RAFT
Attachment A
FY27 Administrative Plan and Scope of Services

Effective July 1, 2026

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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, mortgage costs, rental startup costs, and other costs necessary to resolve a housing crisis. All interventions focus on helping households to develop, pursue, and/or maintain housing stability.

The program is administered on a regional level by 11 Contractors. Throughout this Administrative Plan, these eleven organizations are referred to as the "RAFT Agencies" or the "Regional Administering Agencies (RAAs)."

The RAFT Agencies are responsible 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 is incorporated into this contract between EOHLC and the RAAs.

Target Population

RAFT targets households who, but for this assistance, would imminently be at risk of homelessness or housing instability, including those who are currently homeless but who are not eligible for HomeBASE. 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 households 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 5-7.**

Note that homeless households who are residing in Emergency Assistance (EA) Family Shelter program shelters or who have recently been found eligible for the EA Family Shelter program and have been diverted to HomeBASE, shall use HomeBASE, which is a greater benefit, and shall not be

found eligible for RAFT. Nothing precludes a household who is otherwise eligible for RAFT from using RAFT after they exhaust their HomeBASE benefit.

Household Eligibility

Households must have both an eligible housing crisis and be income-eligible to qualify for RAFT. In FY26 RAFT serves renters, homeowners, and households who are homeless or at risk of homelessness and moving into new housing. Households of all sizes and configurations may be found eligible for RAFT.

RAFT serves residents of Massachusetts who are at risk of homelessness or housing instability in Massachusetts at the time of their application. Homeowners are only eligible to apply for assistance with their mortgage or other homeowner costs if they are owner-occupants of the unit in question. Applications for homeowners will come in through the Housing Help Hub (HHH) system along with all other applications. The homeowner application only requires the homeowner application and does not require a corresponding application from the mortgage servicer or other vendor. All payees for homeowner applications will be added as "Providers" (vendors) in HHH.

As with all RAFT participants, homeowners must be Massachusetts residents and must have income at or below 50 percent AMI (or up to 60 percent AMI if at risk of housing instability due to domestic violence). Homeowners must be owner occupants of the property in question to qualify for mortgage or other homeowner assistance through RAFT.

There are no documentation requirements to demonstrate custody arrangements for children who reside in more than one household. Minor children may reside in two separate households at different addresses, depending on custody arrangements. This does not affect the separate households' eligibility, provided that they meet all other eligibility criteria. RAAs may request details of the formal or informal custody arrangements, if necessary, but households should not be denied simply because a minor child appears in two households.

In rare cases, a homeowner may apply for RAFT for assistance with their mortgage while also applying as a landlord for a tenant applicant. EOHLC expects that in some cases like this, receipt of the RAFT payment from the tenant application would solve the homeowner's housing crisis too and the homeowner would not also need to receive RAFT. However, in rare cases, a homeowner may be approved for RAFT for mortgage assistance in addition to their tenant being approved for RAFT for rental assistance. In such cases, the homeowner must prove to the RAA that they fell behind for some reason other than the tenant's nonpayment. In addition, they must report any actual rental income received as part of their income determination for RAFT.

Housing Crisis

All households who are found eligible for RAFT must demonstrate one of the eligible housing crises listed below.
The housing crisis must be current (ongoing) at the time of application. 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.

If a household has solved their housing crisis prior to RAA processing their RAFT application and there is no longer a present crisis, their RAFT application may be denied for no eligible housing crisis. For example, if a household applies with a Notice to Quit for rent arrears but pays the arrears on their own before RAFT is approved, the household would not be eligible for RAFT to pay the arrears or reimburse themselves.

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

Housing Crisis	**Corresponding App Housing Crisis**	**Verification Required**
Notice to Quit	• I have received a Notice to Quit that says my lease will be terminated	Notice to Quit issued by landlord, dated within the last 90 days at the time of application (this may be for nonpayment or for something else)
Eviction	• 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) or further along such as an Agreement for Judgment or execution letter
Doubled up and must leave/Overcrowding	• I'm couch-surfing or doubled up, and can't stay anymore	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 within 30 days, ***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
Health & safety	• The Board of Health or my healthcare provider says I need to leave my residence because the unit is not safe or healthy for me	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, a failed inspection report, or a letter from a healthcare professional

Domestic violence	• 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	Documentation to support a domestic violence allegation connected to an inability to stay safely in current housing, or a self-statement from applicant if other documents are not available
Fire/Flood/Natural disaster	• I lost my housing due to a fire, flood, or natural disaster	Report of fire, flood, or natural disaster
Utility shutoff	• I have received a shut-off notice • My service has been shut off • My heating oil or heating gas tank is empty and I cannot pay to refill it	Current utility shutoff notice or verification that service is at risk of disconnection or has already been disconnected For deliverable fuel, invoice from utility company for one delivery of fuel
Three or more months behind on mortgage	• I am three months or more behind on my mortgage	Mortgage statement showing three months' missed payments. The three payments do not have to be delinquent; in other words, it is acceptable for two payments to be past due and the third payment to be listed as a current charge, as long as the homeowner has already received the bill for it
Right to cure notice	• I have received a 90 day right to cure notice from my mortgage servicer	90 day right to cure notice dated within the last 60 days
Foreclosure	• I have received a notice of intent to foreclose from my mortgage servicer • I have received a foreclosure notice of sale	Notice of intent to foreclose dated within the last 60 days, or foreclosure notice of sale dated within the last 60 days
Behind on property taxes	• I am behind on property taxes and there is a lien on the property	Documentation showing there is currently a lien on the property from the city or town

Behind on other homeownership payments	• I am behind on other payments that are putting my property at risk of foreclosure	Documentation showing that other payments are putting the homeowner applicant' at risk of foreclosure, such as notice of an impending lien for unpaid taxes or other payments, bill or notice for payment from a reverse mortgage company (for those with reverse mortgages), or other documentation that the RAA recognizes as putting the household at imminent risk of foreclosure
Other crisis that will result in imminent housing loss	• I'm currently • homeless (e.g., sleeping in a shelter, a car, or outside) Other	Documentation to demonstrate that the household is or will imminently become homeless* within 30 days, such as a third-party letter from a medical professional or advocate Some examples include: Documentation from temporary shelter provider (non-EA, sober living etc.) confirming residency, or documentation from treatment facility confirming residency and confirming that the program is not permanent housing (household must leave) Self statements may be accepted as a last resort, if the situation cannot be documented in another way

Note that households in Emergency Assistance (EA) Family Shelter should be directed to HomeBASE rather than RAFT. However, in some cases, a family in the EA Family Shelter program may not be eligible for HomeBASE. In those cases, the family may apply for RAFT. In particular, there is nothing preventing EA Family Shelter program participants from being found eligible for RAFT if they overstay their EA Family Shelter program statutory length of stay and are no longer eligible for HomeBASE. In a case where a family has passed their length of stay date and needs RAFT to exit the EA Family Shelter program unit, they may apply and be found eligible, assuming they meet all other eligibility requirements. Their housing crisis in this situation would be "Other crisis that will result in imminent housing loss," based on the fact that they are staying in a shelter.

A tenant may provide a court agreement that specifies a date by which the tenant must vacate. In that case, it contributes to the ongoing eviction crisis, regardless of whether the date is within 90 days of application submission. If the tenant fails to comply, the landlord can move forward with eviction proceedings, regardless of the agreed vacate date being beyond 30 days, to demonstrate imminent homelessness. The goal is to always avoid the eviction from being fully executed. If a mutual agreement between the tenant and landlord is reached outside of court for the tenant to leave the unit, the tenant must demonstrate a current eligible housing crisis.

In some court agreements, there may be a section that outlines a payment plan between the landlord and the tenant. Within this, there may be language that allows the landlord to return to court to execute the eviction if the tenant does not comply. Any default on this previous payment agreement contributes to the ongoing eviction crisis. Verification of missed payments can be

confirmed with an updated rental ledger, or letter/statement from the landlord. If a tenant is defaulting on a payment plan established outside of court, the tenant must demonstrate a current eligible housing crisis.

Landlords should be made aware that a tenant who files an application for RAFT assistance may not be evicted for nonpayment of rent while the application is pending. If RAFT pays the full amount of the arrears on which the eviction case is based, the case must be dismissed. After receiving a RAFT award, a landlord can still file for eviction if their tenant violates the lease for a reason other than the rent issues which were addressed by payment of RAFT, or if a tenant does not pay the portion of rent they agreed to after the initial court case was dismissed. The landlord does not have to agree to forgive back rent or accept reduced rent. If the landlord has already filed for eviction for nonpayment of rent in court and the maximum RAFT benefit does not cover the full amount of rent owed by the tenant, the landlord must have an agreement in place or enter into an agreement with their tenant that includes a repayment plan for the amount that RAFT cannot cover. If the landlord accepts the RAFT payment and enters into a repayment plan for any remaining unpaid rent, they may but are not required to dismiss the court case. If the tenant agrees to a repayment plan, and then does not pay in accordance with the plan, the landlord can move forward with the eviction or file a new case if the previous one was dismissed.

Verified Housing Crisis Field

Prior to Letter of Intent (LOI) approval or RAFT payment generation, staff must complete the 'Verified Housing Crisis' field in HHH. This field is intended to capture the single housing crisis that has been verified through program documentation and eligibility review for reporting purposes. Applicants may report multiple housing crises within the application. However, staff must select the one verified housing crisis that best reflects the applicant's current and documented housing instability at the time of approval.

When determining the appropriate verified housing crisis, staff should use the following guidance:

- Select the Housing Crisis that is most directly connected to the household's immediate risk of housing loss or instability, and is documented in the application.
- When both a rental/mortgage-related crisis and a utility-related crisis are present, staff should select the rental or mortgage-related crisis.
- If multiple stages of an eviction process are documented, staff should select the furthest documented stage.
    - For example, if both a Notice to Quit (NTQ) and a court date are present, select the court-related housing crisis.
- Staff should exercise professional judgment when multiple verified crises exist and select the option that most accurately represents the household's verified housing situation.
- Only one Verified Housing Crisis may be selected per application.

Self-Attestation

Self-statements as a form of verification for homelessness should only be accepted after all other attempts for third-party documentation have been exhausted. For households affected by domestic violence, a self-statement may be the only available option to document the housing crisis.

Notice to Quit Requirements

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; and
7. Dated within 90 days of the RAFT application.

Households seeking assistance with rent arrears must have at least a Notice to Quit, dated within 90 days of their application, to be considered eligible for rent arrears. 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 not allowed for RAFT. Households whose situation is further along than a Notice to Quit, i.e. households who have a court summons, demonstrate an eligible housing crisis 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. However, 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.

Homeowners seeking assistance with mortgage arrears must be able to show they are at least three months behind on their mortgage. In some cases, a homeowner may have already agreed to a loan modification or a forbearance with their mortgage servicer. In these cases, they are no longer considered at imminent risk of foreclosure and are not eligible for RAFT. Similarly, homeowners in bankruptcy are typically not at imminent risk of foreclosure and are not eligible for RAFT. If a homeowner is able to provide documentation that their primary residence is not included in the bankruptcy filing and they are at risk of foreclosure, a homeowner can be determined to have an eligible housing crisis. An example of such documentation is: a letter from the bankruptcy lawyer verifying that the home is not included in the bankruptcy.

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. RAFT can pay for late/other fees that are shown on the ledger and lease if the fees are tenant's responsibility and if the fees are legally allowed to be charged to the tenant.

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. In these cases, a denial may be issued with the reason listed as "No eligible housing crisis". However, for example, if a household has signed an Agreement for Judgment that states that they pay $3,000 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. When RAFT cannot cover the full rental arrearage, the RAA needs to determine that the remaining balance will not cause the housing crisis to continue. In most cases, this will mean that a payment plan/statement from the landlord is required. The RAA should obtain a copy of the payment plan. This payment plan/statement must acknowledge the landlord is willing to work out a payment plan with their tenant for the amount RAFT cannot cover. The payment plan is between the landlord and the tenant. There is no EOHLC requirement that the plan needs to be signed by both parties. In addition, it does not need to include the exact breakdown of payments.

If there are discrepancies between the household members listed on the Related tab of the HHH RAFT application and the supporting documentation provided (e.g., lease, Notice to Quit, etc.), please obtain verification dated within the last ninety (90) days confirming that the household member is no longer residing in the unit. Acceptable forms of verification may include, but are not limited to, a utility bill or other third-party document showing the household member's new address, or written confirmation from the landlord identifying the current household composition.

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 in a rolling 12 month period. RAFT can only cover months where there is a housing crisis and verifiable good cause (see below).

2. Households residing in subsidized housing must demonstrate good cause for nonpayment of rent. Good cause for nonpayment refers to reasonable circumstances that justify a subsidized household's inability to pay rent for a temporary period. Households in

subsidized housing must demonstrate verifiable good cause for nonpayment because households in subsidized housing have their rent adjusted based on their income.

a. However, a household could access RAFT to pay for subsidized rent arrears if they experience a financial hardship or temporary *unexpected* increase in expenses that caused their affordable rent share to be temporarily unaffordable and did not qualify for a rent adjustment/recertification. Such a hardship or increase in expenses would be considered "good cause." Third party verification of the good cause for nonpayment (ie hardship or *unexpected* increase in expenses) should be documented in the client file and must indicate the dates of the hardship or increase in *unexpected* expenses. The dates of the hardship or increase in expenses should correspond with the dates the household fell behind on rent in ***most*** instances.

b. If the arrears were caused by a decrease in income, the applicant should first request a rent adjustment from their voucher administering agency or housing authority 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. Please note that RAAs may need to contact households' subsidy administrators in some cases, such as to confirm if a hardship qualified for a rent adjustment.

If the household is unable to provide verification of good cause for the full period of their rental arrears, and therefore RAFT is not paying the full balance, the household must submit verification demonstrating the RAFT benefit will resolve the current housing crisis (i.e. a plan for the remaining balance that RAFT cannot cover).

Possible examples of good cause for nonpayment might include, but are not limited to:

Some Good Cause / Hardship Examples	What could that look like?	Examples of Supporting Documents
Household's immigration status	A household's immigration status prevents the household from reducing their rent after reporting income or household composition changes.	Documentation from housing authority that rent share cannot be reduced. Advocate/third-party letter explaining reason rent cannot be reduced.
Unexpected expenses/bills	Applicant had to pay for unexpected bills for themselves or someone in their direct care (examples – medical, car repairs/purchase of new car, funeral expenses, childcare expenses, high utility payments, etc.)	Proof of payment on said bills/invoices. Advocate/third-party letter on how unexpected events affected their ability to pay their rent.
Fewer hours at work than usual	Less hours at work than usual for a short period of time, an	Third party proof as to hours missed at work and why – this

	unpaid sick leave, missed work due to other circumstances beyond applicants' control	could be proof they were out sick from work with a doctors letter stating they needed to be out for a period of time, , and proof from the housing authority or voucher administering agency that this change in hours was not enough to trigger a rent recalculation
Domestic violence	Applicant experienced domestic violence which led them to incur related expenses (example -a hotel stay, replacing damaged furniture, changed locks, damages to unit or possessions, etc.)	Self-statement of domestic violence or statement from advocate, police report, or any supporting documents they can provide.
Disability-related hardship	Applicant experienced a disability-related hardship which directly affected their ability to pay rent.	Verification letter from a medical professional stating that the applicant has a disability and explaining how a disability-related hardship directly affected their ability to pay rent, or Good Cause letter from a Tenancy Preservation Program (TPP) provider agency if the applicant is a TPP client at the time of application. Disclosure of the disability is not required in the supporting document.

Denials for not being able to demonstrate good cause should use the "No good cause (Subsidized)" denial reason.

In determining whether a Low-Income Housing Tax Credit (LIHTC) unit should be considered subsidized housing, RAFT Agencies should follow the EA Family Shelter program rule on LIHTC units: LIHTC units are considered subsidized if the tenant's portion of the rent is less than 50 percent of the tenant's household income. RAFT Agencies should use a household's gross monthly income when making this determination. If the household is verified as receiving DTA/MH, RAAs should refer to the household income as reported by the tenant on their application. If the household is not DTA/MH verified, RAAs should refer to the income documentation uploaded by the tenant to their application, after following the steps to verify the household income. All income verification should be used to calculate gross monthly income, including any deductions. Refer to

the RAFT Income Definitions (available on the RAA Resource Portal) for a list of all inclusions and deductions in gross income.

If after calculation, the unit would be considered subsidized then good cause support would need to be collected for non-payment of rent and the household would be limited to no more than 6 months of rent arrears. As with all subsidized housing cases, proof of good cause should be documented in the client file.

In the example where a household's gross monthly income is $2,645 and the monthly rent is $900, the unit **would** be considered subsidized for RAFT purposes since 50% of the income is $1,322.50, and the rent amount of $900 is lower than 50 percent of the income.

In the example where a household's gross monthly income is $2,645 and the monthly rent is $1,900, the unit **would not** be considered subsidized for RAFT purposes since 50% of the income is $1,322.50, and the rent amount of $1,900 is higher than 50 percent of the income.

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.

RAFT Payments to any utility provider, including National Grid and Eversource, proper documentation should be collected noting that the account is already shut off or is at risk of shut off. Key words for acceptable shut off notices are "shut off," "disconnection," and "termination."

For all other utility accounts, similar documentation should be accepted noting the account as shut off or at risk of shutoff. If there is uncertainty about which documents to accept, RAAs should contact EOHLC. RAFT may assist with home heating oil, propane, and other deliverable utilities by paying for one delivery's worth of fuel for the household per RAFT application up to $7000 within a 12-month period.

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. In most cases this will be the past due amount. RAAs should verify the amount with the utility company. In some instances where the applicant is not eligible to have the full overdue balance paid, a utility company will accept a portion of the balance owed if the applicant or customer agrees to a re-payment plan. RAAs may not require applicants to enter a re-payment plan with the utility company without documented consent from the applicant. RAAs should communicate with the utility company to confirm the portion to be paid. EOHLC 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 so long as the amount is required to prevent shutoff or restore service.

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. Though applicants can apply before securing a new unit, a secured unit is needed to receive assistance for the move.

Hotels and Motels

RAFT is intended to help remove obstacles to households maintaining or obtaining housing, in most cases hotel/motel residents will not qualify for RAFT 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, additionally,
- 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 RAFT program, 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 $7,000 benefit allowed by RAFT in a 12-month rolling period.

Payment for an Airbnb is not an allowable RAFT program expense.

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); or
- 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.

Income Eligibility

All approved households must have income at or below 50 percent 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 percent AMI. Alternatively, households are presumed income eligible if a household member is verified in the HHH/Salesforce system as a Department of Transitional Assistance (DTA) and/or MassHealth benefit recipient.

Households with reported income over the 50 percent AMI limit are required to submit valid income verification documentation, even if HHH/Salesforce verifies them as recipients of benefits from the Department of Transitional Assistance (DTA) and/or MassHealth. 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. At this time, receipt of RAFT funds alone does not generally trigger the "public charge" rule. (Note that the U.S. Citizenship and Immigration Services published the current rule on "public charge" in 2022.)

Prior Assistance

Households are limited to no more than $7,000 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 $7,000 limit in any rolling 12-month period.

RAAs must perform a "12-month lookback" at any prior RAFT payments in HHH in order to determine if an applicant is eligible for additional funds. Households may not exceed the $7,000 limit in any rolling 12-month period. *For example*, if a household received $6,000 in RAFT between January 1, 2025 and July 1, 2025, then the maximum the household is able to receive until at least January 1, 2026 is $1,000 (the difference between the $7,000 maximum benefit limit and the $6,000 already received). The household is limited to the new $7,000 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 2026 could be approved for another $4,000 in January 2027, as long as no more than $4,000 (the difference between the $7,000 benefit limit and what was already paid out in the last 12 months) is paid out from January 2027 until at least March 2027.

Check date	Payment amount	Total in last 12 months at time of check date.

3/1/2026	$2,500 arrears	$2,500
9/1/2026	$2,500 arrears	$5,000
4/1/2027	$4,000 arrears	$6,500 (Note: See below explanation)

In the above example, the household received $9,000 total in *13 months*, but because they did not exceed $7,000 total in any *rolling 12-month period*, they did not exceed the maximum benefit amount.

There is not currently a maximum combined benefit limit between HomeBASE and RAFT. RAAs do not need to factor prior HomeBASE 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 concurrently (i.e. RAFT cannot pay a month of arrears on top of a HomeBASE monthly stipend for the same month).

Any **ERAP** payments made before the end of the ERAP period of performance being applied under the RAFT benefit rules will continue to count as RAFT payments for purposes of remaining benefit calculation. These payments will show as ERAP and as increment 20, 21, 22, or 24.

Sustainability

Households are not required 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.

If a household already signed a repayment agreement or Agreement for Judgement in court, RAAs 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 signed an Agreement for Judgment that is deemed to be affordable for the household, RAFT funds should not be used. However, for example, if a household signed an Agreement for Judgment that is not feasible for the household, RAFT approval may be an appropriate outcome.

Household Eligibility

Households must meet all eligibility requirements in order to access RAFT. The income limit for RAFT eligibility is 50% AMI (or up to 60% AMI if at risk of housing instability due to domestic violence) for both renter and homeowner applicants. Households must present an eligible crisis as outlined above; if applying for overdue rent, a Notice to Quit or Eviction crisis is required, and households receiving a rental subsidy must additionally provide proof of good cause for nonpayment. Households do not need to have legal immigration status to be eligible for RAFT. The RAFT benefit cap is $7,000 in a rolling 12-month period. Households may access RAFT multiple

times per rolling 12-month period, as long as the awards do not put the household over the $7,000 limit. If a household is not eligible to have their full requested expense paid, RAA staff must verify the payment they are eligible for will resolve their housing crisis.

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 $7,000 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 $7,000 within 12 months.[1]

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 $7,000/year limit and will provide only what is necessary for the household to avoid homelessness and maintain or secure stable housing by resolving the identified housing crisis.

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

- Rent arrearage
- Start-up costs (first, last, security deposit) [2]
- Moving costs (only applicable to households moving to new housing, and moving expenses should be reasonable and must be less than $5,000)[3]
- Utility arrears
- Furniture (not to exceed $1,000)[4]
- Appliances, if the unit does not include an appliance and the appliance, such as a refrigerator or a stove, is required to make the unit habitable (not to exceed $1,500)[5]
- Mortgage arrears, for homeowners, which may include principal, interest, property taxes, homeowner's insurance, and other costs billed to the homeowner on the mortgage statement
- Property taxes, homeowner's insurance, or other costs related to solving an imminent risk of foreclosure, for homeowners

Note that all payment types are contingent on a household first being found eligible for RAFT, including demonstrating an eligible housing crisis. For example, a household may receive furniture

[1] Some households with housing subsidies who are applying for RAFT for rent arrears may be limited to less than $7,000 within 12 months. See "Rent Arrearage for Families Residing in Subsidized Housing" in "Documentation" section.

[2] 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.

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

[4] EOHLC can approve waivers for furniture requests above $1,000 in extraordinary circumstance.

[5] EOHLC can approve waivers for appliance requests above $1,500 in extraordinary circumstances.

assistance, but only if they first document that they are experiencing a housing crisis as laid out in the housing crisis table on pages 5-7.

Case examples

1. A household is living in a unit where they and their household members sleep on the floor. The household applies under the crisis "health and safety" and documents the unsafe housing situation (sleeping on the floor) with a doctor's note. This household would be eligible to use RAFT for furniture.

2. A household is living with a family friend and can no longer stay. The family friend writes a letter explaining the situation. This household applies under the crisis "doubled up." The household uses RAFT to move and pay for first, last, security, and furniture for their new apartment. This household would be eligible to use RAFT for furniture.

3. A household has recently moved into new housing. They spent the majority of their savings on their new apartment and although they have beds and other basics, they do not have enough funds remaining to furnish the apartment. This household would not be eligible to use RAFT for furniture because they are not eligible for RAFT due to not having an eligible housing crisis. However, the RAA may be able to help this household by connecting them with their HCEC or other programs to make a referral to a local furniture bank.

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.

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 EOHLC 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 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 may be provided through RAFT on behalf of these households.

Rental stipends for future rent are not an allowable program expense.

For homeowner applications, in many cases, it may be necessary for the RAA to coordinate payment between the RAFT award and the homeowner's own funds. For example, if a mortgage servicer provides a reinstatement amount that is higher than the RAFT benefit limit and states that they require payment to be made in full to apply any funds to the balance, the RAA may collect a personal check from the homeowner and mail that check together with the RAFT check to the mortgage servicer. The RAA should work with the mortgage servicer and the homeowner to ensure that funds are applied appropriately.

The RAA must verify before approving a payment that the payment will resolve the identified housing crisis. For homeowner applications, this verification may vary depending on the mortgage and the servicer, but may include a letter from the servicer showing that the reinstatement amount is less than the RAFT benefit limit, a mortgage statement showing that the amount due is less than the RAFT benefit limit, or a documented phone call or email between the RAA and the mortgage servicer, or documentation from the mortgage servicer to the homeowner, confirming that the RAFT award will prevent the foreclosure process from moving forward.

RAAs are also encouraged to provide referrals to other resources for homeowners that need assistance beyond what RAFT can cover, or in addition to RAFT. There is a template email available in HHH that the RAA can manually trigger at any point in the application process that directs the homeowner to look up their local HUD Housing Counseling Agency and/or their local HCEC.

Accessing the RAFT Benefit

Applications for RAFT are submitted through the statewide centralized application for Emergency Housing Payment Assistance, also known as the "Massachusetts Emergency Housing Payment Assistance Portal," or "Housing Help Hub" (HHH or HHH/Salesforce). EOHLC routes applications to RAAs based on geography and based on processing capacity at each organization. RAAs are responsible for processing and reporting on applications in a timely manner in accordance with this Administrative Plan.

The RAAs 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 HHH/Salesforce by RAA staff acting as advocates within 48 hours of receipt and processed as usual through HHH/Salesforce. RAAs may not process paper applications separately or outside of HHH/Salesforce.

Regional Administration

Each RAFT Agency administers RAFT in a specific region of the state. Attachment D to the RAFT contract shows a breakdown of each RAA and the cities/towns covered by that RAA's region. Note that there is separate routing for Homeowner applications. Homeowner applications are routed to Hearthway, HAC, NeighborWorks, and Way Finders in accordance with the homeowner routing geography found in Attachment D and summarized below. Since the RAP Center does not process homeowner applications, if at any time an RAA processing homeowner applications needs support, EOHLC can transfer applications to another RAA if that RAA has processing capacity.

Homeowner Assistance RAA	**RAA Geographies Served for Homeowner Applications**
Hearthway	- Hearthway - Franklin County Regional Housing and Redevelopment Authority

Housing Assistance Corporation	- Housing Assistance Corporation - Lynn Housing Authority and - Neighborhood Development
NeighborWorks Housing Solutions	- NeighborWorks Housing Solutions - Metro Housing|Boston - Community Teamwork, Inc.
Way Finders	- Way Finders - RCAP Solutions - Central MA Housing Alliance - South Middlesex Opportunity Council

For moving applications, applications are assigned to the RAA 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 who submit a Letter of Intent application are assigned to the RAA that covers the city/town that the person expects they will move to, although their income is calculated based off the city/town they reside in at the time of application.

Letter of Intent (LOI) Process

Letter of Intent is a type of rental assistance application for tenants who plan to move within 90 days, but who do not yet know where they will be living. Tenants receive a Letter of Intent (LOI) to provide to prospective Landlords advising them that they have access to funding for startup costs.

Only tenants who indicate in the application prescreening that they are planning to move within 90 days will be given the option to complete the LOI application. HHH will automatically calculate the household's AMI based off of the region in which they currently reside. This AMI calculation should be used to determine the income eligibility, even if the household later uses the LOI to move to a different region.

The tenant can select from a list of cities and towns in Massachusetts. The selected city or town is used to route the LOI case to the relevant RAA. The routing is based off the city or town that the applicant plans to move to. Once the tenant finds a unit and converts their case to a RAFT application, the original approval stands, and income, housing crisis, and other eligibility factors will not need to be re-verified even if they move to a different city or town and have their application processed by a different RAA. However, if the household composition changes between the time that the LOI is approved and the converted LOI application is submitted, the LOI is no longer valid. In these cases, household will need to submit a new (non-LOI) application as a mover and have their income and other eligibility factors re-verified. (Households who have added a new child in the time between when their LOI was approved and finding housing do not need to submit a new application. In these cases, the RAA can manually add the child as a new household member.) Since there is no landlord application for an LOI case, the tenant case is not matched to a landlord case. There is no Benefits/Payment tab on an LOI case. Specific funding is not requested in an LOI case. Once a client is approved for an LOI, there is no requirement to rescreen for eligibility when the LOI is converted to a moving application. However, a household may still be found ineligible in

limited cases, such as: if the household has maxed out of funds, the crisis is discovered not to be in Massachusetts, or the application is suspected to be fraudulent.

The Letter of Intent confirms the tenant is pre-eligible for assistance, potentially to include security deposit, first and last month's rent and moving expenses. It also provides instructions to the landlord on how to open a landlord RAFT application and provides the tenant code to match with the tenant's application.

The Letter of Intent has an expiration date noted at the top of the letter. It is 90 days from the date the letter was generated. The Letter indicates the tenant must complete a new pre-eligibility determination (application) once the Letter has expired.

The LOI is approved for 90 days from the letter issuance and is applicable to eligible rental units. After 90 days, the LOI case is closed and the tenant must reapply by starting a new case.

Application Overflow

Three RAAs have been designated to receive overflow applications that are not accepted for the first seven days at the original RAA at the chaser level. These RAAs also receive applications with no listed city/town, a misspelled city/town not in EOHLC's list, or an out of state city/town. These RAAs are Metro Housing|Boston, Way Finders, and NeighborWorks Housing Solutions.

On a rotating weekly schedule, each of these three RAAs is assigned to provide support for overflowing applications. Overflowing agencies are continuously monitored for processing capacity and performance, ensuring applications are processed with median days of approval of 35 days. In addition to "natural overflow," meaning applications not accepted in the first seven days or at an interval decided by EOHLC, EOHLC may dictate which and how many applications are sent to the Overflow RAAs for processing, based on criteria determined by EOHLC, mainly the median time from application to approval, which EOHLC expects to be 35 days or fewer. EOHLC may work with RAAs to determine the need for RAP Center support based on other factors, including but not limited to an RAA's application backlog, incoming application volume, regional eviction rates, the RAA's processing ratio (applications processed compared to incoming applications), and RAA staff capacity.

Documentation

The following documentation must be kept as part of the digital applicant file in HHH.

1. Application field responses in HHH/Salesforce;
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");
6. W-9 for property owner or authorized agent receiving RAFT payment(s);
7. Proof of identity for property owner or authorized agent;

8. Authorization of agent, if applicable; and
9. 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, or state-issued identification. Although applicants must be Massachusetts residents facing a housing crisis in Massachusetts, state-issued identifications may be from other states.

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 as long as it is valid identification and proves the person's identity. Expired identity documents should be closely inspected and RAAs should consider running an ID.me identity check via HHH if there are any concerns about the legitimacy of the 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 percent AMI (or 60 percent AMI for households at risk of domestic violence):

a. Presumed income eligibility through Department of Transitional Assistance (DTA) or MassHealth receipt of benefits. This will be automatically verified by HHH. RAAs are not to accept letters from DTA or MassHealth as proof of presumed income eligibility.
    i. Note that if a household's stated income is above 50 percent AMI (or 60 percent AMI for households at risk of domestic violence), presumed income eligibility does not apply and the RAA must verify income using the methods listed below.
b. Income verification using pay stubs, benefit letters, or other documentation provided by the applicant, for households not verified as receiving DTA/MassHealth. (This may be used in conjunction with item 3, below, depending on the household's income types.)
c. RAFT Agency access to state databases to verify stated wage and unemployment insurance, for households not verified as receiving DTA/MassHealth.

Presumed Eligibility through Receipt of DTA or MassHealth Benefits

EOHLC regulation 760 CMR 57.00 grants presumed income eligibility for RAFT to any recipient of certain DTA or MassHealth programs. Even if a household's *stated* income is above the RAFT income limits, by virtue of receiving certain DTA or MassHealth programs, they are to be considered income-eligible for RAFT. EOHLC's RAFT 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 HHH/Salesforce system 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. The only exception is if a household's stated income is above 50 percent AMI (or 60 percent AMI for households at risk of domestic violence). In these cases, presumed income eligibility does not apply.

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.

Please refer to the RAFT Income Definitions (available on the RAA Resource Portal) for information about exactly what income should and should not be included in a household's income, and what expenses should be deducted.

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:

Note that HHH will perform the income calculation for staff, but it depends on staff entering the correct amount and verifying that amount and clicking "Recalculate AMI %," if necessary.

1. **Wage income:** two 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.
    d. Note that HHH will perform the calculation and staff do not have to manually calculate the annual income. However, staff do need to select the Frequency of Income and enter the Amount. The Amount is an average based on the Frequency must be manually calculated outside of HHH, using a calculator or Excel.
        i. Add up all the pay stubs and divide by the number of pay stubs (e.g. if one weekly pay stub is $585.00 and the other weekly pay stub is $1,018.00, the Frequency would be selected as "Weekly" and the Amount would be entered as "$801.50." HHH would automatically round this to "$802."
        ii. This figure should be entered into the "Amount" field in the income record in HHH, and HHH will automatically calculate the annual income. After editing an income record, staff must click "Recalculate AMI %" on the case to get the updated AMI percentage.
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, even if the household's subsidy recertification happens less than annually Households in tax credit units cannot be presumed income eligible based on their subsidy recertification documents.

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. The RAA/RAP Center must document that they attempted to check all of the above income sources before allowing 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).

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. If an applicant is living in a shared space and only applying for their portion of their rent/rent arrears, it must be clearly documented that they are applying as their own household for only their portion of the rent and what they are responsible for. RAAs may, if needed, request that the tenant or landlord fill out a co-housing or shared housing document if the tenant or landlord does not already have documentation about the arrangement.

Property Owner Documentation

In order for an RAA 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; and
2. If the MassGIS verification of the owner in HHH did not pass, proof of ownership for the unit. The RAA should also independently verify this with a local municipal Assessor's office or with the Registry of Deeds

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."

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. RAAs are encouraged to share the following information with landlords:
"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."

Documentation

Homeowner applicants, tenant applicants, and property owner/landlord applicants must all provide some supporting documentation with their applications, as outlined above. Households facing a rent arrears crisis must upload an eligible Notice to Quit or Eviction; additional documentation may be needed if the household receives a voucher subsidy. Households needing assistance with utilities must upload an eligible shut-off/termination notice showing the total overdue balance needing to be paid; RAAs should coordinate with households who are not eligible for the total overdue balance, to set up a payment plan if agreed to by the head of household.

RAAs should review all documentation to ensure consistency and identify any potential red flags, using professional judgement to deny suspicious applications when applicable, using the denial reason "Suspected Fraud."

Conflict of Interest

As outlined in Attachment C, each RAA must adopt and enforce a conflict of interest policy that at a minimum ensures the points laid out in Attachment C. If an RAA staff person or a member of their family applies for RAFT themselves as a tenant, homeowner, or landlord, they are required to self-identify as such in the application when asked if they or any family members work for an organization that administers RAFT. If an RAA receives an application for a staff person or family member who has not self-identified, the RAA should send the application back to draft and request that the person self-identify as an RAA staff member before transferring the case to another RAA. They should also notify EOHLC of the omission.

RAA staff with the "Fraud_or_COI" skill in HHH may process applications for other staff at that RAA. However, RAA staff may not process an application for themselves, for a family member, or for a person in their direct chain of command. In these cases, the application must be rerouted to another staff person with the "Fraud_or_COI" skill. In addition, staff have the ability to recuse themselves from processing a fellow staff person's case for any reason. If the RAA leadership feels that no one at the RAA with the "Fraud_or_COI" skill can impartially process the application, then a Business Administrator at that RAA may transfer it to the RAA who serves the geography nearest to the transferring RAA. The Business Administrator should make contact with the receiving RAA to explain that an out-of-region case is coming their way so that the receiving RAA staff person can log on and accept the case in their Omni-Channel in HHH.

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. Documents should be submitted exclusively through HHH but if the RAA receives documents some other way, the RAA is responsible for uploading them into the applicant's case. The agency must maintain all files and records until further notice from EOHLC.

EOHLC expects that all 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 keyed into the HHH/Salesforce system to become part of the digital record.

Approvals and Quality Assurance

RAAs are responsible for implementing reasonable quality assurance procedures that allow applications to be processed timely and ensure adherence to the Administrative Plan. All cases must be reviewed by a Chaser, a Case Manager, and a Reviewer before being paid.

EOHLC will conduct regular program reviews to ensure compliance with this Admin Plan and other policies.

Required Notifications to Applicants, Utilities, and Landlords

Applicants will receive system-generated notifications at each of the below status changes, though these statuses are not exhaustive. RAA staff must follow appropriate procedures in HHH/Salesforce to ensure the notifications are generated. These notifications apply to all applications received, regardless of which program the applicant is ultimately served with. The status changes are:

- Account registration
- Reminder to submit draft application
- Draft application time out (21 days after application was started, if not submitted)
- Tenant and landlord application submission confirmation, respectively
- If there is missing documentation or information upon initial review, a request for missing documents or information in the next 14 days otherwise the application will be timed out
- Upon application denial, informing the tenant and landlord respectively that the application was denied and providing the administrative review (appeal) information (see "Denials and Administrative Reviews" below)
- Upon approval of benefit, informing the tenant, landlord, utility company, and/or other vendor as applicable about the application approval and award issuance

If the application is advocate-initiated, the advocate will receive the above notifications as well as the tenant, unless the advocate did not indicate on the application that they received consent to communicate on behalf of the tenant.

The system does not automatically generate and send a notification to applicants when an application is manually timed out. Thus, RAAs are required to manually trigger a time out notification when applications are manually timed out.

Denials, Time-Outs, and Administrative Reviews

Denials and Time-Outs

A household may be found ineligible (denied) for the following reasons:

- Ineligibility
  - Exceeds Income Limit: 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 Good Cause (Subsidized): Household residing in subsidized housing did not demonstrate good cause for nonpayment of rent.
  - No Eligible Housing Crisis: Household did not present with a housing emergency that met program eligibility criteria.
  - Receiving Identical Benefits: Household 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.
    - RAFT unable to solve your crisis: Household may be eligible, but RAFT funding is unable to solve their current crisis (e.g. landlord unwilling to enter into a repayment agreement for excess arrears, etc.)
    - Other: (Provide description)
- No Funding: Sufficient program funds are not available. EOHLC will notify RAAs in the event that the No Funding denial reason may be used. RAAs may not use this denial reason without express permission from EOHLC.
- 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 provided in HHH/Salesforce.

Administrative Reviews

Households who are found ineligible for RAFT and who disagree with the ineligibility decision may request an administrative review of their denial. Administrative reviews are requested in the HHH Tenant Portal by the tenant or tenant advocate and are processed in the HHH Staff Portal. When requesting an administrative review, applicants may upload supporting documentation, and RAA staff may request further documentation to be submitted within a specified timeframe in order to make a decision. When the RAA makes a finding, the tenant is notified by an automated email from HHH. There is no appeal to EOHLC of this finding.

Fair Housing and Language Access

In keeping with all EOHLC and HUD program regulations, and as part of the intent of the RAFT program, EOHLC 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 EOHLC 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 EOHLC based on demand.

In the event EOHLC is notified of a suspension, termination, or reduction in RAFT funding, in whole or in part, or if EOHLC reasonably believes that any such action is forthcoming, EOHLC 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 EOHLC 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 onsite 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. Payments will be made by paper check or by direct deposit, according to the payee's selection in HHH and based on the RAA's review of the payment method.

HHH will send payments nightly to HAPPY and HAPPY will return information about the successful payments each morning. RAAs may not enter payments manually into HAPPY. Select RAA staff will maintain access to Happy in order to track Voided payments originating from Happy.
RAAs are responsible for establishing and documenting a pre-check run payment validation process between the program and finance staff to ensure that all payments are for the correct amount, made to the correct vendor.

Data Systems

EOHLC agrees to ensure that all staff will be trained at least annually in the use of EOHLC required systems, including state and federal privacy and data security requirements, and ongoing technical

assistance will be provided by designated contacts at EOHLC. The RAFT Agency must ensure that staff have 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 or HHH, the RAA must notify EOHLC the same day via Zendesk so that access can be revoked.

If staff has Housing Pro access, RAAs are responsible for completing a Remove User Request and submitting it through a Zendesk ticket. EOHLC will be responsible for inactivating the Housing Pro and CITRIX account. HHH business admins are responsible for inactivating internal users in Salesforce, EOHLC will remove the staff Azure AD. EOHLC requires temporary suspension of HHH accounts if a staff person is going on a leave of absence for 1 month or longer. See chart below for HHH removal requests.

RAAs are responsible for complying with all legal requirements pertaining to the use, maintenance, and dissemination of confidential information and for meeting EOHLC reporting requirements in a timely and accurate manner.

HHH Removal Requests

New Employee @ RAA		
Step	Account	Action
1	NA	**RAA** issues Zendesk Add ticket using HHH Access (**Add**/Remove/Suspend/Reactivate: Azure, SFDC HHH, Zendesk) Form
2	Azure AD	**EOHLC SysAdmin** Submits Servicenow ticket to add Azure AD account
3	Zendesk	**EOHLC SysAdmin** Adds Zendesk Profile
4	Salesforce	**RAA Business Admin** Creates the SFDC account with proper role and permissions
5	OmniChannel	**RAA Business Admin** creates OmniChannel Account

No Longer Employed @ RAA		
Step	Account	Action
1	NA	**RAA** issues Zendesk Remove ticket using HHH Access (Add/**Remove**/Suspend/Reactivate: Azure, SFDC HHH, Zendesk) Form
2	Azure AD	**EOHLC SysAdmin** Submits Servicenow ticket to remove Azure AD account
3	Zendesk	**EOHLC SysAdmin** Deletes Zendesk Profile
4	Salesforce	**EOHLC SysAdmin** Deactivates all SFDC licenses including Federation ID
5	OmniChannel	**EOHLC SysAdmin** Deactivates OmniChannel Account

Depart RAA for Temporary Leave of Absence > 1 month		
Step	Account	Action
1	NA	**RAA** issues Zendesk Suspend ticket using HHH Access (Add/Remove/**Suspend**/Reactivate: Azure, SFDC HHH, Zendesk) Form
2	Salesforce	**EOHLC SysAdmin** Deactivates all SFDC licenses
3	Zendesk	**EOHLC SysAdmin** Suspends Zendesk Profile

Return to RAA from Temporary Leave of Absence Longer than 1 month		
Step	Account	Action
1	NA	**RAA** issues Zendesk Reactivate ticket using HHH Access (Add/Remove/Suspend/**Reactivate**: Azure, SFDC HHH, Zendesk) Form
2	Salesforce	**EOHLC SysAdmin** Re-activates all SFDC licenses
3	Zendesk	**EOHLC SysAdmin** Re-activates Zendesk Profile

Depart RAA for Temporary Leave of Absence Shorter than 1 month		
Step	Account	Action
1	NA	NA