RAFT Policy Guidelines FAQ





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RAFT FAQs

RAFT Policy Update

- 1. What are the key changes introduced to the RAFT Policy Administration Plan that are effective as of January 11, 2021?
 - a. During the Massachusetts state of emergency, an increase in maximum benefit level from \$4,000 to \$10,000 across the board for all eligible households (including households at risk of homelessness and moving into new housing and no longer limited to renters affected by COVID-19
 - b. Sustainability requirements no longer in effect
 - c. Simplified housing crisis list
 - Pre-court rental assistance
 - Eviction
 - Doubled up/ overcrowding
 - Health & safety
 - Pre-foreclosure mortgage assistance

- Foreclosure
- Domestic violence
- Fire/flood/natural disaster
- Utility shutoff
- Other crisis that will result in imminent housing loss
- d. Expansion of all housing crisis types to all eligible households, without having different housing crisis options for Upstream, Standard. and COVID RAFT
- e. Consolidation of Upstream and Standard RAFT into one program and payment increment, without 4 months' rent cap on pre-court arrears payments
- f. Decoupling of HomeBASE and RAFT combined maximum benefit limit
- g. Automatic income eligibility for DTA/MassHealth recipients and new ways of calculating income for non-DTA/MassHealth recipients
- h. Streamlined approval processes
- i. Reduced reporting requirements for ineligible households
- 2. Will policy guidelines apply only to new applications coming in after January 11, 2021 (effective date of new policy updates) or will the guidelines apply to all applications in the queue?

Changes are effective for all applications in the queue, regardless of their submission date





3. Do you anticipate further extension of the COVID RAFT enrollment period, based on the latest \$25 billion in new funds from the most recent Federal stimulus package?

As of right now, the last COVID RAFT applicants will be those who are approved on or before June 30, 2021 and the latest that COVID RAFT payments can be scheduled is December 31, 2021.

Increased RAFT Limit to \$10,000

4. Can the \$10,000 limit be applied to all types of RAFT cases, including utilities, moving costs, etc.?

Yes, RAFT funds apply to all of the aforementioned cases. RAA staff must review each application and determine the appropriate level of need to address the crisis.

The \$10,000 maximum benefit is no longer limited to households affected by COVID and it is no longer limited to households who are renting. Anyone who is eligible for RAFT is eligible for up to \$10,000, whether to stay in their current housing or to move into new housing, and whether they are a renter, homeowner, or currently experiencing homelessness.

5. Do households still need to prove future housing sustainability to be approved for RAFT under new guidance?

No, sustainability requirements are no longer in effect. The "6-month rule" to access the \$10,000 benefit and the "presumption of future sustainability" to access RAFT have been removed. If the benefit will resolve the current eligible housing crisis and the household is income eligible, RAAs are expected to process the payment without making a determination about whether the household can afford rent going forward. During the pandemic, the goal is to get funds out quickly to households in need. DHCD feels it would be challenging to correctly predict future housing sustainability during a time of such widespread uncertainty.

- 6. If a client with a subsidy used \$4,000 funding for arrears and utilities in July and has since fallen behind on rent, would they now be eligible for additional funds due to the new \$10,000 limit? Yes, the client could reapply for RAFT funding and receive additional funds, up to the \$10,000 limit in a rolling 12-month period.
- 7. Do prior HomeBASE payments factor into a RAFT benefit determination still?





There is not currently a maximum combined benefit limit between HomeBASE and RAFT; RAAs no longer need to factor prior HomeBASE payments into a RAFT benefit determination. However, families currently in their 12-month 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).

8. Is there a certain number of months a market rate client can receive stipends?

There is not currently a limit, except that the last stipend you can pay for Standard RAFT is June. COVID RAFT can be used through December 2021 if necessary, based on need determination. DHCD may be providing additional stipend guidance shortly. As always, stipends may only be approved if the household's income alone is not sufficient to pay their rent along with their other necessary expenses.

9. Can we provide stipends that disburse after June 2021 for COVID RAFT?

Yes, COVID RAFT approvals can occur through June 2021, and payments can continue through December 2021. The "Program End Date" in HAPPY will automatically calculate to 6/30/2021 for RAFT payments, so if a household is receiving COVID RAFT past 6/30/2021, the Program End Date will need to be manually changed to 12/31/2021.

Rental and Mortgage Arrears

10. Can an applicant use RAFT funds to pay both arrears in current housing as well as moving expenses to a new home?

No, the applicant must decide if they want to stay in current housing or use RAFT funds for moving expenses.

11. Does the \$10,000 limit apply to mortgage arrears?

Yes, all eligible households, including homeowners, have access to RAFT funds up to \$10,000 to resolve their housing crisis.

12. Will the \$10,000 RAFT benefit be considered income?

The RAFT benefit is not paid directly to the participant. As with the old \$4,000 benefit, payments are only made to property owners or vendors. Rental payments are considered income for property owners and RAAs





will send Form 1099s to all owners who received rental payments in the previous tax year. Although DHCD is not aware of any subsidy or benefit programs where receipt of RAFT paid to the owner or a vendor would be considered income for the participant, participants should refer to specific program guidelines to be certain.

13. Will RAFT provide funds for arrears to a client's former residence (either post-eviction of post-relocation)?

No, RAFT funds must be used for an applicant's current place of residence (if using RAFT to stay in current housing) or new place of residence (if using RAFT to move). RAFT cannot pay for arrears for a prior residence unless those arrears are currently preventing them from immediately moving into a viable housing situation.

14. Can an applicant reapply for RAFT if the applicant experiences mortgage or rental arrears again?

An applicant can reapply for RAFT via the same application if the applicant experiences another housing crisis. The applicant should fill out the application again if they have not received the allotted \$10,000 within any rolling 12-month period. Additional, streamlined reapplication guidance may be forthcoming.

Landlords

15. How can the program incentivize landlords to not evict tenants after receiving RAFT for arrears?

Landlords/owners will continue to sign a contractual document and agree not to evict for any payments provided by RAFT. The landlord may still evict after the RAFT payment is received if the tenant does not pay any future rent due.

16. If the property is paid for, but the homeowner is behind on the property taxes, can RAFT funds be used to pay back property taxes? Yes, a homeowner can use RAFT funds to pay back property taxes.

Emergency Rental and Mortgage Assistance (ERMA)

17. How will the ERMA program be impacted by policy updates to RAFT? ERMA program guidance is separate from the RAFT program guidance, but as of January 12, the ERMA limit has increased to \$10,000 as well, with some restrictions around stipend length. Refer to the ERMA





Administrative Plan and policy memos for more guidance. Households are limited to no more than \$10,000 from RAFT or ERMA in any rolling 12-month period.

Application Documents

18. Do applicants need to provide a letter that outlines their financial crisis/situation to be deemed as impacted by COVID-19?

Applicants are not required to submit documentation to support their financial crisis/situation. Applicants being paid out of COVID RAFT must self-certify on the application that their financial hardship is related in some way to COVID-19, but the RAA is not to request any additional documentation to support the self-certification. The self-certification alone, on the application, is sufficient.

19. Is an applicant required to submit a Social Security Card in support of their application?

An applicant is not required to submit a Social Security Card when submitting a RAFT application and the RAA should not ask for Social Security Cards. RAA staff should continue to collect the applicant's Social Security Number (SSN) if the applicant has been issued a SSN. Households without SSNs should be captured in HAPPY using the false SSN "888-88-8888."

20. Do letters from a healthcare provider provide sufficient proof of health and safety impacts?

A letter from a healthcare provider can provide sufficient proof of health and safety impacts. "Health and safety" is a broad housing crisis and RAA staff are responsible for reviewing documentation and determining whether there is a housing crisis causing risk of homelessness.

21. Can the client add proof of MassHealth/DTA directly or can this only be verified by MassHealth and DTA?

Use the batch verification system to verify applicants that are income eligible based on DTA benefits. If a client happens to submit proof of MassHealth/DTA with their application, the RAA can use that proof and skip the batch verification system for that client. However, RAAs should not specifically request MassHealth/DTA proof from individual clients and should default to the batch verification system.





22. Is proof of housing still required?

Yes, applicants are required to provide proof of housing which might be a lease, tenancy at will agreement, or other document verifying proof of housing.

Department of Transitional Assistance (DTA) and MassHealth Benefits Income Eligibility

- 23. If a member of the household receives DTA and/or MassHealth benefits, is the household income eligible for RAFT funds?

 Yes, if any member of the household is receiving DTA and/or MassHealth benefits, then the entire household is deemed income-eligible for RAFT funds.
- 24. If an applicant is not receiving DTA or MassHealth benefits, but an individual in their household is receiving benefits, is the applicant income eligible for RAFT funds?

Yes, if any member of the household receives DTA or MassHealth benefits then the entire household is income eligible for RAFT funds. The household still would need to prove that they have a housing crisis.

25. If an applicant indicates that they receive DTA or MassHealth benefits, does the applicant still need to provide DTA documents?

No. If an applicant indicates that they receive DTA or MassHealth benefits, RAA staff need to verify this. This should be done using the batch verification process (see question 21).

When that list comes back, anyone on the list who was verified can automatically move to housing crisis verification and eligibility determination/approval. So, what this means is that anyone who is VERIFIED as being on DTA or MassHealth cannot be found incomeineligible for RAFT. RAA staff should not request any documentation from the applicant but instead leverage data that is sent over from the verification system. Note: If an applicant does not get DTA/MH, you do still need to verify their income.

26. If a household is on MassHealth and they've been verified, but their income is over 60% AMI, are they still eligible for up to 10K solely because they have DTA/MassHealth benefits?





Yes, the emergency regulation allows the RAA to serve all community members enrolled in MassHealth or DTA, regardless of their income (i.e., income exceeds AMI threshold).

27. Do benefits from other states render an applicant eligible for RAFT funding (i.e., healthcare benefits from another state)?

No, applicants must receive benefits from Massachusetts to be found automatically income eligible under the regulation. Applicants receiving benefits from another state would not be considered automatically income-eligible unless they were also receiving Massachusetts DTA/MassHealth benefits. Note also that households who are not MA residents are not eligible for RAFT at all.

28. How do you determine an applicant's income tier if the applicant is receiving DTA benefits and is automatically income eligible, and does not have to provide proof of income?

For applicants who are deemed automatically income eligible based on the regulation, RAAs will determine their income tier from the stated income that is provided by the applicant.

29. If the household has no DTA benefits or MassHealth, are there no level of benefits for which self-certification of income is allowed?

No, self-certification of income is not allowed for RAFT.

Stipends

30. How will stipends be determined?

Stipend rules have not been changed. Stipends can now be paid through December 2021 for cases paid out of COVID RAFT for households impacted by COVID-19. DHCD may provide additional guidance around stipends in the near future.

31. Are applicants eligible for RAFT support if they have no income? Yes, applicants are eligible for RAFT support if they are experiencing a housing crisis. There are income maximums (50% AMI or 60% AMI if affected by domestic violence) but there are no income minimums.

32. Can stipends cover a full month of rent?

Yes, but the applicant would need to provide sufficient need (i.e., applicant has no income or very low income and has experienced hardship due to other financial obligations). DHCD expects it is very unlikely that





households would need stipends for a full month of rent unless they have zero income.

- 33. Do clients still have to pay 30% of their income toward stipends? This remains a guideline but is no longer a requirement.
- 34. What is to stop a landlord from evicting a tenant as soon as they receive payment for arrears?

The Owner's contract has explicit language around arrears and RAFT payments. Landlords may not evict for any arrears covered by the RAFT payment.

Utilities

35. Can RAFT funds be used to help families with utilities?

Yes, RAFT funds can be used for utilities if the applicant has received a shutoff notice. Due to the winter moratorium, assistance may not be needed.

Other

36. Can a client use RAFT funds for a moving truck?

Yes, RAFT funds can still be used for moving expenses for households who have an eligible housing crisis. There are no changes related to this in the new admin plan.

- 37. Does the Owner Contract Addendum still need to be used under the new policy guidelines?
 - No, the Owner Contract Addendum is no longer in effect.
- 38. If a property owner has already signed the RAFT Owner Contract Addendum agreeing to the six-month tenancy requirement, but the RAA has not yet approved the file for payment, should the RAA ask the owner to disregard the RAFT Owner Contract Addendum? If the Owner Contract Addendum has already been signed by the owner and tenant, it remains in effect and RAAs should continue to move the

and tenant, it remains in effect and RAAs should continue to move the application along in the approval process and, if approved, make payments in line with the addendum that was already signed. If the addendum has not been signed by either the owner or the tenant, it does not need to be signed and RAAs should move the application along in the approval process using just the RAFT Owner Contract, without addendum.





39. Can an applicant qualify for RAFT funds based on neighborhood safety?

RAA staff should evaluate the situation to determine if it rises to the level of a RAFT housing crisis, such as health/safety.



