



# COMMONWEALTH OF MASSACHUSETTS

## Executive Office of Housing and Livable Communities

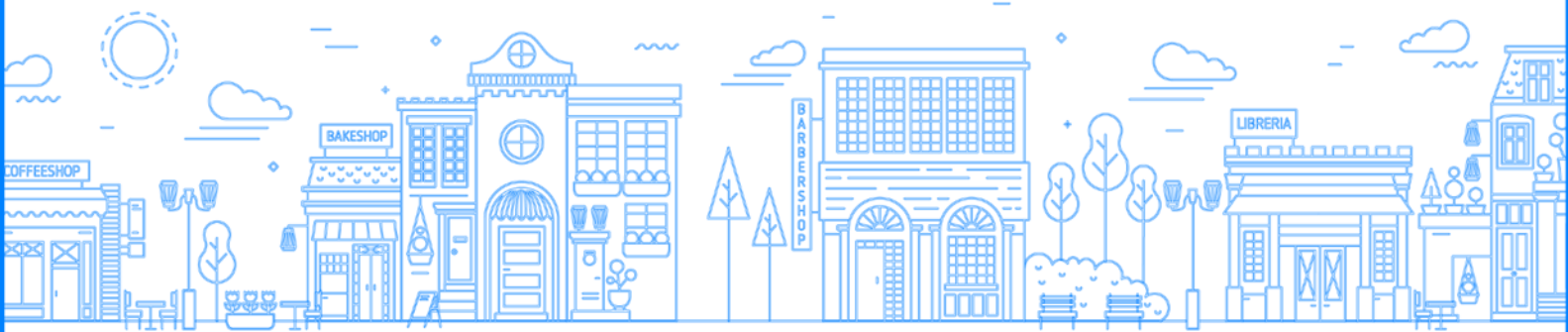
### Moving to Work Program Annual Plan for Fiscal Year 2025

Submitted to the  
U.S. Department of Housing  
and Urban Development

First Submission: April 12, 2024

Second Submission: July 11, 2024

Approved: August 14, 2024



## Table of Contents

---

Table of Contents .....	2
I. Introduction .....	4
A. Overview of Short-Term Annual Goals and Objectives .....	5
B. Overview of Long-Term Goals.....	5
II. General Operating Information .....	7
Housing Stock Information .....	7
Leasing Information .....	32
Waiting List Information .....	34
III. Proposed MTW Activities.....	35
IV. Approved MTW Activities .....	36
A. Implemented Activities.....	36
Activity 2000-1: Family Economic Stability (FES) Program .....	36
Activity 2010-2: Payment Standard Exceptions .....	40
Activity 2010-4: Development of Local Forms .....	41
Activity 2011-2: Supporting Neighborhood Opportunity in Massachusetts .....	43
Activity 2011-4: Multi-Year Recertifications .....	45
Activity 2011-5: Youth Transition to Success Program (YTTSP) .....	48
Activity 2012-1: MTW Utility Allowances .....	52
Activity 2012-4: Expiring Use Preservation Initiative.....	55
Activity 2012-5: Family Self Sufficiency Program Enhancements.....	56
Activity 2015-1: Rent Simplification.....	60
Activity 2018-1: Expanding Housing Opportunities: Relocation Assistance .....	64
Activity 2018-3: Vouchers for Special Populations .....	66
Activity 2018-7: Enhanced Local Project-Based Voucher Program .....	68
Activity 2018-9: Affordable Housing Preservation and Development Fund.....	70
Activity 2021-1: Fair Housing Initiative .....	76
Activity 2021-2: Emergency Waivers .....	78
Activity 2023-1: Housing Navigator Initiative .....	80
Activity 2024-1: Program Efficiencies .....	82
Activity 2024-2: Income Eligibility for Transfers .....	85
B. Not Yet Implemented Activities.....	87

C.	Activities on Hold .....	87
	Activity 2018-5: A Better Life Program Model .....	87
	Activity 2020-1: Moving to College .....	87
D.	Closed Out Activities .....	88
V.	Planned Application of MTW Funds .....	91
A.	Planned Application of MTW Funds .....	91
B.	Local Asset Management Plan .....	94
C.	Rental Assistance Demonstration (RAD) Participation .....	94
VI.	Administrative.....	96
A.	Board Resolution and Certifications of Compliance .....	96
B.	Documentation of Public Process .....	96
C.	Planned and Ongoing Evaluations .....	96
D.	Lobbying Disclosures.....	96
	Appendix A: Listing of Regional Administering Agencies.....	97
	Appendix B: Certification of Compliance with Regulations .....	98
	Appendix C: Documentation of Public Process.....	100
	Appendix D: Disclosure of Lobbying Activities (SF-LLL) .....	121
	Appendix E: Certification of Payments (HUD-50071) .....	122
	Appendix F: Impact Analysis .....	123

## I. Introduction

---

The Massachusetts Executive Office of Housing and Livable Communities (EOHLC, formerly DHCD) is a participant in the Moving to Work (MTW) Demonstration. MTW is a program authorized by Congress through which a limited number of Public Housing Authorities are provided with the flexibility to waive certain provisions of the US Housing Act of 1937 and related federal regulations, and to design and test approaches for providing housing assistance that address one or more of the following statutory objectives:

- Reduce cost and achieve greater cost effectiveness in federal expenditures;
- Provide incentives to families with children whose heads of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient; and
- Increase housing choices for low-income families.

The terms and conditions of EOHLC's participation in the MTW program are defined in its MTW Agreement with the US Department of Housing and Urban Development (HUD), which extends through 2028.

EOHLC administers HUD-funded Housing Choice Voucher (HCV) programs, along with other state-assisted rental assistance programs, through a statewide network of Regional Administering Agencies (RAAs). See Appendix A for a listing of current RAAs. Subject to HUD approval in the MTW Annual Plan, MTW designation allows EOHLC to test new or modified programmatic approaches to administering HCV programs, to implement "local, non-traditional" housing and service activities for the benefit of low-income residents, and to utilize HCV Housing Assistance Payments (HAP) funds in a more flexible manner.

MTW flexibility applies to the HCV programs administered by EOHLC and which are part of the MTW Block Grant. EOHLC may apply MTW operating flexibilities to special purpose vouchers which are not part of the block grant in accordance with HUD's published guidance. In general, HUD allows special purpose vouchers to be administered in accordance with MTW agreements unless MTW provisions are inconsistent with the appropriations act or requirements of the Notice of Funding Availability (NOFA). Enhanced/Tenant Protection Vouchers will be rolled into the MTW Block Grant upon renewal of funds resulting in application of MTW flexibility to these vouchers.

EOHLC is required by HUD to prepare an MTW Annual Plan in a format defined in the MTW Agreement. This Annual Plan, which is subject to HUD approval, reflects the current Plan requirements including use of standard metrics and benchmarks. For purposes of the Annual Plan, an "MTW activity" is defined as any activity that requires MTW flexibility to waive statutory or regulatory requirements. Conversely, a "non-MTW activity" is an activity that does not require MTW funding or programmatic flexibility to implement.

EOHLC's FY 2025 MTW Annual Plan summarizes planned activities for the period from July 1, 2024, through June 30, 2025. HUD provides HAP funding on a calendar year basis; thus, the Annual Plan covers parts of two distinct funding periods. As of the date of this Annual Plan publication, EOHLC has not received confirmation of its 2025 HAP funding. If decreases in funding occur, EOHLC may need to modify, delay, or cancel the proposals herein and/or take other necessary measures, including deferring issuance of turnover vouchers.

Prior to submission to HUD, EOHLC makes the Annual Plan available for public review and comment and conducts public hearings to solicit feedback. EOHLC reviews and considers written and verbal comments that are received during the public review period. Appendix C provides information on the public comment period for this Annual Plan.

## A. Overview of Short-Term Annual Goals and Objectives

In FY 2025, EOHLC projects that rental assistance and related services will be provided to 21,162 MTW households. EOHLC will continue to prioritize housing choice and administrative efficiencies through the implementation of a variety of key policies and initiatives, many of which are already underway:

- **Security Deposit Assistance:** EOHLC's HCV Security Deposit Assistance Program launched in September 2023 and will continue to provide one-time security deposit assistance to MTW voucher households leasing up in a new unit.
- **Small Area Fair Market Rents:** EOHLC will be setting payment standards based on Small Area Fair Market Rents rather than area-wide Fair Market Rents beginning in March 2024.
- **Technology Improvements:** EOHLC issued an RFR in early 2024 for its voucher management software and will use this process as an opportunity to leverage technology to improve voucher operations. EOHLC also plans to develop an online application for its HCV program.
- **HOTMA Implementation:** EOHLC will work to ensure smooth implementation of HOTMA and will request MTW waivers where appropriate (see more about HOTMA later in this section).

In an effort to further increase efficiency and speed up leasing, EOHLC will also continue to explore administrative investments and changes that do not require MTW flexibility.

In FY 2025, EOHLC will continue to offer voucher households a suite of programs and services that foster opportunities for economic mobility. These include EOHLC's housing mobility program, SNO Mass; enhancements to EOHLC's Family Self-Sufficiency (FSS) Program; and the MassHire Career Partnership Program. EOHLC also plans to continue offering the working families income deduction to eligible households with earned income.

EOHLC remains committed to using MTW funding to support affordable housing preservation and production in FY 2025. Awards have been made to a variety of redevelopment projects that will both preserve existing affordable units and produce net-new affordable units.

Finally, EOHLC is also leveraging MTW funds to expand housing access to low-income households across the state. This work includes support for the Fair Housing Initiative (which focuses on fair housing education and enforcement) and for Housing Navigator (an online database of income-restricted rental housing in Massachusetts). Most critically, EOHLC is also helping to address the shelter crisis in Massachusetts by setting aside vouchers for families with children who are in Emergency Assistance (EA) shelters; vouchers started being issued in FY 2024, and issuances and lease-ups will likely continue into FY 2025.

## B. Overview of Long-Term Goals

Through its participation in the MTW program, EOHLC is able to support a variety of programs and policies that promote housing stability and economic security for thousands of participating low-income

households, including families with children, seniors, and people with disabilities. The programmatic flexibility afforded by MTW continues to be an important component of the Commonwealth's overall housing strategy.

EOHLC has been highly focused in recent years on clarifying priorities for its MTW program and developing a strategy for spending down its MTW reserves in a way that reflects those priorities and is financially responsible. The focus areas for our work continue to be:

- Expanding housing choice for voucher holders;
- Increasing the preservation and production of affordable housing;
- Providing economic relief and asset-building opportunities to voucher holders; and
- Improving the voucher administration experience for tenants, landlords, and administering staff.

### **Housing Opportunities through Modernization Act (HOTMA)**

The Final Rule implementing certain sections of the Housing Opportunity Through Modernization Act of 2016 (HOTMA) was published on February 14, 2023, and public housing authorities are required to update their policies to reflect the HOTMA required changes, unless waived by MTW authority.

HOTMA makes significant changes to the US Housing Act of 1937, particularly those affecting income calculation and reviews. EOHLC's existing MTW Agreement continues to allow EOHLC to waive certain statutory and regulatory provisions which are within the scope of EOHLC's MTW authority. Accordingly, this MTW Plan includes several changes to its income calculation and review process, which, prior to HOTMA, were allowed as discretionary policies and which, subsequent to HOTMA, require an MTW waiver to continue to implement. Additionally, in this FY 2025 MTW Plan, EOHLC has proposed changes to existing income and rent review policies which will streamline the process for both participants and EOHLC. The following activities include HOTMA related updates and information:

- Development of Local Forms
- Multi-Year Recertifications
- Rent Simplification
- Program Efficiencies (formerly Alternative Verification Methods)

## II. General Operating Information

### Housing Stock Information

Through its Housing Choice Voucher (HCV) Program, EOHLC provides rental assistance to families, seniors, and persons with disabilities at properties owned by private or non-profit owners. EOHLC partners with a wide array of mission-driven, non-profit, and for-profit organizations to provide quality housing opportunities.

#### *i. Planned New Public Housing Units*

EOHLC does not administer a federal public housing program.

**Table 1: Planned New Public Housing Units in FY 2025**

AMP Name and Number	Bedroom Size						Total Units	Population Type*	# of UFAS Units	
	0/1	2	3	4	5	6+			Fully Accessible	Adaptable
N/A	0	0	0	0	0	0	0	N/A	0	0
N/A	0	0	0	0	0	0	0	N/A	0	0
N/A	0	0	0	0	0	0	0	N/A	0	0
<b>Total Public Housing Units to be Added in the Plan Year</b>							<b>0</b>			

\*Population Type: General, Elderly, Disabled, Elderly/Disabled, Other

If "Population Type is "Other" please describe:

N/A
-----

#### *ii. Planned Public Housing Units to Be Removed*

EOHLC does not administer a federal public housing program.

**Table 2: Planned Public Housing Units to Be Removed in FY 2025**

AMP Name and Number	Number of Units to be Removed	Explanation for Removal
N/A	0	N/A
N/A	0	N/A
N/A	0	N/A
<b>Total: Public Housing Units to be Removed in the Plan Year</b>		<b>0</b>

### iii. Planned New Project-Based Vouchers

**Table 3: Planned New Project-Based Vouchers\***

*\*The 50900 requires reporting of planned PBVs, which will be either under AHAP or HAP during the Annual Plan fiscal year. EOHLC's PBVs are allocated through the state's competitive rental round and in concert with the award of Low Income Housing Tax Credits. Proposal rounds are fluid and occur at different times throughout the year with related funding announcements made upon award. Given that EOHLC's MTW Plan is due to HUD prior to the award of FY 2025 PBV funding, EOHLC cannot identify which projects will be awarded PBVs at this time. Further, of the awards made, EOHLC cannot determine at this time which proposals will pass all screening thresholds and enter into AHAP or HAP contracts. EOHLC will report on all projects and PBVs committed, issued, and leased in the FY 2025 Annual Report.*

Property Name	# of Vouchers to be Project-Based	RAD?	Description of Project
See explanation above			
<b>Total; Planned new Project-Based Units in Plan Year</b>			

### iv. Existing Project-Based Vouchers

**Table 4: Planned Existing Project-Based Vouchers**

The projects listed in the table below represent the existing projects which are committed, issued, or leased in EOHLC's PBV portfolio.

Property Name	City/Town	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
1005 Broadway	Chelsea	8	Issued	No	New construction Family
1060 Belmont Street	Watertown	7	Leased	No	Family and Elderly/Disabled units
108 Centre Street	Brookline	8	Committed	No	Elderly Housing
108 Newbury Street	Lawrence	4	Leased	No	Family - New construction of four-story building
109 Gilman Street	Somerville	1	Leased	No	Family unit
1129 Dorchester Avenue	Boston	8	Leased	No	Family and Elderly/Disabled units
12 Russell Terrace	Arlington	2	Leased	No	Units for homeless individuals
1201 River Street	Hyde Park	8	Committed	No	Elderly Housing



Property Name	City/Town	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
1202 Commonwealth Avenue	Boston	6	Leased	No	Units for homeless individuals
1208 Parkway (formerly Residences Off Baker)	Boston	8	Committed	No	New Construction – Family housing
126 Chandler Street	Worcester	7	Leased	No	Family - new construction 2 & 3-BR
1285-1291 Mass Avenue	Boston	4	Leased	No	Family units
132 Chestnut Hill Ave.	Boston	8	Leased	No	New construction/ Elderly
140 East Street	Great Barrington	2	Leased	No	Elderly/Disabled units
14-24 Roach Street	Boston	8	Leased	No	Family units
153 Green St Parcel A - 4%	Worcester	3	Leased/Issued	No	Family
153 Green St Parcel A - 9%	Worcester	3	Leased/Issued	No	Family
154-168 Eagle Street	Fall River	8	Leased	No	Family units; supportive services
1599 Columbus Street	Boston	8	Committed	No	New Construction – Family housing
165 Winter Street	Haverhill	3	Leased	No	Family - Substantial rehab of historic former school
1-7 Piedmont Street	Worcester	3	Leased	No	Elderly/Disabled units
1740 Washington Street	Boston	8	Leased	No	Units for homeless individuals
181 Chestnut Street	Chelsea	8	Leased	No	Rehab – Family
181 Washington Street	Somerville	8	Leased	No	Family - New construction of four-story, mixed-use building
189 Broadway/One Beach	Revere	8	Leased	No	Age-Restricted (55+ older) - New construction; four stories/elevator
19 Hancock Street	Everett	3	Leased	No	Units for homeless individuals
191-195 Bowdoin	Boston	8	Leased	No	New construction/family
2 Hardy Street	Beverly	6	Leased	No	Family-new construction 2 & 3-BR
2147 Washington Street	Boston	8	Committed	No	New Construction – Family housing

Property Name	City/Town	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
25 Amory Street - Jackson Square	Boston	8	Leased	No	Family - new construction 1, 2, 3-BR
25 Sixth Street	Chelsea	8	Committed	No	New Construction – Family housing
250 Centre Street	Boston	8	Committed	No	New Construction – Family housing
250 Gull Pond Road	Wellfleet	2	Leased	No	Family - New construction of three two-unit townhouses
28 Mount Pleasant Street	Boston	2	Leased	No	Units for homeless individuals
288 Harrison Residences	Boston	8	Committed	No	New Construction – Family housing
32 Kent Street	Somerville	8	Leased	No	Family and Elderly/Disabled units
32 Old Ann Page Way	Provincetown	1	Leased	No	Family and Elderly/Disabled units
370 Essex Street	Lawrence	8	Committed	No	New construction/family
370 Harvard Street	Brookline	8	Leased	No	New Construction/elderly
40A Nelson Avenue	Provincetown	3	Leased	No	Family units
430-436 Dudley Street	Boston	3	Leased	No	Units for homeless individuals
447 Concord Road	Bedford	4	Leased	No	Family units
4-6 Ashland Street	Medford	3	Leased	No	Units for homeless individuals
46-48 School Street	Northampton	2	Leased	No	Family units
470 Main Street	Fitchburg	7	Leased	No	Family and Elderly/Disabled units
48 Water Street	Wakefield	6	Leased	No	Units for homeless individuals
48-64 Middlesex Street	Lowell	6	Leased	No	Family units
5 Benefit Street	Worcester	4	Leased	No	Family units
525 Beach Street	Revere	7	Leased	No	Family and Disabled - Three units reserved for disabled - new construction of four-story building
555 Merrimack	Lowell	8	Committed	No	New Construction – Family and Disabled

Property Name	City/Town	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
57 Main Street	Lee	4	Leased	No	Family - PHA-owned rehab of three-story, mixed-use building
571 Revere Street	Revere	8	Leased	No	Family-new construction 2 & 3-BR
58 Harry Kemp Way	Provincetown	4	Leased	No	Family units
580 South Summer Street	Holyoke	12	Leased	No	Family - Rehab with 1, 2, and 3 BR units
6 Fort Street	Quincy	8	Leased	No	Family and Elderly/Disabled units
616 Third Street	Fall River	4	Committed	Yes	RAD Conversion
62 Packard Bldg A	Hudson	8	Issued	No	Family Housing
62 Packard Bldg A	Hudson	8	Committed	No	Family Housing
66 Hudson at One Greenway	Boston	8	Leased	No	Disabled - PBV units reserved for disabled; new construction of 10-story high-rise
718-724 Second Street	Fall River	6	Committed	Yes	RAD Conversion
75 Amory Avenue	Boston	8	Leased	No	Family - New construction rental PBVs at 30% AMI
75 Cross Street	Somerville	8	Leased	No	Supportive services
82 Green Street	Boston	10	Leased	No	Units for homeless individuals
86 Dummer Street	Brookline	2	Leased	No	Family - New construction of rental in a three-story building
885C State Highway	Eastham	1	Leased	No	Family - New construction - 40B project
9 Leyland Street	Boston	8	Committed	No	New Construction – Elderly housing
9 May Street	Worcester	8	Leased	No	Family and Elderly/Disabled units
910 Main Street/Windrush	Great Barrington	8	Committed	No	New Construction – Elderly housing
950 Falmouth Road/LeClair Village	Mashpee	8	Committed	No	Family Housing
98 Essex	Haverhill	7	Leased	No	New construction/family

Property Name	City/Town	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
Acre High School Apartments	Lowell	8	Leased	No	Family and Elderly/Disabled units
Acushnet Commons	New Bedford	3	Leased	No	Family units
Aileron	Boston	8	Committed	No	Family Housing
Ames Privilege 2	Chicopee	4	Leased	No	Family - Substantial rehab of historic mill complex
Ames Shovel Works/Main and Oliver Streets	Easton	8	Leased	No	Family - Substantial rehab of historic factory complex
Amory Terrace/10 and 20 Amory Avenue	Boston	10	Leased	No	Family units
Amythyst Brook Apartments	Pelham	8	Issued	No	Family Housing
Amythyst Brook Apartments	Pelham	8	Committed	No	Family Housing
Anchor Point I	Beverly	8	Leased	No	New Construction – Family housing
Anchor Point Phase 2	Beverly	8	Committed	No	Family Housing
Appleton Mill Apartments	Holyoke	8	Committed	No	Elderly Housing
Appleton Mill Apartments	Holyoke	8	Committed	No	New Construction – Elderly housing
Armory Street Apartments	Worcester	1	Leased	No	Disabled - PBV unit reserved for disabled; new construction of four-unit building
Austin Corridor II	Worcester	5	Leased	No	Family - Substantial rehab of six separate buildings
Baker Brook Apartments (formerly Lunenburg Senior Living)	Lunenburg	8	Leased	No	New construction/family
Baker Street	Foxboro	20	Leased	No	Family units
Barnstable Family/Kimber Woods	W. Barnstable	7	Leased	No	Family units
Barnstable Senior/Lombard Farm	W. Barnstable	8	Leased	No	Elderly/Disabled units
Bartlett Station (Building A)	Boston	8	Leased	No	New construction/family
Baystate Place Apartments	Springfield	8	Committed	No	New Construction – Family housing
Bellingham Hill Family Homes	Chelsea	7	Leased	No	Supportive - Individual Service Plans (ISP) tailored to tenant needs. Services vary and can

Property Name	City/Town	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
					include: GED, parenting classes, employment training, financial management, referrals to other provider agencies
Benfield Farms	Carlisle	5	Leased	No	Elderly - New construction facility for the elderly
Bentley Apartments	Great Barrington	8	Leased	No	Family-new construction 2 & 3-BR
Berkshire Peak (formerly Riverview Homes)	Pittsfield	8	Leased	No	Disabled - Units reserved for disabled; new construction
Bethany Hill School	Framingham	10	Leased	No	Family units
Blanchard School	Uxbridge	6	Leased	No	Adaptive reuse family units
Bliss School	Attleboro	8	Leased	No	Family units
Borinquen Apartments (formerly Villa Borinquen)	Springfield	7	Leased	No	Family and Elderly/Disabled units
Bostwick Gardens	Great Barrington	8	Leased	No	New construction and Rehab, elderly, at 50% AMI
Bowers Brook	Harvard	4	Leased	No	Elderly/Disabled units
Breezy Acres Expansion/Great Cove Community	Mashpee	8	Leased	No	Family - New construction of five duplex buildings
Brewster Woods	Brewster	7	Committed	No	New Construction – Family housing
Bridgeview Center	Boston	8	Leased	No	Family and Disabled - New construction of mixed-use, multi-story building
Briscoe Village	Beverly	8	Committed	No	New Construction – Senior Housing
Broadway Building	Methuen	4	leased	No	New Construction – Family housing
Brockton South TOD	Brockton	8	Committed	No	New Construction – Family housing
Brook Ave.	Boston	4	Leased	No	Rehab/family units
Burbank Gardens	Boston	8	Leased	No	Rehab/family units

Property Name	City/Town	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
Burbank Terrace	Boston	7	Committed	No	New Construction – Family housing
Cabot Housing	Beverly	8	Leased	No	New Construction SRO
Cabot Street Homes	Beverly	8	Leased	No	Elderly/Disabled units
Canal Bluffs Phase I	Bourne	3	Leased	No	Family units
Canal Bluffs Phase II (Clay Pond Cove)	Bourne	8	Leased	No	Family units
Canal Bluffs Phase III (Highmeadows)	Bourne	7	Leased	No	Family- new construction 2 + 3-bedroom units
Cape View Way	Bourne	6	Issued	No	Family Housing
Cape View Way	Bourne	6	Committed	No	Family Housing
Capen Court	Somerville	8	Leased	No	Elderly/Disabled units
Capital Square Apartments	Arlington	8	Leased	No	Family units
Carpenters Glen	Taunton	8	Leased	No	Family - Rehab of existing townhouse-style development
Carter School	Leominster	8	Leased	No	Substantial Rehab-- Adaptive Reuse, Family units at 50% AMI
Casa Familias Unidas	Boston	8	Leased	No	Supportive services
Central Building	Worcester	8	Leased	No	Substantial Rehabilitation of an historic building creating mixed-income rental units; 50 affordable, 5 market rate
Chapin School Veterans Housing	Chicopee	43	Leased	No	Adaptive reuse of former school for Veterans
Chestnut Crossing	Springfield	8	Leased	No	Mod Rehab, 0-BR units at 50%
Chestnut Park Apartments	Holyoke	8	Leased	No	Family - Adaptive reuse of former church and school; 85, 95, 57-60 Chestnut Street, 218 Hampden Street
Chestnut Square Redevelopment	Lowell	8	Leased	No	Existing housing rehab/family
Cloverleaf	North Truro	8	Committed	No	Family Housing

Property Name	City/Town	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
Cole Ave.	Williamstown	8	Leased	No	Family - new construction 2 & 3-BR
Colonel Lovell's Gate Apartments	Weymouth	44	Leased	No	Family - Preservation
Commonwealth Apartments	Boston	88	Leased	No	Expiring Use Project - Family - 88 out of 106 EVs converted to PBVs
Conant Village	Danvers	13	Leased	No	Family units
Congress Street Residences	Salem	8	Leased	No	Family - New construction; Dow, Palmer, Congress, Perkins, Ward Streets
Conifer Hill Commons II	Danvers	8	Leased	No	Family - Six units have disabled preference; new construction of three-story townhouse
Conifer Hill Commons Phase I	Danvers	8	Leased	No	Family - Six units have disabled preference; new construction of three-story townhouse
Coolidge at Sudbury	Sudbury	8	Leased	No	Age-Restricted (55+ older) - New construction of four-story building
Coolidge at Sudbury Phase II	Sudbury	8	Leased	No	New construction/Family
Coppersmith Village Apartments	Boston	8	Leased	No	New Construction/Family
Cordovan at Haverhill Station	Haverhill	8	Leased	No	Family units
Cottage Square	Easthampton	8	Leased	No	Family - Adaptive reuse of former mill (four stories)
Counting House Lofts	Lowell	6	Leased	No	Family - Adaptive reuse of historic mill (six stories)
Cumberland Homes Apartments/Cumberland and Dwight	Springfield	8	Leased	No	Family units
Cutler Heights	Holliston	7	Leased	No	Family and Elderly/Disabled units

Property Name	City/Town	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
Dalton Apartments	Pittsfield	8	Leased	No	Family - Substantial rehab of existing multifamily housing; 11 separate buildings
Depot Crossing	Wareham	8	Leased	No	Family units
Depot Village I	Hanson	5	Leased	No	Family - new construction 2 & 3-BR
Doe House	Boston	5	Leased	No	Units for homeless individuals
Downing Square Broadway Initiative	Arlington	3	Leased	No	Family-new construction 3-BR
Duck Mill/Union Crossing Phase II	Lawrence	8	Leased	No	Family - Adaptive reuse of historic mill; PBVs serve 30% AMI families
Eagle Mill Phase I	Lee	8	Committed	No	New Construction – Family housing
Earle Street	Northampton	15	Leased	No	Family units; supportive services
East Howard Street/Veterans Housing	Quincy	8	Leased	No	Supportive Housing - Veterans preference; new construction, one building
Edmands House	Framingham	59	Leased	No	Expiring Use Project - Family - 59 out of 68 EVs converted to PBVs
Elias Brookings Apartments	Springfield	8	Leased	No	New Construction – Family housing
Elizabeth Brook Apartments	Stow	8	Committed	No	Elderly Housing
Elizabeth Stone House (formerly Washington Westminster House)	Boston	8	Leased	No	New Construction/family
Elm Place 4%	Swampscott	4	Committed	No	Family Housing
Elm Place 9%	Swampscott	8	Committed	No	Family Housing
Firehouse Place	Hamilton	4	Leased	No	Family and Elderly/Disabled units
First Lowell	Lowell	30	Leased	No	Expiring Use Project - Family - 30 out of 37 EVs converted to PBVs
Fitchburg Arts Academy/62 Academy Street	Fitchburg	8	Committed	No	Family Housing
Fitchburg Place	Fitchburg	8	Leased	No	Elderly/Disabled units



Property Name	City/Town	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
Fitchburg Yarn Mill	Fitchburg	8	Leased	No	Family units
Forest Springs	Great Barrington	5	Leased	No	Family - New construction
Founders Court/979 Falmouth Rd	Hyannis	2	Leased	No	Family units
Four Corners Plaza	Boston	8	Committed	no	New construction – Family housing
Freedom Village	W. Boylston	6	Leased	No	Family and Elderly/Disabled units
Gateway Residences on Washington	Lynn	8	Leased	No	Family - New construction mixed-use building
Gerson Building	Haverhill	8	Leased	No	New construction, family housing, 70% veteran's preference at 50% AMI
Glen Brook Way I	Medway	8	Leased	No	New construction/family
Glen Brook Way Phase 2	Medway	8	Committed	No	New Construction – Family housing
Golda Meir House Expansion	Newton	20	Committed	No	New Construction/elderly
Goshen Senior Housing	Goshen	6	Leased	No	Elderly - New construction
Grand Street Commons	Worcester	8	Leased	No	New Construction – Family housing
Grandfamilies House	Boston	8	Leased	No	Supportive services
Granite Street Crossing	Rockport	8	Committed	No	New Construction – Family housing
Granite Street Housing	Quincy	5	Leased	No	Supportive services
Greater Four Corners Stabilization - Pilot	Boston	2	Leased	No	Family - Scattered site rehab of four buildings
Hadley Building	Worcester	7	Leased	No	Family - Historic rehab of former furniture store
Harbor and Lafayette Homes	Salem	4	Leased	No	Moderate Rehabilitation with existing tenants
Harbor Cove/63 Washington Avenue	Chelsea	24	Leased	No	Supportive services
Harbor Village	Gloucester	8	Leased	No	Family-new construction 2 & 3-BR

Property Name	City/Town	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
Hattie Kelton (formerly General Heath Square Apartments)	Boston	8	Leased	No	New construction, family units
Hayes Building	Haverhill	4	Leased	No	Elderly/Disabled Units
Haywood House	Newton	8	Committed	No	New Construction/elderly
Hearth at Four Corners	Boston	8	Leased	No	Elderly - new construction
Hearth at Olmstead Green	Boston	15	Leased	No	Elderly/Disabled units
Herring Brook Hill (River Street)	Norwell	4	Leased	No	New construction
High Rock Homes	Needham	8	Leased	No	Family units
Highland Terrace	Chelsea	8	Leased	No	Family and Elderly/Disabled units
Highland Village	Ware	110	Leased	Yes	RAD (Rent Supp) - Existing Family Housing - two-story, townhouse-style buildings
Hillcrest Acres	Attleboro	8	Committed	No	New Construction – Family housing
Hillside Avenue	Great Barrington	5	Leased	No	Family and Elderly/Disabled units
Hillside Village	Ware	16	Leased	No	Family units
Holbrook Center Senior Housing	Holbrook	8	Committed	No	New Construction – Elderly housing
Holcroft Park Apartments	Beverly	8	Leased	No	Family and Elderly/Disabled units; 30 Mill Street; 10, 22, 30 Grant Street
Holcroft Park Homes Phase II	Beverly	8	Leased	No	Family and Elderly/Disabled units
Holtzer Park	Boston	8	Leased	No	Family - new construction 1, 2, 3-BR
Holyoke Farms Apartments	Holyoke	8	Leased	No	Rehab/family units
Home Together	Gloucester	4	Leased	No	Family - New construction of two duplex buildings
Hope in Action	Lawrence & Methuen	49	Leased	Yes	RAD (Rent Supp) - Existing Family

Property Name	City/Town	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
					Housing - seven scattered sites/two towns
Housing Corporation of Arlington - Scattered Sites	Arlington	4	Leased	No	Family units; 29 Bow Street, 288B Summer Street, 77 Webster Street, 222 Broadway
Indigo Block	Boston	8	Leased	No	Family-new construction 2 & 3-BR
Ingraham Place	New Bedford	8	Leased	No	Supportive services
Island Creek North/Age Restricted	Duxbury	8	Leased	No	Age-Restricted (55+ older) - New construction; one four-story building
Island Creek North/Age Unrestricted	Duxbury	8	Leased	No	New construction - One four-story building; fitness center/community room
Island Parkside Phase 1	Lawrence	8	Committed	No	New Construction – Family housing
Island Parkside Phase 2	Lawrence	8	Leased/Issued	No	Family Housing
Ivory Keys Apartments	Leominster	8	Leased	No	Family - Substantial rehab of historic former piano factory
Jackson Commons	Boston	8	Leased	No	Family - New construction of four-story building
Janus Highlands	Chelsea	8	Leased	No	Family units
Jewel Crossing	North Attleboro	8	Leased	No	Family - New construction; mixed income
John J Meany Senior	Gloucester	8	Committed	No	Elderly Housing
Julia Bancroft	Auburn	8	Committed	No	New Construction – Elderly housing
Kaszanek House	Malden	8	Leased	No	Rehab of 11-unit SRO facility with a homeless preference
Kendrigan Place	Quincy	8	Leased	No	Family - Rehab of existing six-story building
Kennedy Building Apartments	Hanover	4	Leased	No	Family - Adaptive reuse of old school building

Property Name	City/Town	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
Kensington Court at Lakeville Station	Lakeville	8	Leased	No	Family units
KGH Phase 4	Worcester	5	Leased	No	Family and Elderly/Disabled units
King Street	Northampton	5	Leased	No	Supportive services
Kings Landing	Brewster	78	Leased	No	Expiring Use Project - Family - 78 out of 108 EVs converted to PBVs
King's Lynne Apartments	Lynn	176	Leased	No	Existing family housing
Knitting Mill Apartments	Fall River	8	Leased	No	New construction
Knox Residence I	Springfield	8	Committed	No	New Construction – Family housing
Knox Residence II	Springfield	6	Committed	No	New Construction – Family Housing
Lafayette Housing	Salem	8	Leased	No	Family units; 10 Congress Street, 3-13 Prince Street Place
Lawson Green Apartments	Scituate	8	Leased	No	Elderly - new construction
Leland House	Waltham	8	Committed	No	Elderly Housing
Lenox Schoolhouse	Lenox	4	Leased	No	Age Restricted (55+ older) - Existing project changing from Assisted Living to 55 and older
Library Commons	Holyoke	5	Leased	No	Rehab/family units
Library Commons 2	Holyoke	8	Committed	No	Family Housing
Lighthouses	Salem	8	Committed	No	New Construction – Family housing
Lincoln Hotel	Salem	62	Leased	No	Family units
Lincoln School	Brockton	8	Committed	No	Elderly Housing
Little Pond Place	Falmouth	4	Leased	No	New Construction/family
Littleton Drive Family	Wareham	8	Committed	No	Family Housing
Littleton Drive Senior	Wareham	8	Committed	No	New Construction – Elderly housing
Loft @ 30 Pines (formerly Heywood Wakefield 4)	Gardner	8	Leased	No	Family - Substantial rehab of historic former mill
Loring Towers	Salem	8	Leased	No	Family units
Loring Towers 2	Salem	146	Leased	No	Expiring Use – Family housing

Property Name	City/Town	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
Lower Winter Street	Quincy	8	Committed	No	New Construction – Homeless
Ludlow Mill	Ludlow	8	Leased	No	Age Restricted (55+ older) - Adaptive reuse of historic mill building
Lydia Square Apartments Phase 1	Rockland	8	Leased	No	Elderly - new construction
Malden Mills Phase II	Lawrence	7	Leased	No	Family - Adaptive reuse of historic mill building into 62 units
Manomet Phase II/Cliftex Phase II	New Bedford	8	Committed	No	Adaptive reuse of a mill
Maple Woods	Wenham	8	Committed	No	Elderly/Disabled units
Maribay Apartments	Springfield	16	Leased/Issued	Yes	Family Housing
Marion Village Estates/Front Street/Route 105	Marion	8	Leased	No	Family - New construction of two buildings/two stories
Marshall Place Apartments	Watertown	8	Leased	No	Elderly/Disabled units
Mary Stone	Auburn	8	Leased	No	Elderly - new construction
Mashpee Village Phase II	Mashpee	8	Leased	No	Family - Rehab of existing affordable housing; 51 garden-style buildings
Mashpee Wampanoag Village	Mashpee	8	Leased	No	New construction, family housing, 30% AMI
Mason Square Apartments II	Springfield	8	Leased	No	Family-new construction 2 & 3-BR
Mattapan Station 4%	Boston	6	Leased	No	Family - new construction 2 & 3-BR
Mattapan Station 9%	Boston	2	Leased	No	Family - new construction 2-BR
Mayhew Court	Hopkinton	12	Leased	No	Family units
McCarthy Village/Whittlesey Village	Acton	12	Leased	No	Family - New construction of six duplexes on surplus housing authority land
McElwain School Apartments	Bridgewater	8	Committed	No	New Construction – Family housing

Property Name	City/Town	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
McManus Manor	Acton	8	Committed	No	Elderly Housing
Meadows Apartments (Westfield Hotel)	Westfield	5	Leased	No	Supportive services
Melpet/Route 134 Community Housing	Dennis	7	Leased	No	Family - New construction of eight farmhouse-style buildings
Merrimack Place	Haverhill	8	Committed	No	New Construction – Elderly housing
Middlebury Arms	Middleboro	49	Leased	No	Expiring Use Project - Family - 49 out of 62 EVs converted to PBVs
Mildred Hailey Building 1A	Boston	4	Committed	No	Family Housing
Mildred Hailey Building 1B	Boston	4	Committed	No	New Construction - Family housing
Mill 8 Apartments	Ludlow	8	Committed	No	New Construction – Elderly housing
Montello Welcome Home	Brockton	8	Leased	No	Supportive Housing - Homeless preference; new construction of 20-unit building (+1-2units)
Montello Welcome Home II	Brockton	8	Leased	No	New construction. Supportive housing services- homeless preference.
Moran Square Redevelopment	Fitchburg	5	Leased	No	New construction/family
Morgan Woods/Pennywise Path	Edgartown	6	Leased	No	Family units
Moseley Apartments	Westfield	6	Leased	No	Substantial Rehab-- Adaptive Reuse, Family units at 30% AMI
Noquochoke Village	Westport	8	Leased	No	Family- New construction
North Bellingham Veterans Home	Chelsea	8	Leased	No	Supportive Housing - Veterans preference; substantial rehab of legion post
North Square at the Mill District	Amherst	8	Leased	No	New construction, family units at 30% AMI
North Village II	Webster	134	Leased	Yes	RAD (Rent Supp) - Existing Family

Property Name	City/Town	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
					Housing; 12 townhouse-style buildings
Northampton Lumber Yard Apartments	Northampton	8	Leased	No	New Construction/family
Ocean Shores	Marshfield	8	Leased	No	Elderly/Disabled units
Old High School Commons	Acton	6	Leased	No	Family and Elderly/Disabled units
Olmsted Green 100	Boston	8	Leased	No	New construction, family housing at 50% AMI
Olmsted Green Affordable Rental IV	Boston	8	Leased	No	Family-new construction 1, 2, 3-BR
Olympia Oaks	Amherst	8	Leased	No	Family - New construction; 11 buildings
Orleans Cape Cod Five	Orleans	8	Committed	No	Family Housing
Oscar Romero	New Bedford	8	Leased	No	Family and Elderly/Disabled units
Outing Park I	Springfield	94	Leased	Yes	RAD (Mod Rehab) - Families - Existing multi buildings
Outing Park II	Springfield	81	Leased	Yes	RAD (Mod Rehab) - Families - Existing multi buildings
Oxford Ping on 3-4 Ping Street	Boston	4	Leased	No	Disabled - New construction of 10-story (w/elevator) building: PBV units reserved for disabled
PAC 10 Lofts Phase II	Lawrence	8	Committed	No	New construction/family/disabled
Paige Apartments	Lowell	8	Leased	No	Supportive - Individual Service Plans (ISP) tailored to tenant needs. Services vary and can include GED, parenting classes, employment training, financial management,

Property Name	City/Town	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
					referrals to other provider agencies
Palmer Cove	Salem	6	Leased	No	Family and Elderly/Disabled units, supportive services
Paradise Pond Apartments	Northampton	8	Leased	No	Family units
Parcel 25 Phase 1A	Boston	8	Leased	No	Family - New construction; five-story, mixed-use building
Parcel 25 Phase 2	Boston	8	Leased	No	New Construction/family
Parcel 8 & 9 Hamilton Canal District	Lowell	8	Leased	No	New Construction – Family housing
Pelham House	Newton	3	Leased	No	Elderly/Disabled units
Pilot Grove Apartments II	Stow	7	Leased	No	Family - New construction of five townhouse buildings
Pine Woods	Stockbridge	5	Leased	No	Family and Elderly/Disabled units
Plaza Apartments	South Hadley	8	Committed	No	New Construction – Family housing
Powderhouse Village	Ipswich	8	Leased	No	Elderly/Disabled units
Prichard Academy	Fitchburg	2	Leased	No	Family - Rehab of two four-story buildings
Prospect Estates	Webster	8	Issued	No	Family Housing
Prospect Estates	Webster	8	Committed	No	Family Housing
Prospect Hill	Westfield	4	Leased	No	Family units
Puerta de la Esperanza	Holyoke	27	Leased	No	Family - Rehab with 1, 2, and 3 BR units
Putnam Green	Cambridge	8	Leased	No	Family units
Reed House Annex	Westfield	8	Leased	No	Supportive services
Renwood-PWA Ltd. Part./158 Walnut Avenue	Boston	8	Leased	No	Supportive services
Renwood-PWA Ltd. Part./36 Edgewood Street	Boston	3	Leased	No	Supportive services
Renwood-PWA Ltd. Part./526 Mass. Avenue	Boston	7	Leased	No	Supportive services
Residences at Brighton Marine	Boston	8	Leased	No	New construction, family units 100%



Property Name	City/Town	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
					preference for veterans
Residences at Fairmount Station	Boston	6	Leased	No	New Construction/family
Residences at Salisbury Square	Salisbury	8	Leased	No	Family - New construction of affordable rental housing
Residences at Stonybrook Phase I	Westford	4	Leased	No	Family units
Residences at Stonybrook Phase II	Westford	4	Leased	No	Family - New construction of seven townhouse-style buildings
Reviviendo	Lawrence	3	Leased	No	Units for homeless individuals; 105 Newbury Street, 105 Haverhill Street, 60 - 62 Newbury Street, 10 Jackson Terrace
Rice Silk Mill	Pittsfield	5	Leased	No	Family units
Robert Hill Way Senior Apartments	Ashland	8	Leased	No	Elderly - new construction
Rosewood Way Townhouses	Agawam	8	Committed	No	New Construction – Family housing
RTH Riverway	Boston	8	Leased	No	Disabled - Units reserved for disabled; new construction of 10-story building
Ruggles Assisted Living	Roxbury	35	Leased	No	Supportive services
Sacred Heart	Lawrence	8	Leased	No	Elderly/Disabled units; 23 Hawley Street, 30 Groton Street, 32 Groton Street
Salem Harbor	Salem	4	Leased	No	Family units
Salem Heights	Salem	72	Leased	No	Family units
Salem Point LP	Salem	7	Leased	No	Family units; 43, 57-59, 64 Harbor; 43 Ward; and 38 Peabody Street
Salem Schools	Salem	8	Committed	No	Elderly Housing
Sally's Way	Truro	4	Leased	No	Family - New construction of six buildings on town-

Property Name	City/Town	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
					owned land (99-year lease)
Sanford Apartments	Westfield	5	Leased	No	Family units
Saunders School Apartments	Lawrence	16	Leased	No	Supportive services
Scranton Main	Falmouth	8	Committed	No	Elderly Housing
Senior Residences at Machon	Swampscott	8	Leased	No	55+ new construction
Shoe Shop Place	Middleborough	5	Leased	No	Family - Adaptive reuse of an old mill creating rental housing
Simon C. Fireman Expansion	Randolph	8	Committed	No	New Construction – Elderly housing
Sitkowski School	Webster	8	Leased	No	Elderly - Substantial rehab of former school
Southbridge Mills	Southbridge	5	Committed	No	New Construction – Family housing
Southgate Place	Worcester	6	Leased	No	Family and Elderly/Disabled units
Spencer Green	Chelsea	8	Leased	No	Family and Elderly/Disabled units
Spencer Row	Chelsea	8	Leased	No	Family and Elderly/Disabled units
Spring Gate	Rockland	181	Leased	Yes	RAD (Rent Supp) - Existing Family Housing - two-story, townhouse-style buildings
Spring Hill	Springfield	37	Leased	Yes	RAD (Rent Supp) - Existing Family Housing - two-story, townhouse-style buildings
Spring Meadows	Springfield	52	Leased	No	Expiring Use Project - Family - 52 out of 98 EVs converted to PBVs
Squantum Gardens I	Quincy	39	Leased	No	Elderly/Disabled units
Squantum Gardens II	Quincy	5	Leased	No	Elderly housing
Squirrelwood	Cambridge	2	Leased	No	Rehab & New Construction – Family housing

Property Name	City/Town	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
St. Joseph's Apartments	Lowell	4	Leased	No	Family units
St. Joseph's Redevelopment	Salem	8	Leased	No	Family (3 units) and Disabled (5 units) - New construction of four-story, mixed-use building
St. Polycarp - Phase I	Somerville	8	Leased	No	Family and Elderly/Disabled units
St. Polycarp - Phase II	Somerville	8	Leased	No	Family units
St. Polycarp - Phase III	Somerville	8	Leased	No	Family and Disabled - Three units reserved for disabled - new construction of three-story building
St. Therese Condo I	Everett	8	Leased	No	New construction/elderly
St. Therese Condo II	Everett	8	Leased	No	New construction elderly
Stable Path Residences	Provincetown	5	Leased	No	Family - New construction of 10 buildings (2- and 3-bedroom townhouses)
Stage Coach Residences	Centerville	6	Leased	No	Family (4 units) and Disabled (2 units) - New construction/surplus PHA land
Sterling Lofts/Mechanic Mill	Attleboro	8	Leased	No	Substantial Rehab-Adaptive Reuse, Family units at 30%
Steven's Corner	North Andover	8	Leased	No	Family and Elderly/Disabled units
Stone Mill Apartments	Lawrence	8	Committed	No	New Construction – Family housing
Sudbury Duplexes	Sudbury	11	Leased	No	Family units; 41 Great Road, 56 Great Road, 11 Ford, 19 Greenwood, 10 Landham
Summerhill Glen	Maynard	89	Leased	No	Expiring Use Project - Family - 89 out of 120 EVs converted to PBVs

Property Name	City/Town	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
Sycamore on Main	Brockton	8	Leased	No	New Construction – Family housing
Tapley Court	Springfield	8	Leased	No	Family and Elderly/Disabled units
Tavernier Place	Acton	7	Committed	No	New Construction – Elderly housing
Tenney Place Phase I	Haverhill	8	Leased	No	Family - New construction of two buildings
Tenney Place Phase II	Haverhill	8	Leased	No	New Construction/family
Terrapin Ridge	Sandwich	8	Leased	No	New Construction/family
Thankful Chase	Harwich	5	Leased	No	Family and Elderly/Disabled units
The Coolidge	Watertown	4	Leased	No	Elderly/Disabled units
The Flats at 22	Chelsea	5	Leased	No	Family and Disabled - Four units reserved for disabled; new construction/townho use style
The Kendall	Chicopee	8	Leased	No	Existing SRO; six units at 50% AMI and two units at 30% AMI
The Point at Hills Farm - 9%	Shrewsbury	8	Committed	No	Family Housing
The Pryde	Hyde Park	8	Committed	No	New Construction – Elderly housing
The Residences at Yarmouth Gardens	Yarmouth	8	Leased	No	New Construction – Family housing
The Sirk Building Limited	Lowell	8	Leased	No	Family units
Ticoma Green Workforce Housing	Nantucket	8	Committed	No	New Construction – Family housing
TILL Building	Chelsea	5	Leased	No	Family units
Tri-Town Landing I	Lunenburg	8	Leased	No	Family units
Tri-Town Landing II	Lunenburg	8	Leased	No	Family - New construction of three-story building; former drive-in
Tri-Town Landing III	Lunenburg	8	Leased	No	Family - New construction on site of former drive-in
Twelve Summer Street	Manchester-by-the-Sea	4	Leased	No	Family units

Property Name	City/Town	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
Union Block	Taunton	4	Committed	No	Family Housing
Union Crossing	Lawrence	8	Leased	No	Family units
Union Street Lofts	New Bedford	5	Leased	No	Existing/family housing
Unity House	Lowell	8	Leased	No	Family units; supportive services
Unquity House	Milton	139	Leased	Yes	RAD (Rent Supp) - Existing Elderly Housing - one high rise
Veteran's Supportive Housing/1323 Broadway Street	Somerville	7	Leased	No	Supportive Housing - Homeless veterans; rehab of former nursing home
Veterans Park Apartments/Schoolhouse Green	E. Falmouth	8	Leased	No	Elderly/Disabled units
Village at 815 Main	Wareham	5	Leased	No	Family units
Village at Hospital Hill	Northampton	8	Leased	No	Elderly/Disabled units
Village at Hospital Hill II	Northampton	8	Leased	No	Elderly/Disabled units
Village at Lincoln Park	Dartmouth	3	Leased	No	Family - New construction on former amusement park site
Village at Lincoln Park Senior	Dartmouth	8	Leased	No	Elderly - New construction
Village at Nauset Green (formerly Campbell-Purcell)	Eastham	8	Leased	No	New construction – Family housing
Village Center/Haydenville	Williamsburg & Chesterfield	14	Leased	No	Family - Rehabilitation of seven scattered site buildings: 11, 13 South Main Street; 1 North Main Street; 148 Main Street; 12 Williams Street; 397 Main Road; Chesterfield
Village Green Phase I	Barnstable	6	Leased	No	Family – New construction of two, three-story buildings
Village Green Phase II	Barnstable	8	Leased	No	Family - New construction - Phase II - PBVs are at 30% AMI

Property Name	City/Town	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
Voces de Esperanza	Holyoke	24	Leased	No	Family - Rehab with 1, 2, and 3 BR units
Wadleigh House	Haverhill	7	Leased	No	Supportive services
Wamsutta Apartments Historic Millwork Housing	New Bedford	8	Issued	No	Elderly Housing
Washington Square	Lynn	8	Leased	No	Family and Elderly/Disabled units
Washington Street SRO	Malden	6	Leased	No	Rehab of SRO facility (three-story building) preference for disabled
Water Mill (formerly Whitney Carriage)	Leominster	8	Leased	No	Family and Elderly/Disabled units
Wells School Apartments	Southbridge	8	Leased	No	Adaptive re-use
Westhampton Senior	Westhampton	3	Leased	No	Elderly/Disabled units
Westhampton Woods/Senior Housing-Phase II	Westhampton	2	Leased	No	Elderly - New construction of four duplex buildings
Westminster Senior Residence	Westminster	8	Committed	No	Elderly Housing
Westport Village Apartments	Westport	12	Leased	No	Elderly/Disabled units
Whipple School Annex	Ipswich	8	Leased	No	Elderly/Disabled units
White Terrace	Pittsfield	8	Committed	No	Family Housing
Wilber School	Sharon	8	Leased	No	Family units
Wilkins Glen	Medfield	82	Leased	No	Expiring Use Project - Family - 82 out of 103 EVs converted to PBVs
Winter Gardens	Quincy	6	Leased	No	Family and Elderly/Disabled units
Winter Street	Haverhill	13	Leased	No	Family - Workforce rental housing
Winthrop Apartments	Winthrop	8	Leased	No	Elderly - New construction of four-story building
Woodland Cove I	Wareham	8	Committed	No	New Construction – Family housing
Woodland Cove II	Wareham	8	Committed	No	New Construction – Family housing

Property Name	City/Town	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
Woods at Wareham	Wareham	19	Leased	No	Expiring Use Project - Family - 19 out of 22 EVs converted to PBVs
Worcester Loomworks 2	Worcester	8	Leased	No	Family - New construction (55 units); former mill site
Yarmouth Green	Yarmouth	7	Leased	No	New construction, family housing at 30% AMI
YMCA - Pittsfield	Pittsfield	30	Leased	No	Elderly/Disabled units; two units for homeless individuals
YWCA Fina House	Lawrence	7	Leased	No	Family units
YWCA Hillside	Newburyport	2	Leased	No	Units for homeless individuals
YWCA Market Street	Newburyport	4	Leased	No	Family - Rehab of an existing five-unit building plus a new addition for five units
YWCA Residences at Ingalls Court	Methuen	8	Committed	No	Elderly Housing
Zelma Lacey Mishawum	Boston	20	Leased	No	Supportive services
<b>Total: Planned Existing Project-Based Units</b>		<b>4,873</b>			

*v. Planned Other Changes to MTW Housing Stock Anticipated During the Plan Year*

**Table 5: Planned Other Changes to MTW Housing Stock Anticipated During the Plan Year**

Description
EOHLC does not own or manage any federally funded public housing.

*vi. General Description of All Planned Capital Expenditures During the Plan Year*

**Table 6: General Description of All Planned Capital Expenditures During the Plan Year**

Description
EOHLC does not own or manage any federally funded public housing nor does it receive public housing capital funds from HUD.

## Leasing Information

### *i. Planned Number of Households Served*

Table 7 below provides information only on MTW households that EOHLC plans to serve during FY 2025. In total, EOHLC expects to serve 21,162 MTW households.

**Table 7: Planned Number of Households Served**

Planned Number of Households Served Through:	Planned Number of Unit Months Occupied/Leased	Planned Number of Households to Be Served
MTW Public Housing Units Leased	N/A	N/A
MTW Housing Choice Vouchers (HCV) Utilized	251,304	20,942
Local, Non-Traditional: Tenant-Based	1,080	90
Local, Non-Traditional: Property-Based	1,296	108
Local, Non-Traditional: Homeownership	N/A	N/A
<b>Planned Total Households Served</b>	<b>253,680</b>	<b>21,140</b>

**Table 7A: Local, Non-Traditional Housing Programs**

Local, Non-Traditional Category	MTW Activity Name/Number	Planned Number of Unit Months Occupied/Leased	Planned Number of Households to Be Served
Tenant-Based	Family Economic Stability Program (FESP)	492	41
Tenant-Based	Youth Transition to Success Program (YTTSP)	300	25
Tenant-Based	Expanding Housing Opportunities: Relocation Assistance	288	24
Property-Based	Affordable Housing Preservation and Development Fund	1,296	108
Homeownership	N/A	N/A	N/A
Planned Households Served – Local Non-Traditional Programs		<b>2,376</b>	<b>198</b>

### *ii. Discussion of Any Anticipated Issues/Possible Solutions Related to Leasing*

**Table 8: Anticipated Issues and Possible Solutions Related to Leasing**

Housing Program	Description of Anticipated Leasing Issues and Possible Solutions
MTW Public Housing	N/A
MTW Housing Choice Voucher	EOHLC has experienced increasing challenges in leasing due to high housing costs, low availability of units, and discrimination. To that end, we are increasing our housing search work, looking to increase use of allowed flexibilities to make it easier to approve units, and continuing our Fair Housing Initiative.



Housing Program	Description of Anticipated Leasing Issues and Possible Solutions
Local, Non-Traditional	<p>Vouchers issued under the FES Program generally serve clients in the Boston area. Leasing all of the issued vouchers has affected the success rate of voucher holders due to the lack of availability of affordable housing options in the Boston housing market.</p> <p>Participants in YTTSP also encounter challenges in leasing units, as many of them have limited tenancy history having lived in dormitories and/or group home settings prior to referral. Participants also face the same barriers as other assisted households such as discrimination and ageism.</p>

## Waiting List Information

### *i. Waiting List Information Anticipated*

**Table 9: Waiting List Information Anticipated**

Waiting List Name	Description	Number of Households on Waiting List	Waiting List Open, Partially Open or Closed	Plans to Open the Waiting List During the Plan Year
Federal MTW Housing Choice Voucher Program, Federal Non-MTW Housing Choice Voucher Units	Other*	46,444	Open	N/A
Tenant-Based Local Non-Traditional MTW Housing Assistance Program	Other**	117	Open	N/A

*\*EOHLC combines site-based and centrally managed wait list features. All of EOHLC's Section 8 programs (including MTW and Non-MTW vouchers) use a regional, centrally managed wait list with the exception of Project-Based developments.*

*\*\*The Tenant-Based Local Non-Traditional MTW Housing Assistance Program is the Family Economic Stability Program. The wait list for this program is managed by Metro Housing/Boston. Applicants must meet certain requirements such as working at least part-time or participating in a full-time job training program.*

#### **Describe any duplication of applicants across waiting lists:**

The individuals on the Local Non-Traditional Waiting List for the FES program may also be on the Federal HCV Waiting List.

### *ii. Planned Changes to Waiting List in the Plan Year*

Other than anticipating transitioning the majority of the agency-maintained waitlists to site-based into FY 2025, EOHLC does not have any planned changes to the waiting list.

Waiting List Name	Description of Planned Changes to Waiting List
No Changes	No Changes

### III. Proposed MTW Activities

---

EOHLC is not proposing any new MTW activities for FY 2025.

## IV. Approved MTW Activities

---

This section of the Annual Plan summarizes and provides a status update on MTW activities that have been previously approved by HUD and implemented by EOHLC. As required, this section also includes summary information on MTW activities that have not yet been implemented, activities placed on hold by EOHLC, and closed out activities.

EOHLC has updated the metrics in the approved activities to reflect HUD's guidance that MTW PHAs are required to track all applicable "Standard HUD Metrics" under each implicated statutory objective for each MTW activity. Accordingly, standard metrics which EOHLC determined were not applicable to the identified statutory objective were removed.

### A. Implemented Activities

#### Activity 2000-1: Family Economic Stability (FES) Program

##### **Plan Year Approved, Implemented, Amended**

Approved FY 2000 and implemented FY 2001.

##### **Description/Update**

The Family Economic Stability (FES) Program is an assistance model which provides a fixed annual stipend to eligible families for five years, regardless of future income or family composition changes. Within certain guidelines, participants exercise considerable decision-making in the utilization of the funds, including unit selection and use of support funds. Case management and program coordination is provided by Metro Housing|Boston staff. Participants may select any housing unit, which they deem affordable and appropriate for their needs and which passes a Housing Quality Standards or NSPIRE inspection. The FES program also assists participants in reaching their goals related to increasing earned income, career progress, improving credit and financial literacy skills, increasing asset base, and developing a three-year housing stability plan.

Eligibility for the FES Program is targeted to low-income working families who meet the following criteria:

- Are committed to maintaining employment and agree to provide information to assess the effectiveness of the program;
- Are working at least part-time, are imminently employed, or are enrolled in a full-time job-training program; and
- At voucher issuance, household income must be sufficient to ensure that the tenant share of rent, with the subsidy, is no more than 40% of the monthly income.

FES provides participants with a "flat subsidy" that is not tied to household income. When a participant increases their earned income, as required by the program, their rent subsidy will not decrease. Conversely, if participants lose their jobs, their subsidy will not increase. FES staff and participants work closely to manage employment stability to avoid sudden loss of income. Participants are supported in

their housing search and selection to determine the most affordable unit based on family size and counseled to consider the challenges of a flat subsidy when selecting potential housing. Participants are also required to participate in financial coaching.

EOHLC continues to review and adjust subsidy levels for consistency with housing costs. In each program year, EOHLC reviews expansion of support funds options to include incentive payments for completion of goals such as retaining employment, removal from TANF, or completion of a job-training program. Any approved incentives payments will be part of the \$1,800 annual cap.

Metro Housing| Boston is the only RAA that operates a FES program and anticipates serving 41 households in the FES Program in FY 2025. The FES Program currently has a waitlist of 117 households.

### **Program Extensions**

EOHLC, on a case-by-case basis, may extend the rental subsidy for an additional six months following a loss of earned income as a result of an economic/health/natural disaster emergency as declared by the Governor or his/her designee.

### **Hardship Policy**

The hardship criteria below relate to hardships caused by economic/health/natural disaster emergencies as declared by the Governor or his/her designee and are only applicable during such emergencies.

- **Subsidy:** In the event of job loss, and a resulting rent burden greater than 40% of household income, participants may request to have their subsidy temporarily returned to their enrollment subsidy level. EOHLC will review and approve these requests in consultation with Metro Housing| Boston.
- **Support Funds:** EOHLC will waive the policy prohibiting the use of support funds for rent share in the event of job loss. Note: in order to maintain the availability of flexible support funds to meet other needs, all other available financial supports will be reviewed before releasing support funds.
- **Escrow Funds:** EOHLC will allow the use of accrued escrow funds to make payments for essential expenses such as rent and utilities, including internet access if enrolled in online classes. Note: in order to maintain the availability of escrow funds to maintain an asset base, all other available financial supports will be reviewed before releasing escrow funds.

### **Planned Non-Significant Changes**

EOHLC is currently examining the FES Program's impact and assessing the program model's strengths and challenges. Enrollment in the program is currently paused during the assessment period. In FY 2025, EOHLC may expand the FES model and make up to approximately 250 similar time-limited subsidies available to certain priority populations.

### **Planned Changes to Metrics/Data Collection**

Metrics have been updated to reflect the anticipated outcomes in FY 2025. As established in the FY 2024 Plan, in an effort to more accurately reflect program outcomes, the SS #2 metric will only be reported for graduates of the program during the plan year.

## Metrics

<b>SS #1: Increase in Household Income</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average earned income of households affected by this policy in dollars (increase).	\$18,937	\$35,000		
<b>SS #2: Increase in Household Savings*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average amount of <b>escrow</b> of households affected by this policy in dollars (increase).	\$0.00	\$1,150		
Average amount of <b>savings</b> of households affected by this policy in dollars (increase).	\$0.00	\$2,500		
<i>*These metrics are reported only for graduates of the program during the plan year.</i>				
<b>SS #3: Increase in Positive Outcomes in Employment Status</b>				
<b>Unit of Measurement</b>	<b>Baseline*</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Unemployed	1 participant	7 participants		
	1% of participants	16% of participants		
Employed Part-Time or Full-Time	50 participants	34 participants		
	99% of participants	84% of participants		
Enrolled in an Educational Program or Job Training	0 participants	4 participants		
	0% of participants	10% of participants		
<i>*Baseline numbers represent data from when the program switched from two administering agencies to one. Currently only one agency administers the FES Program and the target participation is 50 households. (Enrollment is paused while EOHLC evaluates the program.)</i>				

<b><i>SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving TANF assistance (decrease).	4 households in FY 2015	6 households		
<b><i>SS #5: Households Assisted by Services to Increase Self Sufficiency</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving services aimed to increase self-sufficiency (increase).	0 households	41 households		
<b><i>SS #8: Households Transitioned to Self Sufficiency*</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households transitioned to self-sufficiency (increase).	0 households	8 households*		
<i>*Self-sufficiency is defined as graduation from the FES Program.</i>				

#### **Planned Significant Changes**

No significant changes are planned.

## Activity 2010-2: Payment Standard Exceptions

### Plan Year Approved, Implemented, Amended

Approved and implemented FY 2010. Amended in FY 2024.

### Description/Update

Under this MTW initiative, EOHLC is authorized to approve any documented and reasonable exception to payment standards as a reasonable accommodation for HCV households with disabled household members without HUD approval.

This policy is utilized without regard to the percentage increase requested over the payment standard. Generally, EOHLC will not impose a limit on the number of exception payment standards; however, EOHLC reserves the right to limit the number of payment standard exceptions when and if budgetary issues arise.

EOHLC will continue to utilize its MTW authority to approve payment standard exceptions without prior HUD approval. EOHLC does not anticipate any significant changes to the volume of requests and outcomes for reasonable accommodation payment standard exceptions in FY 2025.

In its FY 2024 MTW Plan, EOHLC proposed and was approved to use MTW flexibility, as authorized in Attachment C, Section D.2.a of the Amended and Restated MTW Agreement, to adopt reasonable payment standards that may differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. This may include setting EOHLC's HCV payment standards based on certain percentages of HUD's Small Area Fair Market Rents to align with current local rental markets, to increase voucher utilization, and to expand housing choice.

### Planned Non-Significant Changes

There are no non-significant changes planned for FY 2025.

### Planned Changes to Metrics/Data Collection

No changes to metrics or data collection are planned.

### Metrics

HC #5: Increase in Resident Mobility*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	0 households	2,400 households		
<i>*These metrics include the total annual number of households that lease up in a new unit (including new admissions and relocations), as well as the number of households that submit payment standard exception requests that are granted as a reasonable accommodation.</i>				

### Planned Significant Changes

No significant changes are planned.



## Activity 2010-4: Development of Local Forms

### **Plan Year Approved, Implemented, Amended**

Approved FY 2010 and implemented FY 2013.

### **Description/Update**

Under this initiative, EOHLC develops local versions of forms, as needed, to streamline processing, utilize “plain language,” address MTW policies, and address local housing market features. New forms are rolled out to RAA contractors as they are completed.

To date, EOHLC has developed an addendum to the PBV HAP contract to reflect EOHLC’s MTW policies, a local version of the FSS Contract of Participation and Individual Training and Service Plan, and a local version of the Privacy Act and Release Form.

In FY 2025, EOHLC will continue to use the modified local version of the Privacy Act and Release form, implemented in January 2024, to reflect HOTMA Final Rule changes. Specifically, the updated form indicates that all applicants age 18 and over must sign the consent form at admission and participants must sign the consent form no later than their next interim or regularly scheduled income reexamination. After an applicant or participant has signed and submitted a consent form on or after January 1, 2024, they do not need to sign and submit subsequent consent forms at the next interim or regularly scheduled income reexamination except under the following circumstances: (1) When any person 18 years or older becomes a member of the family; (2) When a member of the family turns 18 years of age; and (3) As required by HUD, EOHLC, or the RAA in administrative instructions. Executed consent forms will remain effective until the family is denied assistance, the assistance is terminated, or if the family provides written notification to the owner revoking consent. Revoking consent or failure to provide consent may result in termination or denial of assistance.

In FY 2025, EOHLC anticipates finalizing and implementing local versions of the HCV Tenancy Addendum, the Project Based Tenancy Addendum and PBV Statement of Family Responsibility to reflect differences between the provisions in the documents and EOHLC’s MTW policies. While the new forms do not result in agency savings, the new forms more accurately reflect EOHLC’s MTW program and policies.

EOHLC will continue to look for new ways to streamline processing and enable greater staff efficiency while maintaining required data elements and transparency.

### **Planned Non-Significant Changes**

There are no non-significant changes planned for FY 2025.

### **Planned Changes to Metrics/Data Collection**

Metrics have been updated to reflect anticipated outcomes in FY 2025.

## Metrics

<b>CE #1: Agency Cost Savings</b>				
<b>Unit of Measurement</b>	<b>Baseline*</b>	<b>Benchmark**</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total cost of task in dollars (decrease).	<b>Total Cost Prior to Implementation:</b> \$243,302  <b>Number of Assisted Households:</b> 22,351  <b>Total Time per Form:</b> 0.5 hours  <b>Avg. Hourly Rate:</b> \$21.77	<b>Total Cost:</b> \$119,178  <b>Number of Assisted Households:</b> 20,936  <b>Total Time per Form:</b> 0.25 hours  <b>Avg. Hourly Rate:</b> \$24.74		
<i>* Baseline reflects the revised metric methodology implemented in FY 2022.</i> <i>** Benchmark reflects the number of planned HCV assisted households.</i>				
<b>CE #2: Staff Time Savings</b>				
<b>Unit of Measurement</b>	<b>Baseline*</b>	<b>Benchmark**</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total time to complete the task in staff hours (decrease).	<b>Total staff time required prior to implementation:</b> 11,176 hours  <b>Number of Assisted Households:</b> 22,351  <b>Total Time per Form:</b> 0.5 hours	<b>Total staff time required after implementation:</b> 5,234 hours  <b>Number of Assisted Households:</b> 20,936  <b>Total Time per Form:</b> 0.25 hours		
<i>* Baseline reflects the revised metric methodology implemented in FY 2022.</i> <i>** Benchmark reflects the number of planned HCV assisted households.</i>				

## Planned Significant Changes

No significant changes are planned.

## Activity 2011-2: Supporting Neighborhood Opportunity in Massachusetts (SNO Mass)

### (Formerly Your Choice Program & Opportunity Neighborhoods)

#### **Plan Year Approved, Implemented, Amended**

Approved FY 2011 and implemented FY 2020.

#### **Description/Update**

Under this initiative, EOHLC established the Supporting Neighborhood Opportunity in Massachusetts (SNO Mass) Program. The purpose of EOHLC's SNO Mass MTW initiative is to provide significant supports and encouragement to existing voucher participants and/or new voucher holders who wish to move to areas with empirically documented high-quality schools, healthy environments, and other opportunities. These communities have historically been "off-limits" to voucher holders due to market and administrative restrictions. Through SNO Mass, EOHLC is increasing housing choice for its voucher holders.

Existing participants and/or voucher holders interested in moving into opportunity neighborhoods are provided with counseling both before and after the move through the participating RAAs. Participating households are eligible to receive up to \$4,500 for allowable pre- and post-move expenses to assist families with accessing services and educational and extracurricular activities for their children in their new neighborhood.

SNO Mass is offered at all RAAs statewide with SNO Mass Mobility Specialists available at each RAA. Mobility Specialists complete family assessments to determine priorities and establish a housing plan that meets each family's needs. Once families are situated in their new neighborhoods, Mobility Specialists remain engaged for two years to provide post-move counseling. In FY 2025, EOHLC will continue to focus on support for existing voucher holders; however, the program may be expanded in future fiscal years to offer services to new voucher holders. EOHLC anticipates providing program orientation to 155 interested households in FY 2025 and providing counseling to 130 households. EOHLC's goal is to enroll and engage 110 households in housing search and ultimately move or lease up 60 households in identified opportunity neighborhoods.

#### **Planned Non-Significant Changes**

To help facilitate moves to SNO Mass Opportunity Areas, EOHLC may set special payment standards for SNO Mass participants moving to Opportunity Areas (e.g., use the higher of a certain percentage of area-wide Fair Market Rent and a certain percentage of Small Area Fair Market Rent).

#### **Planned Changes to Metrics/Data Collection**

Metrics have been updated to reflect anticipated outcomes in FY 2025.

**Metrics**

<b><i>HC #5: Increase in Resident Mobility</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark*</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	0 households	60 households		
*While RAAs will provide orientation to 155 interested households, EOHLC expects only 60 households will move/lease up a unit in a neighborhood of opportunity in FY 2025.				
<b><i>HC #7: Households Assisted by Services that Increase Housing Choice</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving services aimed to increase housing choice (increase).	0 households	155 households		

**Planned Significant Changes**

No significant changes are planned.

## Activity 2011-4: Multi-Year Recertifications

### (Formerly Biennial Recertification Process)

#### Plan Year Approved, Implemented, Amended

- Biennial Recert and Limit on Interim Recerts: Approved FY 2011; implemented and modified FY 2012.
- Triennial Recert: Approved FY 2020 and implemented FY 2021.

#### Description/Update

Under this initiative, the following recertification policies apply:

- Triennial recertifications for elderly/disabled households with fixed income only (SS/SSI/pension);
- Annual recertification for zero-income households; and
- Biennial recertifications for all other MTW households.
- Any household that believes they would benefit by an annual recertification may request an annual income recertification. If a household has requested and is approved for an annual recertification frequency, EOHLC will allow one voluntary interim recertification between annual recertifications.

The following policies apply to interim recertifications:

- Limit on voluntary interim recertifications: the number of voluntary interim recertifications that an MTW family may complete between regular biennial recertifications is two (2).
- Required interim recertifications do not count against the limit.

The following households are exempt from this provision and are able to complete an interim recertification at any time: elderly and disabled households, households that live in an Expiring Use project on the conversion date and select a PBV, households participating in the SNO Mass program, and FSS households. In FY 2025, EOHLC will continue the biennial recertification process and triennial recertification process for elderly/disabled households on fixed income. EOHLC continues to benefit from overall cost and time savings for processing biennial and triennial recertifications. As families generally do not have to report increases in income between biennial and triennial recertifications, this activity also has a positive financial impact for families.

#### Hardship

To respond to hardships which are beyond the tenant's control (no-fault hardships), MTW households who have exceeded the limit on interim reexaminations may request an emergency interim reexamination if the loss of household income is greater than 30% and beyond the control of the family.

During a state of economic/health/natural disaster emergency declared by the Governor or his/her designee, EOHLC will temporarily lift the limit on voluntary interim rent reductions for non-exempt families. EOHLC will make determinations as to when to re-impose the limit.

### **Planned Non-Significant Changes**

The changes below are consistent with EOHLC's existing MTW agreement, which continues to be in place and in effect. Any provisions of the 1937 Act and its implementing regulations that are amended by HOTMA and already explicitly waived by the MTW Agreement will continue to be waived by the relevant provisions of the MTW Agreement. Accordingly, the changes below do not require additional waivers and are part of provisions which have been explicitly waived under EOHLC's MTW agreement and which have been previously approved by HUD.

#### **Limit on Interim Recertifications:**

- EOHLC will continue to apply the previously approved limit on interim recertifications and related hardship policy.
- EOHLC's MTW interim recertification policy supersedes the HOTMA provision whereby EOHLC may decline to conduct an interim recertification if the change in the family's adjusted income is less than an EOHLC established percentage.

#### **Reporting Increases in Income Between Regular Recertifications:**

- As an alternative to the HOMTA provision regarding required interim recertifications for applicable increases in income, EOHLC, using its MTW flexibility, will retain its current policy whereby increases in income between regular recertifications do not need to be reported until the next regular recertification.
- Exceptions to this requirement include: required reporting of increases in income between regular recertifications for families reporting zero income and for households who have had a prior interim rent reduction since their last regular recertification.

#### **Rent Increase Effective Dates:**

As an alternative to the HOTMA provision regarding rent increase effective dates for interim recertification, EOHLC, using its MTW flexibility, will retain its current policy whereby if a change is reported late, the increase will be retroactive to the date it would have been effective had the information been provided on a timely basis.

### **Planned Changes to Metrics/Data Collection**

Metrics have been updated to reflect anticipated outcomes in FY 2025.

## Metrics

<b>CE #2: Staff Time Savings*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total time to complete the task in staff hours (decrease).	<b>Total Time Spent on Activity Prior to Implementation:</b> 50,745 hours  <b>Number of vouchers:</b> 20,298  <b>Time per Recertification:</b> 2.5 hours	<b>Anticipated Total Time Spent on Activity in FY:</b> 20,027 hours  <b>Anticipated Number of Recertifications:</b> 8,901  <b>Time per Recertification:</b> 2.25 hours		
<i>*Accounts for time savings from Biennial/Triennial Recertifications &amp; Rent Simplification</i>				

## Planned Significant Changes

No significant changes are planned.

## Activity 2011-5: Youth Transition to Success Program (YTTSP)

### **Plan Year Approved, Implemented, Amended**

Approved FY 2011 and implemented FY 2013. Amended in FY 2021.

### **Description/Update**

EOHLC initially designed and implemented a time-limited program to provide continued support to and build upon the successes of youth currently participating in its Family Unification - Aging Out of Foster Care Program that are facing the expiration on their subsidy. As the demand for FUP vouchers continued to grow, EOHLC has expanded the YTTSP throughout the years. YTTSP now provides subsidies and support to a broader group of youth, which includes FUP AOP referrals and “College” referrals from DCF. Participants receive a shallow, short-term, and time-limited subsidy; supportive services; funds for education, training, and employment-related expenses; an escrow account; and case management. Where DCF services are required for participation in this program, participation in the program ends when DCF services end.

EOHLC continues to review program eligibility requirements, subsidies, and incentives and may modify such program features in order to better serve program participants and enhance efforts for self-sufficiency. Any such modifications will be included in future MTW plans.

The following outlines eligibility requirements:

#### **FUP AOP Referrals**

- Referred by DCF
- Participated in FUP AOP for no less than 18 months
- Employed for at least 12 hours per week
- Enrolled in an education or training program at the time of referral. This includes individuals who are currently enrolled in a GED program as well as those who have completed nine (9) college level credits, but who may not have completed a full year of college
- Participant in good standing under FUP AOP, including no tenancy violations and current on rent
- Income eligible for the HCV Program; and
- Meet other EOHLC eligibility screening requirements.

#### **College Referrals**

- Referred by DCF
- Enrolled in a full-time or part-time moving to full-time post-secondary degree or Associate’s Degree program at the time of referral. This includes individuals who have completed 9 college level credits, but who may not have completed a full year of college
- Income eligible for the HCV Program; and
- Meet other EOHLC eligibility screening requirements.



YTSP will provide participants with:

- A flat rental subsidy that holds steady for the first two years and then steps down annually by 15% for the final three years.
- A matched savings account up to \$800/year; and
- An annual support budget of \$500 for expenses related to sustaining employment and meeting educational goals.

During periods of economic/health/natural disaster emergencies, as declared by the Governor or his/her designee, the following activity changes will be in effect:

#### **Program Extensions**

- Any participant who is scheduled to graduate from the program during the six-month period starting from the Governor's declaration of emergency will be eligible to receive rental subsidy for an additional six months from their planned graduation date. EOHLC may consider longer extensions if necessary, to allow participants to complete their educational program.

#### **Employment Requirements**

- Employment requirements are suspended (but not requirements to pay tenant share of rent) if a participant experiences a job loss or reduction in hours as a result of the emergency. In the event that third party verification is not available, EOHLC will process the change using a self-certification and will follow up with third party verification and confirmation from DCF staff.

#### **College Enrollment/Job Training Enrollment**

- If a current participant can document that they are unable to meet online enrollment requirements of their educational institution and/or the enrollment requirements of their job training program, EOHLC will waive enrollment in an education or job training program as a requirement for ongoing participation until the next semester after the declared emergency has been lifted. If in-person classes resume earlier, this waiver will end.
- In the event that third party verification of education/training enrollment status is not available, EOHLC will process the enrollment using a self-certification and will follow up with third party verification and confirmation from DCF staff.

#### **Hardship Policy**

- **Subsidy:** In the event of job loss, participants may request in writing to have their subsidy returned to their enrollment subsidy level. In the event that third party verification is not available, EOHLC will process the change using a self-certification and will follow up with third party verification and confirmation from DCF staff.
- **Subsidy:** Until the state of Emergency is lifted, rent subsidies will not be reduced in Years Three and Four.
- **Support Funds:** EOHLC will waive the policy prohibiting the use of support funds for rent share, in the event of job loss. Note: in order to maintain the availability of flexible support funds to meet other needs, all other available financial supports will be reviewed before releasing support funds.

- Escrow Funds: EOHLC will allow the use of accrued escrow funds to make payments for essential expenses such as rent, utility payments including internet access if enrolled in online classes. Note: in order to maintain the availability of escrow funds to maintain an asset base, all other available financial supports will be reviewed before releasing escrow funds.

In FY 2023, EOHLC began providing graduating College Track and YTTSP participants with an option to extend the existing subsidy for six months to provide time to search for and obtain employment. In this way, graduating participants are provided with a short-term financial “cushion” on their way to economic self-sufficiency. Additionally, EOHLC adjusted the flat rental subsidies provided to YTTSP participants to reflect 120% of the applicable Fair Market Rent.

In FY 2025, EOHLC anticipates a total of 25 households will be served by this activity.

#### **Planned Non-Significant Changes**

In FY 2025, EOHLC does not plan to accept any referrals from agencies other than DCF. In 2018, referrals were accepted from another provider for individuals enrolled in a full-time designated employment program. The five-year subsidies for those individuals ended in FY 2024, so that group will not be served in FY 2025.

#### **Planned Changes to Metrics/Data Collection**

Metrics SS #1 and SS #3 have been removed as the program is no longer serving participants from other agency referrals who are enrolled in a full-time designated employment program. While YTTSP participants may be employed in addition to attending school or job training, employment is not a central goal of the YTTSP program. Additionally, SS #4 has been removed as it is not a central goal of the program.

#### **Metrics**

<b><i>CE #4: Increase in Resources Leveraged</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Amount of funds leveraged in dollars (increase).	\$0.00	\$380,000*		
<i>*This number is tied to the number of participants.</i>				
<b><i>SS #2: Increase in Household Savings</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average amount of savings/escrow of households affected by this policy in dollars (increase).	\$0	\$1,500 savings		
<i>*The benchmark reflects only FUP AOP and college track referrals.</i>				

SS #5: Households Assisted by Services that Increase Self Sufficiency				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency (increase).	0 households	25 households		
SS #8: Households Transitioned to Self Sufficiency*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase).	0 households	5 households		
<i>*Self-sufficiency is defined as graduation from the YTTS Program.</i>				

#### Planned Significant Changes

No significant changes are planned.

## Activity 2012-1: MTW Utility Allowances

### Plan Year Approved, Implemented, Amended

- UAP \$25 or less
  - Approved FY 2012
  - Implemented FY 2012
- Simplified UA Schedule – Heat only
  - Approved FY 2014
  - Implemented FY 2014
- Other Electricity
  - Approved FY 2016
  - Implemented FY 2017
- Discretionary Periodic UA Review
  - Approved FY 2019
  - Implemented FY 2019
- Introduction of UAs for Cooking and Hot Water
  - Approved FY 2023
  - Implemented FY 2023

### Description/Update

Under this initiative, EOHLC established a simplified Utility Allowance (UA) schedule and eliminated Utility Allowance Payments under \$25. In FY 2014, EOHLC designed a UA model that eliminated all utility allowances except for heat. However, in FY 2017, in response to concerns about rising electricity costs, EOHLC implemented a revision to the UA model to include a utility allowance for other electricity. In addition, under this activity, EOHLC modified its UA policy to reflect discretionary periodic review of HCV utility allowance schedules to determine if adjustments are required. Annual updates are no longer required. Finally, in FY 2023, EOHLC revised the UA model to introduce allowances for cooking fuel and hot water. EOHLC maintains UA schedules for tenant-paid heat, other electricity, cooking fuel, and hot water that are based upon normal consumption by energy-conscious households as well as by unit size. EOHLC's UA schedules do not vary by geographical area and/or building type. Utility allowances for any other tenant-paid utilities are not provided. EOHLC determines reasonable accommodations for utilities on a case-by-case basis.

### Planned Non-Significant Changes

There are no non-significant changes planned for FY 2025.

## Planned Changes to Metrics/Data Collection

Metrics have been updated to reflect the changes in MTW utility allowances.

### Metrics

<b>CE #1: Agency Cost Savings*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total cost of task in dollars (decrease).	\$31,476,912	\$37,611,396		
<i>*Represents total utility allowances with additional UAs added back.</i>				
<b>CE #2: Staff Time Savings</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total time to complete the task in staff hours (decrease).	<b>Total staff time prior to implementation:</b> 2,256 hours  <b>Time required to calculate UA:</b> 8 minutes  <b>Number of UA calculated in FY 13:</b> 16,919	<b>Anticipated total staff time after implementation:</b> 1,340 hours  <b>Time required to calculate UA:</b> 5 minutes  <b>Anticipated number of UAs:</b> 16,078		
<b>CE #3: Decrease in Error Rate of Task Execution</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average error rate in completing a task as a percentage (decrease).	10%	4%		
<b>CE #5: Increase in Agency Rental Revenue*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average Tenant Rent Share (increase).	\$382 per household in FY 2014	\$323 per household		
<i>*EOHLC does not have any rental revenue and has been instructed by HUD to report on Average Tenant Rent to Owner.</i>				

**Planned Significant Changes**

No significant changes are planned.

## Activity 2012-4: Expiring Use Preservation Initiative

### Plan Year Approved, Implemented, Amended

Approved FY 2012 and implemented FY 2013.

### Description/Update

This initiative was designed to preserve the long-term affordability of expiring use properties. EOHLC will make use of the resources provided by HUD in the form of Enhanced and Tenant Protection Vouchers to continue the affordability of the units in these projects by converting eligible units immediately to Project-Based Units with a 15-year affordability period.

Since its approval, this initiative has been modified so that MTW flexibilities may extend to units converted to PBV under RAD. Additionally, EOHLC modified the income eligibility requirements for tenants who occupy units at the time of a RAD conversion to the PBV program.

In FY 2025, EOHLC anticipates additional developments may be added to its expiring use or RAD inventory. In particular, EOHLC is working with Moderate Rehabilitation owners who are interested in converting their properties via the RAD process. To date, EOHLC has 10 expiring use contracts with a total of 684 units under HAP contract. Additionally, EOHLC has completed 11 Rental Assistance Demonstration (RAD) conversion projects and currently provides a subsidy for 851 units under this program.

### Planned Non-Significant Changes

There are no non-significant changes planned for FY 2025.

### Planned Changes to Metrics/Data Collection

No changes to metrics or data collection methods are planned.

### Metrics

HC #2: Units of Housing Preserved				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).	0 housing units	1,535 housing units*		
<i>*Previously EOHLC has included only Expiring Use units when setting benchmarks and determining outcomes for this metric. This figure includes all RAD and Expiring Use units, and EOHLC will continue to use this methodology going forward and does not include any additional units for FY 2025.</i>				

### Planned Significant Changes

No significant changes are planned.

## Activity 2012-5: Family Self Sufficiency Program Enhancements

### Plan Year Approved, Implemented, Amended

Approved FY 2012 and implemented FY 2013.

### Description/Update

EOHLC uses MTW funds to enhance the existing Family Self-Sufficiency (FSS) Program. These features will encourage participation and successful completion of the program. Features include, but are not limited to:

- Providing matched savings for clients who would otherwise be ineligible for the escrow component of FSS due to their level of earned income at the time they join the program (Savings Match Homeownership Program, SMHP);
- Providing flexible funds for expenses that would otherwise present barriers and thus prevent participants from maintaining or starting employment and/or enrolling in education or job training; and
- Establishing a \$5,000 incentive payment for FSS graduates that choose to withdraw from the HCV Program within 2 years of completion of the FSS Program and who apply and are approved for homeownership.

In November of 2013, EOHLC also began providing “gap” funding to address financial barriers to employment and increase long-term economic capacity by providing participants with incentives to complete education and training programs before entering the workforce.

In January 2014, EOHLC implemented revisions to the enhanced FSS program, including:

- Placement of an absolute cap on the amount of escrow regardless of prior FSS participation at any of EOHLC’s RAAs statewide. The cap, which may be periodically reviewed and updated at EOHLC’s discretion, will be set at \$25,000 per household. Education and job training incentive payments provided under the FSS program will be counted toward the escrow cap. Homeownership incentive payments, Jump Start awards, and earned interest are not applied to the escrow cap. In FY 2025, EOHLC is proposing to remove the absolute escrow cap in order to provide FSS participants with more opportunities to escrow.

To encourage the goal of homeownership for applicable households in the FSS Program, EOHLC obtained approval to modify its current FSS Program to allow certain households to define a path to homeownership by utilizing individualized homeownership education, financial coaching, required workshops, and a modified savings/escrow component. EOHLC continues to offer the previously approved goal-specific incentive payments as well as the matched savings homeownership incentive. This component of EOHLC’s FSS program provides higher income households with the opportunity to supplement the traditional escrow model with an EOHLC match of individual savings. In this way, EOHLC is able to assist more families to realize the goal of homeownership.



EOHLC has implemented local versions of the FSS Contract of Participation (COP) and Individual Training and Services Plan (ITSP). The local versions of the COP and ITSP allow EOHLC to reflect MTW program requirements and incentives for FSS participants.

In FY 2024, EOHLC implemented the following approved changes to the FSS program:

- Continue to utilize a 5-year term on all FSS CoPs, with the effective date of the CoP to be the first day of the month following the date the contract is executed (rather than the first reexamination of income after the CoP execution date) and the initial expiration date is five years from the first day of the month following CoP execution.
- Established additional mandatory goals for all FSS participants.
- For participants enrolled in the Savings Match Homeownership Program, graduation is incumbent on the participant completing five homeownership-focused workshops.

In FY 2025, EOHLC anticipates that approximately 150 new participants will join the FSS Program with a total participation of 850 FSS participants in FY 2025. Additionally, EOHLC anticipates that 115 households will graduate from the FSS program in FY 2025 with an average escrow balance of \$7,314.

#### **Planned Non-Significant Changes**

In FY 2025, EOHLC proposes to eliminate the previously approved \$25,000 cap on escrow. This will increase the financial asset base and long-term financial stability of households, increase reengagement and reenrollment of graduates, and increase reenrollment of higher income families who may have previously reached the \$25,000 cap on escrow.

Additionally, EOHLC plans to allow the use of Forfeited FSS Escrow funds for qualifying expenses of other adult household members within the FSS household. FSS participants wishing to access these funds for a household member must have an ITSP goal indicating that overall family economic stability is central to their participation in FSS, and the expenses must be tied to the household member's own economic stability outcomes. EOHLC also plans to allow FSS Forfeited Escrow funds to be used for FSS participants' short-term family emergency expenses (such as diapers, groceries, medical co-pays, and prescriptions) to prevent longer-term crises and financial instability. EOHLC acknowledges that the uses of Forfeited FSS Escrow described in this paragraph do not require MTW flexibilities.

#### **Planned Changes to Metrics/Data Collection**

Metrics have been updated to reflect anticipated outcomes in FY 2025.

#### **Metrics**

<i><b>SS #1: Increase in Household Income</b></i>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average earned income of households affected by this policy in dollars (increase).	\$20,554	\$21,000		

<b><i>SS #2: Increase in Household Savings</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average amount of <b>escrow</b> of households affected by this policy in dollars (increase).	\$0.00	\$4,700		
<b><i>SS #3: Increase in Positive Outcomes in Employment Status</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Unemployed	501 participants	340 participants		
	57% of participants	40% of participants		
Employed Part-Time or Full-Time	372 participants	510 participants		
	43% of participants	60% of participants		
<i>*Represents work-able households only.</i>				
<b><i>SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving TANF assistance (decrease).	162 households	95 households		
<b><i>SS #5: Households Assisted by Services that Increase Self-Sufficiency</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving services aimed to increase self-sufficiency (increase).	0	850 households		
<b><i>SS #6: Reducing Per Unit Subsidy Costs for Participating Households</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average amount of Section 8 subsidy per household affected by this policy in dollars (decrease).	\$931 in FY 2014	\$1,424		

<b>SS #7: Increase in Agency Rental Revenue*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total Household contributions towards housing assistance (increase).	\$388 FY 2014	\$626		
<i>*Represents Average Tenant Rent to Owner.</i>				
<b>SS #8: Households Transitioned to Self Sufficiency*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households transitioned to self-sufficiency (increase).	0 households	115 households		
<i>*Self-sufficiency is defined as graduation from the FSS program.</i>				

#### **Planned Significant Changes**

No significant changes are planned.

## Activity 2015-1: Rent Simplification

### Plan Year Approved, Implemented, Amended

Approved FY 2012, implemented FY 2012, and modified FY 2016.

### Description/Update

In FY 2012, HUD approved EOHLC's Rent Simplification activity. The components of rent simplification that are currently in effect are as follows:

- Minimum Rent of \$50;
- Exclusion of all Full-Time Student Income;
- Streamlined Asset Verification and Calculation;
- Application of the Payment Standard in effect on the effective date of the regular recertification, regardless of any change in the Payment Standard from year to year;
- Application of the Payment Standard used at the last regular recertification during an interim recertification with the following exception:
  - Where households on biennial and triennial recertification cycles have interim recertifications related to increases in contract rents, EOHLC will apply the payment standard in effect at the time of the interim recertification. Where the payment standard in effect at the time of the applicable interim recertification reflects a decrease when compared to the payment standard applied at the last regular recertification, EOHLC will not update the payment standard at the interim recertification and will wait until the next regular recertification to update the payment standard.
- Streamlined approach for calculation of unreimbursed medical expenses by using the prior year's paid, unreimbursed medical expenses plus prospective medical insurance premiums. Over-the-counter medications must be accompanied by a physician's prescription and paid receipt.
- Exclusion of 100% of income received from EOHLC reviewed and approved guaranteed income programs which is paid to support financial stability and economic equality.
- \$5,000 exclusion of earned income for working families (implemented FY 2023).

EOHLC will implement this previously approved provision in FY 2025:

- Revised Mixed Families rent formula where mixed families will pay an additional 10% of TTP regardless of the number of family members without citizenship or eligible immigration status.

EOHLC may implement this previously approved provision in FY 2025:

- The income disregard for households with children who returned to the unit after completing two- or four-year post-secondary degree or accredited technical school programs.

Finally, in FY 2025 EOHLC will also review the current approved rent simplification activity and consider alternative models such as tiered rents or rents based on household size. Any such changes will be included in a subsequent MTW Plan Supplement or Annual Plan.

### **Planned Non-Significant Changes**

The changes below are consistent with EOHLC's existing MTW agreement, which continues to be in place and in effect. Any provisions of the 1937 Act and its implementing regulations that are amended by HOTMA and already explicitly waived by the MTW Agreement will continue to be waived by the relevant provisions of the MTW Agreement. Accordingly, the changes below do not require additional waivers and are part of provisions which have been explicitly waived under EOHLC's MTW agreement and which have been previously approved by HUD.

- **Income Calculation:**

- Using its MTW flexibility, EOHLC will continue to calculate annual income by adding the income the family expects to receive during the 12-month period following the family's admission or regular reexamination effective date. Accordingly, annual income is calculated by projecting current income forward for a 12-month period.
- This method of income calculation will be used for new admissions, regular and interim reexaminations. Exceptions to this policy include but are not limited to families with seasonal income. For these families, retrospective income will be used.
- If an estimate can be made for those families whose income fluctuates from month to month by income averaging, this estimate will be used so that the housing payment will not change from month to month.
- If there are bonuses or overtime, which the employer cannot anticipate for the next twelve months, bonuses and overtime received the previous year will be used.

- **Assets:** As an alternative to the HOTMA asset regulations, EOHLC will apply MTW flexibility and will not implement the HOTMA \$100,000 asset and real property limitations for continuing occupancy participants and instead will retain its existing MTW policy on asset verification, asset income calculation, and asset exclusion for those participants. Accordingly, there are no imputed returns for assets valued at \$50,000 or less. Additionally, EOHLC's MTW asset policies are predicated around market/face value of the asset and not the net cash value of the asset. Self-certification of assets valued at \$50,000 or less will be accepted at admission and at all certifications thereafter. Third-party verification is not required. EOHLC will not require households to verify the amount of their federal tax refund or refundable tax credits, regardless of the total amount of family net assets.

- **Modified Deductions:** As an alternative to the HOTMA deduction regulations, EOHLC proposes the following deduction amount:

- \$650 for Elderly/Disabled households

For EOHLC's revised deduction and expenses policies, EOHLC will consider exceptions to these policies on a case-by-case basis for families whose overall expenses (medical or child care) exceed

\$5,000 and who can demonstrate a long-term hardship that will result from application of the policies to them. Families granted an exception may, at maximum, deduct expenses over the \$5,000 threshold. EOHLC may reevaluate and modify these amounts and policies periodically as needed.

#### Planned Changes to Metrics/Data Collection

Metrics have been updated to reflect anticipated outcomes in FY 2025.

#### Metrics

<b>CE #1: Agency Cost Savings</b>				
<b>Unit of Measurement</b>	<b>Baseline*</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total cost of task in dollars (decrease).	<b>Total Cost of Activity Prior to Implementation:</b> \$922,037  <b>Number of vouchers:</b> 20,298  <b>Time per Recertification:</b> 2.5 hours  <b>Average Hourly Staff Rate:</b> \$18.17	<b>Anticipated Total Cost of Activity in FY:</b> \$495,474**  <b>Anticipated Number of Recertifications:</b> 8,901  <b>Time per Recertification:</b> 2.25 hours  <b>Average Hourly Staff Rate:</b> \$24.74		
<i>*Baseline represents the metrics used when this activity was initially proposed.</i>				
<i>** Accounts for cost savings from Biennial/Triennial Recertifications &amp; Rent Simplification</i>				

<b>CE #2: Staff Time Savings</b>				
<b>Unit of Measurement</b>	<b>Baseline*</b>	<b>Benchmark**</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	<b>Total Time Spent on Activity Prior to Implementation:</b> 50,745 hours  <b>Number of vouchers:</b> 20,298  <b>Time per Recertification:</b> 2.5 hours	<b>Anticipated Total Time Spent on Activity in FY</b> 19,431 hours  <b>Anticipated Number of Recertifications:</b> 8,636  <b>Time per Recertification:</b> 2.25 hours		
<i>*Baseline represents the metrics used when this activity was initially proposed.</i>				
<i>**Accounts for time savings from Biennial/Triennial Recertifications and Rent Simplification.</i>				
<b>CE #3: Decrease in Error Rate of Task Execution</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average error rate in completing a task as a percentage (decrease)	21%  Average error rate for income and rent errors	19%		
<b>CE #5: Increase in Agency Rental Revenue*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Increase in agency rental revenue in dollars (increase)	\$382	\$308		
<i>*EOHLC does not have any rental revenue and has been instructed by HUD to report on average tenant rent to owner.</i>				

#### **Planned Significant Changes**

No significant changes are planned.

## Activity 2018-1: Expanding Housing Opportunities: Relocation Assistance

### **Plan Year Approved, Implemented, Amended**

Approved FY 2018 and implemented FY 2020.

### **Description/Update**

HUD approved EOHLC's Expanding Housing Opportunities activity in FY 2018. Under this activity, EOHLC uses MTW funding flexibility to support a comprehensive redevelopment program that preserves existing state-aided low-income housing. Construction and long-term operating funding will be from state and private equity sources. MTW funds are primarily supporting rental subsidies, moving expenses, and start-up costs (e.g., security deposits, vacancy payments) associated with short-term housing for low-income residents during construction. No MTW funds will be used to support construction. Relocation assistance under this activity will be provided to eligible families at or below 80% of AMI.

EOHLC issued an RFP and awarded planning grants to two Local Housing Authorities (LHAs), Somerville Housing Authority (SHA) and Chelsea Housing Authority (CHA), for the preservation and redevelopment of public housing.

The Chelsea project (Innes Apartments) closed in May of 2022, with relocation beginning in the spring. The project involves the demolition of 96 units of family public housing and the construction of 320 new units at the same site (96 replacement public housing units and 224 market-rate rental units). The project broke ground in the early part of FY 2023 with construction estimated to be completed in FY 2025. Fourteen households were temporarily relocated to private, market-rate units, and thirteen of those households are currently receiving an MTW-funded rent subsidy. An additional 46 households have temporarily relocated to other types of housing and will not require a rent subsidy but may be assisted with moving costs and other relocation-related expenses using MTW funding. It is estimated that households will return to renovated units in October of 2024.

The Somerville project (Clarendon Hill) closed during the first quarter of calendar year 2023. Phase 1A of the project involves the demolition of 72 public housing units and the construction of 168 units, of which 130 represent public housing replacement units and 38 represent net-new affordable housing units. Most tenants in Phase 1A have been temporarily relocated to other parts of the Clarendon Hill development or to other Somerville Housing Authority public housing developments. Eleven households have temporarily relocated to privately-owned units and are currently receiving an MTW-funded rent subsidy. Forty-eight households were temporarily relocated to other units in Somerville's portfolio. Of these 59 total households, 25 are receiving MTW-funded utility assistance payments. Phase 1A is expected to be completed in the fall of 2024, with households returning to the new Building E at the property. Phase 2 is anticipated to begin during the first quarter of calendar year 2025, which will kick off another round of relocation of Clarendon Hill households.

### **Planned Non-Significant Changes**

There are no non-significant changes planned for FY 2025.

### **Planned Changes to Metrics/Data Collection**

Metrics have been updated to reflect the outcomes in FY 2025.



**Metrics**

HC #2: Units of Housing Preserved				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase). If units reach a specific type of household, give that type in this box.	0	226		
HC #4: Displacement Prevention				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households at or below 80% AMI that would lose assistance or need to move (decrease). If units reach a specific type of household, give that type in this box.	0	119		

**Planned Significant Changes**

No significant changes are planned.

## Activity 2018-3: Vouchers for Special Populations

### (Formerly Support for the Secure Jobs Initiative: Vouchers and Services)

#### Plan Year Approved, Implemented, Amended

- Secure Jobs Initiative: Approved FY 2018 and implemented FY 2019.
- Inclusion of other vulnerable populations: Approved and implemented FY 2024.

#### Description/Update

In FY 2018, HUD approved EOHLC's Support for the Secure Jobs Initiative: Vouchers and Services activity. Under this activity, EOHLC utilized MTW vouchers and MTW Block Grant funding flexibility to support and expand on the Secure Jobs Initiative (SJI), which provides integrated case management, employment supports, and housing assistance to homeless and low-income families.

EOHLC provided Housing Choice Vouchers to up to 50 eligible families referred from the SJI Program. The administering agency for SJI, the Department of Transitional Assistance, referred eligible families to EOHLC for these vouchers via a lottery. Supportive services were provided to participants using MTW Block Grant funds, and referrals from SJI were made upon completion of training or job placement. EOHLC screened SJI referrals per its Administrative Plan screening policies, and income, rent, and subsidy were calculated per EOHLC's MTW income and rent policies. As participants leave the program, EOHLC will reissue these vouchers as regular MTW program vouchers and they will no longer be allocated to a participant in the Secure Jobs Program.

No new vouchers were issued to Secure Jobs participants in FY 2024, and it is not anticipated that any will be issued in FY 2025.

In FY 2024, EOHLC expanded this activity to allow vouchers to be set aside for other vulnerable populations in our communities. The Commonwealth of Massachusetts continues to experience a homelessness crisis, with the number of households residing in EOHLC's Emergency Assistance (EA) family shelters at a record high and increasing rapidly. As a "right-to-shelter" state for families experiencing homelessness, the state has an obligation to provide shelter to all families who qualify. By providing vouchers to households referred from EA family shelters (and other types of shelters, as needed), EOHLC will be able to help relieve the pressure on our state's shelter capacity and provide permanent housing to some of the state's most vulnerable residents. In FY 2025, we anticipate continuing to set aside and lease up to 1,500 vouchers for households referred from EA shelters.

#### Planned Non-Significant Changes

As the vulnerable populations contemplated in this activity face the same or similar challenges to households referred for HUD's Emergency Housing Voucher (EHV) program, EOHLC plans to apply relevant programmatic waivers and alternative requirements set forth in section 9 of [PIH Notice 2021-15](#), the EHV operating requirements. We intend to apply flexibilities that are not already covered in other approved MTW activities, namely regarding denial of assistance (9(g)), income verification (9(h) and 9(k)), and Social Security and citizenship verification (9(i)).

### Planned Changes to Metrics/Data Collection

There are no planned changes to metrics or data collection in FY 2025.

### Metrics

HC #5: Increase in Resident Mobility*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	0 households	204 households		
<i>*Defined as the number of households served by this activity that lease up in a unit using their voucher.</i>				
HC #7: Households Assisted by Services that Increase Housing Choice*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase housing choice (increase).	0 households	600 households		
<i>*Defined as the number of households served by this activity that are issued a voucher.</i>				

### Planned Significant Changes

No significant changes are planned.

## Activity 2018-7: Enhanced Local Project-Based Voucher Program

### Plan Year Approved, Implemented, Amended

- Enhanced Local PBV: Approved and implemented FY 2018.
- PBV Site-Based Waiting Lists: Approved in FY 2010 and implemented in FY 2013.

### Description/Update

Through its Enhanced Local Project-Based Voucher (PBV) Program, EOHLC partners with for-profit and non-profit housing providers to expand the supply of affordable housing to low-income families. To meet the evolving needs of the Agency and the residents served, EOHLC enhanced and expanded its existing PBV program as follows:

- EOHLC authorized owners/managers of PBV developments to be responsible for all PBV waiting list intake and management functions for their developments. Applicants contact the owner/manager of a specific development in order to file an application. Applicant files and the waiting list itself are maintained at the development site. Owner/managers are responsible for contacting and screening applicants who come to the top of the waiting list, collecting all needed information from the applicant, and then forwarding the applicant to the RAA for eligibility determination and processing.
- Increase the 20% cap on PB units in EOHLC's portfolio. EOHLC will use 40% as the cap for budget authority allocated to Project-Based vouchers.
- Project base up to 100% of the dwelling units in any PBV project or building.
- Both initial and re-determined PBV rent to owner will not exceed the lowest of the following:
  - The reasonable rent;
  - The rent requested by the owner; or,
  - Such other amount determined by EOHLC to be appropriate for the unit, based upon the nature of the unit and the RFP from which the owner was selected. For example, in certain cases, EOHLC believes a shallower or higher subsidy may be more appropriate.
- Waive the option that allows PBV participant families to move with a tenant-based voucher after one year of assistance in a project-based unit, which has not yet been implemented.

EOHLC will retain its existing MTW policy and continue to allow project-based participant requests for tenant-based vouchers with threshold caps for each RAA. In a prior plan year, EOHLC received approval to discontinue providing tenant-based vouchers to project-based participants; however, EOHLC may choose not to implement this portion of the approved activity.

EOHLC's PBVs are allocated through the state's competitive rental round and in concert with the award of Low Income Housing Tax Credits. Proposal rounds are fluid and occur at different times throughout the year with the related funding announcement made upon award. Given that EOHLC's MTW Plan is due to HUD prior to the award of FY 2025 PBV funding, EOHLC cannot identify which projects will be awarded PBVs at this time. Further, of the awards made, EOHLC cannot determine at this time which proposals

will pass all screening thresholds and enter into AHAP or HAP contracts. EOHLC will report on all projects and PBVs committed, issued, or leased in FY 2025 in the FY 2025 Annual Report. For the purposes of the metrics in this activity, EOHLC estimates that approximately 250 new PBV units will be added throughout its jurisdiction in FY 2025.

#### Planned Non-Significant Changes

There are no non-significant changes planned for FY 2025.

#### Planned Changes to Metrics/Data Collection

No changes to metrics or data collection methods are planned.

#### Metrics

<b>HC #4: Displacement Prevention</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark*</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households at or below 80% of AMI that would lose assistance or need to move (decrease).	0	5,123		
<i>*The benchmark is updated to reflect the total of existing PBVs and anticipated new PBVs in the FY and is projected based on prior FYs.</i>				

#### Planned Significant Changes

No significant changes are planned.

## Activity 2018-9: Affordable Housing Preservation and Development Fund

### Plan Year Approved, Implemented, Amended

Approved and implemented FY 2018.

### Description/Update

In FY 2018, HUD approved and EOHLC began the implementation of the Affordable Housing Preservation and Development Fund activity. Under this activity, EOHLC utilizes MTW Block Grant funds to support the development and preservation of affordable rental housing units through implementation of a new Affordable Housing Preservation and Development Fund (AHPDF). AHPDF funds will provide loans or grants to eligible projects to leverage state-aided public housing capital resources, private equity, privately raised debt, tax credits, proceeds from land and property disposition, and other applicable local and federal resources to preserve and modernize units serving Extremely Low Income (ELI) populations while opening opportunities for net-new housing production. AHPDF funds support the development and preservation of rental units targeted for households earning less than 80% of Area Median Income. EOHLC requires deed restrictions or other legally binding covenants to ensure long-term affordability in conformance with HUD Notice PIH 2011-45 and/or other applicable HUD guidance. Where AHPDF provides loans to a project, the minimum affordability term is thirty years unless otherwise approved by HUD. Units must meet HQS standards throughout the term.

Rental units funded through AHPDF may be owned by a public housing authority, non-profit affiliates of a housing authority, or other public or private entities. Examples of the types of rental projects eligible for AHPDF funds include:

- Existing state-aided public housing developments slated for preservation/redevelopment
- Newly proposed affordable developments involving LIHTC
- At-risk affordable developments nearing the end of their compliance period

EOHLC will report on all funded activities through the MTW Annual Report.

In some cases, projects may be funded that involve the use of Housing Choice Vouchers, Project Based Housing Choice Vouchers, or Project Based Rental Assistance contracts. Any such projects will be subject to all applicable requirements established by HUD.

Projects funded through a competitive process will be eligible for these funds with a priority for projects that serve public housing residents, produce new housing units in addition to preservation through redevelopment with replacement, and/or include supportive services. EOHLC will require any project involving redevelopment of public housing to include 1:1 replacement of public housing units with units serving a similar income level and having similar tenant protections.

Applicants for funding will be required to demonstrate experience in affordable housing development, commit to comply with all requirements of the MTW funds, and meet other EOHLC eligibility requirements. Only projects that demonstrate readiness to proceed will be eligible for funding. EOHLC will evaluate the status of necessary zoning and permitting approvals, the status of architectural documents, and the status of other funding commitments to determine project readiness.

The following projects have been funded under EOHLC's "Modernization to Independence" initiative and are now complete.

Housing Authority	Description	Award Amount
<b>Boston Housing Authority</b>	MTW funding helped preserve 48 units at Camden Apartments. Work included renovations to the fire alarm system, kitchens, and bathrooms, accessibility and common area upgrades, and the installation of new, energy-efficient mechanical systems. Construction was substantially completed in FY 2021.	<b>MTW: \$4,070,000,</b> which leveraged ~\$25,000,000
<b>Cambridge Housing Authority</b>	MTW funding was used to substantially rehab 25 units at three state-aided public housing sites for disabled individuals. Construction was completed in FY 2022.	<b>MTW: \$1,100,000,</b> which leveraged ~\$422,000
<b>Total Modernization to Independence Awards</b>		<b>\$5,170,000</b>

The following projects were funded under EOHLC's Modernizing Public Housing And Supporting Elders ("ModPHASE") initiative for the preservation of affordable housing for low-income elderly and disabled households. Working in partnership with the Executive Office of Elder Affairs, EOHLC provided financial support to preserve Chapter 667 state public housing developments with high capital needs and to facilitate partnerships between LHAs and local service agencies to provide service-rich environments that allow residents to age in their community. MTW funds have been expended for the following projects.

Housing Authority	Description	Award Amount
<b>Beverly Housing Authority</b>	Building envelope improvements, door replacements, kitchen and bathroom upgrades, electrical distribution, and site and walkway improvements were completed at Balch Apartments (25 units assisted). Construction began in June of 2022 and is expected to be substantially completed during the first quarter of calendar year 2024.	<b>MTW: \$1,987,034,</b> which leveraged ~\$1,000,000
<b>Lowell Housing Authority</b>	Funds were used to modernize kitchens and bathrooms and complete fire safety, electrical, and accessibility improvements for 20 units at Lakeview Avenue. Construction began in May of 2022 and was completed in December of 2023.	<b>MTW: \$1,252,489,</b> which leveraged ~\$2,000,000
<b>Total ModPHASE Awards</b>		<b>\$3,239,523</b>

In FY 2023, EOHLC proposed and received HUD approval to provide MTW funding under this activity to support the development and preservation of rental units targeted for low-income households through the following three funding programs, pursuant to Notices of Funding Availability (NOFA) published in October 2022. Total commitments across these sub-initiatives will not exceed \$55 million. Loans or grants can be provided to projects funded under this activity.

### Scattered Site Consolidation

The 705 Scattered Site program is a state-funded family public housing program that aims to provide housing for low-income families in neighborhoods throughout the state. Housing authorities have difficulty maintaining state-funded scattered site family units in older one- to three-family homes. Concentrating these scattered sites into small (10-20 unit) developments with modern construction will preserve the benefits of having small developments integrated into the community while giving residents access to better-maintained, modern homes with accessible and sustainable features. Replacement housing developments will be funded by MTW funds, proceeds from disposition, and local funds. The application deadline was in June 2023. EOHLC made the following grant awards.

Housing Authority	Description	Award Amount
<b>Boston Housing Authority</b>	Disposition of 25 units of scattered-site housing; construction of 25 replacement units at Anne M. Lynch Homes at Old Colony as part of 89-unit affordable housing development	<b>\$8,750,000</b>
<b>Bridgewater Housing Authority</b>	Disposition of 12 units of scattered-site housing; construction of 12 units at Bridgewater HA's Heritage Circle property	<b>\$4,200,000</b>
<b>Haverhill Housing Authority</b>	Disposition of 10 units of scattered-site housing; construction of 34 units at Haverhill HA's Hilldale property	<b>\$3,500,000</b>
<b>Stoughton Housing Authority</b>	Disposition of 7 units of scattered-site housing; construction of 7 units at Stoughton HA's Veterans property	<b>\$2,450,000</b>
<b>Total Scattered Site Consolidation Awards</b>		<b>\$18,900,000</b>

### Repositioning State Funded Public Housing

MTW funding will be utilized to rehab or redevelop approximately 400 state-funded public housing units owned by LHAs to HQS or higher standards. Following the rehab, these units will be accepted into the HUD public housing portfolio using available Faircloth authority. This may involve a Faircloth-to-RAD transaction at the PHA's discretion. EOHLC will provide up to \$30 million in MTW funding to support these repositioning efforts. There is a rolling application deadline for this initiative. The following grant awards have been made to date:



Housing Authority	Description	Award Amount
<b>Medford Housing Authority</b>	Redevelopment and federalization of 144 state-aided public housing units through a Faircloth-to-RAD conversion.	<b>\$15,800,000</b>
<b>Worcester Housing Authority</b>	Rehabilitation and federalization of 29 state-aided housing units through MTW award (90 units total in project).	<b>\$2,175,000</b>
<b>Total Repositioning State Funded Public Housing Awards</b>		<b>\$17,975,000</b>

### Recapitalizing Multifamily Developments

EOHLC will utilize approximately \$1 million in MTW funds to support the long-term preservation of one Section 8 New Construction/Substantial Rehab property with a total of up to 10 units. Funds will be utilized to conduct capital needs assessments and undertake moderate to substantial rehabilitation for properties with poor capital condition, low reserves, and little ability to increase Housing Choice Voucher rents. These efforts will result in improved living conditions and preservation of the least well-resourced project-based Section 8 properties once they no longer have access to EOHLC public housing technical assistance and emergency funding. Contract administration for these properties is being transferred from EOHLC to MassHousing by HUD. The deadline for applications was in February 2023; one application was received with EOHLC making a \$1 million award to Barre Housing Authority. That project is currently in the design phase.

Housing Authority	Description	Award Amount
<b>Barre Housing Authority</b>	Critical updates to 10 family units at Barre HA's Bradford Apartments property and the separation of utilities from the family units and elderly/disabled housing units	<b>\$1,000,000</b>
<b>Total Recapitalizing Multifamily Development Awards</b>		<b>\$1,000,000</b>

### Gap Financing Initiative

In its FY 2024 Plan, EOHLC proposed a Non-Significant Change to this activity to make funding available for redevelopment or modernization of public housing and production of new affordable housing through its "Gap Financing Initiative."

MTW funds will support state public housing redevelopment projects alongside tax credits, EOHLC capital subsidy, and other funding sources. EOHLC will fund projects that have a cost premium over other affordable housing production and preservation projects due to prevailing wage requirements, relocation needs, and/or demolition and abatement costs. Eligible projects must already be subject to prevailing wage and thus not adversely impacted by wage-rate requirements. Sponsors must comply with all federal requirements, including HQS inspections, environmental review, and MTW reporting requirements. These funds may also support major modernization projects in state-aided public housing that do not include tax credits or other mixed-finance sources.

All projects must include 1:1 replacement of redeveloped housing serving low-income populations. Favorable projects will include new production of income-restricted units. Sponsors are encouraged to consider the inclusion of units that are not income-restricted to help contribute to project budgets and boost housing supply, though MTW funds will not be used on non-income-restricted units.

EOHLC has allocated up to \$15 million in MTW funds for the FY 2024 funding round and may commit approximately \$10-15 million in subsequent annual funding rounds, subject to funding availability. EOHLC estimates, based on past projects, that \$15 million of MTW funding can leverage approximately \$135 million to replace 200 units of public housing and build 100 units of new affordable housing. The NOFA for this activity was published on October 23, 2023, with pre-applications due in November. EOHLC received eight proposals in total and invited three housing authorities to submit Round 2 applications, due in February of 2024.

### Planned Non-Significant Changes

There are no non-significant changes planned for FY 2025.

### Planned Changes to Metrics/Data Collection

Metrics have been updated to reflect anticipated outcomes in FY 2025.

### Metrics

<b>CE #4: Increase in Resources Leveraged*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Amount of funds leveraged in dollars (increase).	\$0	\$28,422,000		
<i>*Includes all projects funded from the onset of this activity. Funds leveraged are counted upon completion of construction.</i>				
<b>HC #1: Additional Units of Housing Made Available*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	0	0		
<i>*Defined as new units constructed. Does not include existing units that have been rehabilitated and/or demolished and re-constructed. Existing units undergoing redevelopment are reflected in HC #2.</i>				

<b>HC #2: Units of Housing Preserved*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).	0	118		
<i>*Includes all projects funded from the onset of this activity. Units are counted upon completion of construction and occupancy at the end of the fiscal year.</i>				

**Planned Significant Changes**

No significant changes are planned.

## Activity 2021-1: Fair Housing Initiative

### **Plan Year Approved, Implemented, Amended**

Approved and implemented FY 2021.

### **Description/Update**

The Fair Housing Act prohibits discrimination in the sale, rental, and financing of housing based on race, color, national origin, religion, sex, familial status, and disability. Massachusetts further prohibits discrimination on the basis of marital status, military or veteran status, sexual orientation, gender identity and expression, age, ancestry, receipt of public assistance, and age of children (under 6 years) in housing containing lead paint. Despite progress, many challenges remain, and EOHLC regularly hears from its voucher holders and others about instances of discrimination, with the Massachusetts Commission Against Discrimination alone having received over 400 housing discrimination complaints in FY 2019.

EOHLC will award MTW Block Grant funding to a selected non-profit agency or agencies to identify fair housing compliance and enforcement issues across EOHLC's jurisdiction, investigate discriminatory practices, and provide enforcement assistance (including through voluntary resolution efforts and litigation) for households with a housing subsidy or voucher. Additionally, the funding will be used to develop best practices and education for low-income households and owners regarding fair housing including but not limited to advertising and outreach, as well as seminars on protected classes, fair housing rights and responsibilities, reasonable accommodations, and language assistance. The clients served under this activity may include families with housing assistance vouchers outside of the participants in EOHLC's Housing Choice Voucher Program.

In FY 2022, using a competitive bid process, EOHLC selected a partnership (the Fair Housing Alliance of Massachusetts, or "FHAM") made up of four fair housing agencies throughout the state, all of whom, prior to EOHLC's selection, already provided fair housing training, education, and outreach services. The current three-year contract with FHAM (which totals \$1.6 million) runs through the first half of FY 2025. FHAM's work includes fair housing testing, investigation and enforcement activities, trainings for RAA and PHA staff, and a media campaign to educate renters, property owners, and the general public about fair housing laws. Funding and services are focused on discrimination against voucher holders and/or discrimination against families with children under the age of 6 in housing containing lead paint.

EOHLC plans to do a new competitive bid process to determine future funding for the second half of FY 2025 and beyond.

### **Planned Non-Significant Changes**

EOHLC will utilize up to \$1.5 million of additional MTW funding (approximately \$500,000 per calendar year) to support the Fair Housing Initiative after the current contract expires on December 31, 2024.

### **Planned Changes to Metrics/Data Collection**

Metrics reflect anticipated outcomes in FY 2025.

## Metrics

<i>HC #7: Households Assisted by Services that Increase Housing Choice</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase housing choice through investigation and enforcement	0 households	60 households		
Number of households receiving services aimed to increase housing choice through education and outreach	0 households	500 households*		
<i>*Education and outreach will be provided to housing providers and landlords, in addition to tenant families.</i>				

## Planned Significant Changes

No significant changes are planned.

## Activity 2021-2: Emergency Waivers

### Plan Year Approved, Implemented, Amended

Approved and implemented FY 2021.

#### Description/Update

The economic impacts of the COVID-19 pandemic on households, businesses, and financial markets were profound. COVID-19 also placed additional burdens on housing authorities which worked tirelessly to respond to the needs of their participants while also maintaining compliance with program requirements. In response to the COVID-19 pandemic, EOHLC established an emergency waivers activity which addresses the burdens placed on all stakeholders and includes the following emergency waivers in response to economic and/or health-related emergencies and/or natural disasters, as declared by the Governor or his/her designee, including the authority to determine when to place and lift the waivers. EOHLC may revise, add, and/or remove waivers as needed to address emergency-related conditions.

1. **Delayed Reexaminations:** EOHLC may waive the requirement to conduct a reexamination of family income and composition at least annually. Currently EOHLC completes reexaminations on a biennial basis for HCV program households and on a triennial basis for HCV elderly/disabled households on fixed incomes. Where reexaminations have been delayed due to a declared emergency, EOHLC will complete the reexamination no later than the anniversary month of the year following the close of the emergency declaration. The subsequent reexamination will be scheduled on the same anniversary month using the applicable reexam frequency for the family. For example, if a biennial reexam was due on July 2020, EOHLC would complete the reexam within one year following the close of the emergency declaration. The next scheduled biennial reexam would be effective 2 years following the effective date of the first recertification after the close of the emergency declaration.
2. **Verification of Income:** During periods of declared emergencies, EOHLC will waive the requirements of the verification hierarchy but continue to use EIV.
3. **Increase in Payment Standard:** EOHLC will waive the requirement to apply the increased payment standard back to the regular effective date for delayed regular reexaminations. Instead, during periods of declared emergencies, EOHLC will apply the increased payment standard at the next interim reexamination after the effective date of the increased payment standard. If EOHLC delays a reexam, EOHLC will apply the payment standard in effect on the effective date of the delayed regular reexamination.
4. **Delayed Regular HQS Inspections:** EOHLC may waive the requirement for completion of regular HQS inspections at least biennially. Where a regular HQS inspection has been delayed, EOHLC will complete the HQS inspection no later than the anniversary month of the year following the close of the emergency declaration. The next HQS inspection will be scheduled on the same anniversary month using the applicable inspection frequency for the unit. For example, if an HQS inspection was due by July 2020, EOHLC would complete the inspection within one year following the close of the emergency declaration. EOHLC will continue to request a self-certification from the owner that no life-threatening conditions exist in the unit as of the originally-intended inspection date. Additionally, EOHLC will continue to conduct complaint inspections.

5. **Interim HQS Inspections:** EOHLC may waive the requirement to conduct re-inspections to confirm repair; however, EOHLC will require that the owner self-certify and provide documentation that a life-threatening deficiency has been corrected within 24 hours of notification and that a non-life-threatening deficiency has been corrected within 30 days of EOHLC notification.
6. **HQS QC Inspections:** EOHLC will waive the requirement to conduct HQS quality control inspections and instead may suspend HQS quality control inspections until the emergency waiver has been lifted.
7. **FSS Contract of Participation:** EOHLC will waive the requirement regarding the maximum extension of an FSS Contract of Participation (COP). During periods of declared emergency, EOHLC may extend a family's COP, using the declared emergency as good cause of the need for extension. For households who were already in the two-year extension period when the emergency was declared, EOHLC may extend their COP beyond the two-year extension threshold.

The Governor of Massachusetts lifted the COVID-19-related state of emergency on June 15, 2021. Accordingly, EOHLC discontinued application of these emergency waivers and is addressing completion of any outstanding recertifications and inspections. The Emergency Waivers activity will be reactivated when and if economic and/or health related emergencies are declared in FY 2025 and beyond.

#### **Planned Non-Significant Changes**

There are no non-significant changes planned for FY 2025.

#### **Planned Changes to Metrics/Data Collection**

As EOHLC does not anticipate another state of emergency will be declared in FY 2025, there are no planned changes to metrics or data collection.

#### **Metrics**

<b>HC #4: Displacement Prevention</b>				
<b>Unit of Measurement</b>	<b>Baseline*</b>	<b>Benchmark*</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households at or below 80% of AMI that would lose assistance or need to move	0	0		
<i>*The benchmark represents the number of assisted households during the period of declared emergencies who are effectively protected from displacement.</i>				

#### **Planned Significant Changes**

No significant changes are planned.

## Activity 2023-1: Housing Navigator Initiative

### Plan Year Approved, Implemented, Amended

Approved and implemented FY 2023.

### Description/Update

EOHLC is utilizing MTW Block Grant funding to support the Housing Navigator Massachusetts, a non-profit agency whose goal is to make it easier to find and apply for affordable housing by collecting and providing online information on 100% of the affordable rental housing available to the public in Massachusetts. Specifically, HNM develops technology that promotes housing equity and develops data that brings transparency to the affordable housing market. Massachusetts, as a whole, ranks 3<sup>rd</sup> highest in the nation for rent-burdened households (for whom rent exceeds 30% of income), making it all the more important that low-income individuals get a fair chance at affordable housing opportunities. Access to high-quality information helps not just renters, but owners, housing advocates, homelessness providers, and housing funders. EOHLC has mandated Housing Navigator participation for the roughly 2,000 newly developed affordable units it funds annually. This ensures that the housing data will continue to be an up-to-date resource for all. The Housing Navigator listings provide critical information on eligibility, waitlists, lotteries, and more – in terms that every user can understand.

The clients served under this activity are low-income households including Housing Choice Voucher participants. This local non-traditional activity falls under the category of Service Provision as defined in HUD PIH Notice 2011-45 and will conform to the General Parameters detailed in part 5.A. of the Notice.

Leveraging other state and private dollars, EOHLC has signed a three-year contract of up to \$1 million per year in MTW Block Grant funds to support the costs of maintaining and updating HNM's software; however, EOHLC reserves the right to review and adjust the funding for the Housing Navigator as needs dictate and/or to expand the functions of the Housing Navigator.

The Housing Navigator maintains a regular cycle of user engagement, including surveys and focus groups of renters, service providers, and owners to solicit user feedback to inform adaptations to existing features and the organization's road map for future updates. EOHLC and HNM have identified the following priorities for improvement of the search tool:

- Increasing adoption of the tool's Short Waitlist Feature, implemented in FY 2024, which highlights waitlists with shorter wait times for the convenience of users;
- Increasing the overall level of detail for units accessible to persons with disabilities through property owner outreach and the creation of a data system containing information that EOHLC currently collects from architects;
- Simplifying the input tool to reduce the amount of time it takes property owners (particularly first-time users) to enter information into the tool;
- Easing difficulty for users who are searching for housing with a mobile voucher; and
- Collaborating in the creation of a system for the submission of online rental applications that integrates with the search tool.



**Planned Non-Significant Changes**

There are no non-significant changes planned for FY 2025.

**Planned Changes to Metrics/Data Collection**

Metrics have been updated to reflect anticipated outcomes in FY 2025.

**Metrics**

<i>HC #7: Households Assisted by Services that Increase Housing Choice</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase housing choice	3,800	20,000 average per month*		
<i>*The Housing Navigator database is available to the public, so – while most users are low-income households seeking housing – users may also include housing providers, landlords, policymakers, and researchers.</i>				

**Planned Significant Changes**

No significant changes are planned.

## Activity 2024-1: Program Efficiencies

### (formerly Alternative Verification Methods)

#### Plan Year Approved, Implemented, Amended

Approved FY 2024 and implemented FY 2024.

#### Description/Update

This activity will allow EOHLC to utilize an alternative, streamlined method to verify household member income for program applicants and participants. These methods streamline program administration and reduce administrative burdens to benefit both clients and the agency.

- Extend the timeframe that verification documents are valid:
  - Applicants: Verifications may not be dated more than 120 days from the date of voucher issuance date.
  - Participants: Verifications for reexaminations may not be dated more than 120 days from the effective date of the transaction.
  - Fixed Sources of Income: Verification documents for fixed income sources such as Social Security (SS), Social Security Disability Insurance (SSDI) and pension income will be valid for the full calendar year in which the income is effective. For example, if a Social Security or SSDI benefit letter is dated February 1, 2024, that benefit letter will be valid for any certification with an effective date in 2024.
- Increase the threshold for when it is mandatory to obtain additional verification documentation when there is a substantial difference in reported income. EOHLC will increase the discrepancy threshold to \$5,000. EOHLC and its designees will continue to identify income discrepancies and take action to process discrepancies which may result in interim or annual correction actions; however, the threshold for the discrepancy will be set at \$5,000.
- Revise the HUD Verification Hierarchy: EOHLC's modified Income Verification Hierarchy allows EOHLC and its designees to rely on any of the third-party verification methods before accepting self-certification. This process streamlines the verification process and allows EOHLC and its designees to repurpose staff time on tasks outside of verification.

Level	Verification Technique	Ranking
4	Upfront Income Verification using HUD's EIV and IVT	Highest (Mandatory)
3	Upfront Income Verification using non-HUD system	Highest (Optional)
2	Written Third Party Verification; Written Third Party Verification Form; or Oral Third Party Verification	High (Mandatory) <ul style="list-style-type: none"><li>• Supplements EIV and UIV</li><li>• Also used for:<ul style="list-style-type: none"><li>○ Non-EIV/UIV reported income sources</li></ul></li></ul>

Level	Verification Technique	Ranking
		<ul style="list-style-type: none"> <li>Disputes of EIV reported information</li> </ul>
1	Self-Certification	High (Optional) <ul style="list-style-type: none"> <li>To supplement EIV when EIV reported sources do not contain verification of the full retrospective period where applicable; or</li> <li>When participant cannot produce written third party verification documents.</li> </ul>

### Planned Non-Significant Changes

There are no non-significant changes planned for FY 2025.

### Planned Changes to Metrics/Data Collection

No changes to metrics or data collection are planned.

### Metrics

<b>CE #2: Staff Time Savings</b>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	<b>Total Time Spent on Activity Prior to Implementation:</b> 18,659 hours  <b>Number of Recertifications:*</b> 8,293  <b>Time per Recertification:</b> 2.25 hours	<b>Anticipated Total Time Spent on Activity in FY</b> 17,802 hours  <b>Anticipated Number of Recertifications:</b> 8,901  <b>Time per Recertification:</b> 2.00 hours		
<i>*Baseline represents the number of recertifications completed as of FY 2022 MTW Report</i>				
<b>CE #3: Decrease in Error Rate of Task Execution</b>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	28%	24%		
<i>*Baseline represents the tenant rent error rate as of the FY 2022 MTW Report</i>				

**Planned Significant Changes**

No significant changes are planned.

## Activity 2024-2: Income Eligibility for Transfers

### Plan Year Approved, Implemented, Amended

Approved FY 2024 and implemented FY 2024.

### Description/Update

Income limits as established by HUD for program eligibility vary by location. As per 24 CFR 982.201(b)(4), the applicable income limit for issuance of a voucher when the family is selected for the program is the highest income limit (for the family size) for areas in the PHA jurisdiction. The applicable income limit for admission to the program is the income limit for the area where the family is initially assisted in the program.

Because EOHLC administers vouchers through a statewide network of RAAs and because EOHLC's jurisdiction includes the entire state of Massachusetts, assisted households may utilize their voucher anywhere in the state without needing to exercise portability. Income limits may vary in different regions of Massachusetts, and thus a household that is deemed eligible at issuance (using the highest income limit for the entire Massachusetts jurisdiction) may be ineligible for admission in the community in which they already reside or in a nearby community (even one that may be covered by the same RAA).

This activity waives the second component of 24 CFR 982.201(b)(4) requiring that the household be income eligible in the area in which the household will be initially assisted. Instead, EOHLC will apply the PHA jurisdiction's highest income limit (for the family size) not only at the issuance of a voucher but also at the time of admission to the program. This will reduce administrative burden on EOHLC and RAA staff as well as program participants. Even more importantly, it will also result in additional housing choice for participants, as the two-tiered policy of 24 CFR 982.201(b)(4) may be more relevant in the case of portability or a wider geographical jurisdiction, but internally in Massachusetts, it has the unintended, and contrary, consequence of limiting housing choice across the state but even in participant's own immediate communities.

*Note: The standard provisions of 24 CFR 982.201(b)(4) will still apply to households who exercise portability outside of EOHLC's jurisdiction and/or to another PHA. Additionally, EOHLC will continue to ensure that at least 75 percent of assisted households are "very low-income," that substantially the same number of low-income persons are assisted under the demonstration as would be without the MTW authorizations, and that a comparable mix of families are assisted under the Agreement as would have been otherwise.*

### Planned Non-Significant Changes

There are no non-significant changes planned for FY 2025.

### Planned Changes to Metrics/Data Collection

No changes to metrics or data collection are planned.

## Metrics

<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	<b>Total Time Spent on Activity Prior to Implementation:</b> 527 hours  <b>Number of MTW Tenant-Based New Admissions during FY:</b> 351  <b>Time Spent Determining Eligibility:</b> 1.5 hours	<b>Anticipated Total Time Spent on Activity in FY:</b> 536 hours  <b>Anticipated Number of MTW Tenant-Based New Admissions during FY:</b> 536  <b>Time Spent Determining Eligibility:</b> 1 hour		

## Planned Significant Changes

No significant changes are planned.

## B. Not Yet Implemented Activities

There are no activities not yet implemented.

## C. Activities on Hold

### Activity 2018-5: A Better Life Program Model

#### **Plan Year Approved, Implemented, Amended**

Approved and implemented FY 2018.

#### **Description/Update**

Under this activity, EOHLC piloted a self-sufficiency program called “A Better Life” (ABL) at three local housing authorities (LHAs). The four main components of ABL were coaching services, a work/participation requirement, escrow, and community partnerships with local service providers. MTW Block Grant service dollars supported coaches at the three LHAs who worked one-on-one with participants to set personal goals in the areas of employment, education, family health and stability, and asset building. MTW funding was also used to cover employment-related expenses that would help participants make progress toward their goals. The ABL work/participation requirements were suspended during the height of the pandemic and later modified to make compliance more achievable.

The ABL pilot program – in particular the coaching and escrow components – had a positive impact on many participants. However, the work/participation requirements proved difficult to monitor and enforce, and the escrow was burdensome to calculate each month. As a result, EOHLC decided not to extend the program beyond its current contract end date of April 30, 2024. EOHLC plans to close out this activity in the FY 2025 MTW Report.

### Activity 2020-1: Moving to College

**(formerly Massachusetts Student Housing Security Pilot)**

#### **Plan Year Approved, Implemented, Amended**

Approved FY 2020. Implemented FY 2022.

#### **Description/Update**

Under this activity, EOHLC committed MTW funds to support 20 scholarships for housing expenses for students who were homeless or at risk of homelessness and attending one of four state colleges. Despite active outreach and recruitment efforts, these scholarships were never fully utilized, and enrollment failed to meet the goal of 20 scholarships. In addition, because the scholarships were used for housing, the mandatory HQS requirements for the units conflicted with the colleges’ needs to move students – sometimes quickly and often multiple times during the academic year – from one housing situation to another. All agencies involved in the partnership agreed that student safety was paramount, and that the MTW funding, while flexible, was not appropriate for this program. EOHLC committed to funding the 16

active scholarships for the remaining year of the program, but will not be funding additional scholarships. In FY 2024 there was only one active participant still being served. That participant received support through January 2024 at which time the Moving to College program formally ended. EOHLC plans to close out this activity in the FY 2025 MTW Report.

#### D. Closed Out Activities

The following table summarizes previously approved MTW activities that EOHLC has completed, discontinued, or determined do not require MTW authority to implement.

**Table 10: Closed-Out MTW Activities**

Activity	Plan Year Approved	Plan Year Implemented	Close Out Year	Reason for Close Out
Biennial Inspections (Activity 2011-3)	FY 2011	FY 2013	FY 2015	EOHLC closed out this activity as an MTW initiative due to the 2014 Appropriations Act, which allows EOHLC to transition to a biennial inspection schedule without MTW authority.
Project Based Voucher Discretionary Moves (Activity 2012-3)	FY 2012	FY 2012	FY 2018	EOHLC proposed and received HUD approval for a new Local Project-Based Voucher Program, which includes revisions to the PBV opt out policy.
Rent Reasonableness (Activity 2013-1)	FY 2013	FY 2013	FY 2018  Note: The FY 2019 Plan included this activity; however, prior to the end of FY 2018 (after the FY 2019 Plan was submitted) EOHLC closed this activity.	Under HOTMA, the trigger for reasonable rent redeterminations increased from a 5% decrease to a 10% decrease in FMR from one year to the next. EOHLC determined that a 10% decrease in FMR was such that a reasonable rent redetermination would be warranted to ensure that subsidies paid are in line with market rents.
PBV Rent Reasonableness (Activity 2013-2)	FY 2013	FY 2013	FY 2019	EOHLC closed out this activity and consolidated it with the approved Enhanced PBV Program activity (Activity 2018-7). This action will allow EOHLC to report on all Enhanced PB activity features under one activity.



Activity	Plan Year Approved	Plan Year Implemented	Close Out Year	Reason for Close Out
Equity Builder Program (Activity 2018-8)	FY 2018	Never Implemented	FY 2020	After discussions with for-profit and non-profit owners, EOHLC determined this activity was not financially feasible. Owners relayed lack of interest in pursuing the program and a lack of financial benefits. As the success of the program is dependent on owners providing LTO units, EOHLC decided to close the activity out.
Health Starts at Home (Activity 2018-6)	FY 2018	FY 2018	FY 2020	The Health Starts at Home (HSH) activity was a planned three-year initiative implemented in FY 2018; the study has ended. HSH households are permitted to retain their voucher; however, EOHLC no longer issues new HSH vouchers.
Owner Incentive Fund (Activity 2010-3)	FY 2010	FY 2010	FY 2024	EOHLC decided to close out this activity due to decreasing demand and the very small number of units being upgraded each year.
Value Vouchers (Activity 2011-1)	FY 2011	Never Implemented	FY 2024	EOHLC never implemented this activity and ultimately decided to close it out due to questions about owner interest and the impact of layering subsidies.
Residential Assistance for Families in Transition (RAFT) / Emergency Rental and Mortgage Assistance (ERMA) (Activity 2018-3)	FY 2018	FY 2018 (amended in FY 2020)	FY 2024	Additional, more flexible federal and state resources became available for emergency rental and mortgage assistance in Massachusetts.
Support for the Secure Jobs Initiative: Services Only (Activity 2018-4)	FY 2018	FY 2019	FY 2024	Additional funding has been made available in the state budget to support this program.

Activity	Plan Year Approved	Plan Year Implemented	Close Out Year	Reason for Close Out
Launch (Activity 2019-1)	FY 2019	FY 2019	FY 2024	EOHLC decided to close this activity because it did not quite fit with EOHLC's MTW strategic priorities (including replicability statewide).

## V. Planned Application of MTW Funds

### A. Planned Application of MTW Funds

EOHLC operates an MTW Program that involves only Housing Choice Vouchers. The tables below provide a projection of sources and uses for the MTW Program for FY 2025. Note that no state or local funds are utilized. Note also that HCV funding is allocated on a calendar year (CY) basis. As of the posting of this Plan, EOHLC has not been notified of total renewal funding for the CY; thus, the amounts listed below may change based on actual funding levels.

#### i. Estimated Sources of MTW Funds

Table 11: Estimated Sources of MTW Funding for FY 2025

FDS Line Item Number	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$0
70600	HUD PHA Operating Grants	\$376,502,000
70610	Capital Grants	\$0
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$0
71100+72000	Interest Income	\$20,000
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$50,000
<b>70000</b>	<b>Total Revenue</b>	<b>\$376,572,000</b>

#### ii. Estimated Application of MTW Funds

Table 12: Estimated Application of MTW Funding for FY 2025

FDS Line Item Number	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating – Administrative	\$5,000,000
91300+91310+92000	Management Fee Expense	\$29,000,000
91810	Allocated Overhead	\$600,000
92500 (92100+92200+92300+92400)	Total Tenant Services	\$300,000
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$0
93500+93700	Labor	\$0

FDS Line Item Number	FDS Line Item Name	Dollar Amount
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$0
95000 (95100+95200+95300+95500)	Total Protective Services	\$0
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$0
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$0
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	\$0
97100+97200	Total Extraordinary Maintenance	\$0
97300+97350	HAP + HAP Portability-In	\$341,672,000
97400	Depreciation Expense	\$0
97500+97600+97700+97800	All Other Expense	\$0
<b>90000</b>	<b>Total Expenses</b>	<b>\$376,572,000</b>

**Please describe any variances between Estimated Total Revenue and Estimated Total Expenses:**

N/A

### *iii. Description of Planned Application of MTW Funding Flexibility*

Under the MTW Program, EOHLC is authorized to establish an MTW Block Grant budget. Activities that utilize Block Grant single fund flexibility are described below:

- EOHLC may use Single Fund Flexibility to fund housing specialist positions to expedite issuance, inspection, and leasing processes for special populations or voucher holders participating in specific EOHLC programs (e.g., Emergency Housing Vouchers, SNO Mass). EOHLC anticipates that, if adopted, approximately \$950,000 will be spent to fund the staffing positions and provide housing-related services.
- In 2018, EOHLC committed up to \$4.5 million in Single Fund Flexibility to support a five-year partnership with another state agency, the Executive Office of Labor and Workforce Development (EOLWD), to provide career navigation services to HCV participants. The funds support the cost of Career Navigators at Career Centers in four regions. Navigators meet one-on-one with individuals to help them identify a career path that fits with the available jobs in their region with good wages,

benefits, and opportunity for advancement. Navigators work with participants to identify training or education opportunities, facilitate employer relationships, and support participants through the process of finding a job and post-employment transition. Individuals are referred to Navigators by FSS Coordinators and other RAA staff members, including SNO Mass staff and program representatives working with MTW voucher holders. Single Fund Flexibility also supports a similar partnership in the Metro Boston region offering the same services and assisting the same population. Additionally, funds have supported the development of resources, such as regional employment maps and trainings for RAA staff. In FY 2024, EOHLC and EOLWD agreed to extend their partnership another 18 months, using committed but unexpended funds. In FY 2024 and FY 2025, EOHLC is committing another \$700,000 in Single Fund Flexibility to support staff positions at the RAAs to improve outreach, enrollment, and overall participant engagement in the Career Center partnership and other economic mobility programs.

- Other supportive services: EOHLC will use approximately \$2.15 million in Single Fund Flexibility to support a range of economic mobility initiatives including: supplemental funding for non-FSS NOFA eligible expenses, a series of trainings and workshops for participants and staff on employment and career planning, services for FSS participants in the Metro Boston region, and staffing expenses for EOHLC's innovative FSS Homeownership Initiative.

#### *iv. Planned Application of PHA Unspent Operating Fund and HCV Funding*

**Table 13: Planned Application of PHA Unspent Operating Fund and HCV Funding**

Original Funding Source	Beginning of FY – Unspent Balances	Planned Application of PHA Unspent Funds during FY
HCV HAP	\$144,815,000	\$39,835,998
HCV Admin Fee	\$3,500,000	\$3,500,000
PH Operating Subsidy	N/A	N/A
<b>Total:</b>	<b>\$148,315,000</b>	<b>\$43,335,998</b>

#### *v. Description of Planned Expenditures of Unspent Operating Fund and HCV Funding*

**Table 14: Description of Planned Application of PHA Unspent Operating Fund and HCV Funding**

Item No	Planned Use	Estimated Amount	Funding Source the Planned Use is Attributable to	Projected Time Line or Time Line Update
1.	MTW Initiatives	\$39,835,998	HAP Reserves	6/30/2025

## B. Local Asset Management Plan

*i. Is the MTW PHA allocating costs within statute?*

Yes

*ii. Is the MTW PHA implementing a local asset management plan (LAMP)?*

No

*iii. Has the MTW PHA provided a LAMP in the appendix?*

No

*iv. If the MTW PHA has provided a LAMP in the appendix, please describe any proposed changes to the LAMP in the Plan Year or state that the MTW PHA does not plan to make any changes in the Plan year.*

Not applicable

## C. Rental Assistance Demonstration (RAD) Participation

### *i. Description of the RAD Participation*

As EOHLC does not own or operate any federal public housing units, only Second Component RAD conversions are undertaken. EOHLC understands the relevance and inherent housing preservation and expansion benefits related to the conversion of Rent Supplement, Rental Assistance Payments, and Mod/Rehab Program units to project-based assistance under the RAD Program. Table 13 below indicates that EOHLC does not anticipate any RAD Component 2 conversions in FY 2025.

Table 14 includes those developments that EOHLC has converted through the RAD Program. EOHLC entered into HAP contracts for RAD conversions beginning in FY 2013. The last conversion entered into was in FY 2015. To date, there were 825 units converted under RAD Component 2 to Project Based Assistance.

**Table 13: RAD Conversions Planned in FY 2025**

<b>Rental Assistance Demonstration (RAD) Participation</b>
EOHLC does not anticipate any RAD conversions will take place in FY 2025

Table 14: RAD Conversions Completed or Projected to be Completed by the End of FY 2025

Rental Assistance Demonstration (RAD) Participation				
To date, the following RAD conversions have taken place:				

Property Name	No. of Units Converted to PBV	RAD Conversion Type	FY Reported	Description
North Village	134	2 <sup>nd</sup> Component Rent Supplement	FY 2013	Existing family housing
Hope in Action	49	2 <sup>nd</sup> Component Rent Supplement	FY 2014	Existing family housing
Spring Hill	37	2 <sup>nd</sup> Component Rent Supplement	FY 2014	Existing family housing
Unquity House	139	2 <sup>nd</sup> Component Rent Supplement	FY 2014	Existing elderly housing
Highland Village	110	2 <sup>nd</sup> Component Rent Supplement	FY 2015	Existing family housing
Outing Park I	94	2 <sup>nd</sup> Component Mod/Rehab	FY 2015	Existing family housing
Outing Park II	81	2 <sup>nd</sup> Component Mod/Rehab	FY 2015	Existing family housing
Spring Gate	181	2 <sup>nd</sup> Component Rent Supplement	FY 2015	Existing family housing
<b>TOTAL</b>	<b>825</b>			

ii. Has the MTW PHA submitted a RAD Significant Amendment in the appendix? A RAD Significant Amendment should only be included if it is a new or amended version that requires HUD approval.

No

iii. If the MTW PHA has provided a RAD Significant Amendment in the appendix, please state whether it is the first RAD Significant Amendment submitted or describe any proposed changes from the prior RAD Significant Amendment.

Not applicable

## VI. Administrative

---

### A. Board Resolution and Certifications of Compliance

EOHLC does not have a Board of Commissioners and, therefore, does not have a Board resolution process in place. EOHLC's Undersecretary is the official authorized to sign the attached Certifications of Compliance. The required signed MTW Annual Plan Certifications of Compliance with Regulations is attached in Appendix B.

### B. Documentation of Public Process

EOHLC provided public notice of the draft Annual Plan. The public comment period extended from February 26, 2024, through March 27, 2024. The plan was made available on EOHLC's website and was mailed upon request. A public hearing was conducted virtually via Zoom on March 14, 2024, with 18 individuals participating. Copies of the public notice, a summary of comments and responses, and listing of hearing attendants are attached in Appendix C.

### C. Planned and Ongoing Evaluations

EOHLC, in collaboration with its network of Regional Administering Agencies, utilizes internal resources to track and monitor performance of proposed and ongoing MTW activities. In FY 2024, EOHLC contracted with a team of consultants to conduct an assessment of voucher operations and offer recommendations for improved operations (e.g., procedural changes, targeted investments). This assessment is expected to be completed in FY 2024. There are currently no formal evaluations planned for FY 2025.

### D. Lobbying Disclosures

EOHLC does not have any lobbying activities to disclose. EOHLC has included the Lobbying Activities (SF-LLL) form in Appendix D and Certification of Payments (HUD-50071) form in Appendix E.



## Appendix A: Listing of Regional Administering Agencies

---

**Berkshire Housing Development Corp.**

One Fenn Street Pittsfield, MA 01201  
413-499-4887

**Community Teamwork, Inc.**

155 Merrimack Street Lowell, MA 01852  
978-459-0551

**Housing Assistance Corp**

460 West Main Street Hyannis, MA 02601  
508-771-5400

**NeighborWorks Housing Solutions**

169 Summer Street Kingston, MA 02364  
781-422-4200

**Lynn Housing Authority & Neighborhood Development**

10 Church Street Lynn, MA 01902  
781-592-1966

**Metro Housing|Boston**

1411 Tremont Street Boston, MA 02120  
617-859-0400

**RCAP Solutions**

191 May Street Worcester, MA 01602  
800-488-1969

**South Middlesex Opportunity Council**

7 Bishop Street Framingham, MA 01702  
508-620-2336

**Way Finders**

1780 Main Street Springfield, MA 01103  
413-233-1500

## Appendix B: Certification of Compliance with Regulations

CERTIFICATIONS OF COMPLIANCE
<p align="center"><b>U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT</b> <b>OFFICE OF PUBLIC AND INDIAN HOUSING</b></p> <p align="center"><b>Certifications of Compliance with Regulations:</b> <b>Board Resolution to Accompany the Annual Moving to Work Plan</b></p>
<p>Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chair or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (01/07/2024), hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:</p> <ol style="list-style-type: none"><li>(1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment.</li><li>(2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.</li><li>(3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).</li><li>(4) The MTW PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.</li><li>(5) The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.</li><li>(6) The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan.</li><li>(7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements set out in HUD regulations found at Title 24 of the Code of Federal Regulations, including regulations in place at the time of this certification, and any subsequently promulgated regulations governing the obligation to affirmatively further fair housing. The MTW PHA is always responsible for understanding and implementing the requirements of HUD regulations and policies, and has a continuing obligation to affirmatively further fair housing in compliance with the 1968 Fair Housing Act, the Housing and Community Development Act of 1974, The Cranston-Gonzalez National Affordable Housing Act, and the Quality Housing and Work Responsibility Act of 1998. (42 U.S.C. 3608, 5304(b)(2), 5306(d)(7)(B), 12705(b)(15), and 1437C-1(d)(16)). The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15, which means that it will take meaningful actions to further the goals identified in its Analysis of Impediments to Fair Housing Choice(AI),Assessment of Fair Housing (AFH), and/or other fair housing planning documents conducted in accordance with the requirements of 24 CFR Part 5, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o), and will address impediments to fair housing choice identified in its AI, AFH, and/or other fair housing planning documents associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.</li><li>(8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.</li><li>(9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status.</li><li>(10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.</li><li>(11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 75.</li><li>(12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.</li></ol>

- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 225 (Cost Principles for State, Local and Indian Tribal Governments) and 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982 or as approved by HUD, for any Housing Choice Voucher units under administration.
- (22) The MTW PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
- (23) All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its Plan and will continue to be made available at least at the primary business office of the MTW PHA.

Commonwealth of Massachusetts  
Executive Office of Housing and Livable Communities

MA 901

**MTW PHA NAME**

**MTW PHA NUMBER/HA CODE**

*I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct.*

**WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012; 31 U.S.C. §3729, 3802).**

Benjamin Stone

Undersecretary of Public Housing and Rental Assistance

**NAME OF AUTHORIZED OFFICIAL**

**TITLE**



April 12, 2024

**SIGNATURE**

**DATE**

\* *Must be signed by either the Chair or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chair or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.*

## Appendix C: Documentation of Public Process

---

Includes Public Notice, Participation List, and Summary of Comments and Related Responses

---

### **Massachusetts Executive Office of Housing and Livable Communities (EOHLC)**

Funding Agency for the Housing Choice Voucher Program administered regionally by:  
Berkshire Housing Development Corporation in Pittsfield, MA; Community Teamwork, Inc. in Lowell, MA;  
Housing Assistance Corporation in Hyannis, MA; Lynn Housing Authority and Neighborhood Development in  
Lynn, MA; Metro Housing|Boston in Boston, MA; NeighborWorks Housing Solutions in Kingston, MA;  
RCAP Solutions, Inc. in Worcester, MA; South Middlesex Opportunity Council in Framingham, MA;  
Way Finders in Springfield, MA

---

#### **NOTICE OF PUBLIC HEARING REGARDING EOHLC'S HOUSING CHOICE VOUCHER PROGRAM (HCVP) DRAFT MOVING TO WORK (MTW) PROGRAM ANNUAL PLAN FOR FY 2025**

**Thursday, March 14, 2024  
11:30 a.m. – 12:30 p.m.**

In accordance with its MTW Agreement, EOHLC will hold a public hearing prior to finalizing its FY 2025 Moving to Work Annual Plan. This plan provides details about EOHLC's proposed MTW activities that will commence beginning July 1, 2024.

EOHLC's draft FY 2025 MTW Annual Plan is available on EOHLC's website at <https://www.mass.gov/info-details/moving-to-work-program-mtw> under *Moving to Work Plans*. Additionally, this document will be mailed upon request, by calling Kristin Haas at EOHLC at 617-573-1199 between the hours of 8:00 a.m. and 4:00 p.m. Monday-Friday.

The hearing will be held virtually using Zoom and is accessible using the link below, as well as by phone (audio only). Those interested in providing oral comments may arrive and leave the Zoom meeting at any time between the start and end times listed below.

<b>Thursday, March 14, 2024, 11:30 a.m. – 12:30 p.m.</b> <b>Meeting ID: 811 6947 1971    Passcode: 103572</b>	
To join from a computer or phone using the Zoom app	<a href="https://us06web.zoom.us/j/81169471971?pwd=W8wbmtTG2k5rR04GU5XbuwjJFBzgOg.1">https://us06web.zoom.us/j/81169471971?pwd=W8wbmtTG2k5rR04GU5XbuwjJFBzgOg.1</a>
To join from a phone, audio only	One tap mobile +13126266799,,81169471971#,,,,*103572# US (Chicago) +16469313860,,81169471971#,,,,*103572# US --- Dial by your location • +1 312 626 6799 US (Chicago) • +1 646 931 3860 US • +1 929 205 6099 US (New York) • +1 301 715 8592 US (Washington, DC)

**EOHLC will accept written comments through March 27, 2024. Written comments should either be emailed to [kristin.haas@mass.gov](mailto:kristin.haas@mass.gov) and [jaime.rebhan-buckminster@mass.gov](mailto:jaime.rebhan-buckminster@mass.gov) or sent by mail to:**

**EOHLC Division of Rental Assistance  
100 Cambridge Street - Suite 300  
Boston, MA 02114  
Attention: MTW Annual Plan Comments  
FAX: 617-573-1120**

**If you require an accommodation to review the Annual Plan (materials in Braille/large print, sign language interpreters, etc.), please contact EOHLC at 617-573-1198 no later than March 8, 2024.**



### Public Hearing Participation List

A public hearing was held virtually via Zoom on March 14, 2024. The following individuals participated in the March 14 hearing:

No.	Name	Affiliation
1.	Kristin Haas	MA Executive Office of Housing and Livable Communities
2.	Jaime Rebhan-Buckminster	MA Executive Office of Housing and Livable Communities
3.	Maryssa Schneider McLean	MA Executive Office of Housing and Livable Communities
4.	Ben Stone	MA Executive Office of Housing and Livable Communities
5.	Karlene Maiolino	MA Executive Office of Housing and Livable Communities
6.	Sofia Stavraki	MA Executive Office of Housing and Livable Communities
7.	Elizabeth Rourke	MA Executive Office of Housing and Livable Communities
8.	Nancy Yulfo	MA Executive Office of Housing and Livable Communities
9.	Anne Marie Belrose	Regional Housing Network of Massachusetts
10.	Judith Liben	Massachusetts Law Reform Institute (MLRI)
11.	Arka Pain	Metro Housing  Boston
12.	Chris Montemayor	Way Finders
13.	Joanna Berube	Way Finders
14.	Erik Sundsted	SMOC
15.	Nancy Rivera	RCAP Solutions
16.	Jenna Cotter	RCAP Solutions
17.	Wendy Ciciliane	RCAP Solutions
18.	Hannah Bolcome	Edgemere Consulting

### Summary of Public Comments & EOHLC Responses

The table below is a summary of the oral and written comments received during the public hearing and comment period. The table also reflects EOHLC responses to the comments.

No.	Topic	Comment	EOHLC Response
<b>Judith Liben, Mass. Law Reform Institute (MLRI)</b>			
1.	<b>Thank You</b>	<ul style="list-style-type: none"> <li>▪ Thank you to EOHLC for the many existing policies and promising proposals that are in the plan.</li> <li>▪ Thank you for security deposit assistance. I think that has been universally applauded.</li> <li>▪ Thank you for the set-aside vouchers for families in shelter. That is incredibly important now and is an excellent proposal.</li> <li>▪ Thank you for use of Small Area FMRs.</li> <li>▪ Thank you for funding Housing Navigator. I think this is an excellent use of MTW funds. It's an invaluable resource that allows people to find affordable housing. Now affordable housing is less of a "secret" than it had been for so many years. It's much more out-in-the-open now, and there are avenues to apply. These funds should help Housing Navigator as it improves, expands, and adds more housing resources and information to the site. EOHLC's plan includes some very good proposals for improvements to the site, so thank you.</li> <li>▪ Thank you for using MTW funds to help with the redevelopment and preservation of state public housing, including relocation assistance.</li> </ul>	<ul style="list-style-type: none"> <li>▪ EOHLC appreciates the support and feedback on these initiatives.</li> </ul>

		<ul style="list-style-type: none"> <li>▪ Thank you for SNO Mass.</li> <li>▪ Thank you for exception payment standards to assist with moves to opportunity areas and for reasonable accommodations.</li> <li>▪ Thank you for removing the \$25,000 FSS escrow cap and for the ability to use FSS funds more flexibly. It's a wonderful idea.</li> <li>▪ Thank you for funding the Fair Housing Initiative.</li> <li>▪ Thank you for increased earned income exclusions.</li> <li>▪ Thank you for responding to the request we have made for many years by including the city/town name in the table of PBV properties.</li> </ul>	
2.	<b>Exception Payment Standards (Activity 2010-2)</b>	<ul style="list-style-type: none"> <li>▪ My memory is that very few people had applied for reasonable accommodations for higher payment standards. We're concerned that perhaps people aren't informed about this policy. In legal services, we have many clients who could use that benefit but don't know about it. It's a good policy.</li> </ul>	<ul style="list-style-type: none"> <li>▪ EOHLC appreciates this feedback and will consider additional participant outreach.</li> </ul>
3.	<b>Rent Simplification: Mixed-Status Families (Activity 2015-1)</b>	<ul style="list-style-type: none"> <li>▪ The time has come to finally simplify rent for mixed-status families. EOHLC has long understood that mixed-status immigrant families are at a tremendous disadvantage compared to others and knows how to remedy that inequity.</li> <li>▪ In FY2018, EOHLC proposed a formula to limit the rents on</li> </ul>	<ul style="list-style-type: none"> <li>▪ EOHLC plans to implement the mixed status families rent policy in FY 2025.</li> </ul>



		<p>mixed-status families rather than the traditional and unaffordable pro-rated rents they currently must pay. HUD approved this policy. In its FY2019 Plan, EOHLC indicated that we put this plan into practice, but it never has. Thus far, EOHLC has chosen not to implement it. These families continue to lose an equal chance for voucher rents that they can afford. It's a matter of equity.</p> <ul style="list-style-type: none"> <li>▪ In its response to comments about this in past years, EOHLC has been wishy-washy. EOHLC should finally implement this activity or clearly explain why it is not doing so.</li> </ul>	
4.	<b>Leasing</b>	<ul style="list-style-type: none"> <li>▪ The plan says that EOHLC does not anticipate any leasing issues with the program. We are not sure what this means. EOHLC knows how difficult it can be to lease units with vouchers.</li> </ul>	<ul style="list-style-type: none"> <li>▪ EOHLC has updated Table 8 to address the challenges it faces with leasing.</li> </ul>
5.	<b>Project-Based Voucher Waitlists</b>	<ul style="list-style-type: none"> <li>▪ We think there is a need to centralize site-based, project-based voucher waitlists and applications.</li> <li>▪ All other programs use a regional, centrally-managed waitlist. Each year, there are more and more project-based units.</li> <li>▪ Asking people to apply separately to dozens or hundreds of developments with project-based vouchers is an incredibly difficult, if not impossible, task.</li> <li>▪ Decentralizing the waitlist process for project-based vouchers runs counter to all of EOHLC's other</li> </ul>	<ul style="list-style-type: none"> <li>▪ EOHLC appreciates this feedback and continues to explore ways to improve the application process for those seeking affordable housing.</li> </ul>

		<p>efforts like CHAMP and MassNAHRO centralized waitlist.</p> <ul style="list-style-type: none"> <li>▪ It's confusing for applicants and has fair housing implications.</li> <li>▪ We suggest that there be a more centralized and simplified way for people to apply for project-based voucher developments.</li> </ul>	
6.	<b>Assets</b>	<ul style="list-style-type: none"> <li>▪ The plan discusses verification policies for assets, but I can't find what EOHLC is using for an asset limit. HOTMA says there can be a \$100,000 limit or that can be waived.</li> </ul>	<ul style="list-style-type: none"> <li>▪ EOHLC has updated the plan to include a proposal related to asset verification (see Activity 2015-1 Rent Simplification). As an alternative to the HOTMA asset regulations, EOHLC will apply MTW flexibility and will not implement the HOTMA \$100,000 asset and real property limitations for applicants and participants and instead will retain its existing MTW policy on asset verification, asset income calculation, and asset exclusion.</li> </ul>
7.	<b>Multi-Year Recertifications (Activity 2011-4)</b>	<ul style="list-style-type: none"> <li>▪ There are only two "downward" re-exams allowed between biennial recertifications. This is a huge problem for households with highly variable work hours. Instead of having people apply for hardships or looking at each situation individually, we propose that the number of interim re-exams be increased from two to four.</li> <li>▪ I understand that there is a limited hardship policy, but when I asked my colleagues across the state if tenants know about this policy, it was not clear that they do, nor how effective it would be.</li> </ul>	<ul style="list-style-type: none"> <li>▪ EOHLC appreciates this feedback and will take this proposal under consideration.</li> </ul>

8.	<b>Income Deductions</b>	<ul style="list-style-type: none"> <li>It looks like the average increase for tenants is \$63. We understand that for many tenants, their share of their rent may go down, while for others, it might go up. But we are especially worried about eliminating childcare and medical expenses, and we don't understand exactly why EOHLC wants to eliminate those. Eliminating the childcare deductions runs counter to the state's desire to get people to work when they can. We would like EOHLC to rethink eliminating those deductions.</li> </ul>	<ul style="list-style-type: none"> <li>After further review and based on feedback received during the public comment period, EOHLC has decided <u>not</u> to eliminate the deductions for childcare or unreimbursed medical expenses. EOHLC does plan to increase the threshold for medical expenses from 3% to 10% in accordance with HOTMA. In addition, while EOHLC no longer plans to increase the dependent deduction, it does plan to increase the elderly/disabled deduction to \$650.</li> </ul>
9.	<b>Proposed New Activity: Vouchers for Tenants at Risk of Displacement</b>	<ul style="list-style-type: none"> <li>We propose a pilot program (or perhaps draw-down vouchers) that would offer vouchers to landlords to keep tenants in place if/when the tenancy is jeopardy. If folks are already housed but the tenancy is in jeopardy (e.g., due to a rent increase) and the landlord is otherwise willing to keep them as tenants, this would be an excellent use of vouchers. It avoids the challenge of having to find a new unit, court a new landlord, do all the work that agencies have to do, etc.</li> </ul>	<ul style="list-style-type: none"> <li>EOHLC appreciates this feedback and will take this proposal under consideration.</li> </ul>
10.	<b>Proposed New Activity: Funding for Tenant Technical Assistance</b>	<ul style="list-style-type: none"> <li>In response to the great work EOHLC is doing to assist state public housing as it attempts to reinvent and transform itself (for example in Chelsea and Somerville), I suggest funds for technical assistance to tenant groups so that they can participate in the process with more skills, information, and productive ideas.</li> </ul>	<ul style="list-style-type: none"> <li>EOHLC appreciates this feedback and will take this proposal under consideration.</li> </ul>

Susan Hegel, Cambridge and Somerville Legal Services Judith Liben, Mass. Law Reform Institute Laura Massie, Greater Boston Real Estate Services			
1.	<b>Thank You</b>	<ul style="list-style-type: none"> <li>Thank for you including the city/town in the list of Existing Project-Based Vouchers, which adds to its usefulness. We hope that EOHLC also includes the city/town when it prepares the corresponding MTW Annual Report.</li> </ul>	<ul style="list-style-type: none"> <li>EOHLC appreciates the support and feedback on these initiatives.</li> </ul>
2.	<b>Leasing Information: Non-MTW Section 8 Programs</b>	<ul style="list-style-type: none"> <li>Although not required by HUD, EOHLC had listed the leasing information for its non-MTW Section 8 programs in prior MTW Annual Plans, and we hope that you include it again here for the VASH, Mainstream, FUP, EHVs. etc. as that information is helpful to advocates and others. See, e.g. page 20 of MTW Annual Plan FY21 dated July 21, 2020.</li> </ul>	<ul style="list-style-type: none"> <li>As these are non-MTW programs, they are not relevant to EOHLC's MTW planning. Additionally, as they are targeted programs, they are more difficult to plan for. Utilization for these programs is publicly available, and EOHLC can provide information.</li> </ul>
3.	<b>Leasing Information: Leasing Issues</b>	<ul style="list-style-type: none"> <li>In the second table (Table B), EOHLC states that it does not anticipate any leasing issues in the MTW HCV program. Could you please explain what you mean by that? We continue to hear from tenants and others about the difficulties of leasing up with a voucher (due to, e.g., discrimination including but not limited to landlords failing to delead units, the time it takes for inspections and lease up paperwork, lack of communication from RAA, high rents, and low vacancy rate at least in the Greater Boston area).</li> </ul>	<ul style="list-style-type: none"> <li>EOHLC has updated Table 8 to address the challenges it faces with leasing.</li> </ul>
4.	<b>Development of Local Forms (Activity 2010-4)</b>	<ul style="list-style-type: none"> <li>We request that EOHLC share, at a meaningful time for comment by the legal services community, the draft HCV Tenancy Addendum to be attached to tenants' leases and to consider including provisions to prohibit the</li> </ul>	<ul style="list-style-type: none"> <li>EOHLC appreciates this feedback and welcomes this input.</li> </ul>

		<p>requirement of renter's insurance, imposition of attorney fees (absent a judgment for possession), and imposition of any (or excessive) late fees. These charges result in an additional financial burden for tenants, as they are in addition to the 30% of income that the tenant is generally responsible for rent and utilities, and tenants have little to no bargaining power in the negotiation of leases.</p>	
5.	<b>Multi-Year Recertifications</b>	<ul style="list-style-type: none"> <li>▪ While we appreciate the hardship policy of allowing additional interim rent reductions (beyond the two automatic ones in a biennial period) where there is a no-fault loss of income, the 30% threshold should be reduced and if the criteria is met, then the interim rent reduction must be allowed. For the Enhanced Voucher program, HUD defines significant income decrease as 15% so we suggest that EOHLC use that.</li> <li>▪ Our suggested language is in italics: "To respond to hardships which are beyond the tenant's control (no fault hardships), MTW households who have exceeded the limit on interim reexaminations may request an emergency interim redetermination which <i>shall be granted</i> if the loss of household income is greater than 15% and beyond the control of the family."</li> <li>▪ It is also important that notice of this be included in the rent letters (if not already done). In the alternative to decreasing the trigger from 30% to 15%, the number of voluntary interim rent</li> </ul>	<ul style="list-style-type: none"> <li>▪ EOHLC appreciates this feedback and will take this proposal under consideration.</li> </ul>

		decreases should be increased from 2 to 4 per biennial period.	
6.	<b>MTW Utility Allowances (Activity 2012-1)</b>	<ul style="list-style-type: none"> <li>We urge EOHLC to include a utility allowance for water and sewer. Most new construction, including zoning-restricted housing (at least in the greater Boston area) have separately metered water and sewer with the tenant responsible for these utilities. By not providing for an allowance for this, RAA Section 8 tenants are often foreclosed from renting such housing given this extra financial burden or else have an unaffordable shelter burden.</li> </ul>	<ul style="list-style-type: none"> <li>EOHLC appreciates this feedback and will take this proposal under consideration.</li> </ul>
7.	<b>Rent Simplification (Activity 2015-1): Mixed-Status Families</b>	<ul style="list-style-type: none"> <li>We strongly support EOHLC's mixed immigrant rent formula, first approved by HUD in the FY15 MTW Annual Plan, and urge that it be implemented now. Initially, after this was approved by HUD, EOHLC indicated it was holding off on implementation until it made other changes in the rent formula, but this year EOHLC is proposing to make such other changes. There is no reason for further delay in easing the rental burden of immigrants household who have some but not all with the HUD required immigration status. This may be especially helpful for families obtaining vouchers through the set aside for those in Emergency Assistance shelters.</li> </ul>	<ul style="list-style-type: none"> <li>EOHLC plans to implement the mixed status families rent policy in FY 2025.</li> </ul>
8.	<b>Rent Simplification (Activity 2015-1): Tiered Rents</b>	<ul style="list-style-type: none"> <li>We request that if EOHLC does consider a tiered or other rent formula that it provide the impact analysis and have a discussion with stakeholders early on in the process before starting any formal process for the MTW Annual Plan or amendment thereto.</li> </ul>	<ul style="list-style-type: none"> <li>EOHLC appreciates this feedback and welcomes this input.</li> </ul>

9.	<b>Rent Simplification (Activity 2015-1): Asset Policy</b>	<ul style="list-style-type: none"> <li>Although EOHLC states it will keep its current asset policy for rent calculation purposes, the MTW Annual Plan is silent on whether it is seeking to continue its current policy of “no asset limit” for admission or continued occupancy. We request that EOHLC make it clear in its MTW Annual Plan that it will continue its current policies (of no asset limits for admission if possible and no asset limits for continued occupancy).</li> <li>Additionally, we assume that EOHLC will be using the new income and asset definitions in HOTMA but, as indicated on page 61 still have the exclusion for all full time student income, Guarantee Income benefit programs, and \$5,000 from earned income.</li> </ul>	<ul style="list-style-type: none"> <li>EOHLC has updated the plan to include a proposal related to asset verification (see Activity 2015-1 Rent Simplification). As an alternative to the HOTMA asset regulations, EOHLC will apply MTW flexibility and will not implement the HOTMA \$100,000 asset and real property limitations for applicants and participants and instead will retain its existing MTW policy on asset verification, asset income calculation, and asset exclusion.</li> </ul>
10.	<b>Rent Simplification (Activity 2015-1): Medical and Child Care Deductions</b>	<ul style="list-style-type: none"> <li>While we appreciate the increase in the standard deduction to \$700 per dependent or elderly family, we oppose the elimination of the medical and child care deductions, as that will lead to increased rent burdens for close to 600 tenants. About a third of those will be faced with an increase of more than \$51/month and close to 20% of those are faced with an increase of over \$101/month.</li> <li>We hope to follow up as to some questions about the data.</li> </ul>	<ul style="list-style-type: none"> <li>After further review and based on feedback received during the public comment period, EOHLC has decided <u>not</u> to eliminate the deductions for childcare or unreimbursed medical expenses. EOHLC does plan to increase the threshold for medical expenses from 3% to 10% in accordance with HOTMA. In addition, while EOHLC no longer plans to increase the dependent deduction, it does plan to increase the elderly/disabled deduction to \$650.</li> </ul>
11.	<b>Vouchers for Special Populations (Activity 2018-3)</b>	<ul style="list-style-type: none"> <li>We support EOHLC’s FY2024 expansion of this activity to include the issuance of up to 1,500 vouchers for households referred from EA shelters, and the application of the Emergency</li> </ul>	<ul style="list-style-type: none"> <li>EOHLC appreciates this feedback and will take these proposals under consideration.</li> </ul>

		<p>Housing Voucher waivers and requirements.</p> <ul style="list-style-type: none"> <li>▪ We urge EOHLC to increase this set aside to more than 1,500 given that the shelter crisis has not abated and especially as shelter time limits are now being contemplated.</li> <li>▪ We also urge EOHLC to adopt additional Activities, such as those proposed in Paragraphs 16 and 17 below, in order to maximize families' ability to lease up with vouchers once issued.</li> <li>▪ EOHLC should also adopt metrics related to success in lease-up, in order to maximize transparency and accountability regarding voucher-holders' ability to lease up with their vouchers.</li> </ul>	
12.	<b>Enhanced Local Project-Based Voucher Program (Activity 2018-7)</b>	<ul style="list-style-type: none"> <li>▪ We urge EOHLC to replace the PBV site-based application and wait list process with a centrally administered one. Requiring applicants to apply separately to dozens of developments is not only confusing but also raises serious fair housing implications.</li> </ul>	<ul style="list-style-type: none"> <li>▪ EOHLC appreciates this feedback and will take this proposal under consideration.</li> </ul>
13.	<b>Affordable Housing Preservation and Development Fund (Activity 2018-9)</b>	<ul style="list-style-type: none"> <li>▪ We support the funding of this preservation work and in particular the requirements for 1:1 replacement, similar income limits, and similar tenant protections (listed in the second paragraph from the bottom of page) but suggest that rather than use "similar" that EOHLC change this to require that any development must have the same income limits and same tenant protections (as present) unless LIHTC or Section 8 program requires something different. This would be consistent with EOHLC's requirements for other developments.</li> </ul>	<ul style="list-style-type: none"> <li>▪ EOHLC appreciates this feedback and will take this proposal under consideration.</li> </ul>



		<ul style="list-style-type: none"> <li>▪ We also request that EOHLC make funds available for tenants to obtain technical assistance on such redevelopment work.</li> </ul>	
14.	<b>Planned and Ongoing Evaluations</b>	<ul style="list-style-type: none"> <li>▪ Now that COVID is mostly over and RAAs are returning to “normal” operation, we request that EOHLC conduct a survey of participants’ experiences (by RAA) with the current operation of the Section 8 program to obtain some information on the actual operation from the beneficiaries.</li> <li>▪ This should also include interviews with community groups and legal service programs who represent applicants and tenants and interact with the RAAs as to the administration of the Section 8 program.</li> </ul>	<ul style="list-style-type: none"> <li>▪ EOHLC appreciates this feedback and will take this proposal under consideration.</li> </ul>
15.	<b>Proposed New Activity: In-Place Voucher Program</b>	<ul style="list-style-type: none"> <li>▪ EOHLC should create and fund a pilot program (either at a RAA or as a draw down voucher program for all RAAs) offering vouchers to landlord to keep tenants in place when a tenancy is in jeopardy (e.g. as a result of a rent increase). This could prevent tenants from entering into the EA shelter program and provide an important eviction prevention/housing stabilization tool. It would make the lease up process easy as the landlord has already screened and accepted the tenant.</li> </ul>	<ul style="list-style-type: none"> <li>▪ EOHLC appreciates this feedback and will take this proposal under consideration.</li> </ul>
16.	<b>Proposed New Activity: Landlord Incentives</b>	<ul style="list-style-type: none"> <li>▪ To replace and expand on the discontinued Activity 2010-3, EOHLC should create and publicize landlord incentives, including but not limited to financial assistance with deleading and/or any other repairs needed to bring a unit up to HQS. In order to maximize</li> </ul>	<ul style="list-style-type: none"> <li>▪ EOHLC appreciates this feedback and will take this proposal under consideration, though MTW authority is not needed for certain landlord incentives and thus implementation may not need to go through the MTW planning process.</li> </ul>

		landlord participation and thus increase voucher-holders' likelihood of being able to lease up, EOHLC should ensure that these landlord incentives are administered in a way that is transparent, efficient, and user-friendly.	
17.	<b>Proposed New Activity: Technical Assistance to RAAs to Improve Lease-Up Operations</b>	<ul style="list-style-type: none"> <li>Given the extremely competitive rental market in Massachusetts, landlords are often unwilling to wait for RFTA processing times that can stretch over many weeks, and wind up passing over voucher-holders in favor of higher-income tenants without vouchers. To improve voucher-holders' ability to lease up with their vouchers, EOHLC should provide robust technical assistance to RAAs to enable them to process RFTAs more rapidly, including but not limited to maximizing internal coordination with other RAA-administered programs to reduce inefficiencies and duplicative paperwork requirements in order to streamline the process of leasing up and moving into a unit.</li> </ul>	<ul style="list-style-type: none"> <li>EOHLC appreciates this feedback and will take this proposal under consideration.</li> </ul>
<b>Jenna Carter and Wendy Ciciliane, RCAP Solutions</b>			
1.	<b>Family Self Sufficiency Program Enhancements (Activity 2012-5)</b>	<ul style="list-style-type: none"> <li>We were very excited to see the proposed elimination of the \$25,000 asset cap for FSS. That is a wonderful benefit to families.</li> <li>When will the policy change be effective?</li> <li>How would it interact with the savings match?</li> </ul>	<ul style="list-style-type: none"> <li>EOHLC appreciates the support and feedback on this policy change.</li> </ul>
<b>Erik Sundsted, SMOC</b>			
1.	<b>Multi-Year Recertifications (Activity 2011-4)</b>	<ul style="list-style-type: none"> <li>SMOC does not agree with Ms. Liben's suggestion to increase the limit from two to four interim re-exams. Interim re-exams really are an administrative burden</li> </ul>	<ul style="list-style-type: none"> <li>EOHLC appreciates this feedback and will take this under consideration.</li> </ul>

		(particularly in special programs that already allow more than two interims).	
<b>Brian Scales, Josh Bedarian, and Sally Nieves, RCAP Solutions</b>			
1.	<b>Family Self Sufficiency Program Enhancements (Activity 2012-5)</b>	<ul style="list-style-type: none"> <li>▪ We support the Department's proposal to eliminate the previously approved \$25,000 cap on escrow. This will help families that want to increase their economic stability.</li> <li>▪ We also support the use of Forfeited FSS Escrow funds to support other adult household members who have their own goals of increasing their own economic stability, and the use of these funds to support family emergency expenses, as described in the plan.</li> </ul>	<ul style="list-style-type: none"> <li>▪ EOHLC appreciates the support and feedback on these policy changes.</li> </ul>
2.	<b>Rent Simplification (Activity 2015-1)</b>	<ul style="list-style-type: none"> <li>▪ RCAP supports the increase in the elderly/disabled deductions and the elimination of unreimbursed health and medical expenses.</li> <li>▪ We support the increase in the dependent deduction from \$480 to \$700.</li> <li>▪ We request that the Department reconsider the elimination of the childcare expenses. This elimination could potentially create a financial strain on families who are seeking to increase their financial stability. Disallowance of this expense could disincentivize and hinder families who may not have the resources to pay for adequate childcare facilities or who don't qualify or are waiting for childcare vouchers.</li> </ul>	<ul style="list-style-type: none"> <li>▪ After further review and based on feedback received during the public comment period, EOHLC has decided <u>not</u> to eliminate the deductions for childcare or unreimbursed medical expenses. EOHLC does plan to increase the threshold for medical expenses from 3% to 10% in accordance with HOTMA. In addition, while EOHLC no longer plans to increase the dependent deduction, it does plan to increase the elderly/disabled deduction to \$650.</li> </ul>

Anne Marie Belrose, Regional Housing Network (RHN) Massachusetts			
1.	<b>Data Sharing &amp; Income Eligibility</b>	<ul style="list-style-type: none"> <li>▪ RHN recommends that to the extent possible, EOHLC align determinants/documentation of eligibility across programs. To this end, RHN has worked with EOHLC to expand its data sharing agreement to allow RAAs to access Unemployment Insurance data for purposes of determination of income eligibility.</li> <li>▪ We understand that the data sharing agreement has been updated to allow access by RAAs, and we look forward to implementing it, and are grateful for this important progress.</li> <li>▪ We recommend additional data sharing with the Department of Transitional Assistance, the Department of Revenue's Child Support Enforcement Division, the Massachusetts State Supplement Program, and MassHealth.</li> <li>▪ Enhanced data sharing for eligibility determinations would expedite processing of applications, as the greatest bottleneck in processing applications is obtaining correct and complete information from clients. We expect that expediting applications in this way will measurably impact utilization and expedite lease-ups.</li> </ul>	<ul style="list-style-type: none"> <li>▪ EOHLC appreciates this feedback and will address, where possible, outside of the MTW planning process.</li> </ul>

2.	<b>Rent Simplification (Activity 2015-1)</b>	<ul style="list-style-type: none"> <li>▪ RHN recommends that EOHLC review the medical expense deduction policy and adopt a streamlined methodology with respect to the deduction. This would reduce the administrative burden on the RAAs and minimize errors.</li> <li>▪ Additionally/alternatively, we recommend elimination of medical deductions or increasing the standard deduction for elderly or disabled voucher holders, as both are allowable under the administrative plan for MTW.</li> </ul>	<ul style="list-style-type: none"> <li>▪ After further review and based on feedback received during the public comment period, EOHLC has decided <u>not</u> to eliminate the deductions for childcare or unreimbursed medical expenses. EOHLC does plan to increase the threshold for medical expenses from 3% to 10% in accordance with HOTMA. In addition, while EOHLC no longer plans to increase the dependent deduction, it does plan to increase the elderly/disabled deduction to \$650.</li> </ul>
<b>Ashley Grant, Suffolk University Law School, Housing Discrimination Testing Program</b>			
1.	<b>Housing Navigator (Activity 2023-1)</b>	<ul style="list-style-type: none"> <li>▪ I am voicing my support for EOHLC's MTW funding proposal, in particular the provision of funds to the Housing Navigator to provide up-to-date listings of affordable and accessible housing to low-income individuals and those with disabilities.</li> <li>▪ In my work with victims of housing discrimination, I am constantly seeing the challenges that low-income tenants have in trying to secure housing, particularly if they are using a voucher or in need of an accessible unit.</li> <li>▪ Housing Navigator provides a singular location where individuals can easily search for affordable housing across the state, including hard to find lotteries, subsidized housing and elusive accessible units.</li> <li>▪ Maintaining this website is crucial to providing housing options for low-income individuals beyond the excruciatingly long waitlists for public housing and Section 8, where we</li> </ul>	<ul style="list-style-type: none"> <li>▪ EOHLC appreciates the support and feedback on this initiative.</li> </ul>

		<p>know applicants can remain for many years.</p> <ul style="list-style-type: none"> <li>▪ Further, the data that Housing Navigator collects through their website provides us with important information on where to focus our testing and investigations, as well as gives us a better understanding of the landscape our clients are navigating.</li> </ul>	
<b>Anna Siedzik, Harborlight Homes</b>			
1.	<b>Housing Navigator (Activity 2023-1)</b>	<ul style="list-style-type: none"> <li>▪ I am writing to express my strong support for increased funding to Housing Navigator. I work closely with the team at Housing Navigator to list and market our portfolio. The tool is valuable for both owners and applicants.</li> <li>▪ Housing Navigator provides a centralized repository for all developer properties. It is well-designed, easy to use, and allows owners to quickly update property details and waitlist statuses. This allows us to share timely updates about openings with thousands of potential applicants at once.</li> <li>▪ Establishing a new site on Housing Navigator is transparent and efficient. Housing Navigator quickly creates time-sensitive stub listing certificates needed for closing as required by EOHLC.</li> <li>▪ The interface allows for the sharing of varied unit mixes and multiple images and documents easily. This supports requirements regarding language and inclusion.</li> <li>▪ The ability to refer applicants to opportunities outside of our own offerings is a huge benefit. Access to</li> </ul>	<ul style="list-style-type: none"> <li>▪ EOHLC appreciates the feedback and support for this initiative.</li> </ul>

		more options is particularly helpful for applicants who are distraught and frustrated by the exhausting search for affordable housing.	
<b>Fair Housing Alliance of Massachusetts (FHAM)</b>			
1.	<b>Fair Housing Initiative (Activity 2021-1)</b>	<ul style="list-style-type: none"> <li>▪ We appreciate that one of the primary objectives of the MTW Demonstration is to increase housing choices for low-income families. In Massachusetts, discriminatory housing practices continue to limit housing choice for many residents. Discriminatory barriers exacerbate the existing housing crisis and limit citizens' full access to housing opportunity.</li> <li>▪ Despite state anti-discrimination laws, landlords and real estate professionals still engage in such behaviors. EOHLC's funding for fair housing initiatives is critical so that residents receive accurate, timely education about the laws and so that the laws are vigorously enforced.</li> <li>▪ Though the federal government funds local agencies to engage in enforcement activities to protect the rights enshrined in the federal Fair Housing Act, the funding does not fully cover all activities focused on enforcing protections solely found in local or state laws.</li> <li>▪ FHAM has helped numerous Massachusetts residents access the housing of their choice or avoid displacement through this funding. In one case, we obtained a settlement of \$18,000 for a client who was denied the opportunity to rent an apartment using a Section 8 voucher because the real estate agent said she</li> </ul>	<ul style="list-style-type: none"> <li>▪ EOHLC appreciates the feedback and support for this initiative.</li> </ul>

		<p>needed an apartment with a lead certificate, which the unit did not have. The landlord agreed to remove lead hazards and engage in affirmative advertising. The real estate agency agreed not to work with any landlord who was not willing to comply with the Massachusetts lead law.</p> <ul style="list-style-type: none"> <li>▪ MTW funding has allowed FHAM to assist clients in areas that were not previously serviced by any fair housing agency. We have also engaged in outreach and systemic advocacy aimed at preventing future discrimination and increasing housing choice for voucher participants.</li> </ul>	
--	--	--	--



## Appendix D: Disclosure of Lobbying Activities (SF-LLL)

Not Applicable

<b>DISCLOSURE OF LOBBYING ACTIVITIES</b>		
OMB Control Number: 4040-0013 Expiration Date: 2/28/2025		
Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352		
<b>Review Public Burden Disclosure Statement</b>		
<b>1. * Type of Federal Action:</b> <input type="checkbox"/> a. contract <input checked="" type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	<b>2. * Status of Federal Action:</b> <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input checked="" type="checkbox"/> c. post-award	<b>3. * Report Type:</b> <input checked="" type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change
<b>4. Name and Address of Reporting Entity:</b> <input checked="" type="checkbox"/> Prime <input type="checkbox"/> SubAwardee * Name: <input style="width: 100%;" type="text"/> * Street 1: <input style="width: 100%;" type="text"/> Street 2: <input style="width: 100%;" type="text"/> * City: <input style="width: 100%;" type="text"/> State: <input style="width: 100%;" type="text"/> Zip: <input style="width: 100%;" type="text"/> Congressional District, if known: <input style="width: 100%;" type="text"/>		
<b>5. If Reporting Entity in No.4 is Subawardee, Enter Name and Address of Prime:</b> <div style="height: 100px;"></div>		
<b>6. * Federal Department/Agency:</b> <input style="width: 100%;" type="text"/>	<b>7. * Federal Program Name/Description:</b> <input style="width: 100%;" type="text"/> CFDA Number, if applicable: <input style="width: 100%;" type="text"/>	
<b>8. Federal Action Number, if known:</b> <input style="width: 100%;" type="text"/>	<b>9. Award Amount, if known:</b> \$ <input style="width: 100%;" type="text"/>	
<b>10. a. Name and Address of Lobbying Registrant:</b> Prefix: <input style="width: 100%;" type="text"/> * First Name: <input style="width: 100%;" type="text"/> Middle Name: <input style="width: 100%;" type="text"/> * Last Name: <input style="width: 100%;" type="text"/> Suffix: <input style="width: 100%;" type="text"/> * Street 1: <input style="width: 100%;" type="text"/> Street 2: <input style="width: 100%;" type="text"/> * City: <input style="width: 100%;" type="text"/> State: <input style="width: 100%;" type="text"/> Zip: <input style="width: 100%;" type="text"/>		
<b>b. Individual Performing Services</b> (including address if different from No. 10a) Prefix: <input style="width: 100%;" type="text"/> * First Name: <input style="width: 100%;" type="text"/> Middle Name: <input style="width: 100%;" type="text"/> * Last Name: <input style="width: 100%;" type="text"/> Suffix: <input style="width: 100%;" type="text"/> * Street 1: <input style="width: 100%;" type="text"/> Street 2: <input style="width: 100%;" type="text"/> * City: <input style="width: 100%;" type="text"/> State: <input style="width: 100%;" type="text"/> Zip: <input style="width: 100%;" type="text"/>		
<b>11.</b> Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when the transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be reported to the Congress semi-annually and will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure. <b>* Signature:</b> <input style="width: 100%;" type="text"/> <b>* Name:</b> Prefix: <input style="width: 100%;" type="text"/> * First Name: <input style="width: 100%;" type="text"/> Middle Name: <input style="width: 100%;" type="text"/> * Last Name: <input style="width: 100%;" type="text"/> Suffix: <input style="width: 100%;" type="text"/> <b>Title:</b> <input style="width: 100%;" type="text"/> <b>Telephone No.:</b> <input style="width: 100%;" type="text"/> <b>Date:</b> <input style="width: 100%;" type="text"/>		
<b>Federal Use Only:</b>		<b>STANDARD FORM LLL (REV. 7/1997)</b> Authorized for Local Reproduction

## Appendix E: Certification of Payments (HUD-50071)

### Certification of Payments to Influence Federal Transactions

U.S. Department of Housing  
and Urban Development  
Office of Public and Indian Housing

OMB Approval No. 2577-0157 (Exp. 1/31/2027)

Public reporting burden for this information collection is estimated to average 30 minutes including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The information requested is required to obtain a benefit. This form is used to ensure federal funds are not used to influence members of Congress. There are no assurances of confidentiality. HUD may not conduct or sponsor, and an applicant is not required to respond to a collection of information unless it displays a currently valid OMB control number. Comments regarding the accuracy of this burden estimate and any suggestions for reducing this burden can be sent to the Reports Management Officer, Office of Policy Development and Research, RFE, Department of Housing and Urban Development, 451 7th St SW, Room 4176, Washington, DC 20410-5000. When providing comments, please refer to OMB Approval No. 2577-0157.

Applicant Name

Commonwealth of Massachusetts Executive Office of Housing and Livable Communities

Program/Activity Receiving Federal Grant Funding

Moving to Work Program

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.

**Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official

Benjamin Stone

Title

Undersecretary, Public Housing & Rental Assistance

Signature



Date (mm/dd/yyyy)

4/12/2024

Previous edition is obsolete

form HUD 50071 (01/14)

## Appendix F: Impact Analysis

### Proposed Change to Activity 2015-1 Rent Simplification

- Increase in Elderly/Disabled Deduction from \$400 to \$650
- Also takes into account increase in medical expense threshold from 3% to 10% in accordance with HOTMA

Description	Results
Number of Households	21,391
Number of Elderly/Disabled Households	12,749
Number of Households w Medical/Disability Deduction	532
Number of Households w Dependents	9,520
<b>Annual Total HAP</b>	
Baseline	\$379,884,189
Proposed	\$380,664,666
Change in Annual Total HAP from Baseline	\$780,477
<b>Average Family Share</b>	
Baseline	\$553
Proposed	\$550
Change in Average Family Share from Baseline	(\$3)
<b>Impact on Tenant (TRO/UAP)</b>	
Households with No Change	9,193
Households with a Decrease	17,773
Average Decrease	(\$6)
Dollar Decrease	
\$1 to \$5	94
\$6 to \$10	11,663
\$11 to \$25	6
\$26 to \$50	10
\$51 to \$100	0
\$101 to \$9,999	0

<b>Households with an Increase</b>	425
<b>Average Increase</b>	\$22
<b>Dollar Increase</b>	
<b>\$1 to \$5</b>	45
<b>\$6 to \$10</b>	40
<b>\$11 to \$25</b>	214
<b>\$26 to \$50</b>	103
<b>\$51 to \$100</b>	23
<b>\$101 to \$9,999</b>	0