Commonwealth of Massachusetts

EXECUTIVE OFFICE OF HOUSING & LIVABLE COMMUNITIES

Maura T. Healey, Governor 🔷 Kimberley Driscoll, Lieutenant Governor 🔷 Edward M. Augustus Jr., Secretary

PHN 2024-18

To: Local Housing Authorities (LHAs)

From: Ben Stone, Undersecretary, Division of Public Housing & Rental Assistance

Re: Update to Veteran's Preference Screening and Clarification of the Role of the Centralized

Screening Office (CSO) and Local Housing Authorities in the Tenant Selection Process

Date: October 21, 2024

NEED TO KNOW

- Effective 10/31/24, Local Housing Authorities ("LHAs") will be responsible for screening applicant claims of Veteran Preference. Applicants will now be ranked on LHA waitlists according to claimed Veteran Preference until verified by that LHA. (Veteran Preference will now work just like Local Preference). EOHLC makes this temporary change to expedite the screening process for Priority 7 (Standard) Veteran Applicants. EOHLC has received positive feedback from the NAHRO Housing Committee and other LHAs in support of this change.
- 2. On and after 10/31/24, the Centralized Screening Office ("CSO"), operated by Archipelago Strategies Group ("ASG"), will be responsible for screening:
 - a. Applicants with Priority 1-5 Claims.
 - b. When any of these applicants also has a Local or Veteran Preference Claim, the CSO will also review and make determinations on those preferences.
- 3. LHAs will continue to screen for eligibility and qualification for all applicants. The LHA will make determinations of Local Resident Preference and Veteran Preference claims that remain unreviewed on the worksheet at the time of eligibility and qualification.
- 4. Effective 10/31/24, EOHLC will update criteria for reviewing and granting Veteran preference to align with the HERO act enacted August 8, 2024.
- 5. LHAs are required to respond to applicant questions when contacted. LHA should only refer applicants to the CSO when the applicant has questions related to documentation or review of Priority 1-5 claims. The CSO will not be able to assist applicants with questions about their status on LHA waitlists or about eligibility and qualifications for state-aided housing assistance. The CSO likewise will answer all applicant or referred questions regarding priority claims, but will refer questions on eligibility & qualifications and waitlist rank back to the appropriate LHA.

LHAs review of Standard (Priority 7) Veteran Preference Claims:

Effective 10/31/24, LHAs will once again review Veteran Preference claims for state-aided public housing, and AHVP from standard (Priority 7) applicants. See amended regulatory waivers attached to this PHN. Applicants will appear on waitlist with their Veteran Preference claim until verified, equivalent to how Local Resident Preference currently works and how all priorities and preferences worked before the CSO.

EOHLC makes this change to help the CSO focus on priority claims, which applicants have submitted at a higher-than-expected rate since the implementation of the CSO and some changes to make the CHAMP application more transparent for applicants. At the same time, this change will ensure that applicants claiming Veteran Preference will benefit from their claim in a timely manner.

The CSO, as of 10/4/24, had sent letters to almost 60,000 applicants and approved over 3,700 claims. The CSO has granted priority to 28% of responsive claims, however 88% of all denied claims result from non-response. This has reduced work for LHAs, ensured a consistent applicant experience, and helped LHAs fill units more quickly. We believe this change will allow them to continue this important service.

Update to Definition of Veteran and Veteran Preference

In August 2024, Governor Healey signed the HERO Act (c. 178 of the Acts of 2024) into law. Briefly, the law amended the definition of "Veteran" contained in M.G.L. c. 115. This definition of Veteran applies to most state benefit programs.

While the HERO Act did not amend the definition of Veteran contained in M.G.L. c. 121B, in recognition of the legislature's intent to expand access to state programs to veterans, EOHLC is adopting, for purposes of determining Veteran Preference, the expanded definition of Veteran contained in the HERO Act.

That definition reads:

""Veteran", any person who (a) is a veteran as defined in clause Forty-third of section 7 of chapter 4; or (b) served on active duty in the armed forces for at least 90 days and whose last discharge or release was under conditions other than dishonorable; or (c) served on active duty, to include active duty solely for training purposes, in the armed forces, and was awarded a service-connected disability or who died in such service under conditions other than dishonorable; or (d) served in the national guard or as a reservist in any branch of the armed forces, including active duty solely for training purposes, and was awarded a service-connected disability or who died in such service under conditions other than dishonorable; or (e) is determined to be a veteran according to the U.S. Department of Veterans Affairs; provided, that in any case, the service of such person qualified under clause (a) through clause (e) was entered into or served in Massachusetts, or such person has resided in the commonwealth for 1 day, except for the purpose of determining the residential eligibility of a deceased veteran's dependents."

The updated definition expands on EOHLC's existing definition of Veteran while still including all veterans who would be eligible under the old definition. Importantly, the updated definition decreases the service time requirement for most veterans from 180 days to 90 days and expands the definition of Veteran to any individual determined to be a veteran by the U.S. Department of Veteran Affairs.

EOHLC expects that this expanded definition will make verification of Veteran status simpler for both LHAs/the CSO and for applicants. In the near future, EOHLC will be issuing guidance to LHAs and the CSO on how to make Veteran Preference determinations under the expanded definition.

Ahead of that guidance, you can review resources on Eligibility for Veteran's status under the HERO act here:

Eligibility and Service Requirements | Mass.gov

This change to the definition of Veteran is effective October 31, 2024.

Clarifying the Roles of CSO and LHAs in the Tenant Selection Process:

In 2023, EOHLC moved to a centralized priority/preference screening model for tenant selection in CHAMP. In this model, the CSO makes all determinations for applicants claiming Priority 1-5. When the CSO screens a Priority 1-5 Applicant, the CSO also makes determinations on any Local Resident or Veteran Preferences that the applicant has claimed. These determinations are made centrally on behalf of all LHAs, with each applicant receiving one determination applying to all waitlists.

LHAs continue to screen for eligibility and qualification for all applicants. The LHA will make determinations of Local Resident Preference and Veteran Preference for claims that remain unreviewed on the worksheet at the time of eligibility and qualification. LHAs continue to make determinations for Priority 6 (Transfer for Good Cause).

The CSO is responsible for:

Priority/Preference Screening for Priority 1-5 Applicants:

- Sending out CHAMP generated Priority and Preference verification requests to applicants claiming Priority 1-5;
- Receiving and processing Priority/Preference verification documents from applicants;
- Following up with applicants to gather all necessary Priority/Preference documentation required to complete the Priority/Preference verification;
- Making determinations on Priority/Preference(s) for Priority 1-5 applicants;
- Sending Priority/Preference determination letters to applicants with denials of Priority/Preference; and
- Holding private conferences and reconsiderations for Priority/Preference determinations made by the CSO.

Priority Applicant Assistance:

 Answering applicant questions about Priority and Preference criteria or screening process;

- Responding to applicant questions about general program information, available
 housing resources and referrals to other resources such as 2-1-1 for general housing
 information. THIS IS ALSO AN LHA RESPONSIBILITY;
- Uploading any verification documents received into CHAMP; and
- Updating any application information received in CHAMP.

LHAs are responsible for:

Tenant Selection - Eligibility and Qualification Screening:

- Sending out CHAMP generated eligibility and qualifications verification requests to applicants pulled onto LHA screening lists;
- Receiving and processing eligibility and qualifications verification documents from applicants;
- Making determinations on program eligibility and qualifications for applicants pulled onto lists:
- Making determinations on Veteran Preference, if required, for applicants pulled onto lists (As of 10/31/24, Veteran Preference will work exactly as Local Preference currently works);
- Making determinations on Local Resident Preference, if required, for applicants pulled onto lists;
- Making determinations on Priority 6 (Transfer for Good Cause) for applicants pulled onto lists; and
- Holding private conferences and reconsiderations for any determinations made by the LHA.

* General Applicant Assistance:

- Provide CHAMP paper applications in person or by mail as requested;
- Entering any paper applications received into CHAMP within 14 days;
- Uploading any and all documents received into CHAMP within 14 days;
- Assisting applicants with their CHAMP application, either via CHAMP or otherwise;
- Answering applicant questions about programs; overview of priority and preference categories; eligibility and qualification; and status on the waitlist.
- Responding to applicant questions about general program information, available housing resources and referrals to other resources such as 2-1-1 for general housing information.
 THIS IS ALSO AN ASG RESPONSIBILITY.

CSO Contact Information for Local Housing Authority Staff:

- LHA Email: HACSquestions@discoverasg.com
- LHA Inbound Line: (978) 955-7009

CSO Contact Information for Applicants

- Applicant Email: CSquestions@discoverasg.com
- Applicants Inbound line: (978) 935-4900

EOHLC strongly encourages LHAs to use the staff line and email to address issues with LHA, and only give the applicant line and email to applicants. This will help ensure LHAs receive timely responses.

The CSO is implementing a call center software, Five9, which we expect will help the CSO better triage the higher volume of calls; however, even with a new system LHAs appropriately handling general inquiries on waitlist, eligibility, and qualification will help the CSO answer the volume of calls in a timely manner.

For questions on this PHN, please email <u>eohlcpublichousing@mass.gov</u>. EOHLC will publish a Q&A addendum to this PHN with approximately one week.

Attachments:

Attachment A: Veterans Claims Regulatory Waiver for Public Housing

Attachment B: Veterans Claims Regulatory Waiver for AHVP

Attachment C: Verification of Veteran Preference