

**RAFT**  
**FY21 Administrative Plan**  
**& Scope of Services**  
**Effective January 11, 2021**

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## **Introduction**

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

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

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

## **Key Changes Introduced in January 2021**

As of January 11, 2021, this Administrative Plan has been updated. The key changes to the program are outlined in this section. Managers and staff should read the entire Administrative Plan to gain a thorough understanding of the new RAFT program policies. All prior Administrative Plans and Interim Guidance are no longer in effect. This Administrative Plan constitutes the full guidance for the RAFT program as of January 11, 2021, although DHCD may issue supplementary guidance, training materials, clarifying materials, or new policies at a future date.

Key Changes Incorporated into This Administrative Plan:

1. During the Massachusetts state of emergency, an increase in maximum benefit level from \$4,000 to \$10,000 across the board for all eligible households (including households at risk of homelessness and moving into new housing and no longer limited to renters affected by COVID-19 (p. 8-9)
2. Sustainability requirements no longer in effect (p. 9)
3. Simplified housing crisis list (p. 6-8)
4. Expansion of all housing crisis types to all eligible households, without having different housing crisis options for Upstream, Standard, and COVID RAFT (p. 6-8)
5. Consolidation of Upstream and Standard RAFT into one program and payment increment, without 4 months' rent cap on pre-court arrears payments (p. 5)
6. Decoupling of HomeBASE and RAFT combined maximum benefit limit (p. 8-9)

7. Automatic income eligibility for DTA/MassHealth recipients and new ways of calculating income for non-DTA/MassHealth recipients (p. 14-16)
8. Streamlined approval processes (p. 19-20)
9. Reduced reporting requirements for ineligible households (p. 21)
10. Introduction of a Rental Assistance Processing (RAP) Center with capacity to assist RAAs with overflow and backlog (p. 11-12)

## Target Population

RAFT targets households who, but for this assistance, would imminently become homeless. The households served through RAFT are households at risk of homelessness with

- i. a household income not greater than 30% of Area Median Income 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 Area Median Income 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; 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 can serve two distinct populations: the “Traditional Population” and the “Expanded Population.” The RAFT Agency must indicate in each applicant’s Housing Pro record whether the household is part of the Traditional Population or the Expanded Population using the “Dependent under 21 (Y/N)” field in the Program tab of the Occupancy module.

### Traditional Population

Eligible “Traditional Population” households are families comprised of two or more people living together, at least one of whom is a dependent child under the age of 21 (up until 21<sup>st</sup> birthday), or a single pregnant head of household.

### Expanded Population

Eligible “Expanded Population” households are households of all sizes and configurations, including but not limited to elders, persons with disabilities, and unaccompanied youth. The Expanded Population includes any household that does not meet the definition of the Traditional Population.

## COVID RAFT

The RAFT budget includes funds designated as “COVID RAFT” funds made available for households with a housing crisis that was caused or exacerbated by COVID-19. A household does not need to know whether they are applying for COVID RAFT or Standard RAFT. As of January 11, the “rules” for both programs are the same. RAAs will approve households for RAFT under the same eligibility criteria across the board. If the household checked off the COVID self-certification box on the application (“I certify that I am applying for emergency housing

assistance because of a housing situation that was caused or made worse by the COVID-19 pandemic and economic crisis”) then the household should be served out of COVID RAFT (Increment 13 in HAPPY). All other households not affected by COVID should be served out of Standard RAFT (Increment 2 in HAPPY).

COVID RAFT funds are available for new enrollments until June 30, 2021, unless otherwise stated by DHCD. Households receiving stipends through COVID RAFT may receive stipend payments paid July 1, 2021 and later, with the latest possible COVID RAFT stipend being December 2021. COVID RAFT is the only type of RAFT that can be scheduled into the next fiscal year, FY22. All other RAFT funds must be fully expended by June 30, 2021 with the last allowable stipend being June 2021.

### **Upstream RAFT (FY20-21 Rent Arrears Pilot) – Now Condensed into the Standard RAFT Program**

The Upstream Rent Arrears Pilot Program has been integrated into the Standard RAFT program. Beginning January 11, RAAs do not need to track Upstream and Standard funds separately. All non-COVID RAFT funds should be tracked using Increment 2 (Standard RAFT). DHCD has provided a revised budget combining the Standard and Upstream funding sources into the Standard funding source. (In FY20, a pilot program aimed at increasing upstream homelessness prevention allowed for the RAFT agencies to screen households under two new housing crises: “Upstream Rent Arrears” and “Upstream Mortgage Arrears.”)

\$7M was allocated to this pilot program in FY20 and funds were designated as carrying over into FY21. The RAFT agencies have until June 30, 2021 to spend these funds. DHCD will track spending centrally using a combination of payments already associated to Increment 11 (former Upstream pilot program) and new payments made out of Standard RAFT using the “Pre-court rental assistance” housing crisis.

The prior restrictions under the Upstream RAFT program (financial hardship categorization, proof of sustainability, and limit to four months of arrears) no longer apply. Further, households may use the “Pre-court rental assistance” housing crisis to access any reasonable RAFT benefit to resolve the housing crisis. DHCD expects that in most cases the appropriate payment will be arrears, but households could choose to use RAFT to move instead using the “Pre-court rental assistance” housing crisis.

The four month cap on arrears under the former upstream program is no longer in effect.

### **Household Eligibility**

Households must have both an eligible housing crisis and be income-eligible in order to qualify for RAFT.

## Housing Crisis

All families who are found eligible for RAFT must demonstrate one of the eligible housing crises, listed below and on the RAFT screen. A family may not receive RAFT without demonstrating one of these crises, even if their intended use of RAFT matches one of the allowable payment types. As of January 11, every housing crisis can be used with either the Standard RAFT increment or the COVID RAFT increment. The only difference between the two increments is that COVID RAFT is reserved for families whose housing crisis was caused or exacerbated by COVID-19, or who experienced a financial hardship related to COVID-19 that led to their housing crisis. All eligible households can use any eligible housing crisis and receive funds to stay in their current unit or move to a new unit.

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

Housing Crisis	Verification Required
Pre-court rental assistance	Notice of rent arrears issued by landlord with verification of amount owed, OR verification of inability to pay future market rent
Eviction	Summary Process Summons and Complaint (court summons)
Doubled up and must leave/Overcrowding	Letter from the primary tenant or landlord, including the address where the family is staying, that verifies that the family is being asked to leave, or documentation to demonstrate that the current unit is too small for the number of people residing there, such as, but not limited to, a letter from the landlord verifying the number of people and bedrooms in the unit
Health & safety	Documentation to demonstrate a serious health and safety risk that prevents the family from continuing to live in the unit, such as, but not limited to, a condemnation order from the Board of Health or a failed inspection report
Pre-foreclosure mortgage assistance	Notice of mortgage arrears issued by lender or servicer showing past due amounts owed. (May also include past due escrow amounts or past due taxes or property insurance if such payments are not made out of escrow), OR verification of inability to pay future mortgage costs
Foreclosure	Letter of intent to foreclose from lender

Domestic violence	Documentation to support a domestic violence allegation connected to an inability to stay safely in current housing, or a self-statement from applicant
Fire/Flood/Natural disaster	Report of fire, flood, or natural disaster
Utility shutoff	Current utility shutoff notice or verification that service has already been disconnected
Other crisis that will result in imminent housing loss	Documentation to demonstrate that the family will imminently become homeless within 30 days

### Income Eligibility

All approved households must have income at or below 50% AMI, with the exception of households who are at risk of injury or harm due to domestic violence in their current housing situation, who must have income at or below 60% AMI. Guidance on how to verify and calculate income eligibility can be found in the “Documentation” section.

### Immigration Status

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

Some households who do not have legal immigration status may ask whether receipt of RAFT could trigger the public charge rule now that RAFT is partially funded by federal coronavirus relief funds. The public charge rule is a rule made by the federal government. Under federal law, non-citizens may be considered to be a “public charge” if they receive federal cash assistance for income maintenance, or specified kinds of non-cash assistance, including assistance under certain specifically enumerated housing assistance programs. In the view of DHCD, the rental assistance provided by RAFT (and ERMA) is not cash assistance for income maintenance, nor is it one of the enumerated housing programs subject to the public charge rule. However, please be aware that the federal government, and not DHCD or the RAAs, makes all determinations as to what is counted under the public charge rule.

### Prior Assistance

There is not currently a maximum combined benefit limit between HomeBASE and RAFT. RAAs no longer need to factor prior HomeBASE payments into a RAFT benefit determination. However, families currently in their 12-month HomeBASE benefit period are only eligible for RAFT if they are experiencing an eligible housing crisis and if their full HomeBASE benefit has



already been expended. Households may not be actively receiving funds from HomeBASE and RAFT at the same time (i.e. RAFT cannot pay a monthly stipend on top of a HomeBASE monthly stipend).

Households are, however, limited to no more than \$10,000 from RAFT or ERMA in any rolling 12-month period (and any ERMA benefits are limited to the maximum ERMA benefit limit, which at the time of this admin plan is \$4,000). This does not prevent households from applying and receiving RAFT more than once in a 12-month period. However, RAAs need to ensure that new benefit awards do not put households over the \$10,000 limit in any rolling 12-month period.

Example:

A household who received \$4,000 in RAFT in March 2020 could be approved for another \$10,000 in January 2021, as long as no more than \$6,000 (the difference between the \$10,000 benefit limit and what was already paid out in the last 12 months) is paid out until at least March 2021.

Check date	Payment amount	Total in last 12 months at time of check date
3/1/2020	\$4,000 arrears	\$4,000
1/1/2021	\$5,000 arrears	\$9,000
2/1/2021	\$1,000 stipend	\$10,000
3/1/2021	\$1,000 stipend	\$7,000
4/1/2021	\$1,000 stipend	\$8,000
5/1/2021	\$1,000 stipend	\$9,000
6/1/2021	\$1,000 stipend	\$10,000

In the above example, the household received \$14,000 total in 16 months, but because they did not exceed \$10,000 total in any rolling 12-month period, they did not exceed the maximum benefit amount.

### Sustainability

At this time, households do not need to demonstrate future sustainability in order to access RAFT. The previous “6-month” sustainability rule for households accessing the \$10,000 benefit is no longer in effect. The “pre-COVID” sustainability rule is no longer in effect either. Households who have an eligible housing crisis and who are income eligible may access up to \$10,000 if those funds will resolve their current housing crisis, even if there is not a guarantee of future sustainability.

### 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 families can receive assistance in any combination of benefit types, provided that the total amount of assistance does not exceed \$10,000 within any rolling 12-month period. Families may access program funds more than once in a given year, subject to the availability of funds, as long as they do not receive more than \$10,000 within 12 months.<sup>1</sup>

In determining how RAFT can stabilize a housing situation, RAFT agencies will prioritize the various barriers and expenses that are preventing housing stability. Agencies will use RAFT for those items that will provide the most stability up to the \$10,000/year limit and will provide only what is necessary for the family to avoid homelessness and maintain or secure stable housing by resolving the identified housing crisis.

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

- Rent arrearage
- Rental stipends
- Start-up costs (first, last, security)<sup>2</sup>
- Moving costs
- Utility arrears
- Furniture (only applicable to families moving to new housing, and furniture payments may not exceed \$1,000)<sup>3</sup>

To support families moving to a co-housing situation, RAFT will also allow incentive payments to primary tenant and landlord, including:

- Partial rent payments on behalf of primary tenant (paid to property owner)
- Utility payments on behalf of primary tenant (paid to utility company)
- Grocery gift cards

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

Additional supportive uses, if they allow a household experiencing an eligible RAFT housing crisis to maintain housing or avoid homelessness, include:

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<sup>1</sup> Some families with housing subsidies who are applying for RAFT for rent arrears may be limited to less than \$4,000 within 12 months. See "Rent Arrearage for Families Residing in Subsidized Housing" in "Documentation" section.

<sup>2</sup> Moving-related expenses may only be paid for one move per year per family, except when a subsequent move is caused by a direct threat to the family's safety or a serious health condition of a family member that cannot be reasonably accommodated in the original housing arrangement.

<sup>3</sup> In extraordinary circumstances, RAFT Administering Agency supervisors may request a waiver from DHCD allowing them to exceed the \$1,000 furniture limit for a family.

- Car repair/transportation costs
- Extraordinary medical expenses
- Child care from licensed provider, including payments for summer camp
- Legal assistance
- Financial literacy and budgeting classes
- Financial aid for educational expenses (registration, tuition or fees not covered by financial aid, required textbooks, etc.)
- Certified Adult Basic Education classes (GED/HiSET, ESOL, literacy, etc.)
- Job training and attainment (job skills classes, interview clothing, tools for licensed trades, etc.)

Travel expenses are available to families 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 families moving out of state, but no ongoing assistance (such as rental stipends) may be provided through RAFT on behalf of these families.

### **Accessing the RAFT Benefit**

RAFT Agencies should present RAFT as one tool of their overall housing counseling program. Applicants may be self-referred or may be directed to the RAFT Agency by a partner agency such as DHCD, another state agency, housing court, or a social service agency. While RAFT Agencies may develop their own specific processes for completing intakes, screens, and applications, each RAFT Agency must have a prioritization process in place for families who present as emergency cases. RAFT Agencies may recommend that applicants complete a budgeting or financial literacy class, but approval may not be contingent upon the applicant attending a class.

### **Regional Administration**

Each RAFT Agency administers RAFT in a specific region of the state. Exhibit B shows a breakdown of each RAFT Agency and its cities/towns. Families must be approved for RAFT by the RAFT agency that covers the city/town in which they live, or, if the funds are used to access new housing, to which they are moving. If a family applies for RAFT in one region and then locates housing in a different region, the RAFT Agency will transfer the RAFT file and all collected documentation to the RAFT Agency in the appropriate region. If a family uses RAFT to move out of state, the application and payments will be processed by the RAFT Agency that covers the city/town in which the family is at risk of homelessness.

### **Rental Assistance Processing (RAP) Center**

The RAP Center is a new supplemental processing center that supports the RAAs during this time of extreme need and high application volume. As needed, DHCD will assign certain applications from the RAAs to be processed by the RAP Center, staffed by housing consulting firm Nan McKay and Associates. DHCD will select RAAs to participate in the RAP Center as

needed based on criteria determined by DHCD, including but not limited to an RAA's reported application backlog, application processing times, regional eviction rates, and RAA staff capacity. DHCD may dictate which and how many applications are sent to the RAP Center for processing.

The RAP Center will complete HAPPY data entry and schedule transactions in HAPPY for RAAs, which will then be processed by RAAs in their regular check runs. DHCD may require additional check runs on top of the RAA's normal check run schedule, depending on the volume of applications processed by the RAP Center.

## **Landlord Door**

The Landlord Door is a direct application available to landlords who own 20 units or fewer in Massachusetts. It allows landlords to apply directly for RAFT on behalf of their tenants.

Landlords must upload or submit the DHCD Landlord Application Tenant Consent Form with a landlord application in order for the RAA to process the application. RAAs must verify that this consent form has been received before processing a Landlord Door application.

Applications received through the Landlord Door are processed in the same manner as tenant applications, except that Landlord Door applications must be marked as such in the Program screen of HAPPY, using the Landlord Door Y/N field. This field must be completed for all applications with a "Y" for "yes" if the application came through the Landlord Door and an "N" for "no" if the application did not come through the Landlord Door.

The RAA may communicate directly with the landlord for all tenant information requested on a Landlord Door application since the tenant has consented to the landlord completing the application on their behalf.

## Documentation

All approved RAFT participants must provide the following documentation. This documentation must be kept in the participant’s case file.

1. RAFT/ERMA application. This may be produced through an online form, PDF, or paper application
2. Proof of housing crisis
3. Identification for head of household only\*
4. Proof of income, if required\*
5. Proof of current and/or future housing\*
6. Copies of invoices for any payments made, other than payments to property owners
7. Property owner documentation, if applicable:
  - a. RAFT Owner Contract. (The Owner Contract Addendum is no longer required since the 6-month sustainability rule is no longer in effect.)
  - b. Form W-9
  - c. Proof of ownership for the property for which payments will be made

\*These items are clarified below.

## Identification

1. The RAA must collect identification for the head of household. Acceptable identification must include the head of household’s name and date of birth. Acceptable identification includes, but is not limited to: driver’s license, birth certificate, passport, and state-issued ID.
  - a. 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.
  - b. Note that identification does not need to be current. For example, an expired passport or expired driver’s license is acceptable as proof of identification.

## Proof of Income

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

1. Presumed income eligibility through Department of Transitional Assistance (DTA) or MassHealth receipt of benefits. (No income verification required – income tier reported in HAPPY should reflect the stated income, even if the stated income is above 50% AMI.)

2. Income verification using pay stubs, benefit letters, or other documentation provided by the applicant. (This may be used in conjunction with #3, depending on the household's income types.)
3. RAFT Agency access to state databases to verify stated wage, unemployment insurance and pandemic unemployment assistance (PUA) income.

#### *Presumed Eligibility through DTA or MassHealth Receipt*

On December 16, 2020, DHCD filed an emergency regulation (760 CMR 57.00) granting automatic income eligibility for RAFT to any recipient of DTA or MassHealth programs. Even if a household's stated income is above the RAFT income limits, by virtue of receiving DTA or MassHealth, they are to be considered income-eligible for RAFT. There are three ways to verify that a household is a DTA recipient or MassHealth member:

1. Complete and upload a *MassHealth and DTA Benefit Verification Report for RAFT* (see general requirements and how to get set up to send reports in Exhibit A). This is the option that RAAs are expected to use first, unless the application was provided with verification that the applicant receives MassHealth or DTA benefits. This option may be used if the applicant selected the box on the application that reads "I am on MassHealth insurance" or the box that reads "I receive DTA benefits (i.e., SNAP, TAFDC, EAEDC.) RAAs with large volumes of applications (25+ per day) should send daily uploads to verify DTA/MassHealth benefit receipt. Once an individual in the household is verified, the household is considered income eligible for RAFT and no further income verification is required. Place a reference to the report in the applicant's file, including date and time the report was received. RAAs with smaller volumes of applications claiming DTA/MassHealth benefits may send batch uploads as infrequently as once per week, although they may send batches as frequently as once daily as caseloads require. The other two options should be used only for one-off cases or in cases of emergency where the RAA cannot wait for DTA/MassHealth to return the batch data match.
2. DTA or MassHealth benefit letter provided by the applicant, dated within the last 60 days. (This could also be a screenshot of their DTA or MassHealth app or other verification showing that they currently receive any DTA benefits, or are on MassHealth. Note that because MassHealth cards and DTA cards do not include dates, these cards should not be used as verification of currently being on MassHealth or DTA.)
3. Phone call to DTA at (857) 408-0661 or MassHealth at (833) 501-7898 to verify receipt of benefits. Phone calls should only be made in rare circumstances; for example, if the applicant is completing the application with the RAFT Agency in person. Document the result of the call in the applicant's file. Phone calls to DTA can be done without a release of information since the applicant has consented to information-sharing by signing the RAFT application. Before calling MassHealth, an RAA must send a signed Permission to Share Information (PSI) to MassHealth, or have the head of household on the phone. This is only required for phone calls. Batch uploads of applicant data do not require a PSI.

Households who do not receive DTA or MassHealth must have their income verified. All households are asked to submit income verification with their RAFT application. Each income

source for each household member needs to be verified. Below are the guidelines for types of verification accepted for each income source.

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

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

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

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. Pandemic Unemployment Assistance (PUA)
  - a. Look up the individual in the FAST-UI database to verify any stated federal pandemic unemployment assistance 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 PUA income in the applicant file.
4. 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.
5. 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.

The \$600 January 2021 stimulus payments provided to households by the federal government are not counted in gross income for RAFT purposes.



### Proof of Housing

Each family must provide proof of their current housing situation and of their future housing, if applicable. In some cases a family's proof of housing crisis may also serve as proof of housing. For example, a family 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 family 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 family 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.

### Proof of Rent Arrearage

Applicants or their landlords must provide proof of rent arrearage before an arrearage can be paid. This might include, but is not limited to, a letter from the landlord, a notice to quit, or a court summons.

If a family 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 family 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 family, RAFT funds should not be used. However, for example, if a family has signed an Agreement for Judgment that states that they pay \$3000 within a month, and this is not feasible for the family, RAFT approval may be an appropriate outcome.

### Additional Requirements for Rent Arrearage Payments for Families Residing in Subsidized Housing

The same documentation listed above in "Proof of Rent Arrearage" is required.

Further:

1. Households residing in subsidized housing cannot receive payment for more than six months of rent arrears.
2. Households residing in subsidized housing must demonstrate good cause for nonpayment. This is because households in subsidized housing have their rent adjusted based on their income. However, a household could access RAFT to pay for subsidized rent arrears if they had some hardship or increase in expenses that caused their affordable rent share to be temporarily unaffordable. If the arrears were caused by a decrease in income, the applicant should first request a rent adjustment to reduce the rent share (if applicable based on the subsidy type) before accessing RAFT to pay for the arrears.

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

#### Proof of Utility Arrearage or Need for Heating Fuel

Applicants must provide a copy of a recent utility shutoff notice, or verification from the utility company that services are at risk of shutoff or have already been shut off. Families should not be approved for RAFT for utilities if they have not first exhausted all other options, including applying for Fuel Assistance if available, or asserting shutoff protection(s) on their utility account. 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 families with low income will not receive shutoff notices during this time.

If a family is approved for RAFT for payment of home heating oil because of an empty or near-empty tank, the RAFT Agency should use its discretion in determining an appropriate benefit level. Because there is no equivalent to shutoff protection for households who heat with oil, families may receive assistance with oil in consecutive fiscal years or multiple times in the same fiscal year if the RAFT Agency determines there is sufficient need.

#### 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.

### Monthly Rental Stipend Payment

Based on a review of household's income and expenses, and coordination with the primary tenant if applicable, the agency will determine the amount needed for housing stipends if connected to an eligible housing crisis. Households residing in subsidized housing cannot receive RAFT assistance in the form of a monthly stipend.

### Property Owner Documentation

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

1. Completed W-9 tax form
2. Proof of ownership (deed, most recent real estate tax bill, or current property insurance policy). The agency that is administering RAFT may also verify property ownership with a local municipal Assessor's Office or with the Registry of Deeds.

### Conflict of Interest

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

As outlined in Attachment A, if a member, officer, director, or employee of the RAFT Agency seeks to apply for RAFT, they must apply at the RAFT Agency that is closest to their residence and that is not the same RAFT Agency that they are affiliated with. If they are approved for funds, the RAFT Agency that completed the application should process the funds.

### Participant File

RAFT administering agencies are responsible for maintaining a file for all RAFT families and all files must be maintained in a consistent and orderly manner and in compliance with Executive Order 504. RAFT Agency staff is responsible for ensuring that all program and contract documents are signed and dated by the appropriate parties. Any notation on files or documents must also be signed and dated by appropriate staff. The agency must maintain all files and records until further notice from DHCD.

Paper files are not required. Documents may be retained electronically, on paper, or using a combination of paper and electronic storage. RAAs are not expected to print documents that are submitted to the RAA electronically.

### Approvals and Quality Assurance (QA)

DHCD will be providing additional guidance soon about Quality Assurance (QA) expectations and processes. In the meantime, RAAs should be aware that a supervisor review is not necessarily required for approval of a RAFT file. DHCD will be providing QA guidelines so that

each RAA can develop a QA plan to ensure that funds are processed quickly without compromising the integrity of the program.

In the interim, at a minimum, a second person other than the caseworker who worked on the file should review each application for completion of the following sections before payment is committed:

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

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

## Denials and Administrative Reviews

### Denials

A family may be found ineligible for RAFT during the RAFT application process or after their application is complete. Families who are ineligible or who become ineligible for RAFT must receive a RAFT Notice of Ineligibility/Termination. The appropriate ineligibility reason should be marked. The notice may be issued by email or mail. The ineligibility reasons are described below.

- **Incomplete Documentation:** a household failed to provide all of the documentation that was requested of them during the application process.
- **Over Income:** a household was found to have income over 50% AMI (or over 60% AMI in cases of domestic violence).
- **Participant Non-Compliance:** a household came out of compliance with the Participant Agreement or other program requirements while receiving RAFT.
- **Not At Risk of Homelessness:** a household did not demonstrate an eligible housing crisis.
- **Property Owner Not Willing to Participate:** a landlord refused to accept RAFT payments, whether directly, or by not submitting required property owner documentation to the Administering Agency.
- **Receiving Other Benefits:** a household has already received RAFT or ERMA in such an amount that the total amount of assistance provided already, combined with the amount of assistance requested in the new application, would cause them to exceed the maximum benefit level of \$10,000 in any rolling 12-month period. This ineligibility reason could also be used if a household has already been approved for assistance

through another program (such as local rental assistance) for the same funds requested through RAFT.

- Other: a household is ineligible for some other reason. DHCD anticipates that most ineligible households will be ineligible for one of the above-listed reasons. If a household is found ineligible for some other reason, the Administering Agency should make the reason clear by making a note on the RAFT Notice of Ineligibility/Termination or by attaching a letter to the Notice.
- No Funding: a household does not receive RAFT because the RAFT Agency has exhausted its funding for the fiscal year.

Note: “Not an Eligible Household” has been removed from the list because this previously referred to screen score denials and denials for people who do not have children, both of which no longer apply.

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

### Administrative Reviews

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

The RAFT Agency may determine that a household does not meet the minimum eligibility or qualification standards for any of the following reasons and will include these in the eligibility letter if a benefit is being denied:

### Immediate Termination

Immediate termination may occur when any member of the RAFT household:

- Engages in drug or violent criminal activity;
- Threatens DHCD or RAFT agency staff, employees of the property owner, or others;
- Is evicted from a unit for nonpayment of rent or other “at-fault” reason;
- Vacates a unit without notifying the agency that is administering RAFT; or
- Commits fraud in connection with the program.

If immediate termination is necessary, the RAFT Administering Agency will notify the participant in writing, stating the reason(s) for termination. A copy of the termination letter will be maintained in the participant's file. If requested in writing by the program participant, a review may be conducted at the agency level within 15 calendar days. If the termination is upheld all further benefit will be suspended.

## Fair Housing and Language Access

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

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

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

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

There are two forms that must accompany any documents (in person or mailed) that are to be received or signed by a participant with LEP.

1. *Notice of Important Document.* This notice must accompany all vital RAFT documents. The RAFT Agency contact information must be listed.
2. *Legal Notice Translation.* This notice must accompany any documents signed by the participant. The English version of the documents will always be the legally binding version while a translated version should also be signed. A copy can be kept in the participant record and the original given to the participant along with the *Legal Notice Translation* form.

## Accounting and Fiscal Management

### Allocation of Funds

Allocation of RAFT funds to the RAFT Administering Agencies will be determined by DHCD based on demand. In FY21, the Department will set aside a reserve fund that will be distributed as necessary to regions with high demand for RAFT assistance. RAFT Administering Agencies will be paid an administrative fee equal to 18.95% of all service dollars paid in that month.

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

### Financial Management

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

The financial management system must include but is not limited to:

1. Maintaining the accounting books and records according to generally accepted accounting principles and any other DHCD requirements;
2. Preparing annual operating statements and financial statements; and
3. Cash management of income and expenses, including the distribution of funds made on behalf of each participant.

## 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 family through RAFT. The agency may require that payments be made by direct deposit rather than by paper checks.

All FY21 Standard RAFT payments must be disbursed within FY21. Payments for households who apply in FY21 may not be made any later than June 30, 2021, with the exception of COVID RAFT stipends, which may be scheduled until December 2021 for all households who enroll by June 30, 2021.

## Data Collection

In FY21 DHCD and the RAFT Agencies will utilize Housing Pro, a product of MRI Software, for RAFT screening, applications, and reporting. DHCD will be responsible for determining the minimum data collection elements and for ensuring that each agency has access to the necessary software systems to meet the program requirements.

The following fields are required in Housing Pro:

- Initial Data – Information on Initial Data screen must be updated for prior applicants/participants of RAFT, HomeBASE, ERMA, or METAR who are completing a new application
  - Type of Action
  - Effective date of action
  - Tenant ID
  - Address
  - Phone number (if applicable)
  - Email address (if applicable)
  - Language
  - Agency
  - Housing Program
  - Case Worker
  - Increment
  - Housing Type (formerly “Subsidy Type”)
- Household Members
  - Last name
  - First name
  - Date of birth
  - Sex
  - Relationship
  - Ethnicity
  - Race
  - Social Security Number (if applicable)
    - If no social – use 888-88-8888
- Unit Data
  - Unit address
- Owner
  - Property owner (if applicable)
- Program
  - Start date
  - End date
  - Dependent under 21 (Y/N)
  - Landlord Door (Y/N)
  - Total arrearage (If applicable)
  - Eligibility determination date
  - Application date
  - Housing Crisis
  - Income tier
  - RAFT status
  - Ineligible Reason (If applicable)
- Transactions
  - Check date



- Payee
- Payment type
- Amount

DHCD agrees to ensure that all staff will be trained at least annually in the use of DHCD-required systems, including state and federal privacy and data security requirements, and ongoing technical assistance will be provided by designated contacts at DHCD. The RAFT Agency must ensure that staff has adequate program knowledge and training in the utilization of systems.

RAFT Agency staff must enter complete and accurate data for all program participants into Housing Pro and must obtain required program data elements throughout program participation. Participant records should be kept up to date. DHCD will require a client information release form in order to share information among agencies that work on RAFT such as community service providers, RAAs, EA providers, and DHCD. In addition, the agency is responsible for complying with all legal requirements pertaining to the use, maintenance and dissemination of confidential information and for meeting DHCD reporting requirements in a timely and accurate manner.

## Reporting

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

The following is required weekly:

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

- Average payout
- Date from which most applications are from
- Average staff time per application

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

Data requirements and program metrics may be changed by DHCD after notice and consultation with the agency may be required by DHCD to provide different or additional information.

### Exhibit A: General Requirements

RAAs are expected to verify *multiple* applicant DTA/MassHealth benefit claims through secure data matching directly with DTA and MassHealth. To do so, RAAs must meet the following requirements:

- Signed authorization: RAAs must have on file a signed RAFT Application.
- Verification Report: RAAs must upload the *MassHealth and DTA Benefit Verification Report for RAFT* with the required information in the prescribed format to avoid delays.
- Secure Data Transfer: RAAs must use the Commonwealth's [Interchange File Transfer](#) system to securely upload and receive these reports. MassHealth and DTA will not process verification reports submitted via email or by an unauthorized Interchange User.
- Each RAA must designate a primary and a secondary, "back up" Interchange User. Send your designated user email addresses to [robert.muollo@mass.gov](mailto:robert.muollo@mass.gov). Each user will receive an invite and instructions on how to populate, upload and download reports using Interchange.
- RAA Interchange Users may submit up to one MassHealth and DTA Benefit Verification Report for RAFT each day.
- RAAs have discretion in prioritizing the order in which applications are submitted for verification. DHCD recommends prioritizing submissions by application date (i.e., oldest, first)