



Commonwealth of Massachusetts  
Office of the State Auditor  
Suzanne M. Bump

*Making government work better*

Official Audit Report – Issued November 5, 2014

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Department of Housing and Community  
Development—Review of Emergency Housing  
Assistance Programs and Analysis of Units Removed  
from the Housing Stock of Local Housing Authorities  
For the period July 1, 2009 through June 30, 2012





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November 5, 2014

Aaron Gornstein, Undersecretary  
Department of Housing and Community Development  
100 Cambridge Street  
Boston, MA 02114

Dear Undersecretary Gornstein:

I am pleased to provide this performance audit of the Department of Housing and Community Development's administration of its emergency housing assistance programs. This report details the audit objectives, scope, methodology, findings, and recommendations for the audit period, July 1, 2009 through June 30, 2012. My audit staff discussed the contents of this report with management of the agency, and their comments are reflected in this report.

Sincerely,

A handwritten signature in blue ink, appearing to read "SMBump".

Suzanne M. Bump  
Auditor of the Commonwealth

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## EXECUTIVE SUMMARY

On July 1, 2009, the administration of the state's Emergency Assistance (EA) program for homeless families was transferred from the Department of Transitional Assistance to the Department of Housing and Community Development (DHCD). Under this program, DHCD's responsibilities include preventing homelessness; sheltering homeless individuals; and rapidly rehousing homeless individuals in stable, permanent housing. In fiscal year 2012, DHCD introduced the Building Alternatives to Shelters (HomeBASE) program, which was designed to help families maintain homes and avoid being placed in shelters while pursuing appropriate long-term housing placement. DHCD administers the EA and HomeBASE programs through community-based housing providers and nonprofit regional administering agencies that provide temporary emergency shelter/rehousing services and permanent housing to homeless families that meet the asset and income eligibility criteria for the programs. See Appendix A for a description of the housing assistance programs DHCD operates.

This audit was initiated to examine certain aspects of DHCD's administration of its emergency housing assistance programs, including expenditures made for program services, and DHCD's monitoring of public housing units that had been removed from the available public housing stock by local housing authorities (LHAs). We also wanted to assess the internal controls that DHCD had established for these activities. Finally, as part of our audit, we wanted to review DHCD's Vacancy Reporting System (VRS) to estimate the number of public housing units that had been removed from housing stock at LHAs and could potentially be rehabilitated to house homeless families. However, DHCD did not respond to our repeated verbal and written requests for specific documentation in a timely manner and also did not give us reasonable access to agency operating systems, supporting documentation, and agency personnel related to its emergency housing assistance programs, and therefore we could not meet all of our audit objectives and develop conclusions about these programs.

### ***Summary of Findings***

DHCD has not established adequate controls to ensure that the information being provided by LHAs regarding waiver and offline units is accurate. As a result, DHCD cannot be certain that it has all the information necessary to effectively administer LHAs' activities in this area.

***Recommendations***

DHCD should take the following actions:

- Establish and maintain a statewide list of all waiver and offline public housing units in VRS that can be assessed electronically.
- Develop policies and procedures for verifying the data submitted by housing authorities to VRS.
- Delete public housing units that are fully sold or federalized from the offline list, since they are no longer assets of the Commonwealth.

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## OVERVIEW OF AUDITED AGENCY

### *Background*

The Department of Housing and Community Development (DHCD) was established by Chapter 23B of the Massachusetts General Laws. DHCD's website states, "DHCD's mission is to strengthen cities, towns and neighborhoods to enhance the quality of life of Massachusetts residents. We provide leadership, professional assistance and financial resources to promote safe, decent affordable housing opportunities, economic vitality of communities and sound municipal management." Effective July 1, 2009, the administration of the state's Emergency Assistance (EA) program was transferred from the Department of Transitional Assistance to DHCD by Chapter 4 of the Acts of 2009 (An Act Reorganizing Certain Agencies of the Executive Department), as amended, which authorized Chapter 23B, Section 30, of the General Laws. EA is the Massachusetts program that provides emergency shelter and rehousing services to homeless individuals under age 21 and their low-income families, and homeless pregnant women and their spouses, who meet DHCD eligibility requirements established in 106 Code of Massachusetts Regulations (CMR) 309.<sup>1</sup>

In fiscal year 2012, DHCD introduced the Building Alternatives to Shelters program, which is designed to help families maintain homes and avoid being placed in shelters while pursuing appropriate long-term housing placement. EA family shelter providers also assist EA families in developing rehousing plans;<sup>2</sup> help them develop housing search strategies; and find permanent housing for families who are exiting shelters, hotels, and motels and being placed in state/federal public housing, Section 8 / housing choice voucher<sup>3</sup> housing, or market-rate<sup>4</sup> housing.

DHCD expended \$145.9 million for the EA program in fiscal year 2010, \$154.3 million in fiscal year 2011, and \$133.2 million in fiscal year 2012. In fiscal years 2010 and 2011, 1,351 and 1,989 families, respectively, were placed in non-hotel emergency shelters (see Appendix B). Families temporarily

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<sup>1</sup> Effective September 17, 2012, this regulation was recodified as a DHCD regulation, 760 CMR 67.

<sup>2</sup> A rehousing plan is a plan that adults in a family must follow while in an EA shelter. The plan is developed by DHCD and implemented by the shelter providers and the adults in the family. Individuals from the ages of 18 to 21 may be part of the plan.

<sup>3</sup> The housing choice voucher program is the federal government's major program for helping very-low-income families, elderly people, and disabled people to afford decent, safe, sanitary housing in the private market. A family that is given a housing voucher is responsible for finding a suitable housing unit where the owner agrees to rent under the program. Applicants generally contribute 30% of their adjusted gross income. The federal government establishes allowable rental amounts for different geographic areas.

<sup>4</sup> Market-rate properties are properties rented in an area that is not rent controlled or subsidized by government.

housed in hotels or motels in fiscal years 2010 and 2011 totaled 2,993 and 1,641, respectively (see Appendix B).

DHCD is organized into several divisions and bureaus. Our audit focused on certain activities of the Division of Housing Stabilization, which was established by DHCD as a result of the passage of Chapter 4 of the Acts of 2009, and the Department of Public Housing and Rental Assistance (DPHRA), which is the oversight agency for local housing authorities (LHAs). The Bureau of Housing Management within DPHRA maintains the Vacancy Reporting System (the database that tracks occupancy and vacancy data related to LHAs), which was also part of our audit.

## AUDIT OBJECTIVES, SCOPE, AND METHODOLOGY

In accordance with Chapter 11, Section 12, of the Massachusetts General Laws, we have conducted a performance audit of certain activities of Department of Housing and Community Development's (DHCD's) administration of its emergency housing assistance programs for the period July 1, 2009 through June 30, 2012.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence that provides a reasonable basis for our findings and conclusions based on our audit objectives. However, DHCD imposed constraints on our access to certain records and operating personnel, which constituted a scope limitation and hindered our ability to achieve our objectives, as described below.

### *Audit Objectives*

The objectives of our audit and the effects of the scope limitation on our ability to achieve these objectives were as follows:

- To obtain an understanding of the Emergency Assistance (EA) program DHCD operates and to analyze data on the number of homeless families in emergency and temporary housing, the average length of stay in this housing, its total annual cost, and its average annual cost per homeless family. For this objective, we were able to obtain an understanding of how the EA program operates and the total costs of operation from information in the state's accounting system, but we were not able to verify the number of homeless families in emergency and temporary housing and determine the average length of stay or the total costs per homeless family.
- To ascertain whether expenditures were reasonable; allowable; properly authorized; and in compliance with laws, regulations, and contract terms and conditions. Because we did not obtain sufficient documentation (invoices, contracts, lease information, and shelter logs) for our samples of disbursements from the EA and Building Alternatives to Shelters (HomeBASE) programs, we could not determine whether the expenditures were appropriate for each program and in compliance with legal requirements.
- To review EA applicants' eligibility, placement, and other statistical data to determine whether clients receiving housing and other benefits were qualified according to the regulations. We could not achieve this objective because DHCD did not provide a list of clients served and eligibility information such as recipient income.
- To review DHCD's policies and procedures for tracking public housing units that had been removed from the housing stock by local housing authorities (LHAs); document the number of

units removed; and determine the reasons for removing them, the estimated cost of repair, and whether DHCD data on these units were complete and accurate. We achieved this objective except that DHCD (1) did not provide repair costs for waiver units and (2) limited our online access to its Vacancy Reporting System (VRS), which may have limited our ability to identify units removed from the housing stock.

- To determine whether the Division of Housing Stabilization (DHS) and Department of Public Housing and Rental Assistance (DPHRA) internal control plans were established in accordance with Chapter 647 of the Acts of 1989 (An Act Relative to Improving the Internal Controls within State Agencies) and the Office of the State Comptroller's (OSC's) Internal Control Guide and whether the documented controls were implemented and working as intended. We could not achieve this objective because DHCD did not provide us with internal control plans and procedures for these divisions until 9 to 10 months after we began our fieldwork. Further, DHCD only provided us with limited evidence of documented procedures, and it limited our access to personnel who would have been able to verify the control procedures detailed in these plans.

To achieve our audit objectives, we conducted the following procedures:

- We obtained and reviewed organization charts; applicable laws, guidelines, regulations, policies, procedures, and statistical data related to homeless families; and other miscellaneous documents in order to obtain a working knowledge of DHS's EA, Flexible Funds, and HomeBASE programs.
- We reviewed a limited number of contracts and payment vouchers for shelter and hotel/motel providers in the EA program to determine whether the expenditures incurred during the audit period were reasonable, allowable, properly authorized, recorded, and properly documented in compliance with applicable laws and regulations and contract terms and conditions. In determining reasonableness of amounts paid to hotels/motels, we compared rates paid by DHCD through its hotel/motel broker to rates obtained through the Internet.
- We requested and reviewed the internal control plans established by DHS and DPHRA to determine whether they complied with Chapter 647 of the Acts of 1989 and OSC's Internal Control Guide.
- We used audit command language software in analyzing expenditure data from the Commonwealth Information Warehouse (CIW),<sup>5</sup> which are extracted from the state's Massachusetts Management Accounting and Reporting System (MMARS).
- We reviewed housing data maintained by DHCD regarding waiver and offline units and contacted various housing authorities to determine the number of public housing units removed from the housing stock by the type of unit; the reason for removal, if possible; estimated cost of repair; and whether DHCD data are complete, accurate, and reconciled with LHAs' data.

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<sup>5</sup> The CIW is a database of accounting data and related data in table form. Periodically, MMARS data and related data are loaded into the CIW. Thus, the CIW brings together financial, budgetary, human-resource, payroll, and time reporting information maintained by each state agency.

- We used judgmental sampling in selecting transactions for testing, as follows, and therefore could not project the results of our samples to the various populations:
  - For tests of EA expenses, we selected 76 disbursements from a population of 25,573.
  - For tests of HomeBASE expenses, we selected 26 disbursements from a population of 1,031.
  - For tests of offline units, we selected 30 units from the fiscal year 2011 offline list, which showed a total of 445 offline units.

Program service payments selected for testing were extracted from the CIW, a database that includes information from MMARS. The MMARS data used for this analysis constitute the official procurement and accounting records of the Commonwealth, are widely accepted as accurate, and form the basis for the Commonwealth's audited financial statements. Accordingly, our audit did not involve a comprehensive assessment of the reliability of source Commonwealth data. However, we determined that the information on the limited number of invoices we obtained was in agreement with information in MMARS and could therefore be relied upon. We did not conduct a separate study of the general controls and application controls within VRS because our substantive tests indicated that the data obtained from that system could not be relied upon.

### ***Scope Limitation***

Chapter 2, Section 2.24(b), of the U.S. Government Accountability Office's Government Auditing Standards states that "restrictions on access to records, government officials, or other individuals needed to conduct the audit" constitute scope limitations. Furthermore, Section 7.11 states, "Auditors should also report any significant constraints imposed on the audit approach by information limitations or scope impairments, including denials or excessive delays of access to certain records or individuals."

We were not provided with the following information during our audit:

- A list of EA family placements, including family name or initials, placement type, entry and exit dates, length of stay, and location of placement for the period July 1, 2009 through June 30, 2012.
- Various types of eligibility information regarding EA program participants.
- Various HomeBASE contract files.

- Twenty-six payment vouchers (and supporting documentation), totaling over \$19.8 million, for the HomeBASE program.
- Supporting documentation for 63 shelter and post-shelter payments totaling \$59.9 million, such as attendance records for shelter clients served, original hotel/motel invoices, leases, recipient income verification, and stabilization plans for post-shelter housing and services.

In many cases, DHCD did not respond to our repeated verbal and written requests for specific documentation in a timely manner and also did not give us reasonable access to agency operating systems, supporting documentation, and agency personnel. Also, evidence was not always sufficient to determine the eligibility of EA recipients, placement information, the validity of costs incurred, or whether various contract conditions were met. For example, in attempting to determine recipients' eligibility, we requested a list of families admitted into the EA and HomeBASE programs along with other related files. However, DHCD personnel expressed concern about protecting the integrity of sensitive and personal data, including the recipients' names, case files, and other information. DHCD drafted a confidentiality agreement titled "Acknowledgment of Personal Information Confidentiality and Security" and requested that we sign it and acknowledge that we would protect the confidentiality and security of all personal information we received and reviewed. We signed the confidentiality agreement, but DHCD still did not provide us with the requested records. We were precluded from testing the DHS and DPHRA internal controls and were also denied access to various operating personnel and records pertaining to the emergency housing assistance programs. Finally, we were precluded from reviewing certain data screens in VRS that could have aided us in tabulating units that had been removed from LHA housing stock.

Although our audit procedures were designed to obtain reasonable assurance that our audit objectives would be met, the extensive documentation and data-reliability deficiencies identified in this report limited our ability to formulate conclusions on the emergency housing assistance programs and on other matters pertaining to our audit objectives, such as the extent to which the number of public housing units that have been removed from housing stock at LHAs could be rehabilitated to house homeless families.

After the end of our audit fieldwork, the undersecretary of DHCD acknowledged that much of the information necessary to perform our audit testing had not been provided. Further, at a meeting on August 4, 2014, the undersecretary had the agency's staff provide for our review some of the records (shelter attendance records, hotel/motel invoices, recipient income and eligibility information, and

post-shelter benefit and service information) that should have been provided during the audit. He also stated that he was confident that all of the documentation that we would need to complete our audit testing could be produced. However, DHCD had adequate opportunity to provide the requested documents during our fieldwork and, despite repeated verbal and written requests, chose not to provide them. Because the requested information was not provided while we were conducting our audit fieldwork, we could not perform sufficient audit testing to verify its accuracy and completeness.

***Post-Audit Action***

DHCD officials stated that the agency had taken measures to modernize its system for reporting vacancies and that these measures had improved the accuracy of the information in the system.

## DETAILED AUDIT RESULTS AND FINDINGS WITH AUDITEE'S RESPONSE

### 1. The Department of Housing and Community Development needs to make improvements in maintaining accurate statewide records for waiver and offline public housing units.

The Department of Housing and Community Development (DHCD) has not established adequate controls to ensure that the information provided by local housing authorities (LHAs) regarding waiver and offline units is accurate. Specifically, DHCD does not verify the accuracy of any of the information that LHAs submit regarding these units. As a result, DHCD cannot be certain that it has all the information necessary to effectively administer LHAs' activities in this area. Furthermore, maintaining accurate data is essential for ensuring DHCD's compliance with Chapter 23B, Section 3, of the Massachusetts General Laws, which requires DHCD to act as a clearinghouse for information, data, and other materials useful to local governments in the Commonwealth.

For tests of offline units, we selected a sample of 30 units from the fiscal year 2011 offline list, which showed a total of 445 offline units. Because this was a non-statistical sample, the results cannot be projected to the total population.

#### *Current Practices*

DHCD allows LHAs to remove unoccupied units from the state public housing stock. These units are known as waiver and offline units and can be removed from the LHA inventories for various reasons and at various intervals, as described in the table below.

Type	Length of Time Removed from Housing Stock	DHCD Approval Required?
Waiver	A time period longer than 60 days, always temporary	Yes
Offline	A time period longer than one year, usually permanent (repurposed)	Yes

Based on information provided by DHCD, we determined that the following units were in waiver or offline status for fiscal years 2009 through 2011.

### Waiver Status

Fiscal Year	Modernization and Rehabilitation*	No Waiting List†	Unit Set Aside for Transitional Program‡	Lead Paint Abatement§	Casualty Damage and Natural Disaster**	Other††	Total Number of Waivers
2009	343	66	15	0	8	208	640
2010	292	39	15	1	14	213	574
2011	311	35	25	5	15	215	606

\* LHAs need to renovate or restore public housing units.

† DHCD personnel informed us that the "No Waiting List" classification usually applies to the lack of demand that is characteristic of congregate public housing developments.

‡ Participating LHAs use public housing units in the Local Housing Authority Transitional Housing Program. The program provides transitional housing services to homeless families.

§ LHAs need to remove lead paint from public housing units.

\*\* LHAs need to repair or restore public housing units that are damaged by manmade or natural calamities.

†† This classification is used when none of the other classifications for waiver status are applicable.

### Offline Status

Fiscal Year	Converted to Office Space*	Space for Other Uses†	Sale‡	Offline per Legislation§	Federalization**	Total Number of Offline Units
2009	21	86	0	54	149	310
2010	24	84	1	95	225	429
2011	31	101	6	100	207	445

\* LHAs use public housing units for administrative office space.

† LHAs use public housing units for purposes other than administrative office space, such as storage space, tenant association space, specific program space, police department space, etc.

‡ LHAs sell public housing units to private individuals or corporations. At closing, these units are no longer part of the housing stock.

§ This classification is applicable only to the 54-unit Watuppa Heights public housing development at the Fall River Housing Authority. Per Chapter 235 of the Acts of 2002, the Authority was allowed to transfer ownership of the development to a nonprofit corporation and relocate tenants to alternative housing. In addition, the Fall River Housing Authority was required to propose a Housing Improvement Plan to be approved by DHCD, which would allow the eventual demolition of the development and the building of "a mixed income, single family housing development with home ownership opportunities for persons of low and moderate income."

\*\* Under the American Recovery and Reinvestment Act of 2009 (ARRA), an LHA can seek to federalize a state public housing development by submitting a development proposal with a site acquisition plan to the U.S. Department of Housing and Urban Development (HUD). ARRA funds used for this purpose have to be expended within two years of the obligation date. Once HUD approvals have been obtained, the state housing development becomes a federal housing development and is fully transferred to the federal government.

DHCD uses an online system called the Vacancy Reporting System (VRS) to track the number of waiver and offline units. LHAs enter information regarding each vacancy into this system. VRS also enables LHAs to obtain DHCD approval for waiver and offline units and to record public housing unit vacancies, exclusions,<sup>6</sup> waiver units, and offline units in one database. DHCD uses the information in VRS to monitor the nature and rate of turnover of vacant units and to monitor compliance with its vacancy policy. Accurate and up-to-date vacancy and placement information is

<sup>6</sup> Units can also be removed from the public housing stock for a period of 22 to 60 days; units that are thus removed are in "exclusion" status, and placing a unit in that status does not require DHCD approval. The reasons for placing units in exclusion status are the same as those for waivers.

vital to policy decisions involving funding for public housing. However, DHCD did not provide us with any policies and procedures that indicated that it performed any type of verification of the accuracy of the information provided by LHAs.

In order to assess the reliability of the information in VRS, during our audit we reviewed the Excel spreadsheets that DHCD downloaded from the VRS, and we noted inconsistencies. Subsequently, DHCD gave us limited online access to VRS, and we selected a judgmental sample of 30 of the units that were identified as offline in the fiscal year 2011 spreadsheet and reviewed this information. We found that 7 of the 30 (23%) did not have DHCD approval in VRS for their offline status. We then traced each of the 30 to a report in VRS titled "Waivers Requested/Approved" and found that 6 of them (20%) were listed as waiver units in the report instead of offline units, even though these units came from the offline list. Based on this test and the conflicting or incomplete information we noted on the spreadsheets, we contacted a number of housing authorities to confirm the information in VRS and noted the following discrepancies.

**a. Some waiver units were misclassified as offline.**

Peabody Housing Authority: Two family units were incorrectly listed in VRS as offline units for fiscal year 2011. They should have been on the waiver list instead. According to Authority officials, the units were vacated in January and March 2011, respectively, because of modernization and rehabilitation work. They were reoccupied when the work was completed in fiscal year 2012.

Framingham Housing Authority: 25 units in the housing development for elderly and handicapped residents were vacated in stages between fiscal years 1994 and 2000 in order to convert them into 12 family units. The new family units were all leased in fiscal year 2007 when the rehabilitation work was complete. However, these 12 units were incorrectly listed in VRS as offline units for fiscal years 2009, 2010, and 2011 even though they had been occupied and leased since 2007.

Greenfield Housing Authority: Two units in the development for elderly and handicapped residents were small single-room-occupancy units that were difficult to rent, so they were combined into one unit. The units were vacated in April 2000, remodeled by September 2000, and leased in October 2000. Nevertheless, these three units (the two units and the combined

unit) were still included in DHCD's inventory of offline units for fiscal years 2009, 2010, and 2011.

**b. A unit was listed in error.**

Lynn Housing Authority: A family unit was included in the offline inventory in VRS for fiscal years 2009, 2010, and 2011. However, the unit was apparently vacated in January 1995. There was no clear reason provided for the offline status.

**c. The status of some units was uncertain.**

On the offline lists for fiscal years 2009, 2010, and 2011, we found 45, 87, and 57 units, respectively, that met the criteria of waiver units rather than offline units, because they had reoccupancy dates of less than a year after the vacancy dates. Offline units can be removed from the housing stock for more than one year, but are usually removed permanently (repurposed). Waiver units, on the other hand, are removed for longer than 60 days, but always temporarily. We brought these data to DHCD personnel for further investigation.

Agawam Housing Authority: A family unit was entered several times in the offline lists for fiscal year 2009, 2010, and 2011 with three different identification numbers. DHCD personnel responded that the "unit had been reoccupied," that the error was an "administrative oversight," and that the unit "[had] been removed from the list(s)." However, according to information provided by the executive director of the Authority, the unit was actually a waiver unit removed from the active housing stock for modernization and rehabilitation work, which was still ongoing. According to the executive director, it was not reoccupied because the rehabilitation work had not been completed.

Fitchburg Housing Authority: A unit in the development for elderly and handicapped residents was classified as offline on DHCD lists for 2009–2011. DHCD personnel told us that the "unit [had] been reoccupied as a congregate unit,"<sup>7</sup> that the misclassification was an "administrative oversight," and that the unit "[had] been removed from the list(s)." However, the executive director of the Authority told us that the unit, which was originally 1 of 10 bedrooms in the

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<sup>7</sup> Congregate housing is a shared living environment. Each resident has a private bedroom, but shares one or more of the following: kitchen facilities, dining facilities, and/or bathing facilities.

congregate development, had actually been converted into storage space and had never again been used as housing.

**d. Cutoff errors occurred with some units.**

Ninety-seven units on the fiscal year 2011 offline list were not approved as offline units until fiscal year 2012.

**e. Some units were sold or federalized and not removed from lists.**

While a public housing unit is in the process of being sold or federalized (i.e., transferred to federal ownership), it is still owned by the LHA. However, it may be placed in offline status when, for example, the relocation of tenants is required in order to complete agreed-upon improvements before the completion of the sale or federalization. When the sale or federalization is finalized, the unit is no longer an asset of the LHA and should no longer be on the list. Our review of VRS information revealed that such units often remained on the offline lists. For example, the Chelmsford Housing Authority had five units for elderly and handicapped residents that were vacated in 2003 and sold in 2005, but they were still on the offline lists for fiscal years 2009, 2010, and 2011.

***Authoritative Guidance***

Under Chapter 23B, Section 3, of the General Laws, DHCD shall

*be the principal agency of the government of the commonwealth to: mobilize the human, physical and financial resources available to combat poverty and provide economic training and open housing opportunity, including, but not limited to, opportunities for residents of depressed and slum areas; review and coordinate the activities of agencies of the commonwealth as those activities relate to emergency and transitional housing. . . .*

*provide and act as a clearing house for information, data and other materials useful to local governments and regional agencies. . . .*

*initiate and carry out studies and analyses which will aid in solving local and regional problems. . . .*

In order to meet these statutory responsibilities, DHCD needs accurate housing data, including data related to offline and waiting list units, to effectively oversee and administer its operations.

In addition, the Office of the State Comptroller's Internal Control Guide states on p. 15,

*The purpose of periodic comparison/reconciliation is to verify that the processing or recording of transactions is valid, properly authorized and recorded on a timely basis. Integral parts of the reconciliation process include identifying and investigating discrepancies from established standards, and taking corrective action when necessary.*

### **Reasons for Lack of Verification**

DHCD has not developed any policies and procedures for verifying its information on waiver and offline units. DHCD referred to the VRS errors we identified as administrative oversights but did not provide a reason for not establishing procedures to verify the accuracy of the data. DHCD added that it rarely generates or uses statewide vacancy data in its operations.

### **Recommendations**

In order to address our concerns, DHCD should take the following actions:

- Establish and maintain a statewide list of all waiver and offline public housing units in VRS that can be assessed electronically.
- Develop policies and procedures for verifying the data submitted by housing authorities to VRS.
- Delete public housing units that are fully sold or federalized from the offline list, since they are no longer assets of the Commonwealth.

### **Auditee's Response**

*In the time period after the scope of your audit, DHCD has taken meaningful steps to address any deficiencies in monitoring and vacancies—including by, among other things, modernizing the vacancy reporting system and significantly reducing the vacancy rate across the Commonwealth. . . .*

*When rental units are vacant, this restricts the availability of affordable housing, and represents lost revenue for the Local Housing Authority (LHA) which owns the unit. The efficient use of available public housing resources requires an accurate and comprehensive system of tracking vacancies. This is a governing principle of our agency, and it has been a priority of mine as Undersecretary.*

*Against this backdrop, we appreciate, and agree with, the concerns raised in your report about the accuracy of our reporting systems for public housing vacancies during the time period spanning FY 2009–2011. At that time, the Vacancy Reporting System (VRS) was cumbersome, over-reliant on self-reporting of LHAs, and did not appropriately penalize LHAs that provided incomplete information (or no information at all). Your report identified these issues; so, too, has DHCD. Like you, we felt strongly that they needed to be addressed. And they have been.*

*One of our top priorities over the past two years . . . has been to improve significantly our public housing reporting system. This improvement is in service of a core goal: to re-occupy vacant*

*public housing units as quickly as possible, so that the Commonwealth is able to use its public housing stock to provide housing to as many low and moderate income families and seniors as possible. In 2013, DHCD adopted a modernized vacancy policy, highlighted below, which has greatly reduced public housing vacancies in the Commonwealth.*

*The policy has four pillars in service of the goals of maximizing occupancy and saving money: (i) accurate information on vacancies; (ii) penalties imposed on LHAs for lengthy vacancies, incentivizing expeditious re-occupancy; (iii) a clear policy on the limited circumstances under which vacancy penalties will be waived; and (iv) efficient capital expenditures to return units to habitability, where needed. The overarching policies and each pillar are described in further detail below.*

*Purpose of the policy*

- *Maximize occupancy of state public housing—one of the few resources for extremely low income senior and family households*
- *Save money—each 1% reduction in the vacancy rate generates about \$1.8M in rental income, funds that can be used to better maintain and preserve the 45,600-unit portfolio*

*Description of the policy (effective 1/9/13)*

- *Units vacant 61–90 days without a DHCD-approved waiver are assessed a fee of \$5.50/day.*
- *Units vacant over 90 days without a waiver pay a fee of \$11.00/day.*
- *Average state rent is about \$330/month, or \$11.00/day, so fees recoup the lost rental income.*

*Summary of DHCD-approved waiver categories*

- *Funded Modernization project is underway that will result in re-occupancy of unit*
- *Unit is vacant due to casualty loss—fire, storm, flooding, etc.*
- *No market demand for a second floor walk-up senior housing unit without elevator*
- *No senior housing wait list demand for the LHA's units due to better options elsewhere*
- *Unit was repurposed for non-housing use—supportive senior services, afterschool program, etc.—or is slated for demolition, sale or federalization*
- *Unit needs significant capital funding to reoccupy; funding source not yet identified*
- *Major tenant damage requiring more than 60 days to rehabilitate (short-term waiver only to provide needed additional time)*
- *Sudden rash of vacated units or major illness in maintenance staff outstrips ability to reoccupy all units in timely manner (short-term waiver only to provide needed additional time)*
- *LHA electing to use vacancy as an opportunity to make long-needed major unit improvements*

*DHCD assistance to prevent extended term vacancies*

- *DHCD's Facilities Management teams inspect vacant units and prepare the most efficient maintenance response; they train management, administrative and maintenance staff on best practices to more quickly reoccupy vacant units.*
- *Every LHA now gets an annual capital grant (Formula Funding) to target most urgent needs.*
- *Emergency grants from DHCD are available in certain cases.*
- *In addition, DHCD has experts in construction, architecture, engineering and management who assist LHAs in improving any aspect of their operations.*

*As you can see, the former distinction between waiver units and offline units, which led to some confusion among LHAs, is addressed by clearly listing the allowable reasons for any unit being vacant, including repurposing it for a non-housing use, such as a computer learning center. At the end of the policy, we list the nine acceptable reasons for a unit to be vacant and the specific criteria that must be met for each in order to obtain a waiver.*

*In addition, we are well into the process of developing a new web-based vacancy/waiver tracking system which corresponds to the new policy. We expect to implement this by the end of the calendar year. For example, an LHA requesting a particular waiver will have to check off each of the requirements for the requested waiver and certify that it meets them, so there should be no confusion about whether they meet the waiver criteria. Units that are "repurposed" for a non-housing use are specifically called out as such and cannot be confused with units that simply need modernization. No waiver can exceed 12 months without an extension being specifically requested by the LHA, and reviewed and approved by DHCD staff, at least on an annual basis, including those for repurposed units. The history of all waiver requests, approvals, denials and extensions will be maintained in the system for review and audit purposes. The new web-based system will have a robust reporting capacity, be able to list vacant units by LHA, by waiver type, by date and fees assessed that will meet, if not exceed, the audit recommendations.*

*DHCD has launched an aggressive program to bring vacant units back on-line using our capital funds. The goal of the initiative was to bring those units requiring \$25,000 or less in construction costs back on-line. To date, approximately 469 units have been brought back on-line utilizing approximately \$4.2 million in capital funds. This year, we created a new initiative that is providing \$2 million to fund the re-occupancy of 70 vacant, congregate units for the elderly, and \$1.6 million to fund the rehabilitation of 30 vacant, seriously deteriorated family units that need between \$25,000 and \$65,000 each to bring back on line. These units will be added back to the individual LHA rolls once work is completed.*

*We also have a reconfigured Facilities Management unit that conducts actual inspections of LHA housing units, including the vacant units. The goal is to provide assistance in terms of how best to bring those units back on-line as quickly as possible.*

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## APPENDIX A

### Housing Assistance Programs

The Department of Housing and Community Development (DHCD) administers various emergency and rehousing programs, described below.

#### *Emergency Assistance*

Emergency Assistance (EA) is the Massachusetts program that provides emergency shelter and rehousing services to homeless individuals under age 21 and their low-income families, and homeless pregnant women and their spouses, who meet the requirements of 106 Code of Massachusetts Regulations (CMR) 309, a Department of Transitional Assistance (DTA) regulation.<sup>8</sup> The substantive provisions of 106 CMR 309 remained intact at the effective date of the recodification. According to 106 CMR 309.20(E), in order for a family to be eligible, the family's countable assets cannot exceed \$2,500 and "the household must meet the gross monthly eligibility standards that are based on household size and are adjusted annually based on 130% of the Federal Poverty Level."<sup>9</sup> In addition, the family must be homeless for reasons such as the following:

- A fire or flood not caused by a household member or other natural disaster.
- An eviction caused by foreclosure, condemnation, or non-payment of rent, through no fault of the members of the household.
- Housing that is a threat to the health or safety of the family because of overcrowded conditions or violations of the State Sanitary Code.
- Mistreatment of a family member causing the family to leave its previous residence.
- Lack of any currently available alternative housing with relatives, friends, or charitable organizations.
- Severe medical condition of a household member causing the household to leave its previous residence.

Eligible families can be placed in one of the following:

- A shelter with other families (congregate shelter).

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<sup>8</sup> Effective September 17, 2012, this regulation was recodified as a DHCD regulation, 760 CMR 67.

<sup>9</sup> When the regulation was recodified, the eligibility standard was reduced to 115% of the federal poverty level.

- An apartment (scattered-site shelter).
- A substance-abuse shelter if an applicant or another adult in the family has a substance-abuse problem.
- A teen living program if the applicant is a teen parent or a pregnant teen and space is available.
- Another DHCD-approved temporary shelter, such as a hotel or motel. DHCD can transfer individuals placed in a hotel or motel to a family shelter as soon as space is available.

In fiscal years 2010 and 2011, 1,351 and 1,989 families, respectively, were placed in non-hotel emergency shelters (see Appendix B). Families temporarily housed in hotels or motels in fiscal years 2010 and 2011 totaled 2,993 and 1,641, respectively (see Appendix B).

EA family shelter providers also assist EA families in developing rehousing plans; help them develop housing search strategies; and find permanent housing for families who are exiting shelters, hotels, and motels and being placed in state/federal public housing, Section 8 / housing choice voucher housing, or market-rate housing. The program whereby providers give families this assistance, commonly called the Flexible Funds program, has since been incorporated into the Building Alternatives to Shelters (HomeBASE) program discussed below.

The maximum amount of Flexible Funds money that a provider may allocate to a family being placed in subsidized housing (state/federal public housing, project-based housing, or Section 8 / housing choice voucher programs) is \$2,000. DHCD's Emergency Assistance Flexible Funds Administrative Plan, in Section C1 (Rehousing and Stabilization), states that the \$2,000 may be spent on the following eligible expenses:

- (a) a family's share of the first month's rent;*
- (b) a family's share of the last month's rent;*
- (c) moving expenses of up to \$150;*
- (d) a Security Deposit not to exceed one month's full contract rent;*
- (e) furniture: mattresses/box spring/rails and a refrigerator if not included in the rental unit; and/or*
- (f) a utility arrearage payment for the minimum amount needed to secure provision of a utility.*

According to Section C2 of the same document, the following are eligible Flexible Funds expenses for families being placed in market-rate housing:

- (a) a short-term subsidy of twelve (12) months (inclusive of first and last month's rent);*
- (b) a Security Deposit not to exceed one month's full contract rent;*
- (c) moving expenses up to \$150;*
- (d) furniture: mattresses/box spring/rails and a refrigerator if not included in the rental unit;*
- (e) a utility arrearage payment for the minimum amount needed to secure provision of a utility.*

Families placed in market-rate housing are required to contribute 25% of their income toward rent. When the Flexible Funds program was incorporated into the HomeBASE program, families that had been enrolled in Flexible Funds were allowed to transition to HomeBASE.

### ***HomeBASE***

In fiscal year 2012, DHCD started to incorporate the Flexible Funds program into the HomeBASE program. A regulation, 760 CMR 65, was developed to provide guidelines for the HomeBASE program. HomeBASE is available to families who are homeless or at risk of becoming homeless and who meet the basic requirements of the Commonwealth's EA program or were enrolled in the Flexible Funds program. HomeBASE's guiding principle is that housing stability is more likely to be achieved by other types of intervention than by placements in shelters. HomeBASE assistance can be categorized as (1) household assistance, (2) rental assistance, or (3) temporary accommodations. These types of assistance, which are generally administered through regional administering agencies (RAAs) and community-based rehousing providers (under contract with DHCD), are described below.

#### **a. Household Assistance**

This program provides assistance to families to help establish or maintain their tenancies. This assistance includes moving expenses, security deposits, first and last months' rent, rent or utility arrearages, and payment of extraordinary medical bills that limit a person's ability to maintain a household. The maximum non-rental assistance is capped at \$4,000 for the first year of participation and \$200 for subsequent years.

#### **b. Rental Assistance**

This program provides families with up to 36 consecutive months of rental assistance. Participants must contribute 35% of their gross monthly income to rent and utilities for a unit within a certain fair market limit.

**c. Temporary Accommodations**

When an immediate placement in rental housing cannot be obtained, an RAA places a family in a temporary unit, usually one that it owns or manages.

DHCD has employees at 22 local DTA offices where homeless families can apply for assistance (see Appendix H).

## APPENDIX B

### Number of Emergency Assistance Family Placements in Shelters and Hotels

Fiscal Year	Region	Families Placed in Shelters	Families Placed in Hotels/Motels
2010	Boston	200	474
	Central Massachusetts	403	160
	North Shore	298	1,263
	South Shore	319	363
	Western Massachusetts	131	733
Total		<u>1,351</u>	<u>2,993</u>
2011	Boston	793	355
	Central Massachusetts	304	135
	North Shore	417	394
	South Shore	265	308
	Western Massachusetts	210	449
Total		<u>1,989</u>	<u>1,641</u>

## APPENDIX C

### Summary of Emergency Assistance Payments to Family Shelter Providers— Shelter Accommodations

	Provider Name	Fiscal Year 2010	Fiscal Year 2011	Fiscal Year 2012	Total
1	Action for Boston Community Development	\$ 739,800.00	\$ 1,251,950.00	\$ 1,201,603.20	\$ 3,193,353.20
2	Berkshire Community Action Council Inc.	381,060.00	361,350.00	339,531.30	1,081,941.30
3	Brookview House Inc.	624,150.00	611,010.00	609,754.50	1,844,914.50
4	Casa Nueva Vida Inc.	1,173,840.00	1,122,740.00	1,094,897.16	3,391,477.16
5	Catholic Charitable Bureau of the Archdiocese of Boston	697,444.00	1,011,780.00	966,933.00	2,676,157.00
6	Center for Human Development	3,096,660.00	2,974,020.00	2,898,325.08	8,969,005.08
7	Central Massachusetts Housing Alliance	5,764,810.00	5,547,270.00	5,464,972.83	16,777,052.83
8	Children's Services of Roxbury Inc.	4,644,990.00	4,461,030.00	4,391,758.98	13,497,778.98
9	Citizens for Adequate Housing Inc.	940,240.00	893,520.00	792,999.36	2,626,759.36
10	City of Cambridge	210,390.00	357,210.00	357,700.80	925,300.80
11	Community Action Committee of Cape Cod & Islands Inc.	991,712.00	956,300.00	888,155.40	2,836,167.40
12	Community Care Services Inc.	755,571.00	1,239,840.00	1,242,737.28	3,238,148.28
13	Community Teamwork Inc.	1,865,918.00	2,897,370.00	2,709,040.95	7,472,328.95
14	Crittenton Women's Union Inc.	5,492,520.00	5,284,470.00	5,020,248.78	15,797,238.78
15	Crossroads Family Shelter	1,113,250.00	1,067,625.00	1,145,161.71	3,326,036.71
16	Developmental Disabilities Management Assistance Inc.	620,682.00	590,220.00	555,822.00	1,766,724.00
17	Dimock Community Health Center	704,344.00	1,165,080.00	1,121,390.76	2,990,814.76
18	Emmaus Inc.	1,226,810.00	2,040,350.00	1,922,945.73	5,190,105.73
19	FamilyAid Boston	2,610,480.00	2,803,200.00	2,934,240.00	8,347,920.00
20	Father Bill's & MainSpring Inc.	3,771,180.00	3,621,530.00	3,396,782.76	10,789,492.76
21	Friends of the Homeless of the South Shore Inc.	744,772.00	1,079,859.00	1,017,180.75	2,841,811.75
22	HAP Inc.	1,336,850.00	2,208,250.00	2,132,519.40	5,677,619.40

	Provider Name	Fiscal Year 2010	Fiscal Year 2011	Fiscal Year 2012	Total
23	Heading Home Inc.	2,172,594.00	3,578,825.00	3,254,940.72	9,006,359.72
24	Henry Lee Willis Community Center	704,344.00	1,165,080.00	1,125,521.21	2,994,945.21
25	Hildebrand Family Self-Help Center Inc.	4,588,300.00	4,884,795.00	4,404,036.51	13,877,131.51
26	House of Hope Inc.	1,013,012.00	1,452,335.00	1,329,202.53	3,794,549.53
27	Housing Assistance Corporation	1,233,344.00	2,023,560.00	1,772,020.08	5,028,924.08
28	Housing Families Inc.	1,242,866.00	2,064,695.50	1,961,571.15	5,269,132.65
29	Little Sisters of the Assumption—Project Hope	358,148.00	586,190.00	553,243.68	1,497,581.68
30	Lynn Shelter Association Inc.	311,454.00	449,680.00	432,289.11	1,193,423.11
31	Middlesex Human Service Agency Inc.	4,502,823.99	4,172,680.00	4,068,684.96	12,744,188.95
32	New England Farm Workers' Council	2,390,385.00	2,304,245.00	2,217,834.78	6,912,464.78
33	North Shore Community Action Programs Inc.	1,441,416.00	1,405,950.00	1,387,690.25	4,235,056.25
34	Old Colony YMCA	735,012.00	1,108,870.00	1,108,869.69	2,952,751.69
35	Our Father's House Inc.	438,000.00	510,090.00	511,000.80	1,459,090.80
36	Phoenix Houses of New England Inc.	571,590.00	542,025.00	481,047.39	1,594,662.39
37	Plymouth Area Coalition for the Homeless Inc.	310,219.00	511,000.00	452,290.20	1,273,509.20
38	ServiceNet Inc.	359,160.00	341,640.00	322,038.54	1,022,838.54
39	Serving People in Need Inc.	2,360,820.00	2,304,610.00	960,255.45	5,625,685.45
40	Sojourner House Inc.	334,705.00	321,930.00	307,660.50	964,295.50
41	Somerville Homeless Coalition Inc.	253,675.00	222,110.00	222,951.30	698,736.30
42	South Middlesex Opportunity Council Inc.	2,313,356.20	3,827,390.00	3,712,570.44	9,853,316.64
43	Southeast Regional Network Inc.	2,484,024.00	2,364,470.00	2,128,025.46	6,976,519.46
44	St. Mary's Center for Women and Children	1,705,280.00	1,623,520.00	1,562,488.32	4,891,288.32
45	Victory Programs Inc.	576,576.00	955,570.00	938,456.94	2,470,602.94
46	Wellspring House Inc.	181,200.00	260,975.00	260,975.40	703,150.40
47	YMCA of Greater Boston Inc.	828,436.00	899,360.00	975,652.22	2,703,448.22
	Total	<u>\$72,918,213.19</u>	<u>\$83,427,569.50</u>	<u>\$78,656,019.36</u>	<u>\$ 235,001,802.05</u>

## APPENDIX D

### List of Emergency Assistance Family Shelter Providers and Number of Contracted Units<sup>10</sup>

Geographic Region	Name of Provider	Number of Units	
		Fiscal Year 2010	Fiscal Year 2011
Berkshire/Franklin	Berkshire Community Action Council Inc.	6	6
Berkshire/Franklin	ServiceNet Inc.	6	6
		<u>12</u>	<u>12</u>
Boston	Action for Boston Community Development	32	35
Boston	Brookview House Inc.	18	18
Boston	Casa Nueva Vida Inc.*	16	16
Boston	Catholic Charitable Bureau of the Archdiocese of Boston	22	22
Boston	Children's Services of Roxbury Inc.	126	126
Boston	Crittenton Women's Union Inc.	114	114
Boston	Crossroads Family Shelter	25	25
Boston	Dimock Community Health Center	28	28
Boston	FamilyAid Boston	80	80
Boston	Heading Home Inc.*	72	72
Boston	Hildebrand Family Self-Help Center Inc.*	78	78
Boston	Little Sisters of the Assumption—Project Hope	11	11
Boston	Middlesex Human Service Agency Inc.*	76	108
Boston	Phoenix Houses of New England Inc.	9	9
Boston	Sojourner House Inc.	7	7
Boston	St. Mary's Center for Women and Children	32	32
Boston	Victory Programs Inc.	22	22
Boston	YMCA of Greater Boston Inc.	22	22
		<u>790</u>	<u>825</u>
Cape Cod	Community Action Committee of Cape Cod & Islands Inc.	20	20
Cape Cod	Housing Assistance Corporation	36	36
		<u>56</u>	<u>56</u>
Central	Central Massachusetts Housing Alliance	149	149
Central	Our Father's House Inc.	20	20
		<u>169</u>	<u>169</u>
Hampden/Hampshire	Center for Human Development	84	84
Hampden/Hampshire	HAP Inc.	55	55
Hampden/Hampshire	New England Farm Workers' Council	59	59
		<u>198</u>	<u>198</u>

<sup>10</sup> Contracts with shelter providers indicated a rate of \$96–\$121 per night.

Geographic Region	Name of Provider	Number of Units	
		Fiscal Year 2010	Fiscal Year 2011
Merrimack Valley	Casa Nueva Vida Inc.—Merrimack	12	12
Merrimack Valley	Community Teamwork Inc.	63	63
Merrimack Valley	Emmaus Inc.	43	43
Merrimack Valley	House of Hope Inc.	23	23
		<u>141</u>	<u>141</u>
Metro Boston	City of Cambridge	10	10
Metro Boston	Heading Home Inc.	11	11
Metro Boston	Henry Lee Willis Community Center	28	28
Metro Boston	Hildebrand Family Self-Help Center Inc.—Metro	21	21
Metro Boston	Housing Families Inc.*—Metro	21	21
Metro Boston	Middlesex Human Service Agency Inc.	40	8
Metro Boston	Somerville Homeless Coalition Inc.	5	5
Metro Boston	South Middlesex Opportunity Council Inc.	107	107
		<u>243</u>	<u>211</u>
North Shore	Citizens for Adequate Housing Inc.	16	16
North Shore	Housing Families Inc.	28	28
North Shore	Lynn Shelter Association Inc.	11	11
North Shore	North Shore Community Action Programs Inc.	37	37
North Shore	Serving People in Need Inc.	77	77
North Shore	Wellspring House Inc.	5	5
		<u>174</u>	<u>174</u>
Southeast	Community Care Services Inc.	32	32
Southeast	Development Disabilities Management Assistance Inc.	12	12
Southeast	Father Bill's & MainSpring Inc.	82	82
Southeast	Friends of the Homeless of the South Shore Inc.	23	23
Southeast	Old Colony YMCA	31	31
Southeast	Plymouth Area Coalition for the Homeless Inc.	10	10
Southeast	Southeast Regional Network Inc.	41	41
		<u>231</u>	<u>231</u>
Total Contracted Units		<u>2,014</u>	<u>2,017</u>

\* Provider is located in two geographic regions: Boston Region and Merrimack Region.

Note: There were 47 family shelter providers for the Emergency Assistance program. However, five of the providers shown above—Casa Nueva Vida, Heading Home, Hildebrand Family Self-Help Center, Middlesex Human Service Agency, and Housing Families—served two different regional locations.

## APPENDIX E

### Summary of Emergency Assistance Payments to Community Service Network Incorporated, a Hotel Broker

Fiscal Year	Administration	Hotel/Motel Accommodations	Total
2010	\$151,189.40	\$ 28,712,132.35	\$ 28,863,321.75
2011	151,189.40	28,957,621.22	29,108,810.62
2012	151,189.40	44,843,881.00	44,995,070.40
Total	<u>\$453,568.20</u>	<u>\$ 102,513,634.57</u>	<u>\$ 102,967,202.77</u>

Note: Data supplied by the Department of Housing and Community Development indicated that the average cost of a hotel/motel stay was \$80 per night, with a range of \$54 to \$150 per night.

## APPENDIX F

### Summary of Emergency Assistance Payments to Family Shelter Providers— Post-Shelter Services<sup>11</sup>

	Provider Name	Fiscal Year 2010	Fiscal Year 2011	Fiscal Year 2012	Total
1	Action for Boston Community Development	\$ 703,879.64	\$ 708,161.32	\$ 105,722.00	\$ 1,517,762.96
2	Berkshire Community Action Council Inc.	88,368.82	181,460.38	51,999.99	321,829.19
3	Brookview House Inc.	93,082.50	163,017.58	53,559.99	309,660.07
4	Casa Nueva Vida Inc.	539,587.00	496,266.00	104,000.00	1,139,853.00
5	Catholic Charitable Bureau of the Archdiocese of Boston	485,437.00	254,404.81	65,519.71	805,361.52
6	Center for Human Development	1,237,782.31	2,022,518.46	252,584.73	3,512,885.50
7	Central Massachusetts Housing Alliance	2,393,086.71	2,662,570.84	416,785.29	5,472,442.84
8	Children's Services of Roxbury Inc.	1,583,778.04	2,117,575.15	377,579.98	4,078,933.17
9	Citizens for Adequate Housing Inc.	475,210.01	431,978.90	52,000.00	959,188.91
10	City of Cambridge	373,627.00	143,451.00	44,951.02	562,029.02
11	Community Action Committee of Cape Cod & Islands Inc.	523,439.78	494,167.15	59,800.00	1,077,406.93
12	Community Care Services Inc.	1,163,099.09	480,522.92	96,600.71	1,740,222.72
13	Community Teamwork Inc.	2,140,973.11	1,814,563.83	187,839.50	4,143,376.44
14	Crittenton Women's Union Inc.	401,922.29	1,679,163.45	398,030.46	2,479,116.20
15	Crossroads Family Shelter	266,609.53	370,472.42	78,814.54	715,896.49
16	Developmental Disabilities Management Assistance Inc.	225,034.00	214,156.40	53,278.67	492,469.07
17	Dimock Community Health Center	628,628.74	335,307.00	83,199.42	1,047,135.16
18	Emmaus Inc.	2,869,212.49	1,844,598.00	190,445.00	4,904,255.49
19	FamilyAid Boston	677,123.60	1,257,645.88	238,160.00	2,172,929.48
20	Father Bill's & MainSpring Inc.	1,558,878.85	2,017,574.44	296,992.00	3,873,445.29
21	Friends of the Homeless of the South Shore Inc.	852,200.11	512,266.50	68,640.00	1,433,106.61

<sup>11</sup> Includes placements in public housing, project-based housing, and market-rate housing. Also includes housing choice vouchers and stabilization services.

	Provider Name	Fiscal Year 2010	Fiscal Year 2011	Fiscal Year 2012	Total
22	HAP Inc.	2,722,839.32	1,415,224.21	172,734.00	4,310,797.53
23	Heading Home Inc.	1,974,740.13	971,430.58	271,625.98	3,217,796.69
24	Henry Lee Willis Community Center	821,182.70	561,364.00	20,800.00	1,403,346.70
25	Hildebrand Family Self-Help Center Inc.	936,910.69	1,378,763.19	289,907.62	2,605,581.50
26	House of Hope Inc.	1,093,742.83	763,200.18	77,633.15	1,934,576.16
27	Housing Assistance Corporation	1,622,343.63	706,499.80	107,120.00	2,435,963.43
28	Housing Families Inc.	1,390,040.29	793,297.55	145,600.00	2,328,937.84
29	Little Sisters of the Assumption—Project Hope	412,112.00	229,787.00	56,865.00	698,764.00
30	Lynn Shelter Association Inc.	281,517.83	182,668.23	50,345.69	514,531.75
31	Middlesex Human Service Agency Inc.	778,371.90	1,937,651.28	379,251.33	3,095,274.51
32	New England Farm Workers' Council	1,170,617.84	1,506,358.09	175,759.75	2,852,735.68
33	North Shore Community Action Programs Inc.	631,705.78	1,159,700.23	109,821.15	1,901,227.16
34	Old Colony YMCA	699,730.21	435,845.38	68,372.25	1,203,947.84
35	Our Father's House Inc.	178,529.92	237,266.61	59,800.00	475,596.53
36	Phoenix Houses of New England Inc.	122,904.94	191,563.59	52,000.00	366,468.53
37	Plymouth Area Coalition for the Homeless Inc.	290,213.00	150,725.90	52,000.00	492,938.90
38	ServiceNet Inc.	159,180.44	176,415.01	52,000.00	387,595.45
39	Serving People in Need Inc.	712,371.31	1,296,613.17	131,539.18	2,140,523.66
40	Sojourner House Inc.	371,551.00	938,468.68	52,000.00	1,362,019.68
41	Somerville Homeless Coalition Inc.	137,183.00	387,682.00	52,000.00	576,865.00
42	South Middlesex Opportunity Council Inc.	3,709,112.94	2,123,425.91	391,367.00	6,223,905.85
43	Southeast Regional Network Inc.	340,126.78	534,379.23	121,748.44	996,254.45
44	St. Mary's Center for Women and Children	358,066.60	534,416.00	91,763.94	984,246.54
45	Victory Programs Inc.	529,447.56	320,470.00	65,520.00	915,437.56
46	Wellspring House Inc.	236,623.63	181,983.60	52,930.45	471,537.68
47	YMCA of Greater Boston Inc.	849,531.49	517,191.50	65,520.00	1,432,242.99
	Total	<u>\$41,811,658.38</u>	<u>\$39,834,233.35</u>	<u>\$6,442,527.94</u>	<u>\$88,088,419.67</u>

## APPENDIX G

### Summary of Emergency Assistance Payments to Family Shelter Providers— Shelter and Post-Shelter (Not Including Hotels /Motels)

	Provider Name	Fiscal Year 2010	Fiscal Year 2011	Fiscal Year 2012	Total
1	Action for Boston Community Development	\$ 1,443,679.64	\$ 1,960,111.32	\$ 1,307,325.20	\$ 4,711,116.16
2	Berkshire Community Action Council Inc.	469,428.82	542,810.38	391,531.29	1,403,770.49
3	Brookview House Inc.	717,232.50	774,027.58	663,314.49	2,154,574.57
4	Casa Nueva Vida Inc.	1,713,427.00	1,619,006.00	1,198,897.16	4,531,330.16
5	Catholic Charitable Bureau of the Archdiocese of Boston	1,182,881.00	1,266,184.81	1,032,452.71	3,481,518.52
6	Center for Human Development	4,334,442.31	4,996,538.46	3,150,909.81	12,481,890.58
7	Central Massachusetts Housing Alliance	8,157,896.71	8,209,840.84	5,881,758.12	22,249,495.67
8	Children's Services of Roxbury Inc.	6,228,768.04	6,578,605.15	4,769,338.96	17,576,712.15
9	Citizens for Adequate Housing Inc.	1,415,450.01	1,325,498.90	844,999.36	3,585,948.27
10	City of Cambridge	584,017.00	500,661.00	402,651.82	1,487,329.82
11	Community Action Committee of Cape Cod & Islands Inc.	1,515,151.78	1,450,467.15	947,955.40	3,913,574.33
12	Community Care Services Inc.	1,918,670.09	1,720,362.92	1,339,337.99	4,978,371.00
13	Community Teamwork Inc.	4,006,891.11	4,711,933.83	2,896,880.45	11,615,705.39
14	Crittenton Women's Union Inc.	5,894,442.29	6,963,633.45	5,418,279.24	18,276,354.98
15	Crossroads Family Shelter	1,379,859.53	1,438,097.42	1,223,976.25	4,041,933.20
16	Developmental Disabilities Management Assistance Inc.	845,716.00	804,376.40	609,100.67	2,259,193.07
17	Dimock Community Health Center	1,332,972.74	1,500,387.00	1,204,590.18	4,037,949.92
18	Emmaus Inc.	4,096,022.49	3,884,948.00	2,113,390.73	10,094,361.22
19	FamilyAid Boston	3,287,603.60	4,060,845.88	3,172,400.00	10,520,849.48
20	Father Bill's & MainSpring Inc.	5,330,058.85	5,639,104.44	3,693,774.76	14,662,938.05
21	Friends of the Homeless of the South Shore Inc.	1,596,972.11	1,592,125.50	1,085,820.75	4,274,918.36
22	HAP Inc.	4,059,689.32	3,623,474.21	2,305,253.40	9,988,416.93
23	Heading Home Inc.	4,147,334.13	4,550,255.58	3,526,566.70	12,224,156.41

	Provider Name	Fiscal Year 2010	Fiscal Year 2011	Fiscal Year 2012	Total
24	Henry Lee Willis Community Center	1,525,526.70	1,726,444.00	1,146,321.21	4,398,291.91
25	Hildebrand Family Self-Help Center Inc.	5,525,210.69	6,263,558.19	4,693,944.13	16,482,713.01
26	House of Hope Inc.	2,106,754.83	2,215,535.18	1,406,835.68	5,729,125.69
27	Housing Assistance Corporation	2,855,687.63	2,730,059.80	1,879,140.08	7,464,887.51
28	Housing Families Inc.	2,632,906.29	2,857,993.05	2,107,171.15	7,598,070.49
29	Little Sisters of the Assumption—Project Hope	770,260.00	815,977.00	610,108.68	2,196,345.68
30	Lynn Shelter Association Inc.	592,971.83	632,348.23	482,634.80	1,707,954.86
31	Middlesex Human Service Agency Inc.	5,281,195.89	6,110,331.28	4,447,936.29	15,839,463.46
32	New England Farm Workers' Council	3,561,002.84	3,810,603.09	2,393,594.53	9,765,200.46
33	North Shore Community Action Programs Inc.	2,073,121.78	2,565,650.23	1,497,511.40	6,136,283.41
34	Old Colony YMCA	1,434,742.21	1,544,715.38	1,177,241.94	4,156,699.53
35	Our Father's House Inc.	616,529.92	747,356.61	570,800.80	1,934,687.33
36	Phoenix Houses of New England Inc.	694,494.94	733,588.59	533,047.39	1,961,130.92
37	Plymouth Area Coalition for the Homeless Inc.	600,432.00	661,725.90	504,290.20	1,766,448.10
38	ServiceNet Inc.	518,340.44	518,055.01	374,038.54	1,410,433.99
39	Serving People in Need Inc.	3,073,191.31	3,601,223.17	1,091,794.63	7,766,209.11
40	Sojourner House Inc.	706,256.00	1,260,398.68	359,660.50	2,326,315.18
41	Somerville Homeless Coalition Inc.	390,858.00	609,792.00	274,951.30	1,275,601.30
42	South Middlesex Opportunity Council Inc.	6,022,469.14	5,950,815.91	4,103,937.44	16,077,222.49
43	Southeast Regional Network Inc.	2,824,150.78	2,898,849.23	2,249,773.90	7,972,773.91
44	St. Mary's Center for Women and Children	2,063,346.60	2,157,936.00	1,654,252.26	5,875,534.86
45	Victory Programs Inc.	1,106,023.56	1,276,040.00	1,003,976.94	3,386,040.50
46	Wellspring House Inc.	417,823.63	442,958.60	313,905.85	1,174,688.08
47	YMCA of Greater Boston Inc.	1,789,041.49	1,416,551.50	930,098.22	4,135,691.21
	Total	<u>\$114,840,945.57</u>	<u>\$123,261,802.85</u>	<u>\$84,987,473.30</u>	<u>\$323,090,221.72</u>

## APPENDIX H

### Department of Transitional Assistance Offices Where Employees of the Department of Housing and Community Development Provide Emergency Assistance Benefits<sup>12</sup>

<p><b>Brockton</b> 75 Commercial Street Brockton, MA 02302 508-895-7000</p>	<p><b>Hyannis</b> 181 North Street Hyannis, MA 02601 508-862-6600</p>	<p><b>Plymouth</b> 61 Industrial Park Road Plymouth, MA 02360 508-732-3100</p>
<p><b>Chelsea Center</b> 80 Everett Avenue Chelsea, MA 02150 617-551-1700</p>	<p><b>Lawrence</b> 15 Union Street Lawrence, MA 01840 978-725-7100</p>	<p><b>Southbridge</b> 1 North Street Southbridge, MA 01550 508-765-2400</p>
<p><b>Dudley Square</b> 2201 Washington Street Roxbury, MA 02119 617-989-6000</p>	<p><b>Lowell</b> 131 Davidson Street Lowell, MA 01852 978-446-2400</p>	<p><b>Springfield/Liberty</b> 95 Liberty Street Springfield, MA 01103 413-858-1000</p>
<p><b>Fall River</b> 1567 North Main Street Fall River, MA 02720 508-646-6200</p>	<p><b>Malden</b> 200 Pleasant Street Malden, MA 02148 781-388-7300</p>	<p><b>Springfield/State</b> 310 State Street Springfield, MA 01105 413-858-1300</p>
<p><b>Fitchburg</b> 473 Main Street Fitchburg, MA 01420 978-665-8700</p>	<p><b>New Bedford</b> 160 W. Rodney French Boulevard New Bedford, MA 02744 508-961-2000</p>	<p><b>Taunton</b> 21 Spring Street Taunton, MA 02780 508-884-5300</p>
<p><b>Framingham</b> 75 Fountain Street Framingham, MA 01702 508-661-6600</p>	<p><b>Newmarket Square</b> 1010 Massachusetts Avenue Boston, MA 02118 617-989-2200</p>	<p><b>Worcester</b> 9 Walnut Street Worcester, MA 01608 508-767-3100</p>
<p><b>Greenfield</b> 143 Munson Street, Unit #3 Greenfield, MA 01301 413-772-3400</p>	<p><b>North Shore</b> 35 Congress Street Salem, MA 01970 978-825-7300</p>	
<p><b>Holyoke</b> 72-100 Front Street P.O. Box 1370 Holyoke, MA 01040 413-552-5400</p>	<p><b>Pittsfield</b> 160 North Street, Suite 201 Pittsfield, MA 01201 413-236-2000</p>	

<sup>12</sup> Information in this table was provided by the Department of Housing and Community Development.