

ADDENDUM TO Public Housing Notice 2017-11

Date:	May 24 th , 2017
Subject:	Answers to frequently asked questions about the NOFA regarding planning grants for the A Better Life Program (ABL)
From:	Florence Juillard, Economic Prosperity Programs Manager
То:	All Local Housing Authority Executive Directors

Through this notice, DHCD is issuing written answers to various questions that have been submitted to date regarding the ABL NOFA which was posted on May 3rd, 2017 (see <u>PHN 2017-11</u>). Prospective applicants should review this document and the original NOFA before drafting their applications for funding. ABL planning grant funding applications are due by 5 PM on Wednesday May 31st 2017.

Answers to Frequently Asked Questions for ABL Planning Grant NOFA

1. Are there specifications as to formatting of applications such as margin size and line spacing?

No.

2. Do letters from my housing authority's board count toward the 7 page application limit?

No. The letter from your housing authority's board does not count as one of the 7 pages in the application limit.

3. What if our housing authority has residents living in the same buildings whose subsidy does not fall under Chapter 200 or Chapter 700 housing?

An LHA should consider applying even if there are residents living side by side with those in Chapter 200 or Chapter 700 housing who receive a different subsidy. While these households cannot count toward the 100 unit threshold eligibility requirement, the local housing authority can submit an application that explains how they would work with such residents if they were to implement ABL. DHCD is open to options such as offering voluntary services to these residents through ABL. Details related to counting



these residents toward performance goals and other matters would need to be determined during the planning period.

4. Can I apply if my housing authority has less than 100 units?

Our purpose is creating the 100 unit threshold eligibility requirement was to receive applications for which there would be sufficient scale that at least one staff member would have full time work coaching the ABL participants. If you can make a strong argument that participation would be sufficient in a housing authority with under a 100 units, then DHCD would certainly consider it. However, you must be able to demonstrate sufficient scale to make an ABL program cost-effective.

5. Can I hire an outside consultant if I am awarded the planning grant?

As stated in the NOFA, the planning grants are intended to enable LHAs to pay the cost of engaging consultants and/or staff to conduct research and program design for programs that would serve residents through comprehensive case management, services, and escrow accounts.

6. Can multiple authorities apply together in a regional application?

Yes, multiple authorities can apply together in a regional application. However, they must indicate in their application who will be the lead housing authority and serve as the fiscal agent for the grant. The application must come from that housing authority with board approval from each participating authority. During the planning period, the participating housing authorities will be required to design a joint program, rather than several individual programs.

7. Is this a one-time award?

The planning grant is strictly a one-time award. However, when plans are completed and based on their viability DHCD will be awarding implementation grants with funding for up to 3 years. Up to \$1.5MM is available.

8. Why doesn't the NOFA require local housing authorities to explicitly consult with tenant associations prior to submitting a NOFA response?

As stated in the NOFA, the planning grants are intended to enable LHAs to pay the cost of engaging consultants and/or staff to conduct research and program design for programs that would serve residents through comprehensive case management, services, and escrow accounts. At this preliminary stage, it would be premature for an LHA Board to consider taking action on a rule or policy which will affect the rights, status, duties or welfare of residents, in the absence of the information that will be gathered through the planning process. Accordingly, the tenant participation requirements under 760 CMR 6.09 do not apply to an LHA's decision to apply for planning funds under the NOFA. DHCD fully expects that recipients of the award will comply with the tenant participation requirements of 760 CMR 6.09 in their planning process and will take into account, in awarding implementation grants, the extent to which LHAs have involved residents in the planning process.

9. Must NOFA responses take into account fair housing obligations?

Yes. DHCD expects NOFA responses and implementation of any ABL program to be consistent with applicable fair housing laws, including but not limited to M.G.L. c. 151B, the federal Fair Housing Act, the Americans with Disabilities Act, Title VI of the Civil Rights Act of 1964, and Section 504 of the Rehabilitation Act of 1973, as amended, and that LHAs will incorporate fair housing considerations into the ABL planning process.

10. How does the ABL exemption apply to the admissions preference option?

The NOFA states that ABL has an exemption for the following persons: youth (<18 years old), older adults (>55)^[1], those with documented disabilities, and those experiencing unusual hardships as evaluated by an LHA-organized "hardship evaluation committee." This exemption is intended to apply whether an ABL program is based on a "requirement" or an admissions "preference." Therefore, implementation of an ABL admissions preference must give such exempt persons the benefit of the preference (i.e., exempt applicants will not receive a lower preference for admission on account of their exempt status than persons seeking to enroll in ABL).

11. How do fair housing obligations affect the service planning process?

DHCD also expects that there will be an array of ABL services that are inclusive of all interested tenants, including but not limited to persons with disabilities, persons with limited English proficiency, and families with children, regardless of whether such tenants qualify for exemption from ABL requirements. In awarding implementation grants, DHCD will take into account the range of services that will support participation by all residents, including members of protected classes.

^[1] Persons 55 years of age or older.