

Mass LEAP Program Guidelines

Department of Housing &
Community Development

August 1 2014

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I. Mass LEAP

These guidelines govern the management of the Massachusetts Learning, Employment and Asset Program (Mass LEAP) program sites that provide eligible Tenants of state-aided public housing developments and/or Massachusetts Rental Voucher Program (MRVP) Participants with a set of supportive services including employment and career development/planning; financial literacy and asset development; and post-secondary education. The program creates 5 year partnerships between a set of local housing authorities/agencies (HAs) and service providers to model a comprehensive program designed to increase the ability of participating residents to grow their earned income and assets. The program design of Mass LEAP is a deliberate attempt to build upon successful efforts such as the Family Self-Sufficiency (FSS) program, asset development strategies, and strong workforce /job training programs. Mass LEAP is also an initiative to create and support partnership models that create an alliance of housing, education and workforce agencies.

Mass LEAP was created in response to recommendations from the Governor's Commission on Public Housing Sustainability and Reform and in consultation with stakeholder input from a working group that included the Massachusetts Union of Public Housing, the Massachusetts Law Reform Institute, Inc., service providers, and housing agencies (HAs). It is funded at \$8,125,000 million over 5 years. More information about the award process and program documents can be accessed at the Massachusetts Department of Housing and Community Development's (DHCD's) website at: <http://www.mass.gov/hed/housing/ph-manage/mass-leap.html>.

Mass LEAP rental assistance payments are provided through MRVP and housing subsidies for state-aided public housing Tenants, as well as an additional escrow component of the program. Accordingly, unless specifically waived by DHCD, all MRVP rules and regulations (including 760 CMR 49.00) and all rules and regulations applicable to residents of state-aided public housing (including 750 CMR 4.00, 5.00, and 6.00) shall apply to Mass LEAP Participants.

II. Program Design

A Definitions Section is included within Section IX. Evaluation and Reporting, located at the end of this document.

Participants

A Mass LEAP Participant is an individual person who is the head of household, and the person with responsibility for his/her household. The program's services and support are targeted to the Participant although other household members will benefit from the Participant's success in Mass LEAP. Additional qualifications for Mass LEAP Participant eligibility are enumerated in Section VII. Participant Eligibility and Section IV. Program Participation; Continuing Participation.

Goals

All funded partnership Sites, also referred to as Sites, and all Participants, share the same intended Mass LEAP goals and outcomes, which at a minimum, are the following:

- Increased earned income of Participants through higher wages as a result of re-entering the workforce, acquiring new skills, promotions or wage increases beyond expected cost of living adjustments or wage adjustments;
- Increased skills base through participation in formal job training programs, incumbent worker training, job readiness training, career counseling, and enrollment in and/or completion of post-secondary education; and
- Increased asset base and financial knowledge.

The progress toward outcomes will be measured and shared within partnerships and across Sites and measured and tracked on a quarterly basis by DHCD (see Section X).

Services

Each Site will offer services for:

- employment and career development;
- financial literacy and asset development; and
- post-secondary education support.

Each Site will provide all of these services through one or more Mass LEAP designated service agencies (which are pre-qualified contractors). Services must be open for enrollment to the Participants of MASS LEAP throughout the duration of the program. Participants in Mass LEAP will have a customized LEAP plan which indicates the specific goals and services which the

individual plans to accomplish over the 5 year program duration. Mass LEAP is an integrated service model; Participants may enter through any door (employment, post-secondary education or financial literacy) but must successfully participate in each pathway.

Participants are not required to be enrolled in all activities simultaneously but are required to meet goals in all three areas in order to be considered successful Mass LEAP graduates. Each Site will determine how the partnership will create and deliver the case coordination including the development of an individual service plan and the timing by which the individual will participate in each service type. DHCD encourages the HA's and service providers to create cohorts of Participants that can support each other throughout Mass LEAP.

Sites

The number of total Participants for each Site will be determined and described in the Mass LEAP contract executed between DHCD and the Lead Agency on behalf of the Site's partners. Each program Site must serve a minimum of fifty (50) Participants. This can be a combination of public housing Tenants and MRVP Participants and may include regional consortiums. At the time of application, each Mass LEAP site identified the number of people to be served, and the providers that will be providing services. Since this was a competitive funding process, these numbers and these service providers may not be changed without prior DHCD Approval. In the event that DHCD determines that a service provider is not meeting the required goals and benchmarks, DHCD retains the right to terminate funding to the Lead Agency that supports that service provider. In the event that DHCD determines that a Site is not meeting its overall goals and benchmarks, DHCD reserves the right to terminate the program and Mass LEAP Participants at that site will be held harmless to the greatest degree possible – all Participants in good standing will be eligible for any escrow earned as a result of their participation in Mass LEAP.

The partnership and service delivery plan for each Site must ensure meaningful access to Mass LEAP by all potential applicants in the HAs' service area(s). Services are required to be provided at locations convenient to all Participants, rather than exclusively at the Lead Agencies' or partners' office. This is particularly important for sites with multiple HAs. This includes but is not limited to holding all meetings and events in times and locations that are accessible to all potential Participants, and developing an outreach plan that incorporates a variety of formats and languages to ensure equal access to the program. Sites are expected to comply with the Department's Language Access Plan which can be found here:

<http://www.mass.gov/hed/docs/dhcd/hd/fair/languageaccessplan.htm>.

Partnerships

Within Mass LEAP sites the Lead agency is responsible for all program oversight and outcomes of the partnership and ensuring that the service provider partners meet the goals related to their

areas of expertise and that information about individual Participant's progress is reported to Participants and to DHCD in a timely manner.

The following activities are the responsibility of partners at each site:

- Collaboration between the HAs and service providers regarding the inclusion of resident/Tenant participation in the program design and ongoing evaluation;
- Coordination of outreach, enrollment and program retention efforts;
- Participation in regular team meetings to discuss Participant progress, solutions to barriers and program management;
- Coordination of reporting and data sharing; and
- Working across specialties to share information and support Participants in reaching their goals.

The partnership should designate specific program-wide activities or individual specific activities to one or more of the service providers (e.g. data collection, coordination of partnership activities, service plan/case management maintenance, coordination with resources and agencies that serve a Participant outside/in addition to Mass LEAP).

Resident Involvement

Mass LEAP partnerships must develop and maintain a mechanism for meaningful ongoing Tenant participation in the design and oversight of the site's program. Tenant participation must include both Mass LEAP Participants and non-Participants. This includes active consideration of the responses from the Tenant survey completed as part of the Mass LEAP RFR process, consultation with the Tenant in accordance with 760 CMR 6.09 and/or representation at partnership meetings from the Participants of Mass LEAP and/or residents of the housing associated with the Site.

III. Participant Eligibility

Target Population

Eligible Participants for Mass LEAP are Tenants who live in state-aided M.G.L. ch. 200 and M.G.L. ch. 705 public housing or who receive rental assistance through the MRVP program from an HA/Regional Administering Agency (RAA) which is a partner of the Mass LEAP Site.

All Mass LEAP Participants must be income eligible (i.e. eligible for their housing assistance) at the time of enrollment. Levels of income eligibility at the time of enrollment for eligible applicants are defined as follows:

- (1) MRVP Participants: Household income at or below the maximum income level as is determined by MRVP regulations.
- (2) Public Housing Tenants: Household income at or below the maximum level for State-Aided Public Housing.
- (3) Participants currently living in Public Housing units who are already paying Fair Market Rent (FMR) or the equivalent for their unit are not considered income eligible for Mass LEAP.

In addition, Income eligibility for Mass LEAP is defined as: A household whose net earned income is equal or less than 60 percent of the Area Median Income for the Mass LEAP Site's region.

In addition each Participant must meet the following qualifications at the time of enrollment:

- The Head of Household/Tenant must have a child, or be the legal guardian of a child, under 18 years of age as a member of the household.¹ Only the Head of Household may be a Participant in the Mass LEAP program.²
- Participant is a Tenant committed to increasing his or her earned income and asset base as demonstrated and required by Site's application process; and
- Participant is a Tenant with at least a GED or a high school diploma **AND** is working or with a recent work history (typically within the last six (6) months **OR** is currently enrolled, or actively pursuing enrollment in a job training, post-secondary education or certificate program; and

¹ Exception: a household with a child between the ages of 18-22 who is receiving services through under Mass State Law (Chapter 766) would qualify for Mass LEAP.

² Only one person per household may be a Participant in Mass LEAP even if the head of household changes during the duration of the Mass LEAP program.

- The Participant is a Tenant in good standing at the time of enrollment, and must be in good standing as a requirement for ongoing participation. Good standing requires at least the following:
 - The household is current in payment of rent, charges and fees owed to the HA; No household member has committed any material violations of the lease for at least one (1) year. Eviction proceedings are not pending, and the Tenant is not subject to the terms of agreement for judgment in a prior eviction proceeding; and
 - If the Tenant is on a repayment agreement, he/she must be fully meeting the terms of that agreement. If there are other non-compliance issues related to his/her housing status, the Tenant must be actively working to correct those issues.

Participants who enroll in Mass LEAP who are already matriculating at a post-secondary education program, or enrolled in a job training program, will not necessarily be considered to have completed the career and education and training portions of Mass LEAP. Additional goals in the area of career development and education must be set (and needed) to further strengthen the Participant's career goals and employment opportunities.

Enrollment

Mass LEAP will be open to receiving applications from all Tenants of M.G.L. ch. 200 and M.G.L. ch. 705 public housing and MRVP units. Interested households will complete an application to determine basic eligibility followed by an assessment/selection process conducted at each site. The outreach and enrollment phase of Mass LEAP should be long enough to reach all participants and to meet LEAP benchmarks for recruitment while also allowing for adequate time for program service delivery and the creation of a cohort of Participants. Selection will be rolling until all available slots are filled and each Site will maintain a waitlist if there are more applicants than slots available. The following describes the overall process leading up to participation:

- Outreach
 - Create Materials.
 - Open and wide outreach to all M.G.L. ch. 200, M.G.L. ch. 705, and MRVP Tenants.
 - Determine the dates at which the Site will begin accepting applications and open the Program.
 - Keep enrollment period open until the slots are filled and allow for a waitlist if there are more applicants than spaces available.

- Application Process
 - Accept applications and date and time stamp them.
 - All applications received will be evaluated for basic eligibility.
 - Eligible applicants should be notified using a letter which outlines the next steps, including:
 - the process by which they will be assessed and selected for LEAP;
 - The date, place and time at which they will be assessed, and if necessary how an accommodation can be provided if they cannot attend in person or at that date or time;
 - What documentation if any they will need to be qualified for the program.
 - Conduct the Assessment.
 - Notify applicants who have been determined eligible/ineligible for LEAP within 7 days of their assessment outlining the next steps they will take to enroll or appeal.
- Once a Site's available spaces have been filled:
 - Applications received after all slots have been filled will be date and time stamped in the order they are received and placed on Waitlist in chronological order based on date and time received.
 - When slots become open on the Waitlist the appropriate number of people, according to the date they were placed on the Waitlist, should be evaluated for basic eligibility, and if they meet this initial criteria should be notified that they may be eligible for Mass LEAP outlining the steps for selection as described above.
 - Notify applicants of outcome

More detail on each step is provided in the sections below.

Outreach

Outreach and recruitment must be comprehensive and ensure equal access for all potential Mass LEAP program eligible Tenants in M.G.L. ch. 200 and M.G.L. ch. 705 housing units and MRVP residents, regardless of language, disability, and the type of housing in which they reside at the time of application (state-aided public housing or MRVP). Meetings and orientations for Mass LEAP program-eligible Tenants and MRVP Participants must be held in accessible locations and at times that accommodate the schedules of working adults and full-time students. Partnership Sites are expected to work together to create and distribute materials and orientation packets to

identify good candidates for the Mass LEAP program. Using materials created by the partnership each Mass LEAP Site will conduct outreach. Outreach materials should include an application and explanation of the process and any dates by which a Tenant must apply to become a Participant.

The Mass LEAP program Sites are required to reach full enrollment within 12 months of the program's contract start date. DHCD will be monitoring progress towards this goal. Outreach and enrollment will continue as necessary based on program Participant levels for up to 24 months. At the time of application, agencies were required to determine, using their own data, that there was a sufficient number of potentially eligible Participants in their housing portfolios to support their request for funding. DHCD expects Lead Agencies and their Housing Partners to reach their enrollment and retention goals. No waivers will be granted to sites that are not able to reach their recruitment goals.

Waitlist

Each agency was required to provide a description of their selection and waitlist process. Changes to the agency selection and waitlist processes must be approved by DHCD. This process may vary from site to site, but the following core principles/processes must be observed:

- At the time of initial enrollment, Mass LEAP sites cannot enroll Participants on a "first come, first served" basis without a selection process that occurs after a determination of basic eligibility.
- Enrollment must be open for a reasonable amount of time, applications accepted and verified as eligible before the selection process occurs.
- Applicants not selected may choose to be put on the waitlist in the event that Participants drop out or are terminated within the first 24 months of the program.
- Applicants' basic eligibility will be determined if they are selected off the waitlist.
- At the end of year 2 of the program, the waitlist will be discontinued.
- The reason for lack of eligibility to Mass LEAP should be documented in a spreadsheet.

Applicants must be eligible at the time of initial application to be placed on the Waitlist. Households on the waitlist should be contacted periodically to determine if they are still interested and eligible for the program in the event that slots open up.

All Sites are required to be fully enrolled within 12 months of the program's contract start date. Recruitment and outreach for the waitlist may be ongoing during the first 24 months of the program if there are open slots. All Participants who enroll during and after the initial 12 month period are required to have their services plans/goals end at the end of the same 5 year period (from contract start date) receive the same combination of services, and meet a pro-rated set of outcomes regarding income, employment/career growth and post-secondary education.

Application and Selection

During the application period there are two ways that Tenants may enter Mass LEAP. The RAA/HA/agencies may initiate referrals by identifying appropriate families and Tenants may self-refer to Mass LEAP by filling out an application. Eligible Applicants will be notified by the Site that they meet basic program eligibility and will be given materials to indicate how they may be selected into the Mass LEAP program and what documentation they will need to provide for an assessment. When an applicant is determined ineligible (at either the basic eligibility or Assessment stage) the reason for their lack of eligibility should be presented in a clear and consistent manner (in writing and in person if possible) and must be documented in a spreadsheet. See Section V. Review and Termination Process for an Applicant's status and opportunity for appeal of Mass LEAP decisions on program participation.

Once an assessment has been completed Sites will have 7 (seven) calendar days to notify the eligible applicant of the steps they need to take to enroll in the Site's Mass LEAP program or to let an applicant know that they are not eligible and why. Program Sites will design the next steps eligible applicants will take to coordinate their case management, sign program documents, and enroll into or register for specific services. After receiving an eligibility/invitation to participate in Mass LEAP letter potential Participants will have 30 days to enroll in Mass LEAP or to request a hardship extension for an additional 30 days before enrollment. The contact information for the selection, intake, and assessment process at each Site must be clear.

Assessment

Participants will be assessed (individually or in group settings) to determine program readiness, skills, education levels and opportunities in accordance with eligibility requirements and program goals. Site partners will coordinate meetings and discussions using a predetermined assessment tool (which must be submitted to DHCD prior to contracting) to identify whether the family is interested in and appropriate for the program and if so to create the family's individualized service plan. Changes to the assessment tool must be approved by DHCD. Mass LEAP partners must work together to develop intake and assessment tools and processes that are comprehensive and efficient. To the degree possible, Participants should not be required to submit duplicate information or provide the same basic intake information more than once during their enrollment process and while developing plans for individual service components.

All Participants enrolled in this initiative will have a *unique* Service Plan and will sign a Contract of Participation which outlines the program and the Participant's responsibilities while a Mass LEAP Participant. The Contract of Participation will become effective the first day of the month after it is signed. The Contract of Participation must also indicate how participation in Mass LEAP would be terminated and the process to address grievances.

DHCD understands that retention in these types of intensive, multi-year initiatives is difficult and has accommodated this challenge by allowing Sites to fill slots for months 12-24 in the event that a Participant leaves the program. DHCD set a goal of 85% retention rate in years 2-5 of the program, and expects that all Mass LEAP programs will develop an intake and assessment process that will support these enrollment and retention goals. In addition to establishing a rigorous intake and assessment process, retention issues will also be prevented by the high levels of on-going support and contact with Participants. Regular, comprehensive team meetings will identify individual Participants' challenges and obstacles as they arise, and DHCD expects these issues will be overcome through problem solving and resource development. Participants will not drop out of Mass LEAP because of lack of engagement with their service providers.

IV. Program Participation

Case Management and Services

Once an applicant has been determined eligible, has attended an orientation session and signed all Mass LEAP program documents, participation begins. Partnerships should anticipate taking no more than 60 days from notification of eligibility to the completion of a customized service plan and Contract of Participation. All Participants are required to have met a meaningful set of goals and to have a matching service plan that will also *require* the full five (5) years of the program except for later enrollees as described above.

Service plans will address immediate and long term goals (5 year) and will be created through a partnership of the Participant and the service provider/team. The plan must take into consideration all the services for which Mass LEAP is providing support. The plan will focus solely on the person enrolled in Mass LEAP rather than other household members, though goals may certainly include how the development of skills and assets available through participation in Mass LEAP will benefit other household members directly or indirectly.

Eligible services include:

- Those provided by the Site partnership's service provider staff in the Mass LEAP focus areas (career and skills building, asset development, post-secondary education);
- Services that a Mass LEAP Participant is already enrolled in which meet the goals of Mass LEAP in one or more of the focus areas;
- Services that the Mass LEAP contracted service providers are not able to provide directly but which are a benefit to the individual Participant's goals in the Mass LEAP focus areas. Services must not replace that which might be offered directly by a contracted Mass LEAP service provider.

All Mass LEAP Participants ARE expected to have engaged and completed programs in all of Mass LEAP's focus areas (training and career, asset building and financial literacy, post-secondary education) by their graduation date or within 5 years, including late enrollees to the program. There will not be any extensions or re-enrollments into the program (in contrast to FSS).

During the course of the program, Service plans may be revisited at any time by the Service Team in conjunction with the Participant, and changes may be made that reflect evolving interests, opportunities and resources available to the Participant. Service Plan changes cannot alter or eliminate any of the required services and outcomes. Services are not voluntary but the plan should be flexible and goals may be modified over 5 years. When a change in Service Plan is requested by either Participant or Service Team member it should be made in writing and include the requested changes and the reason for the change. A decision about whether or not the

change will be granted should be made as soon as the members of the Service Team can meet with the Participant, collect information relevant to the request, or within 14 business days of the request. The decision and any amendment to the Service Plan must be in writing and placed in the Participant's file. Participants do not have the right to appeal the decision of the Service Team regarding a Plan change request.

Mass LEAP residents are expected to fully engage in the program for the duration of their time in Mass LEAP: case management meetings are likely to be weekly to bi-weekly for the first 6 months of the program. While not every service team member must be engaged weekly, the program's intended design requires that at least one service provider or case manager is checking in with the Participant according to this schedule. Some Site's program designs may also require regular (though less frequent) participation in peer support groups.

Continuing Participation

Participants will have the following responsibilities and will be terminated from the Mass LEAP program if they fail to meet the following obligations:

- Complete all program application documents and provide the RAA/HAs with all supportive documentation necessary to determine initial and ongoing income eligibility (see Definitions in Section II and Section V);
- Authorizations to release and share information as necessary;
- Attend all required meetings and trainings;
- Establish and work toward goals in all three (3) areas: employment/career, post-secondary education, and asset development unless already satisfied according to service plan and at the discretion of the RAA/HA;
- Report all program progress to the appropriate partner(s) for data collection;
- Comply at all times with the terms of the lease, the state-aided public housing regulation and the MRVP Program regulation;³
- Allow and provide DHCD and the Site with all information to perform ongoing program evaluation and monitoring;
- Fulfill all Mass LEAP program requirements as detailed and agreed to in the Participant's customized service plan; and
- Use escrow savings accounts in the manner described in the Mass LEAP program Guidelines.

³ In addition to complying with the terms of the lease, and to remain eligible for Mass LEAP a Participant must be a Tenant in good standing, as defined in Section III, Participant Eligibility.

Participants who are terminated from Mass LEAP for non-compliance with Mass LEAP Program Guidelines will not lose their housing, unless they are terminated for lease violations or for violating requirements of the MRVP voucher that would otherwise result in the loss of their housing. See Section VIII of these Guidelines for the circumstances under which someone may receive their escrow balance if terminated from the Mass LEAP program.

If a Participant chooses to leave or is terminated from his/her public housing unit or the MRVP program, they are no longer eligible for Mass LEAP. See next section for more details on portability and for guidelines on what constitutes a successful graduation from Mass LEAP.

Income Changes:

MRVP Only

If, during the course of the Mass LEAP program, and as a result of successful completion of training programs, education programs and career planning as outlined in his/her service plan, an MRVP Participant's income increases to such a level that she/he would otherwise become income ineligible for housing assistance, the "new" earned income of the Participant resulting from his or her participation in Mass LEAP will be excluded from household income for the purposes of determining continued income eligibility *during the MRVP Participant's participation in Mass LEAP*. Income increases caused by other household members shall not be excluded. Tenant share of rent will continue to be based on the household's income, as will the resulting changes in escrow account deposits.

This policy will be applied only to MRVP Mass LEAP Participants in good standing, and is implemented to encourage Participants to increase their earned income, and reduce their ongoing reliance on housing subsidies.

The following exception applies: The addition of increased income of another household member that, *on its own*, would result in the household no longer meeting income eligibility requirements. This could result from a situation in which another household member increases his or her earned income or the addition of another adult with earned income to the household. In these circumstances, the Mass LEAP participant would no longer be income eligible for MRVP, and therefore, no longer eligible for Mass LEAP.

Public Housing

In the case of Public Housing residents Mass LEAP Participant households would no longer be eligible for Mass LEAP if the household's net household income increases to a level where 32% of monthly net income equals or exceeds the FMR amount for the unit size for which the

household qualifies (See 760 5.06.). At this point, the Mass LEAP participant would no longer be income eligible for Public Housing, and therefore, no longer eligible for Mass LEAP.

In both cases, if the Mass LEAP Participant is a Participant in good standing, and has met all appropriate goals in his or her service plan, the Participant will graduate from Mass LEAP and receive any remaining escrow funds he or she has earned. Participants graduating under these circumstances will no longer receive State-Aided housing and MRVP housing assistance in accordance with 760CMR49.03(c).

At the conclusion of Mass LEAP any income changes (including earned income) that occurred during the Tenant's time in Mass LEAP will be included for purposes of determining eligibility for State-Aided housing and the MRVP program and the new share of rent –due to earned income increases during Mass LEAP – will become part of the Tenant's share of rent (rather than continuing as escrow).

Moving / Prior to Completion Program Term

Early graduations are allowed only if there is a compelling reason, i.e. the Participant is moving outside of the jurisdiction of the HA for a housing or employment opportunity that is achieved as a **direct** result of program participation. In addition, Participants need to have met all other goals in financial literacy, employment/career and post-secondary education to be eligible for early graduation. Mass LEAP Partnerships should contact DHCD for approval before granting an early graduation.

Portability of Mass LEAP Participation

If a Mass LEAP Participant wishes to move to an area where there is another Mass LEAP program in operation and the Participant would like to continue to participate in Mass LEAP, he/she would request approval to transfer his or her participation from the existing/originating Site to the relocated Site. Such a request should be made in writing to the existing/originating Site and should provide the reasons for such a request. The originating Site will then contact the Site in the relocated area to review the request and make a determination on the Participant's request. Both Sites together must assess whether this transition from the original Mass LEAP Site to another program Site operating in the area in which the household is relocating is in concert with the Participant's existing service plan and whether the receiving Site can absorb the Participant in its program. In considering a request to transfer participation affected Sites should consider at least the following:

- Whether the Participant will be the Tenant in the new unit and continue to follow all Mass LEAP program guidelines; and that the move will not result in a remaining household tenancy for the originating Site;;
- Whether the Participant will avail him or herself of the services at the new Site;
- Whether the receiving HA is able to manage the escrow account;;

- If the Participant is able to access the Mass LEAP supportive services at the HA of origin and if the new HA consents to manage the escrow savings account or, if there is a similar Mass LEAP program at the new HA, the Participant is permitted to fill an open Mass LEAP participant slot, and the new HA manages their escrow savings account; and
- If the move is directly related to the Participant's employment and career goals, as well as educational goals.

The Site teams must make determinations about requests for transfers within 30 calendar days and the Participants should be notified in writing with a copy to their file.

A state-aided public housing Tenant or MRVP project-based housing Participant who moves to private market housing cannot continue to participate in Mass LEAP following the move to private unassisted housing.

V. Review and Termination Process

Mass LEAP Site partnerships must provide a termination and appeal process that is compliant with state and federal law, MRVP rules and regulations, and DHCD Mass LEAP Guidelines.

Participation in the Mass LEAP services is required but there may be instances in which a Participant is temporarily unable to meet the terms of the program's requirements. For Participants who may have difficulty meeting some of the program's obligations, the partnership team must create a process by which program staff can address the problem and explore possible solutions to avoid the Participant's program termination. Mass LEAP Site Partnerships must provide a reasonable review process for a Participant who is making a good faith effort to engage in the program. This includes providing a temporary hardship extension prior to termination when a Participant is experiencing an unanticipated circumstance which temporarily prevents the Participant from meeting his or her obligations under Mass LEAP, but is expected to be able to complete all program goals over the 5 year program period.

An individual or members of the Site's Partnership team should be assigned responsibility for managing the grievance and review process including correspondence with the Participant. Any extension or case reviews and the reason for them must be documented in Participant's files.

For all terminations from Mass LEAP, the termination shall be effective as of the date of the termination notice. DHCD will provide Sites with the language that must be included in the termination and right to appeal letter.

Any hardships or reasonable accommodations requested or made should be made in accordance with DHCD policy and Mass LEAP Guidelines and should be documented in the Participant's file.

Review Process

The review process described below is the only grievance or appeal process that is available for Mass LEAP matters.

An Applicant for Mass LEAP can only request a review when:

- (1) The Applicant is determined eligible but upon verifying information for the program, is determined ineligible.
- (2) The Applicant is determined eligible based on initial eligibility screening but is then determined ineligible based on the Site's assessment during the selection process.

This is further described in the Section entitled Reasons for Non-Participation, below.

A Participant can request a review when:

The Participant is terminated because of a violation of the Participant Contract or Program Guidelines or due to loss of state-aided housing or MRVP rental assistance. However, households cannot appeal a denial of eligibility or termination of services that is due to a lack of funding for Mass LEAP.

Reviews will be performed at the service partner level by a team member familiar with the program but unfamiliar with the particular case being reviewed only when a request is made by an Applicant or Participant. Requests must be made in writing within 15 calendar days of the notice of ineligibility or termination notice. A review must then be conducted within 15 calendar days of the request for review. The Applicant or Participant must be in attendance along with the relevant Service Team members and the meeting can happen in person or over the phone. The review should be recorded and the written review finding should be mailed to the Applicant or Participant, recorded, and a written finding placed in the Applicant or Participant's file. The finding may not be appealed to DHCD or further appealed within the RAA/HA beyond what is described herein.

Reasons for Non-Participation

After the Applicant is determined to be eligible, the Site that is administering the program may determine that an Applicant for participation does not meet the minimum eligibility or qualification standards upon verifying information for the program for any of the following reasons and will include these in a written notice of ineligibility if Applicant is being denied participation in / acceptance to Mass LEAP:

Reasons for Applicant denial:

Incomplete Documentation; Applicant failed to provide all required supporting documentation within 30 days of the RAA/HA's request for information for application.

Over Income; total household income exceeds program enrollment or continuing eligibility income limits.

Not an Eligible Household; Applicant or household does not meet the program definition of eligible Mass LEAP household.

Assessment; Applicant does not meet the Site Team's Selection criteria during an assessment process.

The written notice must contain the specific reason(s) for which the Applicant is being denied and an explanation of how the decision may be reviewed.

Reasons for Participant termination:

If a Mass LEAP Participant is determined by the Site team to have repeatedly failed to act in accordance with his or her service plan (which means the Participant has had 3 or more documented incidents, as defined in Section V. Review and Termination Process, Documenting Violations), has violated his/her Contract of Participation, or has refused to engage in communication with a service provider or HA regarding Mass LEAP program participation or guidelines, they may be terminated from Mass LEAP. These grounds for termination are further explained below:

Participant Non Compliance

The Participant may be terminated when they have failed to comply with the terms of Participant Contract, Service Plan (failed to comply with rent and utility payment obligations, committed fraud, etc.), Program Guidelines, or housing assistance program regulations.

Immediate Termination

Immediate termination from participation in Mass LEAP may occur when the Mass Leap Participant:

- Is convicted in drug/criminal activity;
- Threatens DHCD or partnership staff, property owner or owner's employees or agents, or others;
- Is evicted from a unit for nonpayment of rent or other for cause reason;
- Vacates a unit without notifying the HA/RAA agency;
- Commits fraud against the housing program, Mass LEAP, or any other public assistance program.

If immediate termination is necessary, the Mass LEAP administering agency will notify the Participant in writing, stating the reason(s) for termination. The termination will be effective as of the date of the termination letter. A copy of the termination letter will be maintained in the Participant's file. If the Participant so requests it, a review may be conducted in accordance with the process outlined above.

Termination for Incidents/Violations

If a Participant has 3 or more documented incidents in their Participant file, then they may be terminated from Mass LEAP. An incident is defined below, in the Documenting Violations Section. As part of a service plan meeting following an incident, the housing or service team or providers assigned to work with the Participant should discuss any incidents which could

ultimately lead to termination. After issuing the notice of violation for the third incident, the termination procedures may start with the next violation.

Documenting Violations

An incident is defined as a Mass LEAP program violation for which a Mass LEAP Participant receives a *written* document that informs the Participant of the conduct in question that violated the program rules. The Mass LEAP Participant must receive a copy a written document that informs them of the conduct in question and a copy must be placed in the Participant's file if it is to count as an *incident*. Written documentation does not need to state that it is a warning or violation of the program guidelines, however the notice must be dated. Acceptable forms of written notice include, but are not limited to:

- Notice from a landlord regarding late or nonpayment of rent, or violation of lease
- A written notice of the violation of guidelines or Contract of Participation.

It is only acceptable to use postmarked mail service or hand deliver a warning /notice (does not need require delivery to a person, can be left under the unit door) with a record of such delivery maintained in the Participant's file. However, the assigned staff from the Partnership Team is expected to follow up with the Participant to ensure they received and understand the violation outlined. Participants who do not maintain contact with the program will be sent a letter to their last known address via registered or certified mail terminating their participation from the program.

The following circumstances warrant terminating Participants for failure to maintain adequate contact with the program:

- Three (3) attempts to contact the Participant
- Three (3) missed scheduled meetings with the Participant
- No contact from the Participant with the Site Team for Sixty (60) days.

Termination due to lack of funding

The Department may immediately terminate this program in whole or in part at any time due to lack of funding or expiration of authorizing legislation in the event that funding will be discontinued as specified in the Mass LEAP contract between DHCD and the Lead Agency. Households cannot appeal a denial of eligibility or termination of services that is due to a lack of funding for Mass LEAP.

If DHCD terminates a Site's Mass LEAP program due to funding or other non-Participant related constraints all Participants will be issued their escrow balance and graduated from the program.

Escrow Upon Termination from Mass LEAP

Deposits in an escrow account shall not be made to or on behalf of a Participant who is the subject of eviction proceedings brought by the RAA/HA unless and until the Tenant prevails in court in the eviction case. If the RAA/HA prevails in court in the eviction case, the RAA/HA shall terminate the household's participation in the Mass LEAP program, as outlined in the Immediate Termination Section, above. If the case results in an agreement for judgment, the agreement shall specify whether participation in Mass LEAP is to be terminated.

When a Participant is terminated from Mass LEAP, all amounts in the escrow account for the Participant shall be retained by the RAA/HA for use in its state aided public housing or MRVP program provided that the RAA/HA shall refund the Department's contribution to the Department without interest.

VI. Program Administration

Lead Agency Staffing Roles and Responsibilities

The staffing plans for each Site partnership will be outlined and included in the contract between DHCD and each Site's Lead Agency. Agency staffing plans will identify and codify the parties' roles and responsibilities in both the direct client work and partnership coordination. The specific roles and responsibilities may vary depending on the program design and size. Some staff who are working with Participants may be housing agency staff who have dedicated time to Mass LEAP whereas other staff may be exclusively hired by the housing agency or service provider to manage all or specific Mass LEAP program elements. It is the Lead Agency's responsibility to notify DHCD of staffing changes that impact Mass LEAP Participants. This information will be included in the next monthly report to DHCD following the staff change.

The Lead Agency is expected to:

- Develop the work plan and monitor progress towards goals related to:
 - Enrollment and recruitment;
 - Team meetings and communication; and
 - Participant progress.
- Verify Participant eligibility (income eligible, family composition, education/training levels, compliance with all program requirements, etc.);
- Develop review process in accordance with state and federal law and DHCD Mass LEAP guidelines;
- Complete all Participant income re-determination as needed;
- Establish and monitor escrow savings accounts;
- Monitor escrow savings accounts for accuracy at partner sites if applicable;
- Perform regular data collection and program progress reporting;
- Submit all financial reports and invoices to DHCD in accordance with program guidance;
- Contract with Service Team Contractors;
- Process or coordinate payments to the Contractors;
- Monitor Service Team progress ensuring that all goals will be met;
- Participate in DHCD's ongoing program progress and evaluation meetings, phone calls, surveys and site visits
- Work with Partner LHAs to ensure all program guidelines and requirements are being met, including the establishment of escrow accounts for LHA participants.

Service Partner Agencies Roles and Responsibilities

The service partner agencies are an active part of the Mass LEAP design process and as a team member are expected to develop materials, tools and systems to facilitate the communication of

information such that the process for Mass LEAP Participants is clear and seamless as they progress from an intake to an orientation and toward the completion of their service goals. They will be providing direct services to Mass LEAP Participants or will be referring them to resources in accordance with Participant service plans and monitoring that progress. As such they will sometimes be required to pay vendors for materials or classes or for the object of an interim disbursement. They will, in partnership be part of a team that makes decisions about eligibility and continuing participation and reviews program implementation and administration challenges. Specific staff may be part of an appeals or grievance process. The following describes some of the essential activities that the service partner agencies will provide:

- Work with HAs and other Contractors to develop and deliver services in a seamless, integrated program;
- Secure all proffered in-kind supports from the HAs, including but not limited to space, phone lines, and other office equipment identified in the initial application;
- Provide access to all agreed upon in-kind services and activities from the Service Teams and Contractors;
- Work across service specialties to ensure that Participants receive all supports necessary for success;
- Collect and share all required Participant and program data with the HAs for the purpose of reporting to DHCD;
- Participate in DHCD's ongoing program progress and evaluation meetings, phone call, surveys, and site visits;
- Meet all agreed upon service delivery goals and benchmarks related to the area of expertise; and
- Assist with the development of program termination, Review and appeals process in accordance with state and federal law and DHCD Mass LEAP Guidelines.

Site Team Meetings Requirements

As stated in the Mass LEAP RFQ and RFR (to access these documents see: <http://www.mass.gov/hed/housing/ph-manage/mass-leap.html>), the design of Mass LEAP draws many lessons from the FSS program, as well as other economic self-sufficiency initiatives. Mass LEAP offers an integrated approach to address the education, career and asset development goals of each Participant. Unlike FSS, which is largely referral driven, service providers will be providing direct services in many cases – even if it is planning rather than actual classes as in the case of some post-secondary supports. All Mass LEAP contracted service providers are required to have regular meetings with the Participant no less than one per month. Service providers may develop their own design around how those meetings are recorded and reported on – the purpose is to maintain a high level of personal engagement rather than to prescribe an extensive series of data collection requirements.

Regular Site Team meetings, with representatives from all three service providers present, are also required. These team meetings will be to discuss Participant progress, barriers, and resources. These meetings will discuss the program at both a Participant level and a program level, and will form the basis of the reports that DHCD will require as part of program monitoring and evaluation. DHCD requires team meetings to be weekly or bi-weekly for at least the first 12-18 months of the program, and may occur less frequently during years three and four of the program. The team meetings shall resume intensity as Participants prepare to graduate from the program.

Coordination Case Management Requirements

Team meetings will also ensure that Participants do not fall through the cracks while participating in Mass LEAP. Each of the site partnerships were funded at a level that will provide all needed support to Participants in each Mass LEAP area of specialty, as well as the case management and support Participants need to reach their goals in each of the service areas. The Lead Agency is responsible for coordinating and tracking all relevant information in all three services areas, and for monitoring Participants' and the program Site's progress towards their goals. As mentioned in the requirements for ongoing participation, DHCD expects that case management will occur on a frequent basis (in contrast to FSS) for at least the first several months after program enrollment. Thereafter service plan and progress update communication and support between service providers, case coordinators, and Participants should occur no less than monthly for the duration of Mass LEAP.

Required Program Documents

The following are required program documents:

Orientation materials – Each Site will create its own orientation materials describing the partnership and the program.

Assessment/intake materials – Tools and any descriptive material regarding access, selection and waitlist for Mass LEAP

Reporting Forms - data and financial The format created by the partnership should allow the site/partnership to be able to report to DHCD on Participant progress, program benchmarks, partnership administration (meetings), enrollment and Participant levels and costs per person including escrow and in-kind contributions.

Contracts – Between DHCD and lead agency and between agency and sub-contractors and including staffing plans, workplan and budgets.

Each Participant File shall include the following required program documents:

Enrollment and continuing participation forms (notice of participation eligibility, meeting schedule, notices, program termination notices, escrow reports, etc...)

Authorization for Release of Information/Fair Information Practices Act Statement - Must be signed and dated by all household members who are at least 18 years of age.

Participant Contract – outlines Participant responsibilities and program guidelines

Service Plan – describes the Participant's one year to five year goals in all three service areas while in Mass LEAP. Service plans can be revisited and adjusted during the five years, in response to the Participant's progress and career and education activities.

VII. Earned Income and Escrow Accounts

Mass LEAP is designed to help support residents as they build their economic security and while they attend education and work training programs. Therefore annual assistance provided to Participants who participate in this program includes the rental assistance payments provided to MRVP pursuant to 760 CMR 49.00 and housing subsidy for state-aided public housing Tenants as well as an additional escrow component. All of the regulations and notices that currently apply to MRVP (760 CMR 49.00) and residents of state-aided public housing (760 CMR 4.00, 5.00 and 6.00) will continue to apply to Mass LEAP Participants. However, Participants in Mass LEAP will be allowed to earn up to 60% of AMI before being considered ineligible for the program (See Section III Participant Eligibility and IV. Continuing Participation for Income calculation guidelines). Any apparent conflict of interest in Mass LEAP Program Guidelines and these regulations may be brought to the attention of Mass LEAP administrators at DHCD for consideration and resolution.

Calculating an Escrow Account

As part of the program design there will be no reduction in the RAA/HA's rental support amount as a Mass LEAP Participant's *earned income* increases (up to the area low-income limit for the family size). The Mass LEAP Participant will continue to pay rent in accordance with any increase in income and based on the agency's rent calculation formula as would any other RAA/HA Tenant for the appropriate housing program type. However, the equivalent of the rent increase resulting from an increase in earned income of the Mass LEAP Participant (and including other household members in a Participant's household) will be placed into an escrow account held by the Participant's RAA/HA.

At the start of Mass LEAP Participants will sign a Contract of Participation which will signal their enrollment into the program and indicate their start date for purposes of establishing the baseline for future changes in income and escrow amounts. The RAA/HA will take the annual income, the Participant's earned income and the household rent from the last reexamination or interim determination before the initial participation in Mass LEAP as the baseline calculation. The RAA/HA must conduct a new reexamination if the last one was more than 120 days since the Participant's start in Mass LEAP.

Qualifying earned income includes the full amount before payroll deductions of wages and salaries, overtime pay, commissions, tips, bonuses, fees and other compensation for personal services, net income from operation of a business or profession, military pay, but it does not include pensions, annuities, transfer payments, or any cash or in kind payments.⁴ When the household has a qualifying increase in earned income after the Participant's start date the

⁴ If a person in the household qualifies for an earned income disallowance, certain increases are excluded from calculation of the family's annual income and do not affect family's rent payment.

RAA/HA will conduct a redetermination of household income and rent as well as an escrow calculation. Thereafter whenever the RAA/HA does a scheduled annual or interim reexamination the escrow must also be calculated.⁵ When the household rent share becomes less than the household rent share on the effective date of the contract than there is no escrow generated.

Whose income is counted?

Earned income does not include the earnings or changes in earnings of children under 18 years of age but does include earnings of a spouse or co-head of the household, even if they are a minor. If an adult is added to the household or a child turns 18 while the head of household is an active Mass LEAP Participant, then that income is also counted.

A Mass LEAP Participant may receive an interim reexamination whenever there is a change in the household income (includes a change in earned and unearned income). Household income will be re-determined by the RAA/HA within 30 days of a significant change (more or less than a 10 percent change) in household income. Mass LEAP Participants are required to notify their RAA/HA of any (not just earned income of the Mass LEAP Participant) increase in household income within 30 days of the change in income. Increases in earned income of the Participant will be forfeited (not deposited into escrow by the RAA/HA) for the period of time income remained unreported after 30 days.

The escrow accounts will be established as a pooled account maintained by the RAA/HA with a local bank. Deposits to the account will be made monthly, with records kept identifying the subset of the escrow account which has been accumulated by each Participant. The investment income from the account is prorated and credited to each Participant's account. Each agency will provide an annual report to the Participant on the status of their account which includes their balance, any deductions, amount credited, and interest income.

The Mass LEAP Participant is eligible for this escrow amount upon completion of the Mass LEAP program.⁶ There will be a \$15,000 cap on escrow savings accounts. If a Participant reaches this cap before completing their goals, they must still complete their goals before graduating and receiving their escrow savings. However, Participants are not required to leave public housing or relinquish their MRVP voucher in order to receive their escrow savings. If a family's adjusted income increases to where the tenant portion of the rent equals or exceeds the fair market rent, the family will receive their escrow but will be considered ineligible for the subsidized housing program in accordance with DHCD's regulations and program guidelines.

⁵ This asset will not be counted in the calculation of gross household income for the purpose of determining rent as specified in: 760 CMR 5.0.

⁶ The escrow account will pass to dependents in the participating household if something happens to the Mass LEAP Participant that makes them unable to claim the escrow but were in good standing with the program.

Disbursement and Use of Escrow Funds

Using their Mass LEAP Service Plan as a guide, Participants will be encouraged to plan for the use of their escrow account in a way that furthers their housing and employment goals once the program is complete. All Mass LEAP households with an escrow balance are eligible to request a withdrawal. However, Participants in good standing will be allowed to request money from their escrow accounts prior to the completion of their Contract, to be granted solely at the discretion of the RAA/HA. If granted in the RAA/HA's discretion, the early withdrawal of funds must be used for continuing growth and for reaching the goals articulated in their service plan. Withdrawals can only be made once during a six (6) month period, and are restricted to 30% of the available balance. The family will be required to pay a portion of the overall cost of the item.

Examples of eligible uses for interim disbursements include: books, fees, computers and other educational expenses not covered by grants; car repairs needed to get or keep a car on the road in order to maintain employment or remain in school; emergency childcare expenses in order to maintain employment or remain in school; testing or licensing fees needed to access employment or education; tools, supplies or other items needed to enter the workforce; transportation assistance including train, bus, or T passes. If requested by the Participant and appropriately documented, in certain circumstances, and with DHCD and the RAA/HA's approval, interim disbursements may be used for credit repair, such as student loan debt.

Interim disbursements cannot be used for utility arrearages, storage fees, back rent, or expenses of other household members.

Interim escrow disbursements are included in the escrow limit of \$15,000.

Interim Withdrawal Procedure:

The head of household must submit a budget in addition to a written request for an interim withdrawal (see Attachments). The request must include:

1. The amount of money requested;
2. The amount of money the Participant will be contributing;
3. How the funds will be used;
4. How this will facilitate their movement toward self-sufficiency;
5. An assessment of their progress on their self-sufficiency goals;
6. Alternative funding sources they have tried; and
7. Documentation of expenses.

Mass LEAP staff will discuss the appropriateness of the request during a regularly scheduled meeting. The program reserves the right to request that the Participant attend a meeting for clarification of the withdrawal request before a determination is made and/or require additional documentation prior to making a decision.

The decision to release escrow will be made by consensus of the staff members and the decision will be binding. The decision of the staff members regarding a request to withdraw escrow cannot be appealed. If the withdrawal request is denied, the Mass LEAP family will be given a written response outlining the decision. The housing agency will pay the vendors directly for specific approved uses.

If a Participant fails to complete the program, interim disbursements do not have to be paid back unless the payment was based on fraud or misinformation. Participants who request fraudulent interim disbursements will be terminated from Mass LEAP.

Rental payments held in escrow shall be treated as deductible rent for purposes of calculating Massachusetts personal income taxes pursuant to subparagraph (9) of paragraph (a) of part B of M.G.L. ch. 62 §3; ... notwithstanding the provisions of any general or special laws to the contrary, the release of escrow payments to a household, including interest earned thereon and the value of the matching contribution, shall not create any tax liability for such a household.

Program Completion

The family will be eligible to receive the escrow account in full when they successfully complete their participation in the program. The Mass LEAP graduate will be required to use the escrow savings in some combination of the following (or related) asset development strategies:

- Credit Repair -- Participants may use some or all of their escrow savings to pay creditors in conjunction with other required credit repair activities that have been undertaken during program participation.
- Homeownership – Escrow savings can be used for down payments, closing costs, or repairs that were identified in pre-purchase inspections on a property, with the repairs taking place after purchase.
- Small business start-up or expansion.
- Retirement Savings Accounts -- Escrow savings can be used to fund retirement savings accounts.
- Education Tuition or Education Savings Accounts such as U. Fund College Savings or Massachusetts 529 plans or other state/federal tax deferred savings vehicles for the graduates or their dependents.
- Emergency Savings – No more than six (6) months of emergency savings (this means a maximum of six (6) months of living expenses).

- Participants who are terminated from the program will not receive access to their escrowed funds and the housing agency will also reduce the balance in the account by any amounts owed under the lease by an active Participant in a repayment plan.

As part of the preparation for graduation for Mass LEAP Participants will meet with their case coordinator and/or financial/asset development coach no later than 90 days before the graduation date (Mass LEAP expects that all Participants will have had on-going conversations about budgeting and planning for the duration of the program). During this meeting Participants will create a plan for the balance of their escrow in accordance with the uses described above. The RAA/HA that holds the escrow is responsible for paying vendors in accordance with the graduation/escrow plan. In the case of emergency savings the housing agency may release funds to the Participant directly. The amount of emergency savings will vary by Participant based on household composition, rent assistance type and amount, and other individual family expenses and circumstances and will be determined with the family and the partnership team.

In the event that a Participant leaves the program early, because they are moving to a new location where there is no Mass LEAP program, and have been an engaged Participant in Mass LEAP for the duration of their program time – they have met goals in all three areas in a timely manner in accordance with their service plan – that Participant will be eligible to receive the balance of their escrow. This balance must still be used as described above in this section for full term graduates.

Income Changes for Mass LEAP MRVP graduates:

Successful Mass LEAP graduates, whose income at graduation exceeds the maximum allowed for on-going participation in the MRVP program, will be granted, following the request and approval by DHCD of a waiver, an additional 90 day period (total of 180 days) during which they retain a voucher, but receive no financial housing assistance. DHCD is extending this period to encourage participants to maintain their high level of employment. The following regulations apply:

(c) A Participant shall retain a Voucher, but receive no financial housing assistance, for a period of 90 days after such time as the LHA has certified the Participant's net income, as defined in 760 CMR 49.05(7), to be greater than the applicable MRVP Income Limits. At the expiration of the 90 day period, if such net income still exceeds the MRVP Income Limits, the Participant is no longer eligible for MRVP participation.

Housing Agencies must request a waiver for each participant during the initial 90 day period.

XIII. Accounting and Fiscal Management

Each program Site will serve a number of not less than fifty (50) eligible Participants. Funding will be based on the program Site's contract with DHCD to provide Mass LEAP services and awarded annually, pending funding availability. Initial contracts for Mass LEAP will be for three (3) years, with two (2) renewals possible for one (1) year terms. DHCD reserves the right to terminate Contracts that fail to meet program goals and benchmarks.

While Mass LEAP will operate as a single program that serves PH tenants and MRVP participants in a seamless delivery system, its financial mechanics reflect the two funding streams supporting the program, and the variety of Site designs. Because public housing operating expenses cannot be paid directly from DHCD to any entity other than Housing Authorities, in the case of Consortia Sites with an RAA as the Lead Agency, DHCD requires them to identify one LHA to act as secondary Lead to receive the PHA funding for the program. The secondary LHA lead will use those funds to pay providers for services to PHA tenants.

PH funds and MRVP funds will be accounted for separately, in addition to being accounted for in the consolidated budget for those programs that serve both PH tenants and MRVP participants.

Additional detailed instructions on Quarterly Expenditure Reporting will be sent under a separate Public Housing Notice, and incorporated into the Program Guidelines.

The RAA/HA will subcontract with the site's Mass LEAP service providers who should be paid at least on a quarterly basis. A portion of the budget will be forward funded to cover start-up costs. After the initial funding, monies will be reimbursed at the beginning of each quarter for the last three months costs and will include the service program costs plus the administrative fee identified in the operating statements. All funds are subject to reconciled year end statements.

The budget for Mass LEAP will include an annual program administrative fee will that will be \$1,300.00 per Participant based on fifty (50) Participants. Programs serving more than fifty (50) Participants are expected to reach an economy of scale, and will receive a prorated fee. This fee is to cover expenses directly related to Mass LEAP program management including Participant service coordination and oversight, case management coordination, data collection and reporting, escrow account management, and vendor payments. It may not be used to support any costs unrelated to Mass LEAP. The administrative fee may be shared by the HAs, if the Site utilizes a consortium. It may also be shared by HA(s) and a service provider, however the HA remains responsible for program activities identified in Section B, The Mass LEAP Program of the RFR. DHCD reserves the right to revisit and amend the administrative fee during the life of the program.

During year one of the program DHCD will support the full cost of the administrative fee approved by DHCD. This will allow Lead agencies and their partners to add staff as needed, put systems in place and meet enrollment and outreach goals. It assumes that Sites will reach full enrollment

as required. In years two and beyond the administrative fee payment will be based on per participant enrollment levels. If full enrollment is not achieved or maintained, the administrative fee payment will reflect this. In the event that this payment structure has measurably and demonstratively impacted Sites' ability to manage the program effectively and as required by DHCD, this policy may be revisited.

DHCD requires all service providers to be engaged with the majority of Participants throughout their time in the program. As a result, DHCD expects that ongoing service provider expenses will be regular and able to be paid on a monthly basis.

Participant Expenses

Expenses for costs that are Participant-specific, short-term in nature, or one-time only expenses will be paid for by the service provider and reimbursed the next month. These expenses must be approved by the lead agency prior to payment, and documentation must be submitted before reimbursement will be made. In addition, these type of expenses must be backed out of the annual budget, as they are not ongoing and predictable expenses.

Expenses and payment

Program Cost

Mass LEAP sites will submit quarterly expense reports using the Mass LEAP Expenditure report Form, which separates out MRVP and public housing expenses by approved categories of activities, based on the Mass LEAP program budget. HA/RAAs will be reimbursed for actual costs as soon as the report has been reviewed and approved by DHCD Mass LEAP staff.

In addition a cost breakdown by program (both line item and within MRVP/Public Housing budgets) will need to be filed at year end and should be the same as in the Site's approved budget. HAs should be able to identify and distinguish between which expenses are for MRVP program participants and which are state-aided public housing (non-MRVP) participants.

Cost overruns will not be permitted. Although these expense reports are not due to DHCD until the LHA's year end, authorities will need to continue the delegation of expenses, by program from the beginning of the fiscal year, to ensure the required information is available for the quarterly as well as the year end reporting.

When is the operating statement due for submission?

In addition to the reporting forms that DHCD provided for Mass LEAP, the total quarterly expenses must be reported in the DHCD's online accounting system - Housing Authority Financial

Information System (HAFIS). Although, Housing Authorities are familiar with this system, HA staff are encouraged to contact DHCD for clarification or provide answers to questions regarding this program, how it works, and how it should be incorporated into the HAFIS system.

The submission dates for Mass LEAP RAA/HA sites operating statements will be as follows: Quarterly operating statements must be submitted to DHCD no later than 45 days after the end of each quarter using forms provided by DHCD.

Operating statements will be reviewed for accuracy and eligibility costs as soon as possible provided that the submission is complete and incorporates all relevant explanatory material. Incomplete submissions will be returned to an HA/RAA for correction. DHCD will make every effort to approve the operating statements and payment reimbursement within 45 working days, provided that the original submission is complete and within DHCD guidelines and the necessary reporting certifications are submitted.

For public housing, an HA site with a July 1 – June 30 fiscal year needs to submit an operating statement no later than August 15 which will be 45 days after the end of the fiscal year. An HA with an October 1 – September 30 fiscal year needs to submit an operating statement no later than November 15, an HA with a January 1 – December 31 fiscal year needs to submit an operating statement no later than February 15, and an HA with an April 1 – March 31, fiscal year end needs to submit an operating statement no later than May 15.

Travel and Related Expenses

Travel practices and policies are to be consistent with Department policy. Legitimate travel expenses incurred by staff in the discharge of their duties for any state-aided program are considered reimbursable costs based upon the following considerations:

- Private auto mileage incurred in the course of authority business, is reimbursable at the current DHCD rate of forty five cents (\$0.45) per mile. In addition, reasonable associated costs for parking and tolls for authorized business travel are reimbursable. A flat rate, either calculated on a weekly or monthly basis, for the business use of private vehicle is NOT allowable under any circumstances.
- When employees use an authority owned vehicle for travel, reimbursement for tolls and parking is permissible as long as parking charges are reasonable and cover solely the period of time during which business is conducted.

Financial Management and Subcontracts

The HA/RAA is responsible for establishing a comprehensive financial management system and related internal controls to ensure that Mass LEAP funds are spent in an efficient and effective manner.

This includes but is not limited to:

- 1 Maintaining the accounting books and records according to generally accepted accounting principles and any other DHCD requirements,
- 2 Preparing annual operating statements and financial statements

Cash management of income and expenses, including the

- 3 Distribution of funds made on behalf of each Participant.

Vendor Payments/Interim Disbursements

A Mass LEAP service provider or lead HA may make direct payments to vendors as part of a Participant's program (e.g. a class, a slot in a childcare program, educational materials) and/or as an escrow disbursement. This spending should be included in the quarterly expense report (Mass LEAP Expenditure Report Form) tied to the program which is providing the service.

Financial Management

Mass LEAP RAA/HAs are responsible for establishing a comprehensive financial management system and related internal controls to ensure that Mass LEAP funds are spent in an efficient and effective manner.

This includes but is not limited to:

- Maintaining the accounting books and records according to generally accepted accounting principles and any other DHCD requirements;
- Preparing annual operating statements and financial statements;
- Cash management of income and expenses, including the distribution of funds made on behalf of each Participant.

IX. Evaluation and Reporting

Because Mass LEAP is designed to allow for locally-driven partnerships, DHCD recognizes that each Site may utilize different forms, plans, software, and other materials to guide the Participants' goals and progress. Therefore, the systems used to collect and share data might be different but the benchmarks will be set by DHCD and universally applied. Data requirements and program metrics may be changed by DHCD after notice, and consultation with the agency may be required by DHCD to provide different or additional information. See Appendix for Mass LEAP Goals and Benchmarks.

Participant Files

DHCD will be closely monitoring program and Participant progress at all phases of Mass LEAP operation. Under-performing and non-performing partnerships will be terminated if problems cannot be resolved within a time frame that DHCD and the site partnership determine is appropriate.

DHCD staff may review program sites and individual case files. In addition to the requirements enumerated in Section VI Program Administration, Required Program Documents, at a minimum each Mass LEAP Participant file should include:

Dates of Program Entry

Eligibility letter

Names of service provider staff assigned to Participant.

Individual Service Plan and progress notes

Signed Contract of Participation

Signed Release of information

Annual Income of Household, updated yearly

Type of service program/s enrolled in/locations

Leasing information

Contact information

Rental subsidy amount

Escrow Amount

Any Letters sent to Participants regarding tenancy or services

Any letters or Notices related to property and leasing

Reviews (if applicable):

All documents, letters, and case notes associated with any review or termination.

Data Collection

The lead agency that is administering LEAP must ensure that their program and service provider staff have adequate program knowledge and training in the utilization of systems for reporting program outcomes. Mass LEAP staff must enter complete and accurate data for all program Participants into systems and must obtain required program data elements throughout program participation. Participant records should be kept up to date. In addition the agency is responsible for complying with all legal requirements pertaining to the use, maintenance and dissemination of confidential information and for meeting DHCD reporting requirements in a timely and accurate manner.

All files must be maintained in a consistent and orderly manner and in compliance with Executive Order 504. Agency staff is responsible for ensuring that all program and contract documents are signed and dated by the appropriate parties. Any notation on files or documents must also be signed and dated by appropriate staff. The agency must maintain all files and records until further notice from DHCD.

Reporting

Mass LEAP plans to demonstrate that with a targeted set of supports, and an emphasis on engagement and triage, that motivated residents of state-assisted housing can have a significant increase in earned income and build long lasting assets. DHCD will require quarterly reports to DHCD on the progress made by individuals and by site based on a prescribed set of benchmarks and as delineated in each site's workplan. During the first year, for program monitoring and to provide technical assistance and the opportunity to collaborate across Sites, DHCD will be requiring monthly reports on outreach, enrollment, and Program Participation.

In addition to the expectations for individual Participants Mass LEAP is intentionally funding partnerships, to support DHCD's goal of leveraging outside resources and knowledge to support residents. Partnerships will establish and strengthen service providers' understanding of and ability to serve, residents of public housing and state subsidized rental assistance programs. DHCD will be developing indicators to identify and measure the success of partnerships with qualitative analysis and will work with site teams to collect data and learn from the Mass LEAP experience.

In order to evaluate the partnership DHCD will be requiring Sites to provide baseline data on Participants education, work and income/assets status as they are enrolled in Mass LEAP. The expectation is that the majority of this data is likely to be collected by Site teams during the assessment process as it relates to the ability to demonstrate eligibility and Participant progress toward goals, although DHCD's metrics and format may be different than what each Site is using.

Definitions

In addition to the terms defined in the context of this document, the following terms are defined as follows:

Applicant: A Tenant of State-Aided Public Housing or MRVP rental assistance that has applied for Mass LEAP.

Fiscal Year: The year beginning with July 1st and ending with the following June 30th as defined in M.G.L. chapter 4, section 7. This may also be referred to as the “state fiscal year”.

Graduate: A person will be considered a graduate of Mass LEAP after he/she has completed all of his/her five (5) year service plan goals. A graduate will be eligible to receive all escrow funds and any other program funds earned during program participation. Participants who are terminated or withdraw without meeting service plan goals are not considered graduates, and will forfeit any escrow savings earned.

Housing Agency: For the purposes of this RFR, the term Housing Agency (HA) is in reference to an agency that meets the definition of either an LHA or RAA.

Lead Agency: the agency that holds the contract with DHCD as the lead agency to provide Mass LEAP services.

Participant: A Mass LEAP Participant is an individual person who is the head of household, and the person with responsibility for his/her household. The program’s services and support are targeted to the Participant although other household members will benefit from the Participant’s success in Mass LEAP. Additional qualifications for Mass LEAP Participant eligibility are enumerated in Section VII. Participant Eligibility and Section IV. Program Participation, Continuing Participation. The terms Head of Household, Tenant, and Participant are interchangeable at some points in this document.

Regional Consortium: A group of two (2) or more HAs and the Contractor(s) that deliver services to Participants across several HAs. Each consortium must designate a lead HA.

Service Teams: The Contractors and RAAs/HAs that will deliver the services and supports to Participants.

Site: The location/s and residents of the RAA/LHA(s) receiving funding.