

**RAFT
FY23 Administrative Plan
& Scope of Services
Effective August 1, 2022**

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Introduction

The Residential Assistance for Families in Transition (RAFT) program is a flexible financial benefit designed to prevent homelessness for households facing housing crises in Massachusetts. RAFT provides flexible financial assistance designed to meet each eligible household's unique needs. Eligible payments include, but are not limited to: moving costs, rent arrears, utility arrears, rental stipends, and financial incentives to a primary tenant who agrees to host a household who would otherwise become homeless. All interventions focus on helping households to develop, pursue, and/or maintain housing stability.

The program is administered on a regional level by the Department of Housing and Community Development (DHCD)'s nine Regional Administering Agencies (RAAs) and two HomeBASE Administering Agencies, Lynn Housing Authority and Neighborhood Development (LHAND) and Central Massachusetts Housing Alliance (CMHA). Throughout this Administrative Plan, these 11 agencies are referred to as the "RAFT Agencies" or the "Regional Administering Agencies (RAAs)." The RAFT Agencies are responsible, to the extent funding allows, for the day-to-day operation of RAFT statewide. This includes triaging applicants through the Housing Consumer Education Centers (HCECs) at the RAAs and through the Resource Center at LHAND and the Housing Counseling Program at CMHA, providing information on community-based resources, reviewing RAFT applications, administering RAFT payments, and reporting on RAFT outcomes.

This Administrative Plan will govern the provision of RAFT assistance and will be incorporated into the contracts between DHCD and the RAFT Agencies.

Target Population

RAFT targets households who, but for this assistance, would imminently be at risk of homelessness or housing instability. The households served through RAFT are households at risk of homelessness or housing instability with

- i. a household income not greater than 30% of Area Median Income (AMI) who are homeless and moving into subsidized or private housing or are at risk of becoming homeless; or
- ii. a household income greater than 30% but not more than 50% of AMI who are homeless and moving into subsidized or private housing or are at risk of becoming homeless **due to a significant reduction of income or increased expenses;** (as self-certified on the application) or
- iii. a household income greater than 50% but not more than 60% of Area Median Income who are at risk of injury or harm due to domestic violence in their current housing situation.

RAFT targets renters who are experiencing an eligible housing crisis putting them at risk of homelessness or housing instability, or homeless or housing unstable households who need assistance moving to new housing due to an eligible housing crisis. The list of eligible housing crises for RAFT can be found on pages 4-5. (Note that homeless households who are residing in Emergency Assistance (EA) shelters or who have recently been found eligible for EA and have

been diverted to HomeBASE shall use HomeBASE, which is a greater benefit, and shall not be found eligible for RAFT.)

Households of all sizes and configurations may be found eligible for RAFT.

Household Eligibility

Households must have both an eligible housing crisis and be income-eligible in order to qualify for RAFT. In FY23, RAFT serves renters or households who are homeless or at risk of homelessness and moving into rental housing. In FY23, RAFT does not serve homeowners. Homeowners seeking assistance with mortgage or utility payments may be referred to the Massachusetts Homeowner Assistance Fund (HAF), to the Low Income Home Energy Assistance Program (LIHEAP), or to local programs that assist homeowners.

Housing Crisis

All households who are found eligible for RAFT must demonstrate one of the eligible housing crises, listed below. A household may not receive RAFT without demonstrating one of these crises, even if their intended use of RAFT matches one of the allowable payment types.

Each eligible applicant must provide verification of the housing crisis in accordance with the table on the following pages:

Housing Crisis	Corresponding Central App Housing Crisis	Verification Required
Notice to Quit	<ul style="list-style-type: none"> I have received a Notice to Quit that says my lease will be terminated 	Notice to Quit issued by landlord (this may be for nonpayment or for something else)
Eviction	<ul style="list-style-type: none"> I have been to court or have a court date scheduled about being evicted A judge has said I have to leave my home A sheriff or constable has delivered court papers about being evicted 	Summary Process Summons and Complaint (court summons)

<p>Doubled up and must leave/Overcrowding</p>	<ul style="list-style-type: none"> • I'm couch-surfing or doubled up, and can't stay anymore 	<p>Letter from the primary tenant or landlord, including the address where the household is staying, that verifies that the household is being asked to leave, or documentation to demonstrate that the current unit is too small for the number of people residing there, such as, but not limited to, a letter from the landlord verifying the number of people and bedrooms in the unit</p>
<p>Health & safety</p>	<ul style="list-style-type: none"> • Someone I live with is currently hurting me or my household, threatening to hurt me or my household, or making me or my household feel unsafe 	<p>Documentation to demonstrate a serious health and safety risk that prevents the household from continuing to live in the unit, such as, but not limited to, a condemnation order from the Board of Health or a failed inspection report</p>
<p>Domestic violence</p>	<ul style="list-style-type: none"> • Someone I live with is currently hurting me or my household, threatening to hurt me or my household, or making me or my household feel unsafe 	<p>Documentation to support a domestic violence allegation connected to an inability to stay safely in current housing, or a self-statement from applicant</p>
<p>Fire/Flood/Natural disaster</p>	<ul style="list-style-type: none"> • I lost my housing due to a fire, flood, or natural disaster 	<p>Report of fire, flood, or natural disaster</p>
<p>Utility shutoff</p>	<ul style="list-style-type: none"> • I have received a shut-off notice • My service has been shut off 	<p>Current utility shutoff notice or verification that service has already been disconnected</p>
<p>Other crisis that will result in imminent housing loss</p>	<ul style="list-style-type: none"> • I'm currently homeless (e.g., sleeping in a shelter, a car, or outside) • Other 	<p>Documentation to demonstrate that the household will imminently become homeless within 30 days</p>

Households seeking assistance with rent arrears must have at least a Notice to Quit to be considered eligible for rent arrears. A Notice to Quit is a legal notice provided by a landlord to a tenant to terminate a lease or tenancy at will. The Notice to Quit must be provided to a tenant either 14 days or 30 days prior to the filing of eviction claim in court, depending on the reason for the termination. If the landlord does not provide a valid notice to quit, the landlord cannot evict the tenant and recover possession of the premises.

Notices of arrears that are not in the Notice to Quit format (such as a rent ledger or an informal letter from the landlord) are no longer allowed for RAFT. Households whose situation is further along than a Notice to Quit, i.e. households who have a court summons, are eligible under the “Eviction” housing crisis.

In general, households with a Notice to Quit for rent arrears will be seeking assistance to stay in their unit, although they may also use RAFT to move. They may not use RAFT to pay two different landlords. In general, households with a Notice to Quit for something other than rent arrears will be seeking assistance to move to new housing. This is allowed in the FY23 RAFT program.

To be considered an allowable Notice to Quit under RAFT, the notice must meet at least the following criteria:

1. Written statement from the landlord to the tenant (usually with the title “Notice to Quit” or “Notice Terminating Tenancy”) that states that the tenancy is being terminated
2. Includes the date of the notice
3. Includes the date that the tenancy will be terminated (actual dates meet this requirement, as do phrases like “within 30 days” or “14 day notice to quit”)
4. Includes the name of the leaseholder
5. Includes the rental address
6. Includes the amount due, or, if for something other than nonpayment, includes the reason for the termination

Although landlords are required to provide certain information in Notices to Quit, such as information about the availability of legal services and rental assistance, RAAs and the RAP Center should not deny an applicant if the Notice to Quit does not include this language. Similarly, RAAs and the RAP Center do not have to confirm that a landlord has submitted a copy of the Notice to Quit to the Executive Office of Housing and Economic Development.

Income Eligibility

All approved households must have income at or below 50% AMI, with the exception of households who are at risk of injury or harm due to domestic violence in their current housing

situation, who must have income at or below 60% AMI. Guidance on how to verify and calculate income eligibility can be found in the “Documentation” section.

Immigration Status

Households do not need to have legal immigration status in order to qualify for RAFT. However, any applicant or household member who has been issued a Social Security Number must provide it and the RAFT Agency must document it in Housing Pro.

(Note that the public charge rule published by the U.S. Citizenship and Immigration Services in 2019, under which certain forms of federal cash assistance could cause non-citizens to be considered a “public charge,” has been rescinded effective March 15, 2021.)

Prior Assistance

There is not currently a maximum combined benefit limit between HomeBASE and RAFT or between ERAP and RAFT. RAAs do not need to factor prior HomeBASE or ERAP payments into a RAFT benefit determination. However, households currently in their HomeBASE benefit period are only eligible for RAFT if they are experiencing an eligible housing crisis and if their full HomeBASE benefit has already been expended. Households may not be actively receiving funds from HomeBASE and RAFT at the same time (i.e. RAFT cannot pay a monthly stipend on top of a HomeBASE monthly stipend).

Households are limited to no more than \$10,000 from RAFT in any rolling 12-month period. This does not prevent households from applying and receiving RAFT more than once in a 12-month period. However, RAAs need to ensure that new benefit awards do not put households over the \$10,000 limit in any rolling 12-month period.

Per line item language, the prior RAFT benefit limit was \$7,000 per household (effective January 1, 2022 through the issuance of this updated administrative plan). Households who were approved for an award of \$7,000 or less may receive additional funds, up to a maximum of \$10,000 in any 12-month period, if they reapply and are found newly eligible for RAFT. For example, a household who received \$7,000 to prevent eviction in May 2022 may return in September 2022 with a Notice to Quit and receive up to \$3,000.

RAAs and the RAP Center must perform a “12-month lookback” at any prior RAFT payments in HAPPY in order to determine if an applicant is eligible for additional funds.¹ Households may not exceed the \$10,000 limit in any rolling 12-month period. For example, if a household received \$6,000 in RAFT between January 1, 2022 and July 1, 2022, then the maximum the household is able to receive until at least January 1, 2023 is \$4,000 (the difference between the \$10,000 maximum benefit limit and the \$6,000 already received). The household is limited to the new \$10,000 benefit limit for any awards approved after the effective date of this Admin

Plan even if their prior assistance was awarded under the old benefit limit, and even if they applied for assistance while the benefit limit was \$7,000.

Example of how to apply the “rolling” 12-month lookback:

A household who received \$3,000 in RAFT in March 2022 could be approved for another \$10,000 in January 2023, as long as no more than \$7,000 (the difference between the \$10,000 benefit limit and what was already paid out in the last 12 months) is paid out from January 2023 until at least March 2032.

Check date	Payment amount	Total in last 12 months at time of check date
3/1/2022	\$7,000 arrears	\$7,000
9/1/2022	\$3,000 arrears	\$10,000
4/1/2023	\$4,000 arrears	\$7,000

In the above example, the household received \$14,000 total in 13 months, but because they did not exceed \$10,000 total in any rolling 12-month period, they did not exceed the maximum benefit amount.

Sustainability

Households are not asked to demonstrate future sustainability in order to access RAFT. However, households who have an eligible housing crisis and who are income eligible do need to demonstrate that the benefit award will resolve their current housing crisis. This should be documented in the client file in an auditable way. For example, a household who owes \$20,000 in rent arrears would only be able to access RAFT if they were able to verify a plan for the remaining balance, such as receiving funds from a local rental assistance program or entering into a repayment agreement with the landlord.

Use of the RAFT Benefit

Examples of allowable uses of RAFT funds are summarized below, but the list is not exhaustive. RAFT is intended to be flexible enough to respond to individual circumstances. Eligible participant households can receive assistance in any combination of benefit types, provided that the total amount of assistance does not exceed \$10,000 within any rolling 12-month period. Households may access program funds more than once in a given year, subject to the availability of funds, as long as they do not receive more than \$10,000 within 12 months.²

In determining how RAFT can stabilize a housing situation, RAFT agencies will prioritize the various barriers and expenses that are preventing housing stability. Agencies will use RAFT for those items that will provide the most stability up to the \$10,000/year limit and will provide

² Some households with housing subsidies who are applying for RAFT for rent arrears may be limited to less than \$10,000 within 12 months. See “Rent Arrearage for Families Residing in Subsidized Housing” in “Documentation” section.

only what is necessary for the household to avoid homelessness and maintain or secure stable housing by resolving the identified housing crisis.

The Department anticipates the following uses commonly observed to support housing stability and avoid homelessness:

- Rent arrearage
- One rental stipend, if requested
- Start-up costs (first, last, security deposit)³
- Moving costs (only applicable to households moving to new housing, and moving expenses should be reasonable and must be less than \$5,000)⁴
- Utility arrears
- Furniture (only applicable to households moving to new housing, and furniture payments may not exceed \$1,000)⁵

RAFT payments for rent or utility arrears may only be used when the arrearage on the account was acquired by and is in the RAFT participant's name. As with any RAFT payment, utility payments may only be made if they connect to resolving one of the eligible RAFT housing crises listed on the RAFT screen.

Rarely, RAAs and the RAP Center may identify a necessary expense to stabilize housing that is not specifically called out in this Administrative Plan. With DHCD approval, RAAs and the RAP Center may pay for other expenses associated with solving a household's housing crisis, provided that the expenses are reasonable and will result in the household immediately accessing or preserving rental housing.

Travel expenses are available to households who can resolve their housing crisis by moving out of state. RAFT providers should identify the most economical strategy to support an out-of-state move. Start-up costs such as first month's rent, last month's rent, and security deposit may be paid for households moving out of state, but no ongoing assistance (such as a rental stipend) may be provided through RAFT on behalf of these households.

Accessing the RAFT Benefit

Applications for RAFT now come through the statewide centralized application for Emergency Housing Payment Assistance, also known as the "Central App." DHCD routes applications to RAAs and the RAP Center based on geography and based on processing capacity at each

³ Moving-related expenses may only be paid for one move per year per household, except when a subsequent move is caused by a direct threat to the household's safety or a serious health condition of a household member that cannot be reasonably accommodated in the original housing arrangement.

⁴ RAAs should purchase the most economical solution, which in most cases should be significantly less than \$5,000. DHCD can approve waivers for moving-related requests above \$5,000.

⁵ In extraordinary circumstances, RAFT Administering Agency supervisors may request a waiver from DHCD allowing them to exceed the \$1,000 furniture limit for a household.

organization. RAAs and the RAP Center are responsible for processing and reporting on applications in a timely manner in accordance with this Administrative Plan.

The RAAs and the RAP Center may receive paper applications in the rare instances where an applicant is unable to submit an electronic application. All paper applications received by the RAA must be keyed into the Central App by RAA staff within 48 hours of receipt and processed as usual through the Central App. RAAs may not process paper applications separately or outside of the Central App.

Regional Administration

Each RAFT Agency administers RAFT in a specific region of the state. Exhibit B shows a breakdown of each RAFT Agency and the cities/towns covered by that Agency's region. Applications are assigned to the RAFT agency that covers the city/town in which the applicant lives, or, if the funds are used to access new housing, to which they are moving.- Movers without a known address are assigned to the RAP Center for processing.

Rental Assistance Processing (RAP) Center

The RAP Center is a supplemental processing center that supports the RAAs during this time of extreme need and high application volume. As needed, DHCD will assign certain applications from the RAAs to be processed by the RAP Center, staffed by housing consulting firm Nan McKay and Associates. DHCD may dictate which and how many applications are sent to the RAP Center for processing, based on criteria determined by DHCD, including but not limited to an RAA's reported application backlog, application processing times, regional eviction rates, and RAA staff capacity.

Documentation

The following documentation should be kept as part of the digital applicant file.

1. Application PDF
2. Identification for head of household
3. Verification of current housing (e.g. lease, tenancy agreement or tenancy at will form)
4. Verification of eligible housing crisis (e.g. court summons, notice to quit, notice of eviction, or letter from host if doubled up)
5. Verification of income, or verification of presumed income eligibility (see "Proof of Income" beginning on page 11)
6. W-9 for property owner or authorized agent
7. Authorization of agent, if applicable
8. Proof of ownership for unit

Identification

The RAA must collect identification for the head of household. Acceptable identification must include the head of household's name and date of birth. Acceptable identification includes, but is not limited to: driver's license, birth certificate, passport, and state-issued ID.

Note that identification is not required for other household members. Social Security cards are also not required for any household member. Heads of household and household members who have Social Security Numbers (SSN) must still report their SSN on the application, but documentation to verify the SSN, such as a Social Security card, is not required.

Note that identification does not need to be current. For example, an expired passport or expired driver's license is acceptable as proof of identification.

Proof of Income

All applicants must state their income on their application. This is considered the household's "stated income." There are three ways to verify that a household's gross income is below 50% AMI (or 60% AMI for households at risk of domestic violence):

1. Presumed income eligibility through Department of Transitional Assistance (DTA) or MassHealth receipt of benefits. (No income verification required – income tier reported in HAPPY should reflect the stated income, even if the stated income is above 50% AMI.)
2. Income verification using pay stubs, benefit letters, or other documentation provided by the applicant. (This may be used in conjunction with #3, depending on the household's income types.)
3. RAFT Agency access to state databases to verify stated wage, unemployment insurance and pandemic unemployment assistance (PUA) income.

Presumed Eligibility through DTA or MassHealth Receipt

DHCD Regulation 760 CMR 57.00 grants presumed income eligibility for RAFT to any recipient of DTA or certain MassHealth programs. Even if a household's stated income is above the RAFT income limits, by virtue of receiving DTA or certain MassHealth programs, they are to be considered income-eligible for RAFT. DHCD's Central Application will automatically run households against DTA and MassHealth databases to identify whether any household member receives any of the eligible programs. If they do, the Central App Verifications file will note that the household is an eligible DTA or MassHealth program participant. For these applications, the RAA/RAP Center should not request any additional income verification as the household will be presumed income eligible based on 760 CMR 57.00.

Households who are not found as a match against DTA or MassHealth databases must have their income verified. Each income source for each household member needs to be verified. Below are the guidelines for types of verification accepted for each income source.

RAAs are expected to verify household income using **any combination** of the following methods that will result in the quickest verification of the household's income:

Income verification using pay stubs, benefit letters, or other documentation provided by the applicant.

1. Wage income: 2 paystubs dated within the last 60 days
 - a. The paystubs do not need to be consecutive
 - b. Multiple working household members do not need to provide paystubs from the same dates
 - c. The 2-paystub requirement is in effect regardless of whether pay is weekly, biweekly, or monthly
 - i. If pay is weekly, multiply average of pay stubs x 52
 - ii. If pay is bi-weekly, multiply average of pay stubs x 26
 - iii. If pay is monthly, multiply average of pay stubs x 12
 - iv. If pay is at a different interval than above, then use alternate formula to annualize the total.
2. Social Security: most recent benefit letter dated within the last 12 months OR bank statement showing deposit dated within the last 60 days
 - a. Benefit letter can be last year's benefit letter or a current benefit letter showing next year's benefit
3. Unemployment benefits: printout showing weekly payment amount dated within the last 60 days OR bank statement showing deposit dated within the last 60 days
4. Child support through DOR: DOR printout dated within the last 60 days OR bank statement showing deposit dated within the last 60 days
5. Child support not through DOR: letter from parent paying the child support, dated within the last 60 days, stating the child support amount and the frequency of payments OR bank statement showing deposit dated within the last 60 days
6. Other sources of income: letter or other verification showing current income dated within last 60 days

Database-Verified Income

Before requesting any missing income documents from the household RAFT Agencies with authorized access should use existing state agency databases to verify stated wages or state unemployment insurance.

RAAs only need to look in the database that corresponds to the income stated on the application. For example, an applicant who stated that they receive wages only would have their income verified in WageMatch. The RAA would not also need to check UIOnline if Unemployment Insurance benefits were not reported.

1. Earned Wages
 - a. Look up the individual in WageMatch to verify any stated wage income on the application. To do this, RAA needs the individual's First Name, Last Name and Social Security Number.

- b. Annualize the verified income for the most recent available quarter preceding the date of RAFT application.
 - c. Record the verification result in the applicant file.
 - d. Use this verified income when determining income eligibility.
2. Unemployment Insurance (UI)
 - a. Look up the individual in the UI Online Database to verify stated unemployment insurance income on the application.
 - b. Annualize the most recent weekly benefit amount and dependency allowance paid to the individual, before other deductions and adjustments.
 - c. Record the verification of UI income in the applicant file.
3. Other Income Sources. These databases will not verify all income types. In these circumstances, RAAs must give applicants two (2) weeks to provide missing documentation. Examples of other income sources include:
 - a. Social Security, SSI, alimony, child support, and other unearned income sources.
 - b. “Gig-work” income that are typically not reported until tax filing.
 - c. DTA/MassHealth benefits, wages, and PUA income for individuals that cannot be verified in these databases due to lack of social security number.
4. Income Disputes. The applicant may dispute the RAAs determination based on the verified income reflected in data systems within two (2) weeks of notice by providing proof no less than 60 days old.
 - a. Examples of documents include: notices of work furloughs or closings, letter from employer, benefit denial letter, unemployment benefit determination linked to job loss from previous employer.

Presumed Income Eligibility for Subsidized Housing Residents Households who live in public housing, project-based Housing Choice Voucher (Section 8), or project-based Massachusetts Rental Voucher Program (MRVP), or who have a mobile Housing Choice Voucher (Section 8) or a mobile MRVP, may provide proof of their income determination from their housing authority or voucher administering agency in lieu of income documentation for RAFT. The letter must be on housing authority/voucher administering agency letterhead or must be a printout from software used by the housing authority/voucher administering agency. The letter or printout also must be dated within the last 12 months from the time of application.

In many cases, households residing in subsidized housing will have already been presumed income eligible by their participation in DTA or MassHealth programs and therefore will not need to provide this documentation.

Zero Income and Unverified Cash Income

Households who have zero income or are paid in cash may have their income verified through self-certification. Self-certification is a last resort, available only if the household is confirmed to not have any income using all of the income verification methods listed above

(DTA/MassHealth, WageMatch, UI Online, third-party income documentation). The RAA/RAP Center must document that they attempted to check all of the above income sources before allowing self-certification.

Proof of Housing

Each household must provide proof of their current housing situation and of their future housing, if applicable. In some cases a household's proof of housing crisis may also serve as proof of housing. For example, a household who is doubled-up and must leave and who provides a letter to that effect may use that letter as proof of their current housing situation and as proof of their housing crisis. Any household using RAFT to move to new housing must provide proof of the new housing in the form of a lease, tenancy at will agreement, or other verification from the property owner. If a household is using RAFT to move into a unit with a subsidy, proof of the total contract rent and of the tenant's rent share must be provided. Depending on which agency or housing authority administers the voucher or subsidy, this may take the form of a lease or a rent share letter.

Subleases, Roommates, and Co-Housing

Applicants who are subleasing a unit or sharing a unit with an unrelated household member (roommates or co-housing) may be found eligible for RAFT. In all cases, payments for rent or security deposits must be made directly to the legal property owner or a property manager designated by the owner.

In roommate situations where each roommate is responsible for only a portion of the total rent amount, the RAFT award will be prorated based on the portion that the applicant is responsible for. If two roommates apply together as one household, they may receive assistance with the total rental amount owed or due, as long as the total household income is counted when determining income eligibility.

Proof of Rent Arrearage

In cases where an applicant is requesting RAFT to pay for a rent arrearage (such as if the housing crisis is a Notice to Quit or eviction notice for rent arrears), applicants or their landlords must provide proof of rent arrearage before an arrearage can be paid. In some cases, the proof of rent arrearage will be included on the housing crisis documentation (Notice to Quit or eviction notice). In other cases, the applicant or their landlord will need to submit a rent ledger or other verification to verify the amount owed.

If a household has already been to court for eviction and has signed an Agreement for Judgment, RAFT Agencies should use their discretion as to whether there is imminent risk of homelessness and whether RAFT funds should be paid. For example, if a household has signed an Agreement for Judgment that stipulates that they pay an extra \$100 per month, and this is deemed to be affordable for the household, RAFT funds should not be used. However, for example, if a household has signed an Agreement for Judgment that states that they pay \$3000

within a month, and this is not feasible for the household, RAFT approval may be an appropriate outcome.

In some cases, an applicant with an application in process will have accrued additional rent arrears since the time of the application. In these cases, it is acceptable to pay the updated total amount owed, as long as the award does not exceed the benefit limit. RAAs and the RAP Center must document the new amount owed before making a payment. A new, updated ledger or written record is preferred. If, however, an updated ledger or written record cannot be obtained, the RAA/RAP Center may create a written record (case note) of a verbal conversation with the landlord to satisfy the requirement of updated documentation. In these cases, the RAA/RAP Center must at least collect written documentation of the original arrearage amount from the time of the application.

Additional Requirements for Rent Arrearage Payments for Households Residing in Subsidized Housing

There are two additional requirements for rent arrearage payments for households with income-based subsidies, such as Housing Choice Voucher (Section 8), MRVP, public housing, etc.:

1. Households residing in subsidized housing cannot receive payment for more than six months of rent arrears.
2. Households residing in subsidized housing must demonstrate good cause for nonpayment. This is because households in subsidized housing have their rent adjusted based on their income. However, a household could access RAFT to pay for subsidized rent arrears if they had some hardship or increase in expenses that caused their affordable rent share to be temporarily unaffordable. Such a hardship or increase in expenses would be considered “good cause.” Verification of the good cause for nonpayment (ie hardship or increase in expenses) should be documented in the client file. If the arrears were caused by a decrease in income, the applicant should first request a rent adjustment to reduce the rent share (if applicable based on the subsidy type) before accessing RAFT to pay for the arrears. Failure to report an income change in accordance with the subsidy program rules is, generally, not considered good cause on its own.

In determining whether a LIHTC (“Tax Credit”) unit should be considered subsidized housing, RAFT Agencies should follow the EA rule on LIHTC units: LIHTC units are considered subsidized if the tenant’s portion of the rent is less than 50% of the tenant’s household income. RAFT Agencies should use a household’s gross monthly income when making this determination.

Proof of Utility Arrearage or Need for Heating Fuel

Applicants must provide a copy of a recent utility shutoff notice, or verification from the utility company that services are at risk of shutoff or have already been shut off. During the Winter Moratorium on utility shutoffs, RAFT funds should not be used to prevent shutoff unless the

household has received a shutoff notice and is not eligible for shutoff protection under the moratorium. Most households with low income will not receive shutoff notices during this time.

RAFT will cover the minimum amount required by the utility company to prevent shutoff or restore service. DHCD has provided contact information for gas and electric companies on the RAA Resource Portal. Application processors may reach out to these direct contacts to find out the minimum amount needed on each account rather than calling the utility's customer service line. In some cases, the utility may require a portion of the "current charges" in addition to a portion of the "past due" amount. Both are acceptable to pay with RAFT as long as the amount is required to prevent shutoff or restore service.

RAFT may assist with home heating oil, propane, and other deliverable utilities by paying for one delivery's worth of fuel for the household.

Move-in Costs

If using RAFT to move into new housing because of an eligible housing crisis, applicants must provide a lease, tenancy at will agreement, or other written verification from the property owner outlining the terms of the tenancy/agreement and specifying what costs are required. RAFT may not be used to pay broker fees.

Rental Stipend Payment

RAFT may pay one stipend payment to households who request "Future Rent Assistance" on the RAFT application. The stipend payment will be the equivalent of one month's rent, or the difference between the RAFT benefit limit and the RAFT award before the stipend, whichever is less.

If a household does not request a stipend on the application but mentions to the RAFT Agency that they do need assistance with future rent, the RAFT Agency may award one stipend payment.

Stipend payments may cross state fiscal years, meaning that households approved in June 2023 may receive a July 2023 stipend.

No household may receive more than one rental stipend per application.

Households residing in subsidized housing cannot receive RAFT assistance in the form of a monthly stipend.

Hotels and Motels

Because RAFT and ERAP are intended to help remove obstacles to households maintaining or obtaining housing, in most cases hotel/motel residents will not qualify for RAFT/ERAP rental assistance, given the transitory nature of hotel/motel accommodations, plus the lack of legal

protections of tenancy for short-term hotel/motel guests. However, there are certain limited situations where a hotel or motel may be considered permanent housing.

Applicants residing in a hotel or motel seeking RAFT to pay arrearages owed to the hotel or motel owner must meet all of the following criteria before receiving a rental assistance award:

- The applicant has received a Notice to Quit (NTQ) and/or a court summons and complaint for eviction, acknowledging the applicant's residence to have the status of tenancy, AND
- The applicant has lived in the motel or hotel for at least 12 consecutive months, AND
- The applicant meets all other eligibility requirements for the ERAP or RAFT programs, including the ability to provide proof of housing and proof of the rent amount, such as a written agreement between the owner and applicant, receipts showing the amount paid, statement from the owner recognizing the agreement and the rent amount, or other verification accepted by the RAA or RAP Center.

In these limited situations, RAFT may be used to assist tenants with housing payments to the hotel or motel, up to the maximum allowed by the program.

Manufactured Homes

Some mobile homes or manufactured housing require rental or occupancy fees for:

- The land these structures occupy (i.e. "pads")
- The water these structures occupy (i.e. houseboats)
- The structures themselves

The rental fees for these buildings and/or the area they occupy (whether land or water) are eligible RAFT expenses. RAAs/RAP Center may issue rental assistance payments as they would to any occupant in a traditional apartment lease situation, so long as the amount of the fees owed and agreement to pay such fees is clearly documented (through agreement or contract, invoices or overdue notices, or other written confirmation). Utility arrears and moving assistance for households living in these homes would also be eligible for payment under RAFT. RAFT will not cover costs related to moving the actual mobile home to a different lot.

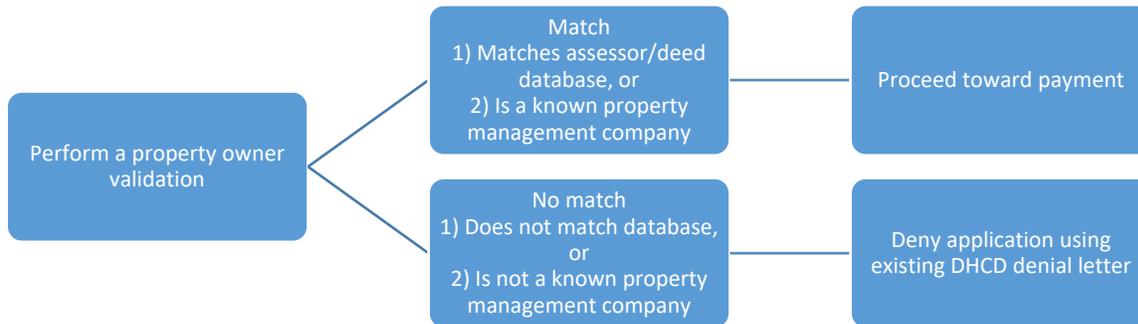
Property Owner Documentation

In order for a RAFT Agency to make a RAFT payment to a property owner on behalf of a participant household, that property owner or his/her agent must provide:

1. Completed W-9 tax form
2. Proof of ownership (The agency that is administering RAFT must verify property ownership with a local municipal Assessor's Office or with the Registry of Deeds, and may not rely on submitted documents)

If an application is submitted where there is a mismatch between the payee and the property owner, and the payee is not a property management company already known to the RAA/RAP Center, the application should be denied with the right to an administrative review. The reason for the denial should be "Suspected Fraud" and in the Description section, the RAA/RAP Center

should write: *“The property owner/landlord/payee does not appear to own the property associated with this application.”*



In the case of an administrative review, the person conducting the review should provide the Property Owner Affidavit and follow the steps laid out in previous guidance from DHCD on property owner administrative reviews:

- Landlord affidavit submitted through the Central app, including unexpired photo ID and deed.
- RAA attempt to contact the true owner of the building as listed in a property ownership database to confirm the alleged owner is legitimate.
- If owner cannot be contacted, RAA conduct a video or in-person interview with the payee to verify identity.

If the outcome of the administrative review is that the landlord legitimately wants payment to be issued to the third party listed on the affidavit, then the RAA/RAP Center may proceed with payment.

A property owner’s failure to provide the above documentation may violate fair housing law and may result in a tenant filing a complaint at a state or local fair housing agency.

Conflict of Interest

Before an Administering Agency makes a payment on behalf of a RAFT participant residing in or moving to a unit that is owned or operated by the RAFT Agency or its subsidiary, the RAFT Agency must disclose this conflict of interest to DHCD by email.

As outlined in Attachment A, if a member, officer, director, or employee of the RAFT Agency seeks to apply for RAFT, their application will be assigned to a different RAFT Agency or the RAP Center.

Participant File

RAFT administering agencies are responsible for maintaining a file for all RAFT households and all files must be maintained in a consistent and orderly manner and in compliance with Executive Order 504. RAFT 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.

DHCD expects that documents will be stored digitally. RAAs are not expected to print documents that are submitted to the RAA electronically. Paper documents submitted or mailed to the RAA should be uploaded through the Central App portal so that they become part of the digital record.

Approvals and Quality Assurance (QA)

RAAs are responsible for implementing reasonable quality assurance procedures that allow applications to be processed timely and ensure adherence to the Administrative Plan. While a supervisor review is not necessarily required for approval of a RAFT file, at a minimum, a second person other than the caseworker who worked on the file should review each application for completion of the following sections before payment is committed:

- Income eligibility
- Housing crisis eligibility
- Owner W-9, proof of ownership, and direct deposit information accurate (if applicable)
- Payment does not exceed the program limit in any rolling 12-month period

The second reviewer could be a peer, a QA specialist, a senior RAFT case manager, or a supervisor. RAAs should be mindful of supervisors' other time commitments and limit supervisor review to those cases that are deemed to be highest risk, such as files completed by new staff or files being approved at payment amounts above a payment threshold. RAAs may also choose to have supervisors review a random sampling of files to determine case manager accuracy and make decisions about staff assignments or the need for additional training.

Required Notifications to Applicants, Utilities, and Landlords

Applicants must be notified by email, phone, or mail at the following status changes. These notification requirements apply to all applications received, regardless of which program the applicant is ultimately served with.

- Receipt of application – this occurs automatically through the Central Application

- Upon review, if there is missing documentation, a request for missing documents that clearly states deadline to submit before application will be closed out (not less than 10 business days)
- Upon application close-out or denial, stating reason and process for requesting administrative review (see “Denials and Administrative Reviews” below)
- Upon approval of benefit, copying the tenant on any transmission of payment to the landlord, utility, or vendor

If the person completing the application is the landlord or an advocate using the landlord or advocate versions of the Central App, the above notifications must go to the landlord/advocate as well as the tenant, unless the advocate did not indicate on the Central App that they had consent to communicate on behalf of the tenant.

Denials, Time-Outs, and Administrative Reviews

Denials and Time-Outs

A household may be found ineligible for RAFT during the RAFT application process or after their application is complete. Households who are ineligible or who become ineligible for RAFT must receive a Denial Letter, using the form provided by DHCD on the RAA Resource Portal. The appropriate ineligibility reason should be marked. The notice may be issued by email or mail. The ineligibility reasons are described below.

- Application Denied for Ineligibility:
 - Income: Household’s total income exceeds program eligibility income limits.
 - Participant Non-Compliance: Household violated the terms of the “Participant Obligations” in the emergency housing payment application. (Provide description)
 - No Eligible Housing Crisis: Household did not present with a housing emergency that met program eligibility criteria.
 - Receiving Identical Benefits: 10,000Household received other benefits already for the same cost in the same time period.
 - Suspected Fraud: Household is suspected to have committed fraud, misrepresented facts, or provided inconsistent or inaccurate information as part of the emergency housing payment assistance application process. (Provide description)
 - Household Received Maximum Benefit: Household received the maximum dollar limit of RAFT.
 - Other: (Provide description.)
- No Funding: Sufficient program funds are not available.
- Termination: The benefit was already approved, but will be terminated for the following reason:

- Household is suspected to have committed fraud, misrepresented facts, or provided inconsistent or inaccurate information as part of the emergency housing payment assistance application process.
- Household appears to have purposely jeopardized their housing or employment status in order to receive benefits.
- Household was found to have had a financial interest in the unit for which program funds were being used.
- Household was found to have received duplicate benefits for the same cost in the same time period.
- Household vacated the unit where funds were being used without notifying the Regional Administering Agency.
- Other (Provide description)

If a household's application is timed out due to applicant or property owner non-response, the RAA should send a Time-Out Letter, using the form provided by DHCD on the RAA resource portal. The RAA should select the missing documentation on the form. If the household provides the missing documentation by the 14 calendar day deadline, the RAA will reopen the application and continue to process it.

All emails or letters to the landlord requesting property owner documentation should include the following language, which should also be used in all phone calls to the landlord:

“You should be aware that refusal of emergency rental assistance (including by refusing to provide required program documentation) may, under some circumstances, violate Chapter 151B of the Mass. General Laws, which prohibits discrimination against a tenant receiving housing subsidies. A civil rights enforcement agency, such as the Massachusetts Commission Against Discrimination (MCAD), the Massachusetts Attorney General’s Office, the Boston Office of Fair Housing and Equity, or a local fair housing agency, may bring or investigate a complaint against landlords who refuse funds or who refuse to provide documentation in violation of c. 151B or similar local codes.”

Text messages to landlords requesting property owner documentation must also include the following language:

“Refusing to accept rental assistance may be a violation of Massachusetts law that prohibits discrimination against persons with housing subsidies.”

Denials must be tracked in Housing Pro (HAPPY), but RAAs do not need to provide as much data for a denied application as an approved application. If the denial occurs before full household data has been entered into HAPPY, RAAs may exclude other household members from the data entry and only enter head of household data in the Household screen. RAAs do not need to enter data in the Unit Data or Owner tab for denied applications. The Initial Data and Program tabs still need to be completely filled out.

In addition, RAAs/RAP Center should not enter suspected fraud denials in HAPPY, so long as the suspected fraud is caught pre-payment. Instead, RAAs/RAP Center should enter those denials in a Formstack form provided to each organization's Compliance Coordinator by DHCD.

Administrative Reviews

Households who are found ineligible for RAFT and who disagree with the ineligibility decision may request an administrative review of their denial. The applicant's right to a review is described in the RAFT Notice of Ineligibility/Termination. Each Administering Agency must fill in the appropriate address on page 2 of the Notice before sending it to any ineligible applicant. The applicant has 10 days from the date of the notice to request a review. Reviews will be performed, within 15 days from the request for a review, at the Administering Agency level by a supervisor who is familiar with the program but unfamiliar with the particular case being reviewed. The decision should be sent to the client and a copy of the written finding should be placed in the applicant's file. There is no appeal to DHCD of this finding.

Fair Housing and Language Access

In keeping with all DHCD and HUD program regulations, and as part of the intent of the RAFT program, DHCD and all partner organizations will comply with all applicable nondiscrimination and equal opportunity requirements set forth in 24 CFR 5.105(a) and will administer RAFT in an affirmative manner to further fair housing. This will include making reasonable modifications and accommodations needed by applicants and program participants, consistent with federal and state fair housing laws.

RAFT households with Limited English Proficiency ("LEP") may not be denied meaningful access to the program. Meaningful access includes the process and documents associated with an assessment, application, and any disciplinary or appeals procedures. Each RAFT Administering Agency has its own Language Access Plan ("LAP") which details how an agency provides services to persons with LEP.

If a client is LEP, staff must use the translated vital documents provided by DHCD and follow the RAFT Agency's LAP. Any spoken communication should be done either with bilingual staff or with the use of an interpreter, and any forms provided should be made available in the client's preferred language, if it is a language into which the forms have been translated. If not, the forms can be read to the LEP client using an interpreter.

If a form has been translated, the RAFT Agency does not need to collect an English version and can include only the translated version in the file.

Accounting and Fiscal Management

Allocation of Funds

Allocation of RAFT funds to the RAFT Administering Agencies will be determined by DHCD based on demand.

In the event DHCD is notified of a suspension, termination, or reduction in RAFT funding, in whole or in part, or if DHCD reasonably believes that any such action is forthcoming, DHCD shall provide the Contractor with written notice to decrease or terminate RAFT activity as appropriate.

Financial Management

The RAFT agency is responsible for establishing a comprehensive financial management system and related internal controls to ensure that funds are spent in an efficient and effective manner.

The financial management system must include 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; and
3. Cash management of income and expenses, including the distribution of funds made on behalf of each participant.

Fiscal Controls

The Contractor certifies that it has established sufficient internal policies to carry out its obligations that meet the requirements established by the Department, which internal policies shall include executive compensation policies and procedures, compliance policies and procedures, conflict of interest policies, code of conduct policies, and internal controls policies that relate to fiscal management.

The Contractor and any agency under subcontract with the Contractor having costs chargeable to the Contract shall maintain an accounting system, financial management system, and supporting fiscal records adequate to audit, and any other records necessary to substantiate the Contractor's claims for payment hereunder. This shall include, without limitation payroll records, accounting records, and purchase orders to document the Contractor's activities under this Contract. In addition, the Contractor and any agency under subcontract with the Contractor shall otherwise verify that payments and costs meet applicable Federal and State requirements.

The Department shall have the right to monitor and review the Contractor's compliance with any Contract and the adequacy of the Contractor's fiscal and audit records and/or conduct on-site field visits, as the Department deems appropriate, at any time during the term of the Contract. The Department may determine at any time during the term of the Contract that additional information and/or further action may be required. Upon notice of such

determination by the Department, the Contractor agrees to promptly provide such information to the Department or undertake such further action deemed necessary by the Department.

Further, the Department reserves the right to secure its own independent audit of the Contractor's records if, in its sole discretion, the Department determines that it is necessary for any reason.

The Contractor shall ensure the cooperation of its employees and governing board members with all requirements set forth in any Contract relating to any audit, review, or monitoring, whether it is conducted by the Department or its authorized representatives or representatives of the Commonwealth of Massachusetts. In the event of any such audit, review, or monitoring, the Contractor shall allow the Department and its representatives or representatives of the Commonwealth of Massachusetts access (both in-person and electronically) to all its books and records pertaining to this Contract.

Vendor Payments

The RAFT regional administering agency will make direct payments to participating vendors (property owners, utility companies, etc.) on behalf of the program participant up to the level of financial assistance provided each household through RAFT. The agency may require that payments be made by direct deposit rather than by paper checks.

Data Collection

Until the launch of the new end-to-end or "E2E" case management system, expected during FY23, DHCD and the RAFT Agencies will enter data into Housing Pro, "HAPPY," a product of MRI Software, for demographic and program data collection on RAFT applicants. DHCD will be responsible for determining the minimum data collection elements and for ensuring that each agency has access to the necessary software systems to meet the program requirements.

The following fields are required in Housing Pro:

- Initial Data – Information on Initial Data screen must be updated for prior applicants/participants of RAFT, HomeBASE, ERMA, ERAP, or METAR who have completed a new application for RAFT
 - Type of Action
 - Effective date of action
 - Tenant ID
 - Address
 - Phone number (if applicable)
 - Email address (if applicable)
 - Language
 - Agency
 - Housing Program

- Case Worker
- Increment
- Housing Type (formerly “Subsidy Type”)
- Household Members
 - Last name
 - First name
 - Date of birth
 - Sex
 - Relationship
 - Ethnicity
 - Race
 - Social Security Number (if applicable)
 - If no social – use 888-88-8888
- Unit Data
 - Unit address
- Owner
 - Property owner (if applicable)
- Program
 - Start date
 - End date
 - Dependent under 21 (Y/N)
 - Landlord Door (Y/N)
 - Total arrearage (If applicable)
 - Eligibility determination date
 - Application date
 - Housing Crisis
 - Income tier
 - RAFT status
 - Ineligible Reason (If applicable)
- Transactions
 - Check date
 - Payee
 - Payment type
 - Amount

DHCD agrees to ensure that all staff will be trained at least annually in the use of DHCD-required systems, including state and federal privacy and data security requirements, and ongoing technical assistance will be provided by designated contacts at DHCD. The RAFT Agency must ensure that staff has adequate program knowledge and training in the utilization of systems. If staff leave the agency or are reassigned to another program that does not require the use of Housing Pro, the RAA must notify DHCD within 24 hours so that access can be revoked. RAAs are responsible for inactivating the Housing Pro account and DHCD will be responsible for inactivating the Amazon WorkSpaces account.

RAFT Agency staff must enter complete and accurate data for all program participants into Housing Pro and must obtain required program data elements throughout program participation. Participant records should be kept up to date. DHCD will require a client information release form in order to share information among agencies that work on RAFT such as community service providers, RAAs, EA providers, and DHCD. 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.

Reporting

In order to track application status before entry into Housing Pro, RAFT Administering Agencies will be required to report weekly on the number of applications in their pipeline. Reporting is due by the close of business every Monday, providing data from the prior week. Data will be collected in a format specified by the Department.

The following is required weekly:

- # New applications received in prior week
- # Applications approved in prior week
- # Applications denied in prior week
 - For ineligibility
- Total number of households currently in pipeline
 - # Submitted but no staff review
 - Applications that have been submitted, but have not yet reviewed or contacted by a staff person
 - # Submitted and Reviewed
 - Applications submitted to RAA and reviewed by staff person
 - Missing information from tenant and/or landlord
 - Do not include Cognito status 'incomplete'
 - # In process for approval
 - Applications in which client and landlord have completed their portion of the application process
 - Awaiting review and approval from staff/manager/supervisor
- % of applicants normally approved
- Average payout
- Date from which most applications are from
- Average staff time per application

Refer to COVID Reporting Spreadsheet Definitions for full explanation and definitions of above data points.

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.