeless/Housing Status Eligibility Criteria</p>	<p>Required Documentation</p>
<p>Moved because of economic reasons two or more times during the 60 days immediately preceding the application for ESG homelessness prevention assistance</p>	<p>Evidence of moving includes, but is not limited to:</p> <ul style="list-style-type: none"> • moving receipts • change of address documentation (utility bills, bank statements, pay stubs, etc.) • eviction notice • leasing documents <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 provider'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, EOHLC 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"> • documentation of past eviction • bank statements • documentation of loss of employment • expense receipts • verification from owner or primary leaseholder <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"> • Hotel or motel receipts • Bank statements documenting hotel or motel charges • Letter from hotel or motel manager documenting length and cost of stay
Lives in an SRO or efficiency	For eligibility purposes, 1.5 persons residing per room includes all rooms in the housing unit, including bedrooms, living rooms, dining rooms, kitchens, finished

<p>apartment with more than two persons OR lives in a housing unit where more than 1.5 persons reside per room</p>	<p>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"> • Lease listing the number of persons residing in the unit and the number of rooms or size of the unit. • Third party verification from the landlord documenting the size of the unit and the number of people residing in that unit. • 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.
<p>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>	<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, EOHLC 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 <i>at risk of homelessness</i> prior to entering the publicly funded institution or system of care.</p> <p>Adequate documentation may include:</p> <ul style="list-style-type: none"> • Discharge papers or other evidence documenting the time period the person or household was in a publicly funded institution or system of care • 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 • Notice of eviction which occurred during the period the participant was residing in a publicly funded institution or system of care
<p>Has a summary process notice</p>	<p>At a minimum, a Summons and Complaint served by a sheriff or constable is required. Households in between the Summons and Complaint and Execution 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"> • A police report • Third party verification from a domestic violence provider • Lapsed or current restraining orders • Affidavits from restraining orders • Medical records (if DV was referenced or treated) • Written statement from social worker or mental health counselor • Psychiatrist letter <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>

RECORDKEEPING REQUIREMENTS FOR ALL ELIGIBLE HOUSEHOLDS

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

Recordkeeping Requirement	Required Documentation
Services received	<p>Subrecipients or sub-providers must document the types of essential 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>Subrecipients or sub-providers 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>Subrecipients or sub-providers choose to cap or restrict services to eligible participants, they must establish written policies outlining such restrictions and</p>

	<p>procedures for applying them fairly to eligible households. <u>EOHLC must approve ESG standards.</u></p> <p>Rather than establishing rigid formulas for financial assistance, it is encouraged to work with each eligible participant to determine what services are necessary to resolve their immediate housing crisis. It is also expected that services, including financial assistance, be provided on an as-needed, case by case basis.</p>
<p>Verification of participant sustainability</p>	<p>ESG subrecipients must document that households receiving 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>
<p>Legal lease hold (HP, PH, PSH, and RRH)</p>	<p>A legally binding, <u>written</u> lease for the unit assisted is required. The lease must be between the owner or owner’s representative and the household and is required prior authorizing any payment for rental assistance, excluding ESG 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"> • Tenant name • Address of unit • Term of tenancy • Move in date • Rent amount • Responsibility for utilities • The lease must be signed and dated by all appropriate parties <p>-----ESG Only-----</p> <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 provider on the organization or property owner’s official letterhead detailing the address of the unit, rent amount, and term of occupancy.</p> <p><i>*A one-time payment of up to 6 months of rental arrears is an eligible cost under ESG RRH. However, this service should only be provided if the participant would not be able to secure housing without it.</i></p>

<p>Property ownership (ESG Only)</p>	<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. Documentation of ownership may include a copy of a deed, water bill, mortgage payment, or tax bill.</p>
<p>Rental assistance agreement (HP, PSH, PH and RRH)</p>	<p>A rental assistance agreement between the property owner/landlord and provider must be in place prior to executing any service under the rental assistance component (including ESG rental arrears). The agreement must set forth the terms under which assistance will be provided. The agreement must also provide that, during the period indicated, the property owner must give the provider 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>
<p>Shelter and Housing Standards</p>	<p><u>Housing and Lead Based Paint* standards apply for all households receiving services, including ESG rental arrears or legal assistance only.</u> *Lead Based Paint visual assessments must be completed on all units receiving assistance if constructed before 1978 <u>AND</u> 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 grant administrative records. The training can be found at: https://apps.hud.gov/offices/lead/training/visualassessment/h00101.htm</p> <p><u>ESG</u> The Emergency Solutions Grants (ESG) Program interim rule, at 24 CFR 576.403, establishes minimum standards for safety, sanitation, and privacy in emergency shelters funded with ESG.</p> <p>Completion of a shelter standards inspection checklist or a copy of an inspection report completed by a HUD-certified inspector must be kept on file for any emergency shelter that receives ESG funds for renovation or shelter operations. The completed inspection must, at minimum, document compliance with the following habitability standards:</p> <ul style="list-style-type: none"> • Structure and materials • Access • Space and security • Interior air quality free of pollutants • Contamination free water supply

- Necessary heating and cooling facilities
- Adequate and safe illumination and electricity
- Adequate space for safe food preparation when such space is provided
- Unit must be maintained in overall sanitary condition
- Fire safety
 - Second means of egress
 - Smoke detectors on each level (when applicable smoke detectors must be designed to alert hearing impaired tenants)
 - Public areas of the facility must be equipped with smoke detectors

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 **any type** of ESG service. The completed inspection must, at minimum, document compliance with the following habitability standards:

- Structural soundness
- Adequate space & security
- Interior air quality free of pollutants
- Contamination free water supply
- Sufficient and private sanitary facilities in proper operating condition
- Necessary heating and cooling facilities
- Adequate and safe illumination and electricity
- Adequate space for safe food preparation when such space is provided
- Unit must be maintained in overall sanitary condition
- Fire safety
 - Second means of egress
 - Smoke detectors on each level (when applicable smoke detectors must be designed to alert hearing impaired tenants)
 - Public areas of the facility must be equipped with smoke detectors

CoC

Completion of a housing quality standards inspection checklist must be in the case record for all households receiving tenant based rental assistance. The completed inspection must, at minimum, document compliance with the following standards:

The HQS consist of:

- (A) Performance requirements; and
- (B) Acceptability criteria or HUD approved variations in the acceptability criteria.

	<p>(ii) This section states performance and acceptability criteria for these key aspects of housing quality:</p> <ul style="list-style-type: none"> (A) Sanitary facilities; (B) Food preparation and refuse disposal; (C) Space and security; (D) Thermal environment; (E) Illumination and electricity; (F) Structure and materials; (G) Interior air quality; (H) Water supply; (I) Lead-based paint; (J) Access; (K) Site and neighborhood; (L) Sanitary condition; and (M) Smoke detectors.
<p>FMR & rent reasonableness (HP, PH, PSH, and RRH)</p>	<p>Rent reasonableness 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>Fair Market Rent compliance may be documented using screenshots or other printable material from HUD resources.</p> <p>Fair Market Rents established by HUD may be found at: http://www.huduser.org/portal/datasets/fmr.html</p>
<p>Housing search and placement costs (Broker Fees)</p>	<p>Real estate broker fees must be documented in the applicable client files detailing not only the amounts paid, but also how the assistance was necessary to assist a program participant to obtain suitable permanent housing.</p> <p>Providers that choose to utilize a for profit company as a vendor (e.g. realtors) must follow the provider's procurement procedures.</p>
<p>Determination of Ineligibility</p>	<p>For each individual and family determined ineligible to receive Emergency Solutions Grant (ESG) assistance, the record must include documentation of the reason for that determination.</p>
<p>Emergency Shelter Facilities</p>	<p>If ESG funds are used to renovate, rehabilitate, or convert buildings to be used as emergency shelter for homeless families and individuals records must include documentation of the value of the building before the rehabilitation of an existing emergency shelter or after the conversion of a building into an emergency shelter and copies of the recorded deed or use restrictions.</p>

	<ul style="list-style-type: none">• Where the ESG funds that are used for the renovation of an emergency shelter exceed 75 percent of the value of the building before renovation, records must be retained until 10 years after the date that ESG funds are first obligated for the renovation.• Where the ESG funds that are used to convert a building into an emergency shelter exceed 75 percent of the value of the building after conversion, records must be retained until 10 years after the date that ESG funds are first obligated for the conversion.
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FUNDING PROCESS AND REQUIREMENTS

GRANT AWARDS

The amount of ESG allocation received from the U.S. Department of Housing and Urban Development (HUD) varies each year and is awarded to the State via an annual Award Notice

GRANT AGREEMENTS GENERAL TIMELINE

Initial notification of pending grant agreements are generated electronically by HUD and are sent to the Federal Grants Manager. In many cases, there are issues and conditions from HUD that must be resolved prior to the grant agreement being sent by HUD to EOHLC. The initial electronic notification will include those issues and conditions.

RECEIVING & PROCESSING THE GRANT AGREEMENT

HUD will notify EOHLC that the grant agreement is prepared for signature by EOHLC. Typically, the notice is issued to the Director of Policy or to the Federal Grants Manager; the person who receives the notice will coordinate with the Undersecretary's office to complete the signature process with HUD.

Once complete, the Director of Policy or Federal Grants Manager will scan and send a copy of the document to the ESG Contract Manager.

The ESG Contract Manager will coordinate with the Budget Analyst on an appropriate timeline for issuing contracts to vendors based on when funds will be loaded into IDIS. This process typically takes 2-3 weeks, during which time contracts may be generated and submitted for internal review.

PREPARING CONTRACTS & AMENDMENTS

All communication on initial contracts and contract amendments should be discussed with the assigned contracts manager.

PAYMENT REQUESTS / INVOICE

PROCESSING PAYMENT REQUESTS

1. Payment requests and corresponding supporting documentation (MER, personnel summary reports, rent rolls, etc) for all programs are due to the Program Coordinator no later than the close of business on the 20th of each month, unless a modified submission date has been agreed upon.
2. Once received, within two business days, the Program Coordinator will review the packet for:
 - a. Assuring completeness of the payment voucher
 - b. Assuring that the payment requests are consistent with the contract
 - c. Date stamping and logging the request

- d. All costs are eligible under the activity being billed
 - e. Consistency between the supporting documentation in the packet with the payment voucher.
 - f. The payment request is appropriately signed
 - g. There are adequate funds remaining on the contracted amount within each line item to cover the payment requested.
3. If there are issues with the packet:
- a. The Program Coordinator will email the sub-recipient and request corrections be made and the revised payment request be re-submitted within two days and will follow up with the sub-recipient by phone and email (cc'ing the Federal Grants Manager as necessary) every three days until the revised packet has been received.
 - b. On the 1st of the following month, the Program Coordinator will generate a list of sub-recipients that have failed to submit a complete packet for processing, including any status updates from the sub-recipient. The list of outstanding ESG packets will be given to the Federal Grants Manager by the end of the business day.
 - c. The Federal Grants Manager will contact the Executive Director of the agency with incorrect or missing payment request via phone and e-mail on the 2nd of each month alerting them to the situation and asking them to assure that the repaired request is submitted to the Program Coordinator within the next three days.
 - d. On the 5th of each month, the Program Coordinator will alert the Federal Grants Manager of any PVs that are still incomplete or missing.
 - e. The Federal Grants Manager will send, via US mail, a written letter explaining that the payment request is significantly late and the project is in jeopardy of being in noncompliance.
4. If there are no issues with the packet:
- a. The Program Coordinator will prepare the PRC and, where relevant LOCCS forms, including assigning a unique PRC number.
 - b. The Program Coordinator will prepare the packet for accounting
 - c. The Program Coordinator will then send the packet to the Director of Finance and log it on the unit spreadsheet.
 - d. The Director of Finance will review and approve the packet and send it to accounting.

RECEIVING REQUESTS IN A TIMELY WAY

Payment vouchers and corresponding supporting documentation (MER, personnel summary reports, requisition forms rent roles, invoices, etc) for all Federal Grants are due to the Program Coordinator responsible for monitoring the project, no later than the close of business on the 20th of each month.

The Program Coordinator will contact the subrecipient of any project with missing payment vouchers via phone or an e-mail on the 21st of each month and follow up as needed. Subrecipients will be instructed to submit their paperwork within 48 hours.

The Program Coordinator will notify the Federal Grants Manager of any missing payment vouchers by the close of business on the 25th of each month.

The Federal Grants Manager will contact the Executive Director of the agency with missing payment vouchers via phone and e-mail on the 25th of each month alerting them to the situation and asking them to assure that the voucher is submitted to the Program Coordinator within the next three days.

On the 29th of each month, the Program Coordinator will alert the Federal Grants Manager of any payment vouchers that have still not been submitted. The Federal Grants Manager will send, via US mail, a written letter explaining that the payment voucher is significantly late and the project is in jeopardy of being in noncompliance.

FEDERAL CASH DRAW PROCESSING

Control Objective: To ensure that cash draws are for legitimate service related expenses; for the correct vendor, for proper service activities, and the correct amount.

Risk Assessment: There is the risk that payments and related cash draws might not be service/program related and the authorization control violated.

Procedures to mitigate risks

The following procedures are in place to ensure cash draw procedure control.

Cash Draw Processing CoC

1. Once the payment voucher and corresponding paperwork meet expectations as outlined in #5 (Processing of Payment Requests) above, the Program Coordinator will:
 - a. Initial and date the Request
 - b. Assign a unique number to the request
 - c. Enter the numbers from the payment request onto the tracking spreadsheet
 - d. Forward the payment voucher packet on to the Director of Finance.
 - i. At least initially, and at other times as needed, the Program Coordinator will, instead, forward the packets onto the Federal Grants Manager who after reviewing, will forward it onto the Director of Finance
2. The Director of Finance will review the packet, sign and date it and return it to the Program Coordinator.
3. Within 1 business day of receipt of the returned packet from the Director of Finance, the Program Coordinator will:
 - a. Pull together the packet for Accounting
 - b. Log and submit the payment voucher packet to accounting.
4. Accounting will:
 - a. Send payment to the subrecipient
 - b. Draw down

Cash Draw Processing ESG

1. Once the payment voucher and corresponding paperwork meet expectations as outlined in #5 (Processing of Payment Vouchers) above, Federal Program Coordinator will:
 - a. Initial and date the purchase voucher
 - b. Enter the numbers from the payment voucher onto the tracking spreadsheet
 - c. Forward the payment voucher packet on to the Director of Finance.
2. The Director of Finance will review the packet, sign and date it and return it to Feral Program Coordinator.
3. Federal Program Coordinator forward package to the Financial Analyst
4. Financial Analyst reconciles current expenditures in MMARS to grant expenditure spreadsheet aligning to corresponding activity code(s).
5. Federal Grants Analyst
 - a. Inputs expenditures/activities into HUD IDIS system to obtain HUD voucher # and authorization.
 - b. Attach the HUD voucher form to the vendor invoice packet

- c. Log and submit the payment voucher packet to accounting.
- 5. Accounting will:
 - a. Send payment to the subrecipient
 - b. Draw down

PROJECT MONITORING

PURPOSE

This document is intended to outline the Department of Housing and Community Development's policy on programmatic monitoring of subrecipients receiving ESG funding.

POLICY STATEMENT

EOHLC is responsible for ensuring compliance with all regulatory and statutory requirements relative to ESG funding. Therefore, it is incumbent upon EOHLC staff to ensure Emergency Solutions Grant funds or those specifically delineated as match are spent on time and in compliance with all regulatory, statutory, and mandates outlined in the subrecipient agreements. EOHLC staff also ensure adherence to the Continuum of Care's written standards.

Programmatic monitoring is an essential part of ensuring the effectiveness of programs funded to meet the basic needs of those at risk of or experiencing homelessness and ensuring the policies and procedures outlined by EOHLC are being adhered to. EOHLC has developed the following policy and procedures to ensure that subrecipient monitoring is an effective ongoing process.

The risk assessment tool is a comprehensive tool that reviews the past programmatic and financial performance of subrecipients. Completed risk assessments target attention to program activities and participants that represent the greatest risk of poor programmatic performance and/or susceptibility to fraud, waste, and mismanagement. Once the level of risk is determined for each subrecipient, the appropriate monitoring level is determined. To ensure compliance, all subrecipients will receive annual risk assessments prior to any program expenditure. In addition, programs scoring for "high" risk will receive, at minimum, annual desk audits and a site visit every 24 months. A "medium" score will, at minimum, receive a site or desk review every 24 months. And those with a "low" risk score will be reviewed as needed. EOHLC may elect, at any time, to complete chart reviews to assess the quality of services offered to program participants or address regulatory concerns.

EOHLC will issue a formal finding letter within 60 days following any desk or site monitoring. As appropriate, EOHLC will create a corrective action plan for areas of concern. Failure to submit an acceptable plan of correction within the timeline outlined in the finding letter can result in additional action ranging from placing a hold on reimbursement requests to reallocation of funds awarded to the organization. These decisions will be made as a team, as needed, within EOHLC based on the seriousness of the original findings and the responsiveness of the subrecipient.

Programmatic and fiscal monitoring for homeless service organizations includes the the following but is not limited to:

- Review of Policies and Procedures that outline client service provision

- File review of randomly selected client files, including review and comparison of information provided in the HMIS record with paper files
- For site-based projects, a physical inspection of the facility
- Staff Interviews
- Cost supporting documentation
- Accounting of Policies and Procedures

This monitoring policy may evolve overtime as appropriate and as funding and capacity needs change.

DEFINITION OF TERMS

Grantee: EOHLC ESG

Subrecipient: Subrecipients are entities that are provided ESG and CDBG funds by a grantee for their use in carrying out agreed-upon, eligible activities.

Program Monitoring: is the primary tool EOHLC uses to ensure subrecipient programs are being operated in accordance with Federal, State, and City laws/ordinances, and contractual obligations.

Risk Assessment: An annual assessment of risk for each subrecipient to determine the level of monitoring to be conducted.

Desk Monitoring: a monitoring review conducted without a visit to the subrecipient location.

Monitoring Letter: written correspondence sent to the subrecipient within 60 days after the completion of a monitoring visit outlining the results of the monitoring visit.

Monitoring Finding: is a deficiency in program performance based on material noncompliance with a statutory, regulatory, or program requirement for which sanctions or other corrective actions are authorized.

Monitoring Concern: is a deficiency in program performance not based on a statutory, regulatory, or other program requirement. Monitoring Concerns that are not addressed can become a Monitoring Finding.

Programmatic Monitoring: is a process that helps improve subrecipient program performance and achieve results. Its goal is to improve current and future program outcomes, and impact.

Financial Monitoring: is a process that helps improve subrecipient financial performance and achieve results. Its goal is ensure financial compliance.

Site Visit: a visit to the subrecipient program site to observe facilities, interact with staff and program participants, ensure program is in operation during contractual terms, inspect for health, safety, and sanitary conditions.

Homeless Management Information System (HMIS): a local information technology system used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness.

PROCEDURES

Risk Assessment: Assigned contract managers will complete the risk assessment tool on the ESG Monitoring Toolkit file for each subrecipient to determine the level of oversight necessary to ensure successful operation of the program.

The Risk Assessment is to determine the monitoring level (High/Medium/Low) for each sub-recipient. Subrecipients will be assigned for monitoring based on their overall ranking and the division's resources.

Selection for programmatic monitoring is not based solely on scores and ranking outlined in the Risk Assessment. Staff may select an agency with a lower risk for monitoring because of unique circumstances or a specific risk factor that may reveal a need for a program or project monitoring. The following chart, based on risk assessment, will be utilized in determining frequency and type of monitoring a subrecipient will receive throughout their contract:

Subrecipient Risk Level	Minimum Required Monitoring
High Risk	On site visits every 24 months, and file reviews annually
Medium Risk	On site visit or desk review every 24 months
Low Risk	As needed

Program Monitoring: Once a subrecipient has been identified for an on-site program monitoring, a monitoring date is established with the subrecipient. Email correspondence is sent to the organization confirming the meeting date, purpose, as well as advising of specific documents, processes and areas subject to review. The EOHLC staff conducting the program monitoring shall inform the subrecipient of any program Findings or Concerns within sixty (60) days after the conclusion of the monitoring visit.

Desk Monitoring: Desk Monitoring is performed on each contract award to ensure the standards and requirements are met according to the subrecipient agreement, department policy, and regulatory requirements. Desk monitoring may include: reviewing the accuracy of reimbursement submissions, outcome and output reports, running Homeless Management Information System (HMIS) reports to review program performance, HMIS chart reviews, issuing deficiency letters, email notifications, and other documentation relative to the subrecipient operations.

ACCESS TO RECORDS

Subrecipients must comply with the requirements for access to records which establish that HUD, the HUD Office of the Inspector General, and the Comptroller General of the United States, or any of their authorized representatives, and EOHLC, must have the right of access to all documents, papers, or other records kept by the subrecipient relevant to the ESG award. This also includes access to subrecipients' staff for the purpose of interview and discussion of documents. These rights last as long as the records are retained.

APPENDIX A ORGANIZATIONAL POLICY REQUIREMENT SUMMARY AND CHECKLIST

Providers are required to keep records of the following:

Client Level Documentation:

- Program participant records that include the following:
 - Documentation of homelessness or at risk of homelessness status
 - Compliance with regulations related to providing program services in accordance with program components and eligible activities, determining eligibility and amount and type of assistance, and using appropriate assistance and service (see 24 CFR 576.101, 24 CFR 576.106, 24 CFR 576.401(a) and (b), and 24 CFR 576.401 (d) and (e)).
- Initial consultation form and case notes
- Intake and certification form
- Follow-up case manager/client meetings and at least monthly case notes
- Documented individualized housing and service plan, including a path to permanent housing stability
- Documentation of services and assistance provided to the program participant, including, as applicable, leases and rental assistance agreement, the security deposit, rental assistance, and utility payments made on behalf of the program participant. Documentation should include dates of occupancy by program, type of assistance, payee name, client name, check number, and amount paid using ESG funds
- The monthly allowance for utilities (excluding telephone) used to determine compliance with the rent restriction
- Compliance with the housing standards in 24 CFR 576.403, including inspection reports
- Types of services provided under ESG, including rental assistance, housing stabilization, and relocation services,
- Determinations of ineligibility or termination of assistance (if applicable)
- For each individual and family determined ineligible to receive ESG assistance, the client file must include documentation of the reason for that determination (note that documentation of termination of assistance must comply with the requirements in 24 CFR 576.402.)

- Documentation of the HMIS client ID number or a documented reason why the number is not available

Providers are Required to Establish Organization-Level Policies and Documentation for the Following:

- Compliance with the requirements of 24 CFR 576.400 for consulting with the Continuum of Care and coordinating and integrating ESG assistance with programs targeted toward persons experiencing homelessness and mainstream service and assistance programs
- Participation in HMIS or a comparable database
- Compliance with organizational conflicts-of-interest requirements in 24 CFR 576.404(a), a copy of the personal conflicts of interest policy or codes of conduct developed and implemented to comply with the requirements in 24 CFR 576.404(b), and records supporting exceptions to the personal conflicts of interest
- Compliance with the homeless participation requirements under 24 CFR 576.405
- Compliance with faith-based activities requirements under 25 CFR 576.407
- Compliance with the nondiscrimination and equal opportunity requirements under 24 CFR 576.407(a)
- Compliance with the uniform administrative requirements in 24 CFR part 84
- Compliance with the environmental review requirements, including flood insurance requirements
- Certifications and disclosure forms required under the lobbying and disclosure requirements in 24 CFR part 87
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- Compliance with the displacement, relocation, and acquisition requirements in 24 CFR 576.408
- Documentation of how ESG funds were spent on allowable costs in accordance with the requirements for eligible activities
- Receipt and use of program income

- Procurement contracts and documentation of compliance with the procurement Requirements
- Written confidentiality procedures to ensure:
 - All personally identifying information of any individual or family who applies for and/or receives ESG assistance will be kept secure and confidential.
 - The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under ESG will not be made public, except with written authorization of the person responsible for the operation of the shelter.
 - The address or location of any housing of a program participant will not be made public, except as provided under a pre-existing privacy policy of the provider and consistent with state and local laws regarding privacy and obligations of confidentiality.
- Period of Record Retention 24 CFR 576.500(y) and 24 CFR 578.103(c)
- Provider Monitoring
- Lead-Based Paint Requirements [24 CFR 35.700-730 (PBRA); 24 CFR 35.1000-1020 (Supportive Services); 24 CFR 35.1200-1225 (TBRA); 24 CFR 576.403(a).
- All HUD-funded programs with housing units occupied by participants are required to incorporate lead-based paint remediation and disclosure requirements. Generally, these provisions require the provider to screen for, disclose the existence of, and take reasonable precautions regarding the presence of lead-based paint in leased or assisted units constructed prior to 1978.
- CoC-funded units are required to incorporate HUD regulations in 24 CFR part 35, subparts A, B, K, and R. ESG-funded projects are required to incorporate the Lead-Based Paint Poisoning Prevention Act (42 USC 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 USC 4851-4846), and 24 CFR part 35, subparts A, B, H, J, K, M, and R in the unit.
- Habitability Standards (ESG Rapid Re-Housing Only) [24 CFR 576.403(c); 24 CFR 576.500(j)
- Federal Fair Housing Act and Affirmative Outreach Disabilities Policies

HOME Investment Partnerships Act (HOME) Program

MASSACHUSETTS HOME PROGRAM

ONE-YEAR ACTION PLAN FOR FEDERAL FISCAL YEAR 2026

As the Commonwealth continues to experience historic high demand for affordable housing, the need for ongoing HOME investment in rental housing development and preservation is as strong as ever and has been robustly sought in recent competitive rental funding rounds. The Executive Office of Housing and Livable Communities anticipates receiving an allocation of \$10,525,910.25 in HOME funds in federal fiscal year 2026 (FFY26) per allocations announced April 3, 2026. EOHLC also estimates that it will receive up to an additional \$4,000,000 in program income during the FY2026 annual action plan period. EOHLC may retain up to 10 percent of program income for administrative purposes. EOHLC plans to reserve 10 percent of the HOME allocation for administrative purposes, and award the majority of the remaining \$9,473,319.23 in funding through competitive funding rounds and, in certain circumstances, readiness-based rolling submissions. The HOME program follows the agency's policies and procedures regarding rental development programs.

In addition to these resources, we expect several of our previously funded HOME projects to request permission to refinance and to request EOHLC consent to limited partnership restructuring. Upon review of project proposals, EOHLC may identify an opportunity to collect either an early principal and/or early interest payment on the HOME project. Any loan payment funds collected will be treated as HOME Program Income, per 24 CFR Part 92.253.

It is EOHLC's intent to commit program income to projects as it is received during the 2026 Annual Action Plan Year. All applicable program income deposited in the local trust account for rental development will be committed to projects prior to committing funds in the HOME Investment Trust Fund Treasury account for the applicable program year, in accordance with CFR 92.503(d). Once these funds are committed, Program Income from the local account will be disbursed before HOME funds are drawn from the Treasury for those projects funded with both HOME Program Income and HOME Investment Trust Treasury account funds. Any program income that is received during the 2026 program year that is uncommitted at the end of the 2026 program year will be carried over into the 2026 program year and committed to projects prior to HOME Investment Trust Fund Treasury account funds. EOHLC anticipates that it will receive up to approximately \$4,000,000 in HOME program income in FFY26, of which up to ten percent may be retained for administrative purposes. This estimate is based on the program income that has been received in previous program years. In general, it is difficult to precisely anticipate HOME Program Income, as HOME rental loans are nearly all deferred payment loans and the current economic factors, including interest rates and operating costs have reduced potential repayment amounts, as well as the frequency of opportunities.

The new HOME Final Rule was published on April 17, 2025, and includes updates to maximum permissible rents, allowable methods of calculating utility allowances, qualifications for CHDOs, and acceptable standards for physical inspections. We will continue to conform with the prior HOME Final Rule (published July 24, 2013) where not in conflict with the new 2025 Final Rule, including the clarifications regarding performance and accountability, as well as property standard requirements. We have updated monitoring checklists in response to new requirements and have updated program policies and procedures, as needed. We continue to refine program administration practices, as we receive guidance, learn of new best practices, etc. We previously incorporated the 2012/2013 allocation requirements and these requirements are reinforced by the prior HOME Final Rule and subsequent notices and guidance.. We will continue to refrain from committing HOME funds to any project unless EOHLC

certifies that it has conducted an underwriting review including cost reasonableness, assessed developer capacity and fiscal soundness and examined neighborhood market conditions to ensure adequate need. EOHLC will evaluate a Community Housing Development Organization (CHDO)'s capacity and staff development experience in accordance with the new 2025 HOME Final Rule before committing HOME funds and will not provide CHDO Reserve funds to an organization whose staff does not have development experience. We will stay mindful of pertinent commitment, completion, inspection and occupancy requirements and deadlines. Property standards requirements will continue to be updated per additional HUD guidance (regarding NSPIRE, in particular) and in accordance with effective date requirements.

EOHLC will continue to contingently award its rental funds through a competitive RFP process. Notices of Funding Availability (NOFA) are published on EOHLC's website, the state's COMMBUYS site, and EOHLC's listServ notifies subscribers when the NOFA or any new pertinent program information is posted. To subscribe to the listServ, anyone can send a blank email to: join-EOHLC-housingdevelopment@listserv.state.ma.us. EOHLC also reserves the option to make rental funds available on a rolling basis with clear readiness standards for projects that will serve low- and extremely low-income homeless families and individuals and low- and extremely low-income veterans. Homeless and veteran populations have been identified as often needing housing with supportive services. Although projects serving these populations will have a link to services, accepting services will not be a condition of HOME unit occupancy. Preferences will cover all protected classes and will not violate non-discrimination laws. EOHLC may allow a preference in HOME-assisted housing units to certain populations identified as having priority housing needs in SP-25 of the Consolidated Plan, provided that such preference does not violate state or federal fair housing law and otherwise meets the requirements detailed in 24 CFR 92.253(d). EOHLC will award federal fiscal year 2026 HOME program funds and program income to the following program type: multi-family rental loans. Eligible applicants for HOME funds are municipalities, non-profit agencies (including CHDOs as defined by HUD), and for-profit developers. At this time, we anticipate that a minimum of 15 percent of the federal FY 2026 allocation will be reserved for certified CHDOs serving as owners, sponsors, or developers of rental production projects. The Secretary of EOHLC reserves the right to consider geographic distribution in making funding decisions, including for the 15 percent CHDO set-aside. EOHLC 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.

We note that the Build America Buy America preference will apply to FFY24, FFY25, and FFY26 HOME funds per applicable HOME program guidance from HUD, unless waived by HUD. We understand that the application of BABA requirements to HOME housing development projects will result in a measurable increase in cost, both for materials and in additional time to source or process waiver requests. EOHLC will be working with the development community to assess the implications and the feasibility of using HOME funds with certain rental development activities. The team will continue to follow HUD guidance and to develop policies and procedures for BABA implementation for areas not addressed by HUD CPD Notice 2025-01.

Allocation of Funds

EOHLC will continue its past practice of seeking to competitively award HOME funds in those areas of the Commonwealth that do not receive HOME funds as a result of entitlement community or HOME consortium designation. EOHLC also will competitively award HOME funds for rental loan projects in entitlement communities that provide a match for EOHLC administered HOME funds.

During FFY 2026 EOHLC anticipates the following approximate amounts will be awarded through a competitive RFP process and we note that are some rental activities from the prior fiscal year's similar competitive process that may utilize some of these funds:

- \$9,473,319.23 plus 90% of the \$4,000,000 in HOME PI (amounting to \$3,600,000 est.) that is anticipated to be received during this program year, total: \$13,073,319.23(est.)
- n/a- project-based first-time homebuyer program
- n/a- purchaser-based first-time homebuyer program

Eligible HOME rental projects may be the production of newly constructed housing units or the adaptive reuse of structures to create housing units. Eligible HOME rental projects also may be preservation endeavors where an occupied property may be at the end of (e.g.) a tax credits compliance period and needs sufficient rehabilitation to bring the housing units to a stronger standard of viability 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, EOHLC 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 EOHLC 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

EOHLC 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 EOHLC-administered HOME funds.

The following criteria are used to evaluate projects:

- strength of overall concept
- strength of development team, including demonstrated capacity and evidence of good standing
- demonstrated need for project in the target neighborhood
- evidence of marketability and HUD-required marketing plan included in proposal
- suitable site and design, including appropriateness with regard to energy-efficient building standards and increased accessibility
- appropriate scopes of rehabilitation or efficient construction
- appropriate total development costs for properties included in proposal
- financial viability and ongoing health of the project, including evidence of minimal, yet sufficient, utilization of HOME assistance
- degree of local support, including local funding commitments
- evidence of readiness to proceed

- evidence of satisfactory progress on previously funded projects.
- Adherence to the general requirements of HLC’s current housing development rental policies and procedures, including adherence to HUD HOME rule requirements and associated guidance in vendor procurement.
- CHDO-sponsored projects
- Appropriate capacity and preparedness to implement BABA requirements

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 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, EOHLIC will award up to \$1,000,000 per project and up to \$100,000 per HOME-assisted unit in HOME entitlement/consortium communities. In non-entitlement or non-consortium communities, the maximum loan is typically up to \$125,000 per HOME-assisted unit. Given projected rental development budget challenges with HOME BABA applicability, HLC reserves the option to increase the per unit and per project amounts to align with HOME per-unit subsidy limits. We reserve the option to increase the per unit amounts for family projects located in gateway communities or areas of opportunity. We also reserve the option to increase the per unit amounts for projects sponsored by certified CHDOs. In some instances, EOHLIC may award up to \$2,000,000 per project, subject to HUD HOME per unit subsidy limits.
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	Rental project budgets must demonstrate cost reasonableness consistent with comparable efforts in the current market. Developer Fee + overhead may not exceed 12.5% of a project’s Total Development Cost (with the exception of applicants also seeking LIHTC, which follow HLC rental housing development guidance).
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

Terms and Conditions: Multi-Family Rental Projects	
	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	EOHLC 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, the HUD HOME minimum period of affordability and an extended local use restriction. During the final year of a loan, the owner may request an extension of up to 30 years in order to maintain the affordability of the housing. Typically, HOME funds are structured as repayable deferred loans; in some cases, EOHLC may require regular payments from a project's cash flow.
Recourse	The loans will be non-recourse.
Interest Rate	Generally, EOHLC HOME loans are deferred payment loans with nominal or no interest rates. EOHLC 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	EOHLC 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.
Cross-Cutting HUD requirements	All HOME projects must meet HUD vendor procurement and reporting guidelines and must follow other applicable HUD crosscutting requirements.
Violence Against Women Act (VAWA)	All HOME projects must comply with the Violence Against Women Act (VAWA) (Violence Against Women Act Reauthorization Act of 2022) and HLC rental housing development policies and procedures.
HUD-Required Property Standards for Efficiency	All new construction project must meet HUDrequired property standards for efficiency. All

Terms and Conditions: Multi-Family Rental Projects	
	rehabilitation projects must meet HUD-required property standards for efficiency to the greatest extent feasible for the project.
Buy America Preference (BAP)	All HOME-assisted projects will comply with the BAP for covered products, including due diligence to source American-made products and completion of waiver requirements for any products procured from outside the United States.

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
- suitable site and design, including attention to efficient building standards and to federal Section 504 requirements
- appropriate efforts to address HUD-required property standards for appropriate total development cost for properties included in proposal, including evidence of minimal utilization of HOME assistance
- appropriate sales prices and affordability analyses included in proposal
- evidence of marketability and buyer selection plan included in proposal
- degree of local support, including local funding commitments
- evidence of readiness to proceed
- evidence of satisfactory progress on previously funded projects.

First-time Homebuyer Resale or Recapture Provisions and Resubordination Policies

EOHLC 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 EOHLC program beyond rental housing.

EOHLC will submit a Consolidated/Action Plan amendment proposal if the agency pursues the use of HOME funds with any new project-based or purchaser-based ownership activity and will present proposed restriction documents for HUD approval.

In general, EOHLC 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 EOHLC. EOHLC also typically consents if a homeowner is looking to reduce an interest rate and is not taking cash out of the transaction, even if the LTV exceeds 90% but is less than 100%. The existing HOME first-time homebuyer portfolio is minimal, as most units have passed the maturity date of applicable HOME restrictions and the program hasn't added new HOME ownership units in many years.

Eligible Applicants for HOME Funding

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 have sufficient MRVP expenditures to use that single source in our MATCH report for this year. Annual expenditures through this program alone are over \$200 million. Since states are permitted to "bank" match, that expenditure level will constitute match -- calculated at 25 cents (\$0.25) on the HOME dollar (\$1.00) -- for many years.

HOME Technical Assistance

In the coming year, the HOME team, including its compliance monitoring contractor, will continue to offer HOME technical assistance directly from EOHLC HOME staff, as well as through the HOME compliance monitoring contractor. Typically, program updates are shared proactively and we engage with developers and property managers to clarify program requirements. Both the listserv and our website are effective ways to convey HOME program news, as are our standard pre-HOME loan closing business meetings and pre-and post-funding round information sessions, funding round debrief calls, memos and letters. EOHLC will work with the affordable housing development community to ensure any changes to program requirements under BABA and the implementation of the Buy America Preference are shared proactively, and engage with developers and property managers to clarify program requirements.

Historically, EOHLC successfully administered four HOME Technical Assistance grants; in 2013, we closed out the fourth grant. EOHLC does not anticipate an additional TA grant during the 2026 HOME program year.

HOME Performance Measures

In accordance with CPD Notice 03-09, EOHLC's HOME program has been collecting data for quantifiable performance measurement. Representatives from Massachusetts participated with the national workgroup which developed the HUD Outcome Performance Measurement System, as outlined in the Federal Register, June 10, 2005. HOME staff project managers attended HUD-sponsored performance measurement training in the summer of 2006. The following of the Commonwealth's housing and community development objectives remain a primary focus of the HOME program:

1. Develop and maintain an adequate supply of safe, decent housing that is affordable and accessible to residents with a range of income levels and household needs.

EOHLC'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, EOHLC provides funding for rental production and rental rehabilitation. EOHLC has been incorporating the following primary performance measures for each funding type:

Rental Production

- Number of affordable units produced for each income category
- Amount of money leveraged for the rental activity
- Number of units for households at or below 30% of area median income
- Number of units for elderly households
- Number of households assisted by demographics
- Number that are compliant under Section 504
- Number of units meeting HUD-required property standards for efficiency
- Number of units for formerly homeless households and formerly chronically homeless households

Rental Rehabilitation

- Number of affordable units preserved for each income category
- Number of households assisted by demographics
- Number of children under age 6 within HOME-assisted units
- Amount of money leveraged for the rental activity
- Number of units for households at or below 30% of area median income
- Number of units for elderly households
- Number that are compliant under Section 504
- Number of units that meet HUD-required property standards for efficiency
- Number of units brought to lead safety standards
- Number of years of extended affordability
- Number of units for formerly homeless households and formerly chronically homeless households
- Number of units for former residents of public housing

We also ask for narrative data regarding HOME residents in new or older HOME projects to better learn how HOME units make an impact in the lives of low-income individuals and families. EOHLC pursues ongoing data collection through compliance monitoring and via the Massachusetts legislation regarding tenant data collection. We expect that EOHLC's HOME Program's performance measurement standards will further evolve, as our experience with the initiative matures.

**MASSACHUSETTS DEPARTMENT OF PUBLIC HEALTH
BUREAU OF INFECTIOUS DISEASE AND LABORATORY SCIENCES
HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS (HOPWA)**

FFY26 NARRATIVE PLAN

The Massachusetts Department of Public Health (DPH), Bureau of Infectious Disease and Laboratory Sciences (BIDLS), Office of HIV/AIDS (OHA) administers the Housing Opportunities for Persons with AIDS (HOPWA) “Balance of State” award. In federal fiscal year 2026 (FFY26), DPH anticipates receiving approximately \$2,047,303 as a formula grantee. These HOPWA resources will fund services provided by AIDS Project Worcester, Commonwealth Land Trust, Community Counseling of Bristol County, Victory Programs, the City of Springfield, and the City of Worcester.

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 and at high risk for acquiring HIV infection. Community Counseling of Bristol County, Inc. is a behavioral health provider located in Taunton, Massachusetts that offers HIV support services to individuals in the Southeastern region of the state. Both AIDS Project Worcester and Community Counseling of Bristol County will use HOPWA resources to provide Housing Information Services. These services will help enable low-income individuals with HIV to access and maintain safe, stable, and affordable housing that will support 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 individuals with complex needs, including people living with HIV. Victory Programs, Inc. is a multi-service organization that provides housing and services to individuals and families experiencing homelessness who may have substance use disorders, HIV, hepatitis C, and/or mental illness. Both agencies will use HOPWA resources to provide Supportive Services in the form of HIV Medical Case Management (MCM) services for individuals with HIV who live in housing programs in Greater Boston and in the Northeast region of Massachusetts. HIV MCM services include, but are not limited to, medical care coordination, social service coordination, adherence support, and benefits counseling. These services are intended to help individuals living with HIV access and maintain engagement in ongoing HIV medical care and treatment to maximize health outcomes, prevent acquisition of other commonly co-occurring infectious diseases, and reduce potential transmission of HIV to others.

OHA awarded AIDS Project Worcester, Commonwealth Land Trust, Community Counseling of Bristol County, and Victory Programs contracts during a statewide procurement in 2017. This procurement involved the allocation of CDC HIV prevention, HUD HOPWA, HRSA Ryan White HIV/AIDS Program, and State resources to successful applicants. Vendor selection involved a comprehensive community and internal review process, and as successful applicants, these agencies initiated their new contracts on November 1, 2017. These contracts will end as of June

30, 2026, and DPH is procuring these services for a contract start date of July 1, 2026. OHA anticipates that these four organizations will maintain HOPWA funding in order to sustain current service provision.

DPH will also provide HOPWA resources to the City of Springfield and the City of Worcester to fund services in their respective Metropolitan Statistical Areas (MSAs). These MSAs are no longer eligible to receive HOPWA formula funding directly from HUD. Through the FFY26 award, HUD will provide DPH with approximately equivalent funding that had previously been awarded directly to the Springfield and Worcester MSAs in FFY25. On February 18, 2026, DPH issued a Notice of Intent regarding this plan which demonstrates DPH's commitment to ensuring continuity of services for Massachusetts residents living with HIV in these regions. Should either or both MSAs become eligible for HOPWA formula grants in the future, DPH will re-visit coverage under the DPH allocation. The City of Springfield and City of Worcester will contract with organizations in their respective MSAs to provide housing information services; permanent housing placement; short-term rent, mortgage, and utility assistance; supportive services; and tenant-based rental assistance. The City of Springfield and City of Worcester will promote open and full competition in the solicitation of these services and will ensure adherence to all applicable state and federal policies and proper management of funds in compliance with monitoring standards.

OHA conducts thorough oversight of all its contracts. Monitoring mechanisms include, but are not limited to, annual work plans, annual contract performance reviews, monthly contract management calls, review of monthly client data submissions, and ongoing fiscal monitoring.

**MASSACHUSETTS EXECUTIVE OFFICE OF HOUSING AND
LIVABLE COMMUNITIES**

National Housing Trust Fund (HTF)

ALLOCATION PLAN

FY 2026

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ATTACHMENTS

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Attachment B – HTF Rehabilitation Standards

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

**NATIONAL HOUSING TRUST FUND
Allocation Plan**

**Massachusetts Executive Office of Housing and Livable Communities
April 2026**

I. Background and Purpose of the National Housing Trust Fund (HTF)

The National Housing Trust Fund (HTF) is a federal program to support the development of affordable housing for low-income individuals and households. HTF is funded annually with certain proceeds available from two government-sponsored entities – the Federal National Mortgage Association (Fannie Mae) and the Federal Home Loan Mortgage Corporation (Freddie Mac). The U.S. Department of Housing and Urban Development (HUD) administers HTF at the federal level and distributes trust funds to all states in accordance with an established formula. Each state has identified one qualified housing agency to allocate the funds made available through HTF. In addition, each state must prepare and submit for HUD approval an allocation plan outlining the process it intends to follow to distribute the HTF monies. The HTF allocation process must be referenced both in the state’s Consolidated Plan (within the annual action plan) and in the state’s Qualified Allocation Plan (QAP) governing the administration of the Low Income Housing Tax Credit Program (LIHTC). The National Housing Trust Fund Interim Rule can be found at 24 CFR Parts 91 and 93.

In 2016, the Executive Office of Housing and Livable Communities (EOHLC), then DHCD, was identified as the allocating agency for the HTF in the Commonwealth of Massachusetts. The state has not appointed subgrantees for HTF and will continue to distribute funds directly to recipients, defined as “organizations, agencies, or other entities that receive HTF funds to undertake an eligible project.”

It is EOHLC’s intent to award HTF funds as rapidly and efficiently as possible. Given the amount of HTF currently available and the critical need in Massachusetts for housing with services, EOHLC will continue its practice, established in 2016, of awarding HTF exclusively to housing with services.

II. HTF and Supportive Housing in Massachusetts

EOHLC has a long and successful history of providing federal and state funds to service-enriched housing – typically defined as units in multifamily rental projects with appropriate services available to tenants who need them. EOHLC is strongly committed to the development of housing with services for special populations, including individuals or households who are either very low-income (VLI) or extremely low-income (ELI). Individuals or households are defined as VLI if their incomes are less than 50% of area median income (AMI). Individuals or households are defined as ELI if their incomes are less than 30% of AMI. VLI and ELI individuals or households often face other life challenges, including difficulty in paying for food, transportation, health care, child care, and other life necessities. Some VLI or ELI individuals or households face further special

challenges. Low-income homeless veterans frequently cope with difficult medical challenges, including substance abuse, post-traumatic stress disorder, and difficulty in accessing necessary services. Frail seniors who are VLI or ELI may live in apartments or houses that are not suitable for persons with mobility issues and service needs. At the other end of the age spectrum, young adults who are aging out of state foster care systems often are VLI or ELI and face significant life challenges. Almost by definition, they have very limited support systems and are particularly vulnerable to substance abuse and homelessness.

These highly vulnerable populations clearly need housing they can afford, but they frequently need support services as well. No housing program – federal, state, or local – can ever address all the life challenges encountered by people with very low or extremely low incomes. But the Housing Trust Fund offers agencies such as EOHLC the opportunity to award capital dollars to produce deeply affordable units in combination with other resources to help fund services for new HTF residents. EOHLC has the ability to help fund these support services through the state’s rental voucher program, known as MRVP (Massachusetts Rental Voucher Program). The Executive Office currently plans to set aside MRVP vouchers in support of HTF units in 2026. Each voucher that EOHLC awards will include up to \$1,500 annually in service funding for these units, in order to help provide supportive services including but not limited to:

- Case management
- Job search and training
- Financial literacy and planning
- Self-sufficiency training and coaching
- Counseling
- Parenting classes
- Early education and childcare services
- Mental health and addiction treatment
- Adult education and GED
- Skills training, etc.

Like in its prior HTF allocations, EOHLC will prioritize HTF funds for projects that will provide service-enriched housing and housing for homeless families and individuals. The tenant selection preferences for each project will be evaluated as part of EOHLC’s competition for HTF funds. As indicated below, in the evaluation process, EOHLC will give priority to projects with tenant selection plans that include some of the following criteria:

- Preference for homeless families
- Preference for homeless individuals
- Preference for veterans
- Preference for persons with disabilities
- Preference for other vulnerable populations, such as the frail elderly

Recipients should note that EOHLC has certain standards for the support services to be delivered to tenants in supportive housing units. It is the Executive Office's expectation that recipients of projects seeking HTF in Massachusetts will adhere to EOHLC's standards and policies for services and service delivery, appended to this document as Attachment A.

III. Eligibility Requirements

To be eligible for HTF, sponsors must be non-profit entities or developers partnered with non-profit entities that receive support service funds from federal sources, from private foundations or sources, from the Executive Office of Health and Human Services, and/or from the Executive Office of Aging and Independence. Eligible recipients will have the opportunity to apply for HTF, as well as certain state bond funds and MRVPs, a special competition to be held in late calendar 2026 or early calendar 2027. EOHLC intends to commit its full allocation of HTF through this competition, however, it may be necessary to make HTF resources available in other rental competitions held by the Executive Office throughout the year. EOHLC further anticipates allocating at least half of its HTF to units reserved for individuals or households making the transition from homelessness, as reflected in project tenant selection plans and affordable fair housing marketing plans.

Interested sponsors should note that EOHLC will award HTF as subordinate debt and will close all HTF assistance through the MassDocs process.

IV. Application Requirements

The Executive Office will issue a Notice of Funding Availability (NOFA) for the HTF and several additional EOHLC resources. Consistent with EOHLC's past practice, the NOFA will include the deadlines by which sponsors interested in HTF must submit their pre-applications for EOHLC review. The full funding competition for HTF and other EOHLC monies will be invitation-only. Those sponsors whose pre-applications are approved by EOHLC will be invited to submit full funding applications for HTF and other EOHLC resources. The deadline for invitation-only, full funding applications will be included in the NOFA. Both pre-applications and full funding applications (OneStop+ applications) must be submitted through EOHLC's online OneStop+ Intelligrants system.

V. Selection Criteria

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

- Strength of overall concept
- Percentage of units to be reserved for homeless families or individuals
- Strength of development team
- Appropriateness of tenant selection plan
- Evidence of market feasibility/effective demand from target population
- Demonstrated need for project in the target neighborhood or region/needs assessment of neighborhood/region
- Financial viability of the project

- Degree of local support, including local funding commitments
- Degree to which the project maximizes energy efficient building standards and development principles
- Evidence of intent to create units for residents who face multiple barriers to securing and/or maintaining permanent housing
- Demonstrated ability to provide effective stabilization and supportive services to establish and maintain successful tenancies
- Geographic location of project
- Degree to which proposed rents are affordable to ELI/VLI households
- Minimum term of affordability: at least 30 years

It is EOHLC's intent to award HTF and state resources to projects that are highly ready to proceed. Further, it is EOHLC's intent to award the funds to recipients with extensive experience and strong track records in the development and operation of housing with support services. Sponsor experience and capacity will be critical elements in the EOHLC review process. The degree of readiness of a project and its ability to move through the loan closing process to construction also will be critical review components. It is the Executive Office's expectation that projects receiving HTF and/or state resources during the 2026/2027 HTF competition will proceed to construction in late calendar 2027.

VI. Eligible Activities and Certification

In accordance with HUD guidance, the funds available through HTF can only be used to directly support housing units for the target income groups (ELI individuals or households). HTF units can be included in projects that also serve higher income level tenants, but the HTF monies can only support the HTF-designated units. All HTF-assisted rental housing must meet a 30 year affordability period.

HTF funds may be used for the production or preservation of affordable housing through the acquisition, new construction, reconstruction and/or rehabilitation of non-luxury rental housing with suitable amenities. All HTF applications must include a description of the eligible activities to be conducted with HTF funds. Funds may be used to support:

- Real property acquisition
- Site improvements and development hard costs
- Related soft costs
- Demolition
- Financing costs
- Relocation assistance

Additionally, HTF funds may be used to refinance existing debt secured by rental housing units that are being rehabilitated with HTF funds. Refinancing may be permitted in order to reduce interest or other payments on primary debt when the added revenue will enable the project to remain solvent, increase contributions to replacement reserve, or reduce costs to a state agency that pays some or all of operating costs. Refinancing

may also be permitted in order to create an increase in debt that enables essential improvements such as life-safety systems or accessibility. Such improvements must enhance safety and quality of life for the residents. Refinancing costs are only permitted when:

- Rehabilitation is the primary eligible activity
- Refinancing is necessary to reduce the overall housing cost and to make the housing more affordable and is proportional to the number of HTF-assisted units in the rental project; and
- The rehabilitation cost attributable to the HTF units is greater than the amount of debt to be refinanced that is attributable to the HTF units.

HUD requires that each recipient of an HTF award certify the number of HTF units by income group. In addition, recipients must certify that:

- All tenants in HTF-assisted units meet the income limits as required by program guidelines
- The recipient will comply with rent limits, determined to be no more than 30% of 30% of area median income.

VII. Maximum Per-Unit Subsidy Amount

The U.S. Department of HUD requires all HTF allocating agencies to establish maximum per-unit subsidy limits for all projects that include HTF assistance. The HUD guidance on establishing per-unit limits gives allocating agencies the option of developing and implementing new per-unit subsidy limits or using per-unit limits established for other federal programs, such as the Low Income Housing Tax Credit program (LIHTC).

The Massachusetts Executive Office of Housing and Livable Communities has served as the allocating agency for the LIHTC and the federal HOME program for over 30 years and maintains an extensive database of multifamily rental projects funded through federal and state resources. The database currently contains information on more than 5,000 multifamily projects with 40,000 units and is updated with each new EOHLC funding award or modification to an existing project. The information contained in the data base has been invaluable to EOHLC in the development of numerous affordable housing policies. For example, during the past decade, the Executive Office has been engaged in an ongoing effort to better manage the cost of developing affordable housing in Massachusetts. The information contained in the data base has helped EOHLC make various determinations relative to appropriate project costs. Using the database and working with its quasi-public affiliate, the Massachusetts Housing Partnership, EOHLC regularly updates statistics on cost. Each year, in EOHLC's Qualified Allocation Plan (QAP) for the Low Income Housing Tax Credit (LIHTC), the Executive Office uses the updated data to establish recommended cost limits per unit, based on project type, location, and size. The recommended cost limits per unit that apply to tax credit projects also apply to all other EOHLC housing resources, including the HOME program and ten

state-funded bond programs. The recommended cost limits per unit also apply to the Housing Trust Fund.

EOHLC maintains different per-unit cost limits depending on the size of the project as defined by the bedroom mix. EOHLC categorizes projects that primarily feature studios and one-bedroom units as “smaller” projects. Projects with a significant number of two- and three-bedroom units are characterized as “larger” projects. In every region of the state, recommended cost limits are lower for smaller projects than for larger.

For EOHLC, there is a direct correlation between the recommended cost limits per unit and the Executive Office’s commitment of subsidy per unit. Historically, EOHLC is willing to award subsidy to support approximately 25% of the cost of producing or preserving an affordable unit. It is the Executive Office’s long-standing practice to inform recipients that they must obtain the balance of the financing per unit from other private and/or public sources. EOHLC intends to follow its long-standing policy on subsidy per-unit in making HTF awards. However, smaller highly supportive projects may need more state assistance to achieve feasibility. If a recipient seeks other EOHLC resources in addition to HTF, as many are expected to do, the amount of HTF may be reduced below the typical limit as EOHLC awards other sources to the project. In general, recipients should assume that EOHLC typically will cap all HTF awards at approximately \$125,000 to \$150,000 per unit, depending on project characteristics and up to \$2,000,000 per project. This award level will, in general, be utilized to fund projects with ten or more HTF units. In special circumstances, EOHLC may commit a maximum of \$3 million to a single project. EOHLC would direct this level of funding solely to projects with a high percentage of ELI units and to projects serving the most vulnerable populations including but not limited to, homeless families, chronic homeless individuals, veterans with supportive service needs, individuals in recovery from substance abuse disorder and homeless unaccompanied youth.

VIII. Additional Information

Sponsors of potential HTF projects for 2026 should note the following:

- In order to fund as many HTF units as possible, EOHLC typically will cap the amount of HTF per eligible unit. Details on per-unit caps are included in the previous section of this plan. However, as previously indicated, recipients also may seek certain additional state resources to complete their financing packages. Overall, recipients should assume that EOHLC will cap all Executive Office assistance, other than state rental assistance, at \$150,000 per HTF unit, inclusive of the HTF per-unit cap.
- In order to support multiple projects with HTF units, EOHLC typically will cap the amount of HTF per project at \$2,000,000.
- Priority will be given to applicants who propose rents that are affordable to ELI households through the use of project-based rental assistance or other means

such as cross subsidization of rents within the project. EOHLC will set aside MRVP vouchers to be available to HTF applicants in 2026.

- During the HTF competition, EOHLC will consider both new construction and preservation/rehabilitation projects for HTF. Design and scope of work standards apply to both types of projects. Sponsors who previously have received EOHLC assistance on affordable housing projects are familiar with EOHLC's various standards. The design and scope standards are delineated in the Executive Office's annual Qualified Allocation Plan (QAP) for the Low Income Housing Tax Credit. Standards also are delineated in the document entitled, "HTF Rehabilitation Standards" and included within this document as Attachment B. EOHLC's architects will review the design and scope components of all applications for HTF and state resources.
- The Executive Office believes that there is a need for supportive housing units in every region of the state. However, in Massachusetts, the number of homeless and the surrounding metropolitan area. In EOHLC's view, this area would be well served by HTF projects. In addition, EOHLC always encourages the creation of units for ELI individuals and families in so-called "areas of opportunity." The Executive Office defines an area of opportunity, in part, as a neighborhood or community with a relatively low concentration of poverty based on U.S. Executive Office of HUD data. In addition, EOHLC identifies an area of opportunity as a neighborhood or community that offers access to jobs, health care, high performing school systems, higher education, retail and commercial enterprise, and public amenities.

Additionally, sponsors interested in seeking HTF to support eligible units within their projects should review all the following materials related to HTF or to EOHLC's recent rental rounds:

- The HUD interim rule for HTF at <https://www.gpo.gov/fdsys/pkg/FR-2015-01-30/pdf/2015-01642.pdf>
- For additional information on this allocation plan, please contact Catherine Racer or Bronia Clifton at EOHLC at Catherine.Racer@mass.gov and Bronia.Clifton@mass.gov.

ATTACHMENT A

EOHLC and Support Services

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EOHLC and Support Services

The standards and policies described below apply to services to be funded through the HTF as well as other EOHLC sources.

Support services for individuals or families living in service-enriched housing units must be based on an individualized and detailed assessment of the individual or family's strengths and areas of needed support and improvement. In order for the assessments to be effective, the service provider must be experienced at individual or family outreach and engagement. As part of any application to EOHLC for supportive housing (SH) funds, the recipient is expected to describe the method to be used to prepare individual or family assessments.

EOHLC will give preference in funding decisions to qualified applicants who intend to create SH units for individuals or families who face multiple barriers to securing permanent housing. Multiple barriers may include poor credit, prior evictions, past criminal offenses, poor rental history, and multiple shelter placements.

Effective stabilization and case management should assist an individual or family in maintaining a successful tenancy and increasing self-sufficiency. After an initial assessment of each tenant household, the service provider will develop an individualized service plan with measurable goals and objectives. The service plan should address the following: 1) maintaining a successful tenancy; 2) securing quality childcare, education, healthcare and recreational activities for any children in the household, 3) securing or improving adult education attainment and employment; 4) improving and maintaining behavioral and physical health; 5) improving financial and asset management skills; and 6) improving community connections.

The entity providing stabilization services and case management must document the individual or family's initial assessment and work plan and also must track and document the individual or family's engagement and progress toward the goals and measures outlined in the work plan. The services to be provided as well as the reporting requirements are subject to further EOHLC guidance.

If the service provider is a different entity from the owner of the property receiving EOHLC funds, the provider and the owner should have a successful record of previous collaboration and should provide EOHLC with documentation (such as an MOU) of their previous work together.

Persons with disabilities will not be required to accept any medical or disability related services, although exceptions may apply to treatment for people with addictions.

ATTACHMENT B

HTF REHABILITATION STANDARDS

ATTACHMENT B
HTF REHABILITATION STANDARDS

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ATTACHMENT B

HTF REHABILITATION STANDARDS

In May 2016, the U.S. Department of HUD issued Frequently Asked Questions (FAQs) on the rehabilitation standards to be established by state allocating agencies for rental or homebuyer housing with HTF assistance. Although the Massachusetts Executive Office of Housing and Livable Communities (EOHLC) has had extensive experience in establishing and implementing rehabilitation standards for programs including HOME and the Low Income Housing Tax Credit, EOHLC has modified its existing rehabilitation standards in order to conform as closely as possible to the guidance published by HUD in the May 2016 FAQs.

All recipients of multifamily rental projects seeking HTF assistance must ensure that their projects conform to all the rehabilitation standards identified in this memorandum.

I. Health and Safety In Occupied Rehabilitation Projects

As part of the funding application to EOHLC, each recipient of an occupied project must provide a narrative describing the existing condition of the property and must identify any life-threatening deficiencies and a plan for addressing such deficiencies prior to commencement of renovation activities. The recipient must describe how residents who will remain in structures under renovation will be assured of safe egress, protection from fire hazards, noxious fumes, exposure to hazardous materials, and loss of security for themselves and their possessions. This narrative is a mandatory requirement for occupied rental projects whose recipients are seeking HTF. The narrative will be reviewed by EOHLC's architects as well as other Executive Office staff, and EOHLC will conduct an inspection of the property prior to making a funding decision.

Certain health and safety issues must be addressed immediately when a unit is already occupied. These items include:

- Air Quality - Propane/Natural Gas/Methane Gas Detected
- Blocked Egress/Ladders
- Electrical Hazards - Exposed Wires/Open Panels
- Electrical Hazards - Water Leaks on/near Electrical Equipment
- Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable
- Missing Outlet Covers
- Missing/Damaged/Expired Extinguishers
- Misaligned Chimney/Ventilation System
- Outlets/Switches/Cover Plates - Missing/Broken
- Smoke Detector - Missing/Inoperable
- Windows - Security Bars Prevent Egress

For a complete list of health and safety requirements, please see Attachment D.

II. Major Systems

The HUD FAQs from May 2016 identify major systems as structural support; roofing; cladding and weather proofing (e.g., windows, doors, siding, gutters); plumbing; electrical; heating, ventilation, and air conditioning. As part of the application to EOHLC for HTF, each recipient – regardless of the size of the project – must commission a capital needs study to be performed by a third party entity acceptable to EOHLC. The capital needs study must address all major systems as defined by HUD as well as other components of the proposed project including fire suppression and/or detection, security, tel/data, stormwater management systems, basic livability requirements mandated by the Massachusetts State Sanitary Code, as well as requirements of the Massachusetts Architectural Access Board and applicable Federal accessibility standards. In addition, each recipient’s architect must complete a systems checklist identifying each major system, its current condition, the proposed scope of rehabilitation, and the expected useful life of the system following rehabilitation. EOHLC’s reviewing architects will evaluate the capital needs assessment as well as the systems checklist and all other components of the recipient’s design and scope submission.

The term of affordability for all EOHLC-funded HTF projects will be at least 30 years. If EOHLC and its reviewing architects conclude that the useful life of one or more major systems in the proposed project does not meet the minimum period of affordability, the Executive Office will require the recipient to establish an appropriately-funded replacement reserve. If the project is funded, the Executive Office will monitor the performance of the various systems over time and the recipient’s response to systems deficiencies. Every EOHLC-funded HTF project must meet health and safety standards as well as all applicable code requirements throughout the term of HTF affordability.

III. Energy Conservation and Green Design

EOHLC has a long history of encouraging and requiring recipients of affordable housing projects to incorporate energy conservation measures and other thoughtful approaches to green design into their projects. Recipients of rehabilitation projects seeking HTF will be required to provide information on energy efficiency and green design in their applications to EOHLC, in particular, aspects of developments that exceed requirements of the base Massachusetts Building Code, or the “Stretch Code” if adopted by the locality

- The project recipient must address how the site layout and site design adequately address environmental issues; vehicular and pedestrian circulation, parking needs; stormwater management; trash management, appropriate open space requirements; landscaping, outdoor amenities appropriate for the target population, accessibility to public ways and common amenities, visitability, etc.
- The project recipient must address whether the project complies with energy efficient building envelope guidelines such as EPA’s Energy Star standards (including regular quality control inspections during construction), for appliance and light fixture selection as well as air sealing and insulation measures.

- The project recipient must address how the project will incorporate materials and equipment consistent with promoting a healthful interior environmental quality, including mechanical ventilation measures to provide fresh air, control humidity, exhaust bathrooms and kitchens, and generally promote good indoor air quality.
- The project recipient must confirm that the project will provide interior CO detectors as mandated by state regulations.
- The project recipient must confirm that the proposed project, at a minimum, will conform to state and local code-mandated regulations for water conservation (low flush volume toilets, low-flow faucet and showerhead devices, etc.) as well as storm water management. The recipient should identify all water conservation measures that go beyond state/local regulations.
- The project recipient must confirm that there will be sufficient construction oversight, building envelope testing, and building system commissioning to ensure that all systems are properly installed, adjusted, and meet all specified performance criteria.
- The project recipient must confirm that he/she has employed effective cost management techniques in the design process, including but not limited to Integrated Project Delivery methods, and significant involvement by contractors or other cost estimation professionals early on, and throughout the design process. In rehabilitation (as in new construction), EOHLC strongly prefers project designs that incorporate site planning, exterior envelope, detailing, and mechanical system technologies to achieve energy efficiency. EOHLC strongly encourages demolition and rehabilitation processes that result in waste reduction and conservation of resources. EOHLC also encourages the use of building materials that are local in origin and durable and that incorporate recycled content. EOHLC also strongly encourages recipients to avoid the use of toxic materials.

IV. Lead-Based Paint

Recipients of rehabilitation projects seeking HTF from EOHLC must conform to all applicable provisions of 24 CFR Part 35 regarding lead-based paint. Recipients also must conform to all Massachusetts laws and regulations, as well as EPA requirements regarding lead-based paint, including protection of workers who may be exposed to lead paint during the construction process. .

V. Accessibility

Recipients of all rehabilitation projects seeking HTF must conform to all accessibility requirements of 24 CFR Part 8 (<http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:1.1.1.1.8>) implementing Section 504 of the Rehabilitation Act of 1973) and Titles II and III of the Americans with Disabilities Act implemented at 28 CFR Parts 35 and 36)

For “covered multifamily dwellings”, as defined at 24 CFR 100.205 (http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title24/24cfr100_main_02.tpl), EOHLC will require recipients to meet the design and construction requirements at 24 CFR 100.205.

In addition, recipients must conform to any and all applicable Massachusetts laws and regulations regarding accessibility, including, in renovation projects, obtaining all necessary variances from the Massachusetts Architectural Access Board. Recipients must complete the EOHLC accessibility checklist appended to this memorandum.

VI. Disaster Mitigation

Recipients must ensure that projects conform or exceed all federal and state requirements and best practices to mitigate the potential impact of disasters or disruptions, such as extended power outages, earthquakes, hurricanes, floods, and wildfires in accordance with state or local codes, ordinances, and requirements.

Recipients shall submit a “resiliency narrative” that describes all such measures incorporated into the project.

VII. State and Local Codes

All recipients seeking HTF from EOHLC must meet all applicable Massachusetts state and local codes, ordinances, and requirements including but not limited to the following:

- Local Zoning Ordinances
- Massachusetts State Building Code
- National Electrical Code
- Massachusetts Fuel Gas and Plumbing Code
- Massachusetts Fire Regulations
- Massachusetts Elevator Regulations
- Massachusetts Sanitary Code
- Massachusetts Department of Public Health Requirements
- Massachusetts Historic Commission Regulations
- U.S. Department of Energy Regulations
- Massachusetts Department of Environmental Protection Regulations
- HUD Rehabilitation Guidelines
- HUD Section 8 Housing Quality Standards
- Americans with Disabilities Act
- Massachusetts Architectural Access Board Regulations

- Local, State and Federal Requirements Related to Sewage/Septic Systems
- Requirements for Housing Trust Fund Environmental Provisions

VIII. Uniform Physical Condition Standards (UPCS)

EOHLC will require all recipients to ensure that HTF-assisted housing will be decent, safe, sanitary, and in good repair as described in 24 CFR 5.703 (<http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:1.1.1.1.5>). As it monitors HTF-assisted projects, EOHLC will include the UPCS inspectable items and observable deficiencies for the site, building exterior, building systems (multifamily housing only), common areas (multifamily housing only), and units identified on the following. Recipients should review the HTF FAQ appendices: Uniform Physical Condition Standards for Multifamily and Single Family Housing Rehabilitation (/onecpd/assets/File/HTF-FAQ-Appendices-UPCS-for-Multifamily-and-Single-Family-Housing-Rehabilitation.pdf) as well as Attachment E to the HTF Allocation Plan, Uniform Physical Condition Standards for Multifamily Housing Rehabilitation - August 2016.

IX. Additional EOHLC Standards for Multifamily Rehabilitation Projects

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

Overall Unit Size:

- SRO: 120 square feet (sf)
- Enhanced SRO: 175 sf (includes food preparation area and bathroom)
- One-bedroom unit: 600 sf (or applicable HUD program standards; for example for Section 202)
- Two-bedroom unit: 850 sf
- Three-bedroom unit: 950 sf
- Four- or more bedroom unit: 1,100 sf

Minimum Room Size:

Rooms in rehabilitation projects shall meet the following minimums (including a dimensional minimum):

- Primary bedrooms: 120 sf (10.5 ft.)
- Secondary bedrooms: 100 sf (9.5 ft.)
- Living room: 150 sf (12 ft.)
- Dining room: 100 sf (10 ft.)
- Living/dining room combo: 200 sf (12 ft.)
- Full bathroom: 40 sf (5 ft.)

If a room has a sloped ceiling, any portion of the room measuring less than 5 feet from the finished floor to the finished ceiling shall not be included in the measurements of the floor area.

Closets and storage cannot be included in the measurement of the floor area.

Kitchen:

The size of the unit should determine the amount of counter space to be provided:

	<i>counter space length</i>	<i>minimum circulation width</i>
• One-bedroom unit	6 linear feet	4 feet
• Two-bedroom unit	8 linear feet	4 feet
• Three or more bedroom unit	10 linear feet	4 feet

The minimum total linear feet of counter cannot include the space occupied by the sink, stove, and refrigerator.

Bathrooms:

The number of bedrooms within the unit determines the number of bathrooms:

• One-bedroom unit	One bathroom
• Two-bedroom unit	One bathroom
• Three bedroom unit	One-and-a-half bathrooms (minimum)
• Four or more bedroom units	Two bathrooms

Reusable and Sustainable Material Use:

Recipients are asked to:

- Use fewer building materials thorough advanced framing techniques or other systems approach to building construction.
- Use recycled content such as:
 - High fly ash content concrete in foundations, wall systems and finish floors.
 - Cementitious siding or stucco with high fly ash content.
- Composite framing such as engineered joists instead of dimensional lumber:
 - Light-gauge steel in whole house or interior walls. (Verify that thermal bridging is avoided if steel is used in exterior walls.)
 - Rapidly renewable resource materials for flooring and finishes, such as wheat straw board.
 - Insulation made of renewable, easily recyclable material or recycled content such as recycled newspaper (cellulose), soy-based foam, cotton fiber, or other when appropriate.
- Use locally available building materials, such as:

- Locally produced masonry
- Recycled lumber or locally milled timber or Forest Stewardship Council (FSC) certified lumber or other recycled materials.
- Recycled aggregate from demolition of existing site work or structure or nearby source.

Energy Efficiency:

Recipients are asked to:

- Use properly sized and designed sealed combustion boilers or furnaces and distribution systems or other low-energy use heating.
- Use tankless water heaters, indirect water heaters, sealed combustion water heaters, or solar hot water heaters.
- Specify LED fixtures.
- Specify insulation as required by Energy Star standards and above code where feasible and contributing to significant energy savings.
- If possible, avoid or minimize air-conditioning with natural ventilation or other passive cooling strategy. Ensure that adequate cooling is included in all elderly developments.
- Consider renewable energy sources such as solar thermal collectors, photovoltaics (or pre-wire and provide adequate roof structure so that systems can be added when feasible), or wind turbines, using research grants and rebates when possible.

Indoor Environmental Quality – Healthy Buildings:

Recipients are asked to:

- Detail building envelope to shed water with adequate flashing and a continuous drainage plane (rain-screen). Design walls to be able to dry to the interior, exterior, or both as appropriate.
- Provide operable windows with screens to take advantage of natural cross-ventilation when possible.
- Provide continuously running, dual-speed exhaust fans in all bathrooms.
- Provide kitchen range hoods that are ducted to the outdoors, preferably exhausted at roof level.
- Use air sealing techniques during construction to compartmentalize units to minimize unwanted air transmission.
- Provide mechanical ventilation to remove excess moisture and indoor pollutants from living spaces and to provide an adequate amount of outside air, preferably individually supplied to each dwelling unit.
- Specify sealed combustion boilers, furnaces, and water heaters.
- Use only low volatile organic compound (VOC) paints, sealants, and finishes.
- Use paperless gypsum board or cement board substrates at all damp areas.

- Install flooring with low or no off-gassing such as concrete, ceramic tile, FSC certified wood flooring, linseed-oil based resilient flooring, or bamboo with low urea formaldehyde content. If wood flooring is finished on site, use low VOC water-based polyurethane finish.
- Minimize the use of carpeting, which can hold dirt, mold, and other allergens. If carpeting is necessary, specify carpet with low VOCs recyclable fiber and backing content. If available, install carpeting that can be recycled.
- Install carbon monoxide detectors in living areas as well as garages.
- Perform fresh air flushing before occupancy.
- Educate tenants or owners by providing user manuals on use of systems, their required maintenance such as changing of filters and batteries. Use filters that remove allergens in forced-air units.
- Protect onsite building materials from rain during construction to prevent mold growth.
- Design wall and ceiling assemblies to mitigate impact sound and air-borne sound transmission between units, preferably at a level that exceeds building code requirements. .

Additional Design Considerations for Multifamily Rehabilitation Projects:

Recipients should note:

- Rehabilitation projects funded with federal funds must be demonstrably improved in order to mitigate the impact of potential natural disasters or service disruptions (e.g., significant power outages, earthquakes, hurricanes, floods) in accordance with applicable state and local ordinances.
- Kitchens must be designed with a pantry or broom closet.
- All applicable appliances must be Energy Star* rated.
- Range hood vented to outdoors.
- Garbage disposal, ¾ HP minimum.
- 30" range with self-cleaning oven.
- Dishwasher, if the unit includes a full kitchen and is larger than one-bedroom.
- Refrigerator sized for maximum energy savings.
- Storage space within units or in central storage spaces should be provided wherever possible.
- The design should optimize the use of space. Unit size and layout should maximize efficiency and minimize circulation (hallways), provide spacious furnishable main living areas and provide adequate storage.
- For all buildings under rehabilitation, designs shall include durable, low maintenance, energy efficient systems and materials. Electric heat is not acceptable.

- Cementitious siding materials, such as Hardi-plank or Cem-plank is the preferred exterior siding, as opposed to vinyl cladding for residential buildings.
- Specifications should include fiberglass/asphalt roofing shingles with a minimum of a 25-year warranty or light-colored TPO membrane for flat roofs. All pitched roofs must have a ridge and soffit venting system when appropriate.
- Window guards, window sash limiters, and heavyweight screening must be installed in windows of housing units where a child age 6 or under may live or regularly visit.
- Painted finishes should have a one-coat primer and two finish coats.
- Bathroom floors must be tiled with a floor grade, non-slip glazed or unglazed ceramic tile or sheet vinyl. VCT is not approved for bathrooms. If carpeting is installed, 26 oz. minimum fabric face weight per square yard is the standard. Specify carpet with low VOCs and recyclable fiber and backing content. If available, install carpeting that can be recycled.
- Stacked plumbing with suitable shut-offs to facilitate maintenance is strongly recommended in order to reduce material and construction costs, centralize water supply and drain lines.
- All outdoor mechanical equipment should be located and installed so that it cannot be seen from the surrounding street. Special attention must be given to adhere to all standards promulgated to prevent excessive noise or other kinds of annoyance from any mechanical equipment.
- As previously indicated, if the useful life of one or more major systems (including structural support, roofing, cladding, weatherproofing, plumbing, electrical and HVAC) is less than the applicable period of affordability, the recipient must ensure that a replacement reserve is established to replace systems as needed.

Any proposed deviations from design recommendations should include a narrative describing why an alternative approach/material is preferred.

X. Required Architectural Submission (Multifamily Rental Rehabilitation Projects)

This section outlines the type of drawings and other documentation that recipients must submit for rehabilitation projects that fall within these guidelines. EOHLC requires that an architect and/or construction cost estimator prepare the plans and construction budgets for each project.

Site Plan: Indicate the location of the building, property lines, access to the building from the street, landscape, curb cuts, driveways, orientation (north arrow), at an appropriate scale.

Existing Floor Plan: Include plans for each floor, including basement and roof. Drawings should be drawn at an appropriate scale. The existing floor plans should include the following information:

- Structural elements such as existing bearing walls, columns (indicate this with a note or graphically, e.g.: shade in the structural walls).
- Direction of floor joists if structural changes are being made.
- Existing plumbing, ventilation chase, fireplaces and any other information that affects design.

Proposed Floor Plans: Drawings should address changes of layout, removal of walls or structural elements, or any other changes. The proposed floor plans should include the following information:

- Unit Floor Area (i.e., the total area within the unit exterior walls).
- Room Areas (i.e., the area within the perimeter wall of the room excluding storage and closet space).
- Critical overall and interior dimensions.
- Vertical structural elements.
- Wall thickness to scale.
- Location and size of windows, indicating the window-sill height (measured from the finished floor).
- Ceiling heights.
- Location of mechanical equipment, meters, and electric service panels.
- Location of water, gas, sewer, and electric services.
- In the case of attic renovation, drawings should be provided indicating ceiling heights, knee wall heights, dormers location, etc.
- All units should be built with internet connectivity, COAX cable for TV and CAT5e or better for tel/data.

Elevations: Drawings should include all elevations impacted by the scope of work. .

XI. Landscaping Guidelines

This section outlines suggestions for site improvements and landscaping for projects that all under these guidelines.

Site Design:

- Where possible and feasible, provide usable areas such as the following where the community can meet and gather:
 - Safe play areas for children in multifamily developments.
 - Community garden areas, including planters for vegetables, herbs, flowers. .
 - Semi-public open spaces.
 - Patios, front yards, porches, or balconies to encourage community interaction and provide eyes-on-the-street surveillance.
- Provide for alternative transportation, e.g., bike paths and storage, pedestrian links, car shares.

- Provide all required accessible routes of travel, and in general, avoid use of stairs, wherever the terrain permits.

Prioritize pedestrian over vehicular traffic and use traffic calming devices. Incorporate attractive well-lit pedestrian paths wherever possible

Site Demolition and Clearing:

- Remediate all hazardous materials such as asbestos (ACMs), lead (LCMs), PCB's, VOC's, Arsenic, etc. carried out in accordance with all applicable local, state and federal regulations.
- Provide a summary and accurate estimate of the site remediation plan, if applicable, along with grading plans.

Tree/Shrub Pruning and Removal:

- Remove trees that originate at foundation wall of building or present a hazard to the structure.
- Remove dead trees.
- Trim stump to below grade.
- Prune back branches that overhang roof or brush walls of building.
- Prune branches that may threaten utility connections.
- Clean up and properly dispose of brush and wood.
- Remove shrubs that are diseased, those that obstruct walkways, drives and pathways, and those that obstruct windows.

Grading: Restore grade to include, when appropriate, a 6” minimum deep planting bed of clean loam/topsoil. New grade should slope away from buildings and fit the existing neighboring grades, particularly at street or sidewalk. Grades for usable lawn areas should not exceed twenty percent. The grade across paved areas should not exceed four percent, or any applicable maximum slope required by accessibility or applicable site engineering standards.

Paving, Fencing and Walls:

- Restore walks and driveways to good condition.
- Fences should generally never exceed a height of 6 feet. Material and style should be appropriate to surrounding neighborhood.

Lawns:

- Sod or seed new lawns. If seeded, pegged cloth or salt hay should be used to prevent erosion on slopes in excess of six percent. If lawn area is shady, seed or sod should include appropriate mix of fescues or other low-maintenance grasses, which will tolerate shade.
- Require general contractor to maintain all lawns throughout applicable warranty periods.

Plantings: Select hardy, maintainable, regional stock. All plantings should be placed in a manner that enhances the appearance of the property and is in keeping with the surrounding neighborhood.

All recipients and/or other development team members should contact EOHLC staff in advance of submitting applications for HTF assistance. EOHLC staff members are available to answer questions on rehabilitation standards as well as other aspects of HTF.

ATTACHMENT C MA DHCD HTF

Uniform Physical Condition

Standards for Multifamily Housing Rehabilitation August 2016

MA DHCD RTF Rehab Standards Appendix E: Uniform Physical Condition Standards for Multifamily Housing Rehabilitation - August 2016

NOTE: Deficiencies highlighted in blue are life-threatening and must be addressed immediately, if the housing is occupied.

Requirements for Site	Deficiencies	Type and Degree of Deficiency that must be addressed
Aspen/Aspen Drive Parking (See Notes)	Observable Deficiency Curtain blowing in wind	None or minor or moderate or severe or critical or life-threatening or life-threatening
	Missing Sections	Minor or moderate or severe or critical or life-threatening or life-threatening
Grass	Overgrown/Cutting Areas	Minor or moderate or severe or critical or life-threatening or life-threatening
	Overgrown/Invasive Vegetation	Minor or moderate or severe or critical or life-threatening or life-threatening
	Ponding/Soil Drainage	Minor or moderate or severe or critical or life-threatening or life-threatening
Health & Safety	Air Quality - Sewer Odor Detected	Minor or moderate or severe or critical or life-threatening or life-threatening
	Air Quality - Propane/Natural Gas/Methane Gas Detected	Minor or moderate or severe or critical or life-threatening or life-threatening
	Electrical Hazards - Exposed Wiring/Open Panel	Minor or moderate or severe or critical or life-threatening or life-threatening
	Electrical Hazards - Water Leak's w/ Near Electrical Equipment	Minor or moderate or severe or critical or life-threatening or life-threatening
	Flammable Materials - Improperly Stored	Minor or moderate or severe or critical or life-threatening or life-threatening
	Garbage and Debris - Outdoors	Minor or moderate or severe or critical or life-threatening or life-threatening
	Hazards - Other	Minor or moderate or severe or critical or life-threatening or life-threatening
	Hazards - Sharp Edges	Minor or moderate or severe or critical or life-threatening or life-threatening
	Hazards - Tripping	Minor or moderate or severe or critical or life-threatening or life-threatening
	Infiltration - Insects	Minor or moderate or severe or critical or life-threatening or life-threatening
Walkways/Project Signs	Walkway Missing/Damaged	Minor or moderate or severe or critical or life-threatening or life-threatening
	Signs Damaged	Minor or moderate or severe or critical or life-threatening or life-threatening
Parking Lots/Overlays/Bluffs	Paving	Minor or moderate or severe or critical or life-threatening or life-threatening
	Petrol/Liquid Material	Minor or moderate or severe or critical or life-threatening or life-threatening
	Settlement/Heaving	Minor or moderate or severe or critical or life-threatening or life-threatening
Other Areas and Equipment	Damaged/Broken Equipment	Minor or moderate or severe or critical or life-threatening or life-threatening
	Unauthorized Play Area Use	Minor or moderate or severe or critical or life-threatening or life-threatening
Refuse Disposal	Broken/Damaged Enclosure/Inside Spills Outside Storage Space	Minor or moderate or severe or critical or life-threatening or life-threatening
Perching Birds	Overgrown/Tripwires	Minor or moderate or severe or critical or life-threatening or life-threatening
Spots Drainage	Damaged/Obstructed	Minor or moderate or severe or critical or life-threatening or life-threatening
Walkways/Steps	Broken/Missing Hand Railing	Minor or moderate or severe or critical or life-threatening or life-threatening
	Cracks/Settlement/Heaving	Minor or moderate or severe or critical or life-threatening or life-threatening
	Soiling/Exposed Rebar	Minor or moderate or severe or critical or life-threatening or life-threatening
Requirements for Building Exterior	Observable Deficiency	Minor or moderate or severe or critical or life-threatening or life-threatening
Exterior Door	Damaged Frame/Criminals/Unusable Type	Minor or moderate or severe or critical or life-threatening or life-threatening
	Damaged Hardware/Locks	Minor or moderate or severe or critical or life-threatening or life-threatening
	Damaged Surface (Holes/Punctures/Bulging/Glue)	Minor or moderate or severe or critical or life-threatening or life-threatening
	Damaged/Missing Screen/Storm/Security Door	Minor or moderate or severe or critical or life-threatening or life-threatening
	Decorative/Weathering Caulking/Seals	Minor or moderate or severe or critical or life-threatening or life-threatening

	Missing Door	Any exterior door that is missing	It is not clear that it is missing
Fire Barriers	Blocked Exits/Landings Lobby Missing Components	Blocked Exits/Landings Lobby Missing Components	Blocked Exits/Landings Lobby Missing Components
Foundations	Cracks/Spalls Spalling/Exposed Rebar	Cracks/Spalls Spalling/Exposed Rebar	Cracks/Spalls Spalling/Exposed Rebar
Heats and Joints	Structural Hazards - Impacted Wires/Pipes/Walls Structural Hazards - Water Leaks on/over Electrical Equipment	Structural Hazards - Impacted Wires/Pipes/Walls Structural Hazards - Water Leaks on/over Electrical Equipment	Structural Hazards - Impacted Wires/Pipes/Walls Structural Hazards - Water Leaks on/over Electrical Equipment
	Emergency Exit Signs - Emergency Exit Signs Missing/Inaccessible	Emergency Exit Signs - Emergency Exit Signs Missing/Inaccessible	Emergency Exit Signs - Emergency Exit Signs Missing/Inaccessible
	EMERGENCY Exit Signs - Missing Exit Signs Flammable/Combustible Materials - Inappropriate Storage	EMERGENCY Exit Signs - Missing Exit Signs Flammable/Combustible Materials - Inappropriate Storage	EMERGENCY Exit Signs - Missing Exit Signs Flammable/Combustible Materials - Inappropriate Storage
	Surfact and Debris - Outdoors Hazard - Other	Surfact and Debris - Outdoors Hazard - Other	Surfact and Debris - Outdoors Hazard - Other
	Hazard - Sharp Edges Hazard - Tripping	Hazard - Sharp Edges Hazard - Tripping	Hazard - Sharp Edges Hazard - Tripping
	Infestation - Insects Infestation - Rods/Mice/Vermis	Infestation - Insects Infestation - Rods/Mice/Vermis	Infestation - Insects Infestation - Rods/Mice/Vermis
Lighting	Swollen Electrical Panels Damaged Safety Signs Damaged Vents	Swollen Electrical Panels Damaged Safety Signs Damaged Vents	Swollen Electrical Panels Damaged Safety Signs Damaged Vents
	Damaged/Clogged Downspouts Damaged/Torn Membranes/Missing Ballast Missing/Damaged Components From Downspouts/Gutters Missing/Damaged Signage Jacking	Damaged/Clogged Downspouts Damaged/Torn Membranes/Missing Ballast Missing/Damaged Components From Downspouts/Gutters Missing/Damaged Signage Jacking	Damaged/Clogged Downspouts Damaged/Torn Membranes/Missing Ballast Missing/Damaged Components From Downspouts/Gutters Missing/Damaged Signage Jacking
Walls	Cracks/Spalls Damaged Chimneys Missing/Damaged Insulation/Weatherstripping Missing Insulation/Weatherstripping Stains/Peeling/Peeled Paint	Cracks/Spalls Damaged Chimneys Missing/Damaged Insulation/Weatherstripping Missing Insulation/Weatherstripping Stains/Peeling/Peeled Paint	Cracks/Spalls Damaged Chimneys Missing/Damaged Insulation/Weatherstripping Missing Insulation/Weatherstripping Stains/Peeling/Peeled Paint
Windows	Broken/Missing/Cracked Panels Damaged Sills/ Frames/Double Glazing Missing/Missing Screens Missing/Peeling/Loose Caulking/Sealing Components Peeling/Spalls Paint Security Bars Present/Expired	Broken/Missing/Cracked Panels Damaged Sills/ Frames/Double Glazing Missing/Missing Screens Missing/Peeling/Loose Caulking/Sealing Components Peeling/Spalls Paint Security Bars Present/Expired	Broken/Missing/Cracked Panels Damaged Sills/ Frames/Double Glazing Missing/Missing Screens Missing/Peeling/Loose Caulking/Sealing Components Peeling/Spalls Paint Security Bars Present/Expired
Requirements for Building Systems	Observable AWC Corrosive Water	Observable AWC Corrosive Water	Observable AWC Corrosive Water
Electrical Systems	Blocked Access/Impover Storage Panel Breakers	Blocked Access/Impover Storage Panel Breakers	Blocked Access/Impover Storage Panel Breakers

Any of the functional components that affect the function of the fire escape - who section of a ladder or railing, for example - are missing Large cracks in the concrete more than 1/8 inches wide by 1/8 inches deep by 6 inches long that present a possible sign of a structural failure problem or separation for repair, penetration or spalling of wall or floor that are broken apart Significant surface areas showing more than 10% of any functional wall or floor registered reinforcing rods - yellow or other Any exposed live wires or splicing in electrical panels located where do not pose a risk Any water leaking, dripping or pooling on or around any electrical equipment that could pose a risk of fire, electrocution or explosion The wall cannot be moved or set in a fixed position or door or window is not closed A lock or alarm panel is present's checked, drilled, damaged or other conditions place one For a fire that clearly affects all occupants even one missing or there is an indication in the area of the sign Flammable materials are improperly stored, causing the potential risk of fire or explosion Too much garbage has gathered more than the allowed storage capacity or garbage has gathered in an area not anticipated for storage or storage garbage or debris Any general defects or signs that pose a risk of bodily injury Any personal defect that could cause cutting or laceration of human skin or other bodily harm Any personal defect in workbench or other finished area that poses a tripping risk Deflection of light fixture or other finished area that poses a tripping risk Substantial enough to present a health and safety risk Evidence of rats or mice - gnawing, cut or mouse holes, or droppings substantial enough to present a health and safety risk 10% or more of the lighting fixtures and bulbs damaged or broken or missing Spills or leaks that should be there are missing or so damaged that water penetration is visibly possible Wells are missing or an visibly damaged roof drainage is visible The drain is damaged or partially clogged with debris in the drain no longer functions Water has leaked out into the room as it should or more or damage to the roof membrane that may result in water penetration Missing system elements or existing or damaged causing visible damage to the roof, structure, exterior wall surface, or interior Missing elements are missing or damaged enough to create a risk of water penetration Evidence of standing water on roof, causing potential or visible damage to roof surface or underlying elements Any large crack or gap that is more than 1/8 inches wide or deep and it indicates that presents a possible sign of a structural problem or opportunity for water penetration Pan or rim of the chimney has a visible separation from the adjacent wall or there are cracks or missing pan from large enough to present a sign of separation below or there is a risk of falling panes that could create a safety hazard Any exterior wall cracking or mortar deterioration that presents a risk of water penetration or risk of structural damage Any exterior wall deterioration or holes of any size that present a risk of water penetration or risk of structural damage More than 10% of the exterior paint is peeling or paint is missing and siding surface is exposed thereby exposing siding to water penetration and deterioration Any existing joints of glass or cracked joints of glass where the crack is wider than 1/8 inch or wider than 1/8 inch or wider than 1/8 inch or wider than 1/8 inch integrity of the window pane Sills, frames, sashes, or trim are missing or damaged exposing the inside of the surrounding walls and compromising its weather tightness Missing screens or screens with holes greater than 1 inch by 1 inch or more greater than 2 inches in length There are missing or deteriorated seals or joints - with evidence of leaks or damage to the window or surrounding structure More than 10% of the exterior window panes are missing or peeling or paint is missing and window frame surface is exposed thereby exposing window frame to water penetration and deterioration The ability to exit through egress window is limited by security bars that do not function properly and, therefore, pose safety risks Leaking water from water supply line is observed There is no pressure relief valve or pressure relief valve does not drain into the floor The water meter display shows evidence of falling, displacement, pitting, or cracks that may create holes that could allow bath water to leak from the shower There is no working water in any area of the building where there should be One or more floor drains or drains of sufficient size and subject to proper access to the building system's electrical panel during an emergency Carbon monoxide, natural gas, or other gases are present
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	Disrupted/Discontinued Trim	10% or more of the wall trim is damaged
	Peeling/Spaced Paint	10% or more of interior wall/paper is missing or missing
	Water Stains/Water Damage/Water/Moisture	Evidence of a leak, stain or mold/moisture covering a wall area greater than 2 feet square
Windows	Cracked/Spaced/In Leaking Panes	Any missing pieces of glass or cracked pane of glass where the crack is either greater than 4" and/or sufficient enough to require the opening for the job is damaged enough to require the window pane
	Distorted Window Ill	There are missing or distorted panes or seals - with evidence of leaks or damage to the window or surrounding structure
	Missing/Discontinued Caulking/Seals/Weatherstripping/Components	Any window that is not functioning or cannot be returned to normal looks to be done
	Inoperable/Not Lockable	More than 20% of exterior window panes is peeling or missing
	Peeling/Spaced Frame	The ability to get through the opening is limited by security bars that do not lock/are improperly and, therefore, pose safety risks
	Security Bars Present/Issues	

Appendix - Alternate/Local Data Sources

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

