

**COMMONWEALTH OF MASSACHUSETTS**

**HOME-ARP PLAN**

**DEPARTMENT OF HOUSING AND COMMUNITY  
DEVELOPMENT**

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# **COMMONWEALTH OF MASSACHUSETTS**

## **HOME-ARP PLAN**

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## **SECTION I**

**SOURCE OF FUNDS/ALLOCATION  
AMOUNT**

## **SECTION I: SOURCE OF FUNDS/ALLOCATION AMOUNT**

On March 11, 2021, President Joseph R. Biden, Jr. signed into law the American Rescue Plan Act (P.L. 117-2) (ARPA), a bill providing over \$1.9 trillion in relief funds to address the impact of the COVID-19 pandemic on the economy, public health, state and local governments, individuals, and businesses. The American Rescue Plan Act provided the Commonwealth of Massachusetts with \$36.5 million in HOME-ARP funds to be allocated by the Massachusetts Department of Housing and Community Development (DHCD) and by certain other Massachusetts cities and towns. The federal oversight agency for HOME-ARP is the U.S. Department of Housing and Urban Development (HUD). In accordance with the enabling statute and HUD guidance, state and local allocating agencies can award HOME-ARP funds to certain housing projects and activities that serve certain populations. Each HOME-ARP allocating agency must follow a specified process for seeking public input and must submit a written plan to HUD, describing the principal uses of its HOME-ARP funds. The Massachusetts Department of Housing and Community Development now has completed the public process and has prepared the draft plan for public comment.

## **SECTION II**

### **EXECUTIVE SUMMARY: HOME-ARP IN MASSACHUSETTS**

## **SECTION II: EXECUTIVE SUMMARY – HOME-ARP IN MASSACHUSETTS**

The need for more affordable housing was significant in Massachusetts before the COVID-19 pandemic began. The pandemic exacerbated the need, especially for very low-income and extremely low-income individuals and households, who were deeply affected by the partial collapse of sectors of the economy and often unable to pay rent without direct government assistance. Three years after COVID first emerged in this country, it continues to affect American lives. The effects on the housing sector vary from region to region, but in high-cost states and metropolitan areas, including Massachusetts and the Boston metropolitan area, low-income and extremely low-income individuals and households are directly suffering from the ongoing lack of affordable rental housing and significant post-COVID rent increases.

Like many other states, Massachusetts is in need of more affordable housing resources than ever before. The Greater Boston Housing Report Card 2022 notes that underproduction over the past few years has affected a number of U.S. regions with growing economies and tight land restrictions. In Massachusetts, the Boston metropolitan area housing market has been impacted by these dynamics. But other regions of the state also have been underproducing housing – including affordable housing – for some time. The need for more affordable housing resources is critical, although increased resources alone will not resolve all the barriers preventing adequate production.

In order to create more resources for housing and other needs, Congress passed legislation in 2021, during the first full year of COVID-19 impact. The legislation is known as the American Rescue Plan Act, or ARPA. The Commonwealth has deployed and continues to deploy the ARPA funds made available by Congress in 2021. About \$800 million in ARPA funds made available as Coronavirus State and Local Fiscal Recovery (SLFR) funds is being used to support multifamily rental projects, supportive housing projects, homeownership projects in certain Massachusetts cities, and direct homebuyer assistance in certain locations. The Massachusetts Department of Housing and Community Development (DHCD) either is directly administering the ARPA SLFR funds or is deploying the funds through contracts with its network of quasi-public housing affiliates. DHCD and its quasi-public agencies oversee a long-standing and highly successful delivery system for all forms of housing assistance. DHCD and its quasis typically are able to deploy new housing resources through the existing delivery system, while targeting certain projects and/or populations such as homeless individuals and families and other vulnerable individuals and families. The ARPA SLFR funds for housing are a highly significant new resource for DHCD and its delivery system as they seek to support the production of hundreds of new affordable units, including affordable and accessible units.

In addition to the ARPA SLFR funds available for housing, DHCD welcomes the new allocation of HOME-ARP funds from the U.S. Department of HUD. HUD has allocated to DHCD \$36.5 million to be fully expended by 2029. Before committing and expending HOME-ARP funds, DHCD must comply with all HUD requirements for the new monies, including submission of this written HOME-ARP plan for HUD review and approval. As of December 2022, the Department completed the HUD-mandated consultation process for the written plan. DHCD also has completed the mandatory data collection process for the draft plan and will shortly make the plan available for public comment, including at a formal public hearing.

As it prepared the plan, DHCD conformed to HUD requirements regarding populations eligible for assistance; eligible uses of funds; preferences (if any) for particular populations. In accordance with HUD requirements and guidance, DHCD will use the HOME-ARP money to serve populations who meet the HUD definition of individuals or families who are homeless/chronically homeless or at-risk of homelessness as well as other populations identified by HUD as “qualifying populations”. As indicated, DHCD will deploy the HOME-ARP funds through its existing delivery system. The delivery system is described in detail in the next section of this document. DHCD expects to submit the written HOME-ARP plan to HUD in March 2023.

In summary, DHCD welcomes the allocation of HOME-ARP funds, which will help the Department and its quasi-public affiliates produce more units intended to serve certain deeply vulnerable populations in Massachusetts.

## **SECTION III**

# **HOME-ARP AND THE MASSACHUSETTS AFFORDABLE HOUSING DELIVERY SYSTEM**



### **SECTION III: HOME-ARP AND THE MASSACHUSETTS AFFORDABLE HOUSING DELIVERY SYSTEM**

For years, Massachusetts state legislators and governors have worked to enact state housing bond bills and to appropriate millions of dollars in additional state resources to produce, preserve, and operate affordable rental housing. The Department of Housing and Community Development is the state agency with direct responsibility for oversight of the billions of dollars in state funds made available over four decades to support affordable housing. DHCD also is the allocating agency for the federal low-income housing tax credit, the federal HOME program, the National Housing Trust Fund (HTF), and the new HOME-ARP program.

DHCD awards almost all federal and state multifamily rental housing resources through regularly scheduled competitions – typically two or three competitions each year. While all resources are not available during all competitions, the list of federal and state resources that typically are available is long:

- 9% low-income housing tax credits (federal LIHTC)
- 4% low-income housing tax credits (federal LIHTC)
- State LIHTC
- HOME funds (federal)
- National Housing Trust funds (federal)
- Housing Stabilization Funds (state)
- Affordable Housing Trust Funds (state)
- Transit-Oriented Development funds (state)
- Housing Innovation Funds (state)
- Capital Improvement Preservation Funds (state)
- Facilities Consolidation Funds (state)
- Community Based Housing Funds (state)

In 2022, DHCD also became the state agency primarily responsible for additional federal relief funds made available through the SLFR funds made available under Section 9901 of ARPA. Working with three of its quasi-public affiliates, DHCD oversaw the implementation of four new housing programs, with over \$600 million in housing resources, made available through SLFR funds appropriated by the Massachusetts legislature as Chapter 102 of the Acts of 2021 and referred to in Massachusetts as ARPA-1. HOME-ARP is not part of ARPA-1: it is a source created through a separate section (Section 3205) of ARPA.

In addition to capital resources, DHCD typically provides several hundred rental assistance vouchers in each competition through federal Section 8 funds and/or state MRVP funds. Sponsors of most rental applications submitted for funding must commit to restricting at least 13% of the total units in a project for extremely low-income individuals or families earning less than 30% of area median income and often transitioning from homelessness. In a typical year, DHCD uses its rental housing resources to produce or preserve approximately 2,500 total units, with 18% to 20% of the units reserved for ELI individuals or households.

Despite the long list of Massachusetts affordable housing resources and the amounts typically available in DHCD competitions, the demand for resources always far exceeds the available resources. Massachusetts is a high-cost state: additional housing resources are always needed. Demand is especially high for units affordable to extremely low-income and very low-income individuals and families, who face the biggest challenge in finding affordable rental units, including accessible units, while struggling with other financial challenges in this high-cost state. Thus, despite the long list of already-available resources for housing, DHCD is confident that the HOME-ARP funds will be an important resource serving certain very vulnerable populations. Along with other resources, the Department will make HOME-ARP available during its 2023, 2024, and 2025 funding competitions. DHCD anticipates that it will fully commit the HOME-ARP project funds – approximately \$32 million – during the three-year period from 2023 through 2025.

With HOME-ARP available during regularly-scheduled DHCD competitions, project sponsors will have access to important DHCD resources in addition to the new HOME-ARP funds. Sources that will work especially well with HOME-ARP include the state Affordable Housing Trust Fund, the state Housing Stabilization Fund, the state Housing Innovations Fund, and, in some projects, federal and/or state low-income housing tax credits. At this time, DHCD anticipates producing between 225 and 275 new rental units for qualifying populations with approximately \$32 million in HOME-ARP project funds.

## **SECTION IV**

### **THE HUD MANDATORY CONSULTATION PROCESS/PUBLIC PARTICIPATION PROCESS**

## **SECTION IV: THE HUD MANDATORY CONSULTATION PROCESS/PUBLIC PARTICIPATION PROCESS**

### **A. Consultation**

In 2021, the U.S. Department of HUD issued HOME-ARP consultation guidance to all HOME-ARP allocating agencies. The guidance requires each allocating agency to meet with certain groups as it prepares its HOME-ARP plan. Further, the guidance requires each allocating agency to describe how it collected information from the mandatory consultation groups and the dates on which it met with the groups. The guidance was included in HUD Notice CPD-21-10 – Requirements of the Use of Funds in the HOME-ARP Program.

In accordance with HUD guidance, DHCD consulted with the following groups as it prepared the HOME-ARP plan:

- CoCs serving the Commonwealth of Massachusetts, including statewide leaders and representative CoCs;
- Homeless service providers;
- Domestic violence service providers, including participants in a statewide working group;
- Veterans' groups;
- Public housing agencies (PHAs), including the division director of the statewide housing authority, DHCD;
- Public agencies that address the needs of qualifying populations; and
- Public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

From August to November 2022, DHCD conducted eight virtual meetings with mandatory consultation groups:

- August 25, 2022 – Massachusetts Continuum of Care Organizations/Homeless Service Providers
- August 31, 2022 – Veterans' Organizations
- September 21, 2022 – Commonwealth of Massachusetts Executive Office of Elder Affairs
- October 3, 2022 – Commonwealth of Massachusetts Department of Mental Health
- October 6, 2022 – Public Housing Authorities
- October 14, 2022 – Housing Stability Policy Working Group of the Governor's Council to Address Sexual Assault and Domestic Violence
- November 16, 2022 – Public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities

Two DHCD divisions worked closely together during the mandatory consultation process. During each virtual session, DHCD staff presented a powerpoint summarizing key aspects of HOME-ARP, then encouraged open discussion among the participants attending the sessions. Following each session, DHCD also asked participants to respond to a series of questions conveyed

through Survey Monkey. Many participants in the consultation groups provided the Department with important information and thoughtful suggestions on the implementation of HOME-ARP in Massachusetts. Appendix D to this document includes a full list of the consultation groups and comments received during and after the consultation sessions.

In addition to meeting with the mandatory consultation groups, DHCD also solicited comments more broadly from individuals and groups involved with affordable housing in Massachusetts in an effort to broaden public participation. The Department found Survey Monkey to be a useful tool for seeking HOME-ARP comments. Survey Monkey results are included in Appendix D. Appendix D to this document includes a full list of all respondents to Survey Monkey, as well as excerpts from their responses. Some interested parties also sent letters to DHCD, suggesting certain priorities of HOME-ARP in Massachusetts. The Department has included these letters in Appendix E to this document.

In general, DHCD received thoughtful and well-informed comments from participants in the mandatory consultation process and the broader outreach process. The various comments from interested parties, as well as results from the data collection process, were very helpful to DHCD as it completed the draft HOME-ARP plan.

## **B. Public Participation Process:**

As indicated above, during the preparation of the draft HOME-ARP plan, DHCD reached out broadly to the Massachusetts development community, to local officials, to housing and homeless advocates, and to other interested parties to solicit suggestions and comments on how to use the new funds. The Department also conducted mandatory consultations with all groups identified by HUD in its HOME-ARP guidance. Early in 2023, with the draft plan completed, DHCD conducted a formal public participation process, as required by HUD in its HOME-ARP guidance. During the formal public participation process, the Department took the following actions:

1. DHCD posted the draft HOME-ARP plan to its website on February 17, 2023.
2. DHCD sent an email to over 1,000 recipients on a Department listserv notifying them that the plan had been posted, that a public hearing would be held on March 9, 2023, and that the public comment period would remain open until March 16, 2023.
3. On or about February 17, 2023, DHCD ran three legal notices in major Massachusetts newspapers stating that a HOME-ARP public hearing would be held on March 9, 2023 and noting how the Department intended to use its HOME-ARP funds. (A copy of the legal notice is included in Appendix G. The notice included instructions in several languages for individuals who might need special access in order to join the public hearing.)
4. DHCD further posted notice of the March 9, 2023, public hearing to its website.
5. DHCD held a public hearing on March 9, 2023, to solicit formal comments on its draft HOME-ARP plan.
6. In the several notices it distributed and posted regarding the public hearing, DHCD stated that it would accept written comments on the draft HOME-ARP plan until March 16, 2023.

### **C. Results of Public Participation Process:**

During 2022, the Department received numerous suggestions and comments during broad outreach to interested parties and to the mandatory consultation groups on the use of HOME-ARP funds.

The formal public participation process, including the March 9, 2023, public hearing, resulted in a limited number of comments and suggestions. During the March 9 public hearing, attended by 15 people, three people offered brief comments, as follows:

- A representative of the Pine Street Inn encouraged the use of HOME-ARP funds for homeless individuals. Following the public hearing, Lyndia Downie -- President/ Executive Director of Pine Street Inn -- submitted written comments again confirming the importance of producing more permanent housing with services for homeless individuals. Ms. Downie re-emphasized the critical importance of the services packages to be made available.
- A municipal official described the shortage of affordable housing on Cape Cod, the significant need for more affordable units, and the need to simplify the application process for affordable projects.
- A veterans' shelter representative asked for help in securing funds for his organization.

The Pine Street Inn representative also submitted a comment letter to DHCD before the public participation comment period ended on March 16, 2023. The Department received no other written comments on the draft HOME-ARP plan during the formal participation process. Through the citizen participation process, there were no HOME-ARP comments that were not accepted.

Prior to the beginning of the formal public participation process on February 17, 2023, the Department received several letters with suggestions on the use of HOME-ARP. The letters are included in Appendix E.

## **SECTION V**

# **NEEDS ASSESSMENT AND GAPS ANALYSIS**

## SECTION V: NEEDS ASSESSMENT AND GAPS ANALYSIS

Through Section 3205 of ARPA, Congress authorized the use of HOME-ARP funds to provide housing, shelter, and services to specific qualifying populations:

1. Homeless as defined in 24 CFR 91.5(1), (2), (3);
9. At risk of homeless as defined in 24 CFR 91.5;
10. Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking; and
11. Other populations who do not qualify under any of the populations above, but meet one of the following criteria:
  - a. Other families requiring services or housing assistance to prevent homelessness; and
  - b. Those at greatest risk of homelessness.

In accordance with Section V.C.1 of the HUD Notice on HOME-ARP, every allocating agency must evaluate the size and demographic composition of **all four** of the qualifying populations within its boundaries and, in addition, must assess the unmet needs of each of those populations. Further, the allocating agency must identify any gaps within its current shelter and housing inventory as well as in its service delivery system. Each agency is expected to use current data, including point-in-time count, housing inventory count, or other data available through CoCs and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

### Section V.A.: Housing Needs Inventory/Gap Analysis Table

Although HUD does not require allocating agencies to include the following tables, DHCD has chosen to do so:

**Homeless Needs Inventory and Gap Analysis Table**

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	12,421	3,841	3,151	#	84								
Transitional Housing	703	272	1,453	#	825								
Permanent Supportive Housing	2,959	1,221	7,342	#	3,201								
Other Permanent Housing	2,811	1,013	3,107	#	87								
Sheltered Homeless						3,076	4,255	507	868				



Unsheltered Homeless						5	1,082	27	81				
<i>Current Gap</i>										3,148	1,032	-	#

**Suggested Data Sources:** 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation

<b>2022 Point-in-Time Homelessness Count: All Persons Experiencing Homelessness by Race</b>		
	<b>Count</b>	<b>Percent</b>
<b>Black or African American</b>	5,855	37.8%
<b>White</b>	8,588	55.4%
<b>Asian</b>	144	0.9%
<b>American Indian or Alaska Native</b>	84	0.5%
<b>Native Hawaiian or Other Pacific Islander</b>	111	0.7%
<b>Multiple Races</b>	725	4.7%
<b>Total</b>	<b>15,507</b>	<b>100.0%</b>

### **Housing Needs Inventory and Gap Analysis Table**

<b>Non-Homeless</b>			
	<b>Current Inventory</b>	<b>Level of Need</b>	<b>Gap Analysis</b>
	<b># of Units</b>	<b># of Households</b>	<b># of Households</b>
Total Rental Units	984,730		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	151,895		
Rental Units Affordable to HH at 50% AMI (Other Populations)	41,700		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		173,175	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		55,560	
<i>Current Gaps</i>			35,140

**Suggested Data Sources:** 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS)

### **Section V.B.: Size/Demographic Composition of Qualifying Populations.**

HUD requires each allocating agency to describe the size and demographic composition of qualifying populations within its boundaries:

#### ***Homeless as defined in 24 CFR 91.5***

Under 24 CFR 91.5, “Homeless” is defined to mean:

- (1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
  - (i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
  - (ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals);
  - (iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;
- (2) An individual or family who will imminently lose their primary nighttime residence, provided that:
  - (i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
  - (ii) No subsequent residence has been identified; and
  - (iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks needed to obtain other permanent housing;
- (3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:
  - (i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
  - (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
  - (iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
  - (iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General

Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or

Data from the 2022 point-in-time (PIT) homelessness count completed by Continuums of Care across Massachusetts provide measures of the number of households and total persons experiencing homelessness on a given night in 2022. The Department compiled data from each of the 12 Massachusetts Continuums of Care to quantify the number of households and persons experiencing homelessness, the household composition, demographic profile, and the incidence of homelessness among specific populations.

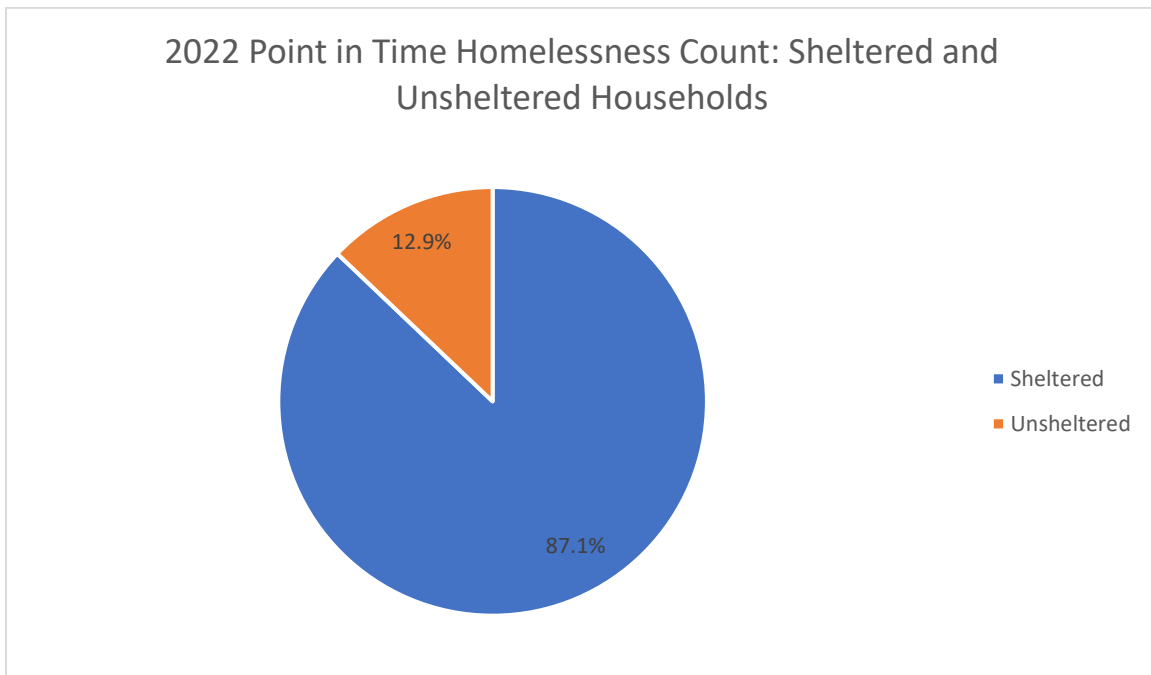
The PIT data show that there were 15,507 total persons experiencing homelessness at the time of the count. Of these households, 14,372 were sheltered (92.7%) and 1,135 were unsheltered (7.3%). Persons over the age of 24 comprised 53.8% of the population experiencing homelessness, totaling 8,343 persons. Eighty-seven percent (7,258 persons) of this group were sheltered and 13% (1,085) were unsheltered. Children (under the age of 18) comprised 38.5% of the population experiencing homelessness, totaling 5,977 children. Of these children, 6 were unsheltered (0.1%) and 5,971 (99.9%) were sheltered. There were 1,187 persons aged 18-24 experiencing homelessness, with 96.3% (1,143 persons) of this population sheltered and 3.7% (44 persons) unsheltered.

According to the PIT data, people of color were disproportionately represented among persons experiencing homelessness at the time of the count. While, according to the 2021 American Community Survey five-year estimates data profiles, Massachusetts' total population is approximately seven percent Black/African American and approximately 12% Hispanic/Latino (any race). Approximately 38% of the overall homeless in the PIT count (5,855 persons) were identified as Black, African American, or African, and slightly more than one-third of the overall homeless in the PIT count (5,780 persons) were identified as Hispanic/Latino.

The PIT data does not indicate how many of the persons experiencing homelessness at the time of the count were persons with disabilities. However, 2,460 persons were identified as chronically homeless, which under 24 CFR 91.5 requires that the person be "a homeless individual with a disability" as defined in Section 401(9) of the McKinney-Vento Homeless Assistance Act, 42 USC 11360(9). Of the chronically homeless, about 80% (1,945) were in emergency shelter, while about 20% (459) were unsheltered.

The following tables and graphs further demonstrate the information above:

<b>2022 Point in Time Homelessness Count: Persons Experiencing Homelessness</b>		
	<b>Total</b>	<b>Percent Share of Total Population</b>
Children Sheltered (under age 18)	5,971	38.5%
Children Unsheltered (under age 18)	6	0.0%
Persons 18-24 Sheltered	1,143	7.4%
Persons 18-24 Unsheltered	44	0.3%
Persons Over Age 24 Sheltered	7,258	46.8%
Persons Over Age 24 Unsheltered	1,085	7.0%
Total	15,507	100.0%



In addition to PIT data, DHCD used waitlist data from its Common Housing Application for Massachusetts Programs (CHAMP) (currently used to apply for state-aided public housing and the Massachusetts Alternative Housing Voucher Program) to help quantify the number of households experiencing homelessness. The CHAMP data indicates that there are approximately 32,102 applicants for state-aided public housing who identified as homeless. While this data does not indicate the ages of the applicants, it does provide a snapshot of the racial composition of the population self-identifying as homeless in applications for deeply affordable housing. The composition of this population by race is as follows:

<b>CHAMP Waitlist: Persons experiencing homelessness by race of the head of household</b>	
<b>Race</b>	<b>Percent</b>
Alaska Native	0.0%
American Indian	0.8%
Asian	1.4%
Black or African American	18.8%
Native Hawaiian or Other Pacific Island	0.3%
Other	3.9%
White	48.5%
No Response	23.2%

Based on the PIT and CHAMP data, DHCD notes that:

- Children and unaccompanied youth represent a substantial portion of the overall homeless population in Massachusetts.

- Black/African American and Hispanic/LatinX individuals and families are disproportionately represented among the Massachusetts homeless population.
- Chronically homeless persons – who by definition are persons with disabilities – represent 16% of the homeless in Massachusetts, highlighting the need for housing that meets the accessibility needs and service needs of persons with disabilities.

As part of the needs/gap analysis, HUD also requires all HOME-ARP allocating agencies to include certain information contained in this subsection.

***At Risk of Homelessness as defined in 24 CFR 91.5***

Under 24 CFR 91.5, “At Risk of Homelessness” is defined as follows:

*At risk of homelessness.*

(1) An individual or family who:

- (i) Has an annual income below 30 percent of median family income for the area, as determined by HUD;
- (ii) Does not have sufficient resources or support networks, *e.g.*, family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “Homeless” definition in this section; and
- (iii) Meets one of the following conditions:
  - (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
  - (B) Is living in the home of another because of economic hardship;
  - (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
  - (D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;
  - (E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;

- (F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
- (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan.

- (2) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or
- (3) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

The prevalence of cost burden and of severe housing problems among extremely low-income households (earning less than 30% AMI) helps quantify the number of households in Massachusetts who are likely to meet HUD’s definition of “at risk of homelessness” at 24 CFR 91.5 for the HOME-ARP Program. However, it is important to note that there is no one single measure available to determine whether a household is at risk of homelessness.

Data from HUD’s Comprehensive Housing Affordability Strategy (CHAS) indicate that there are approximately 317,935 extremely low-income renter households in Massachusetts. Of this population, approximately 221,595 are cost burdened (monthly housing costs exceed 30% of gross monthly household income). Among renter households earning less than 30% AMI, 173,175 households were experiencing a “severe housing problem,” as defined by HUD. HUD defines a household with a “severe housing problem” as a household experiencing at least one of the following conditions: 1) housing unit lacks complete kitchen facilities; 2) housing unit lacks complete plumbing facilities; 3) household is overcrowded<sup>1</sup>; and 4) household is severely cost burdened, meaning that they pay more than 50% of their gross household income towards rent. The vast majority of households experiencing a severe housing problem (approximately 96%), totaling 165,805, are severely cost burdened and may experience one or more of the other conditions defined by HUD as a housing problem.

The distribution of extremely low-income renters with a “severe housing problem” by race/ethnicity is detailed in the table below.

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<sup>1</sup> Approximately 3,675 extremely low-income Massachusetts renter households are experiencing severe overcrowding, defined as more than 1.5 people per room. Severe overcrowding is a characterization used by HUD to determine whether a household is at risk of homelessness.

<b>% of ELI Renter with Severe Housing Problem by Race/Ethnicity</b>	
	<b>Percent</b>
White alone, non-Hispanic	55.05%
Black or African-American alone, non-Hispanic	12.92%
Asian alone, non-Hispanic	6.42%
American Indian or Alaska Native alone, non-Hispanic	0.40%
Pacific Islander alone, non-Hispanic	0.02%
Hispanic, any race	25.19%

The CHAS data demonstrate the significant number of households in Massachusetts who are extremely low-income and potentially at risk of homelessness resulting from severe housing cost burden, overcrowding, and physical unit deficiencies. Overall, of the 317,935 extremely low-income renter households, an estimated 54.5% were experiencing a severe housing problem, with approximately 52.2% of extremely low-income renter households severely cost-burdened.

Data is not readily available to accurately quantify the number or percentage of extremely low-income households who also meet one or more of the specific conditions listed in the definition of “at risk of homelessness” at 24 CFR 91.5. However, the following data illustrates the magnitude of housing instability among this population:

- During calendar year 2022, more than 32,000 residential tenants received “executions” – court orders allowing their landlords to complete the eviction process – and increase of 43.9% over calendar year 2021.
- According to data from the Commonwealth’s Department of Elementary and Secondary Education, Homeless Student Program Data, during the 2021-2022 school year, a total of 22,232 children and youth qualifying as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act were enrolled in Massachusetts public schools. Of these, approximately 14,909 were identified as doubled-up in their primary nighttime residence due to economic hardship.
- There are approximately 3,675 ELI households experiencing severe overcrowding.

DHCD also notes the particular need for accessible housing to meet the needs of persons with disabilities, including but not limited to chronically homeless persons and those exiting institutions. According to the 2021 American Housing Survey, approximately 247,000 Massachusetts households included at least one person with a disability. Of these, approximately 85,900 reported a hearing disability, 45,400 reported a vision disability, and 145,500 reported a physical disability. According to the 2021 American Community Survey, 68% of Massachusetts housing stock was built before 1979, and 86% of Massachusetts’ housing stock was built before 1999. (By comparison, nationally only 52% of housing units were built before 1979, and 79% before 1999.) This older housing stock is less likely to include units that are fully accessible, or even to provide for stair-free access. Notably, federal requirements for accessibility did not apply to the vast majority of housing units in the Commonwealth due to their age. DHCD is committed to enhancing the accessibility of the subsidized housing stock in Massachusetts and is proposing that at least half of the units created with HOME-ARP funding be fully accessible.

***Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice***

The National Network to End Domestic Violence completes an annual Domestic Violence Counts Survey, which represents an unduplicated count of adults and children seeking domestic violence services on a single day.

Data from the 2021 Domestic Violence Counts Survey for Massachusetts indicated that 2,302 adults and children impacted by domestic violence were served on a single day. Of those served, 926 were sheltered/housed in emergency/transitional housing, and 1,376 adults and children received supportive services. An additional 322 requests for services could not be met due to resource constraints, with approximately 57% of these requests for housing and emergency shelter. There were 508 contacts received on domestic violence hotlines.

Statewide waitlist data from CHAMP show that there are approximately 7,428 applicants who identified themselves as experiencing homelessness as a result of domestic violence. The distribution of these applicants, by the race of the head of household, is detailed below:

<b>CHAMP Waitlist: Persons experiencing homelessness as a result of domestic violence</b>	
<b>Race</b>	<b>Percent</b>
Alaska Native	0.0%
American Indian	1.4%
Asian	1.4%
Black or African American	15.5%
Native Hawaiian or Other Pacific Island	0.4%
Other	10.0%
White	49.2%
No Response	22.0%

***Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice:***

The prevalence of cost burden and of severe housing problems among very low-income households helps quantify the number of households in Massachusetts who meet HUD’s definition of “Other Populations” for the HOME-ARP Program.

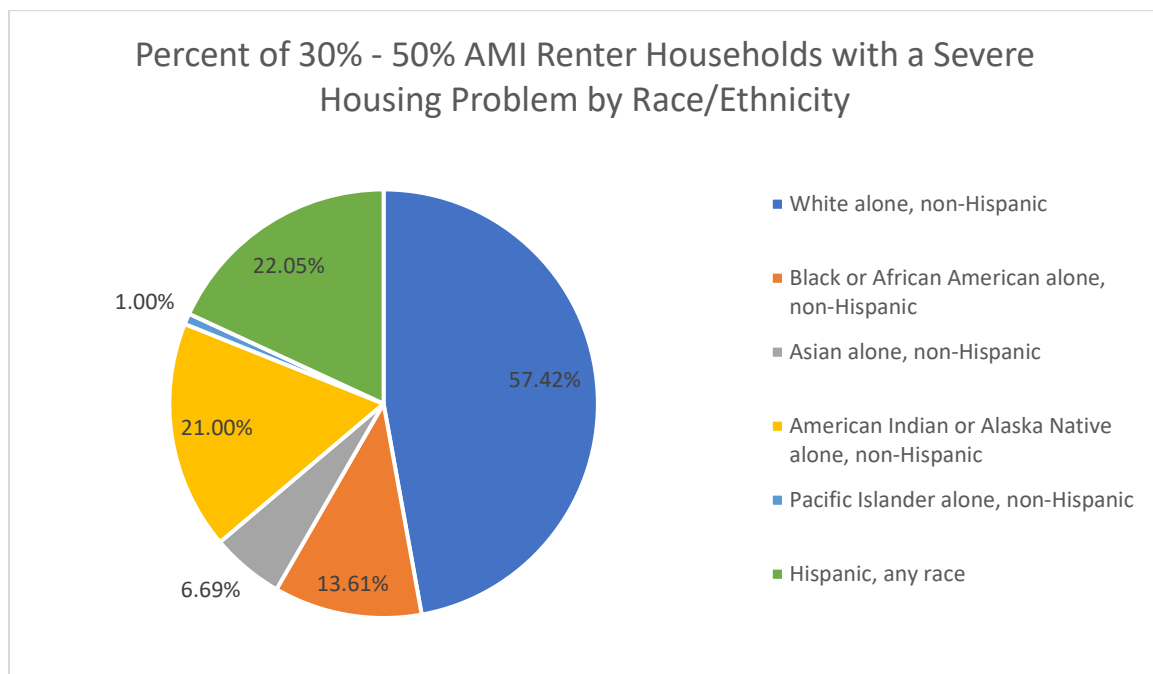
Estimates from HUD’s CHAS dataset indicates that there are approximately 169,000 renter households earning between 30% and 50% of AMI. Of these households, approximately 55,560 have a severe housing problem, with 45,890 of these households experiencing a severe housing cost burden. Approximately 2,895 renter households earning between 30% and 50% of AMI are experiencing severe overcrowding, defined as more than 1.5 people per room. Severe overcrowding is one of the characteristics HUD uses to determine whether a household is at great risk of housing instability.



DHCD’s approved consolidated plan indicates that low-income families, non-white families, and the elderly are the most severely affected by lack of affordable housing. Common characteristics of households facing housing instability, which often turn into barriers to housing, include, but are not limited to, language restrictions, disabilities among one or more household members, sporadic employment coupled with low-wage jobs, lower levels of education, and domestic violence.

The distribution of renter households earning between 30% and 50% AMI with a “severe housing problem” by race/ethnicity is detailed in the table below:

<b>Percent of 30%-50% AMI Renter Households with a Severe Housing Problem by Race/Ethnicity</b>	
	<b>Percent</b>
White alone, non-Hispanic	57.42%
Black or African-American alone, non-Hispanic	13.61%
Asian alone, non-Hispanic	6.69%
American Indian or Alaska Native alone, non-Hispanic	0.21%
Pacific Islander alone, non-Hispanic	0.01%
Hispanic, any race	22.05%



The Commonwealth of Massachusetts administers homelessness prevention programs that are designed to help households remain stably housed in the face of eviction and financial hardship. Data from these programs, which were expanded during the COVID-19 pandemic, provide additional insight into the number of households experiencing housing instability in Massachusetts. During the period from July 2021 through early December 2022, approximately 115,700 households were served through an emergency rental/mortgage assistance program administered through DHCD.

## **Section V.C.: Current Resources Available for Qualifying Populations**

HUD has suggested that all HOME-ARP allocating agencies provide information on current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, tenant-based rental assistance, and affordable and permanent supportive rental housing. Although optional, not a HUD requirement, DHCD has included this information in Appendix F to this document.

## **Section V.D.: HUD requires each allocating agency to describe the unmet housing and service needs of qualifying populations**

### ***Homeless as defined in 24 CFR 91.5:***

Data from the 2022 point-in-time count show that there were more than 15,000 persons experiencing homelessness in 2022 on the evening of the count. Of these persons, approximately 92% were sheltered and approximately 8% were unsheltered. Data from CHAMP show that there are approximately 32,000 households on the waitlist for state-aided public housing who have identified themselves as homeless. Among this population, there is significant need for additional affordable housing, including permanent supportive housing and accessible housing. The need for additional affordable housing and the need for permanent supportive housing for persons experiencing homelessness were identified through the HOME-ARP consultation process as unmet needs. DHCD will use HOME-ARP to help address these critical needs.

### ***At Risk of Homelessness as defined in 24 CFR 91.5:***

CHAS, CHAMP, and other data included in this report demonstrate the significant need among extremely low-income households experiencing housing instability for affordable housing with supportive services. There are approximately 173,175 ELI households experiencing severe housing problems and approximately 145,000 ELI households on the centralized waitlist for state-aided public housing. Data from the Department of Elementary and Secondary Education Program indicate that there were more than 15,000 students doubled-up in their primary nighttime residence due to economic hardship. CHAS data indicate that there are approximately 199,000 ELI households with a disabled household member.

These populations need additional affordable housing units. They frequently need accompanying supportive services along with rental assistance and access to homeless prevention programs such as short-term emergency rental assistance. These needs were identified through the mandatory consultation process and are consistent with the needs identified in the Department's 2020-2024 Consolidated Plan. The Department will use HOME-ARP to help address these needs through the production of additional affordable rental units, including units with supportive services and accessible units. The Department will continue to administer existing emergency assistance and rental assistance programs to serve this population.

***Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice:***

During the mandatory consultation process, the need for affordable housing units to serve this qualifying population was clearly identified. DHCD received suggestions from the consultation participants, including integrating units for this qualifying population into larger projects or supporting projects targeted solely to these qualifying populations. The consultation group also identified issues that make it difficult for some individuals or households in this qualifying population to secure rental assistance adequate to their needs. The 2022 PIT data demonstrates that there were 81 unsheltered victims of domestic violence and 868 sheltered victims of domestic violence. Data from the annual domestic violence counts report shows that 40% of households impacted by domestic violence on any given night needed placement in emergency shelter/transitional housing, and 60% received supportive services. The production of additional affordable units to serve this population will help relieve the burden an existing shelter/transitional housing and support placement in permanent affordable housing.

***Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the HOME-ARP Notice:***

CHAS data included in this report demonstrate the significant need among other populations experiencing housing instability for affordable housing and supportive services. There are approximately 55,560 very low-income (VLI) households experiencing severe housing problems. Since July 2021, approximately 115,000 households have been served by Department-administered emergency rental and mortgage assistance programs.

Among this population, there is significant need for additional affordable housing and affordable housing with supportive services. This population also needs rental assistance and access to homelessness prevention programs, such as short-term emergency rental assistance. These needs also were identified through the HOME-ARP consultation process. The Department intends to use HOME-ARP funds to help address these needs.

**Section V.E.: HUD requires every allocating agency to identify any gaps within the current shelter and housing inventory and within the service delivery system:**

The needs assessment and the consultation process confirmed what Massachusetts housing experts already knew: the primary gaps within the service delivery system for qualifying populations are adequate supplies of affordable housing and of permanent supportive housing. Based on 2022 PIT data, approximately 8% of homeless persons in the state are unsheltered, with approximately 92% sheltered and in need of affordable housing, often including permanent supportive housing. Other groups identified by HUD as qualifying populations also have a demonstrated need for more affordable housing, more permanent supportive housing, and more accessible rental housing.

As a “right to shelter” state for families, Massachusetts has one of the lowest rates of unsheltered persons with children in the nation. The shelter system currently includes approximately 3,600 units. As the state recovers from the COVID-19 pandemic, the emergency shelter system for families has experienced increased demand, resulting in families being sheltered in hotels and

motels when shelters are at capacity. The increased pressure on the emergency shelter system simply underscores the importance of using HOME-ARP funding to increase the supply of affordable housing, including permanent supportive housing and accessible housing for homeless families.

In addition to family shelters, the Department supports a network of approximately 50 shelter providers serving the unaccompanied adult homeless population. This network includes approximately 3,070 beds, supported by approximately \$110 million in annual funding from the state operating budget. The Department will continue to support the network of shelter providers for the unaccompanied adult population and will prioritize the production of supportive housing units for this population with its HOME-ARP allocation.

#### **Section V.F.: Additional HUD Requirements Related to Needs/Gaps Analysis**

**HUD requires all allocating agencies, also known as participating jurisdictions, to identify priority needs for qualifying populations:**

Among all Massachusetts qualifying populations, the priority need is the production of affordable housing, including permanent supportive housing and accessible housing. The information in this section clearly supports this conclusion.

**HUD further requires all allocating agencies to explain how they determine the level of need and gaps in their shelter and housing inventory and service delivery systems based on the data presented in the plan:**

The Department used data from the Continuum of Cares throughout the state, HUD's Comprehensive Housing Affordability Strategy (CHAS) dataset, and waitlist data from the Common Housing Application for Massachusetts Programs (CHAMP), along with other data sources, to quantify the housing and housing-related needs of the various qualifying populations. The Department used this data, the mandatory consultation process, and its broad experience in administering millions of dollars in federal and state housing resources, over four decades, to inform the needs and gaps analysis included in this plan. The data support this conclusion: the need for more affordable units, including permanent supportive housing and accessible units, is paramount. The need far exceeds the resources available to produce thousands of such units over time. HOME-ARP is an important and welcome resource, but, despite the availability of HOME-ARP, the need remains very significant.

## **SECTION VI**

# **PROPOSED USE OF HOME-ARP IN MASSACHUSETTS**

## **SECTION VI: PROPOSED USE OF HOME-ARP IN MASSACHUSETTS**

During the HOME-ARP consultation process, the majority of groups and individual participants identified the production of additional permanent supportive housing units (PSH) as the most important use of HOME-ARP. The data that DHCD collected from the continuums of care and other sources supports the recommendations the Department received during the consultation process.

Although most respondents during the mandatory consultation process emphasized the importance of permanent supportive housing, several respondents suggested that DHCD use some HOME-ARP funds for tenant-based rental assistance. At this time, the Department is not prepared to include tenant-based rental assistance as a HOME-ARP use. Most states do not fund their own tenant-based rental voucher programs, but Massachusetts has funded both tenant-based and project-based assistance for over 30 years. During this period of time, the Commonwealth has expended millions of dollars in its own funds for rental assistance.

In addition, the Department receives a direct allocation of federal Section 8 funds each year from HUD. The Department, as an all-voucher Moving to Work agency, receives a direct allocation of federal Section 8 funds each year from HUD. These funds support more than 20,000 households with tenant-based and project-based vouchers and provide supportive services and other housing support to more than 900 additional families through local non-traditional programming. Also in 2021, DHCD received over \$350 million in Section 8 funds, which the Department allocates to local housing organizations to support both tenant-based and project-based rental assistance. DHCD's investments of state funds in tenant-based and project-based assistance are far greater than the investments made by almost all other states.

It is the Department's belief that adding to the supply of affordable housing, including permanent supportive housing and accessible units, is the most important use of HOME-ARP funds. As indicated, DHCD will deploy HOME-ARP to produce new units for the qualifying populations identified by HUD. DHCD also is prepared to support the new HOME-ARP units with project-based rental assistance, through Section 8 and/or the state-funded MRVP.

Interested sponsors should note that DHCD will not use HOME-ARP funds to refinance existing projects.

### **Additional HUD-Required Information:**

In its HOME-ARP guidance, HUD requires all allocating agencies to provide the following information related to the use of funds:

#### **A description of the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:**

The Department will make HOME-ARP resources available through regularly scheduled competitions and a competitive Notice of Funding Availability. DHCD follows this process for allocating all its rental funding resources. The process is explained in greater detail in Section III of this document. Prior to competition deadlines, DHCD holds group information sessions and meets individually with any development team seeking advice in timely fashion.

**A description indicating whether the allocating agency will administer eligible activities directly:**

The Department will directly administer all HOME-ARP funds in a manner consistent with eligible activities. Further information is contained in Section III.

**If any portion of the PJ's HOME-ARP administrative funds are provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:**

Not applicable

## **SECTION VII**

### **HUD HOME-ARP FUNDING CHART**



## SECTION VII: HUD HOME-ARP FUNDING CHART

In accordance with its HOME-ARP notice, HUD requires all allocating agencies to submit the following table:

### Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$0	0%	
Acquisition and Development of Non-Congregate Shelters	\$0	0%	
Tenant Based Rental Assistance (TBRA)	\$0	0%	
Development of Affordable Rental Housing	\$30,985,752.10	85%	
Non-Profit Operating	\$0	0%	5%
Non-Profit Capacity Building	\$0	0%	5%
Administrative and Planning	\$5,468,073.90	15%	15%
<b>TOTAL HOME-ARP Allocation</b>	<b>\$36,453,826.00</b>		

Further, HUD requires all allocating agencies to respond to the following:

**Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:**

The Department will make HOME-ARP resources available for permanent supportive housing through regularly scheduled competitions and NOFAs, as previously described in this document. DHCD will evaluate all applications for HOME-ARP resources based on threshold and scoring criteria. DHCD will assess overall project feasibility and the proposed supportive services plan in accordance with HUD program requirements.

Further, HUD requires all allocating agencies to respond to the following:

**Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:**

Among qualifying populations in Massachusetts, the primary unmet need is the need for more permanent supportive housing. The body of this document contains data supporting this need. The results of the mandatory consultation process also support this need.

Further, HUD requires all allocating agencies to respond to the following:

**Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:**

DHCD anticipates funding between 225 and 275 HOME-ARP assisted units.

Further, HUD requires all allocating agencies to respond to the following:

**Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how the production goal will address the PJ's priority needs:**

The goal is stated above: 225 to 275 HOME-ARP assisted units. These units will help address the primary unmet need of qualifying populations in Massachusetts – the need for many more units of permanent supportive housing.

## **SECTION VIII**

### **HOME-ARP PREFERENCES/PRIORITY PROJECT TYPES IN MASSACHUSETTS**

## **SECTION VIII: HOME-ARP PREFERENCES/PRIORITY PROJECT TYPES IN MASSACHUSETTS**

Allocating agencies for programs such as the Low-Income Housing Tax Credit (LIHTC), HOME, and various state resources often permit sponsors to include certain preferences in tenant selection. The need for a preference must be documented, and the preferences must be allowable under fair housing laws. The U.S. Department of HUD has issued specific guidance on tenant selection preferences in projects funded with HOME-ARP. The guidance is entitled “HOME-ARP Policy Briefs/Preferences, Methods of Prioritization, and Limitations” and is included as an appendix to this plan.

In accordance with the HUD guidance, DHCD intends to permit HOME-ARP sponsors to include either one, two, or three preferences among HOME-ARP qualifying populations in the tenant selection process. Sponsors must document the reasons for the proposed preferences, which must be reviewed and approved by DHCD. If appropriate for their project, sponsors may propose one, two, or three of the following preferences:

- Homeless individuals and/or families, in accordance with the HUD definition of homeless under 24 CFR 91.5, which may include, though not be limited to:
  - Homeless unaccompanied youth, as per the definition at 24 CFR 91.5
  - Homeless veterans, as per the definition of 24 CFR 91.5
- Chronically homeless individuals and/or families, in accordance with the HUD definition of chronically homeless, which may include, though not be limited to:
  - Chronically homeless unaccompanied youth, as per the definition at 24 CFR 91.5
  - Veterans, as per the definition at 24 CFR 91.5
- Individuals and/or families at risk of homelessness, in accordance with the HUD definition at 24 CFR 91.5, which may include, though not be limited to:
  - Youth, 24 CFR 91.5 the definition criteria at 24 CFR 91.5
  - Veterans, 24 CFR 91.5 the definition criteria at 24 CFR 91.5
- Those fleeing or attempting to flee domestic violence and meeting HUD definition criteria at 24 CFR 91.5

While DHCD may decide to approve one or more preferences, as described above, sponsors of HOME-ARP projects must allow all qualifying populations to apply for the HOME-ARP units. Further, within a given project, qualifying populations may be able to apply for affordable units that are not HOME-ARP assisted. As applicants, qualifying populations are not restricted to HOME-ARP units. Their housing needs could be met if they are selected as residents in other units.

An example of how HOME-ARP tenant selection with preferences can work in Massachusetts is as follows:

A sponsor seeks HOME-ARP funding for six units within a larger Massachusetts affordable housing project. The sponsor fully understands that the only applicants eligible to seek the HOME-ARP units must be qualifying populations, as defined by HUD. The sponsor also understands that all qualifying populations must be allowed to apply for the units. However, within the qualifying populations, the sponsor notifies DHCD that he/she intends to adopt one allowable preference in tenant selection. The preference is for chronically homeless as defined above. The sponsor prepares both the project tenant selection plan and the affirmative fair marketing plans/materials to incorporate the six HOME-ARP units, all restricted for qualifying populations as defined by HUD. The tenant selection plan and the affirmative fair marketing plans/materials further incorporate the chronically homeless preference for the six HOME-ARP units. The sponsor submits the tenant selection plan and the affirmative fair marketing plan/materials for review and approval by DHCD before the marketing process begins. During the tenant selection process, which includes a well-publicized lottery, the sponsor's management agent first selects four eligible applicants -- who meet the preference -- for four of the HOME-ARP units. At that point in time, no other applicants meet the preference criteria for the HOME-ARP units. The sponsor's management agent then selects two more applicants from the broader pool of qualifying populations to fill the remaining two HOME-ARP-assisted units. One of the two units is filled by a veteran who meets at least one of the HUD criteria for qualifying populations. The other remaining unit is filled by an individual over 62 years of age who also meets at least one of the HUD criteria for qualifying populations.

On a case-by-case basis, DHCD may allow a project sponsor to base its tenant selection on referrals from the CoC through its coordinated entry process (CE) to determine the eligibility of HOME-ARP qualifying populations and to rank individuals and families for preference in admission to the HOME-ARP units. Any such approval will be subject to DHCD establishing and approving the prioritization applied by the CoC in accordance with the requirements of the HOME-ARP Notice. In all cases, DHCD will comply with the requirements for preferences, referral methods, and limiting eligibility to subpopulations, if applicable, in the HOME-ARP Notice.

DHCD strongly urges sponsors seeking HOME-ARP funds to contact the Department as they structure their projects and make decisions on preferences within the qualifying populations eligible for HOME-ARP units.

### **DHCD Priorities for Project Types:**

In addition to offering the preferences above in tenant selection, DHCD will prioritize several project types as it reviews multifamily rental funding applications that include HOME-ARP. The project types are as follows:

- Projects intended to exclusively serve homeless or chronically homeless individuals or families, as defined by HUD. Proposed staffing levels must be appropriate and approval by DHCD.

- Projects whose sponsors intend to restrict at least 50% of the total units for homeless or chronically homeless individuals or families as defined by HUD. Proposed staffing levels must be appropriate and approved by DHCD.

**APPENDIX A**  
**HUD TITLE 24 CFR 91.5**

# Appendix A

## Title 24 - Housing and Urban Development

### Subtitle A - Office of the Secretary, Department of Housing and Urban Development

#### Part 91 - Consolidated Submissions for Community Planning and Development Programs Subpart A – General

**Authority:** 42 U.S.C. 3535(d), 3601-3619, 5301-5315, 11331-11388, 12701-12711, 12741-12756, and 12901-12912

**Source:** 60 FR 1986, Jan. 5, 1995, unless otherwise noted.

#### **§91.5 Definitions**

The terms Affirmatively Furthering Fair Housing, elderly person, and HUD are defined in 24 CFR part 5.

This content is from the eCFR and is authoritative but unofficial.

*At risk of homelessness.*

- (1) An individual or family who:
  - (i) Has an annual income below 30 percent of median family income for the area, as determined by HUD;
  - (ii) Does not have sufficient resources or support networks, *e.g.*, family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “Homeless” definition in this section; and
  - (iii) Meets one of the following conditions:
    - (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
    - (B) Is living in the home of another because of economic hardship;
    - (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
    - (D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;
    - (E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;



- (F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
  - (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;
- (2) A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 573a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14143e-2(6)), section 330(H)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or
  - (3) A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

*Certification.* A written assertion, based on supporting evidence, that must be kept available for inspection by HUD, by the Inspector General of HUD, and by the public. The assertion shall be deemed to be accurate unless HUD determines otherwise, after inspecting the evidence and providing due notice and opportunity for comment.

*Chronically homeless* means:

- (1) A "homeless individual with a disability," as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:
  - (i) Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
  - (ii) Has been homeless and living in described in paragraph (1)(i) of this definition continuously for at least 12 months or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (1)(i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility;
- (2) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or
- (3) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) or (2) of

this definition, including a family whose composition has fluctuated while the head of household has been homeless.

*Consolidated plan* or (“the plan”). The document that is submitted to HUD that serves as the comprehensive housing affordability strategy, community development plan, and submissions for funding under any of the Community Planning and Development formula grant programs (e.g., CDBG, ESG, HOME, and HOPWA), that is prepared in accordance with the process described in this part.

*Consortium*. An organization of geographically contiguous units of general local government that are acting as a single unit of general local government for purposes of the HOME program (see 24 CFR part 92).

*Continuum of Care*. The group composed of representatives of relevant organizations, which generally includes nonprofit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons that are organized to plan for and provide, as necessary, a system of outreach, engagement, and assessment; emergency shelter; rapid re-housing; transitional housing; permanent housing; and prevention strategies to address the various needs of homeless persons and persons at risk of homelessness for a specific geographic area.

*Cost burden*. The extent to which gross housing costs, including utility costs, exceed 30 percent of gross income, based on data available from the U.S. Census Bureau.

*Emergency shelter*. Any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless, and which does not require occupants to sign leases or occupancy agreements.

*Extremely low-income family*. Family whose income is between 0 and 30 percent of the median income for the area, as determined by HUD with adjustments for smaller and larger families, except that HUD may establish income ceilings higher or lower than 30 percent of the median for the area on the basis of HUD’s findings that such variations are necessary because of prevailing levels of construction costs or fair market rents, or unusually high or low family incomes.

- (1) An individual or family who lacks a fixed, regular and adequate nighttime residence, meaning:
  - (i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
  - (ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals);

- (iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;
- (2) An individual or family who will imminently lose their primary nighttime residence, provided that:
  - (i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
  - (ii) No subsequent residence has been identified; and
  - (iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks needed to obtain other permanent housing;
- (3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:
  - (i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
  - (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
  - (iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
  - (iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or
- (4) Any individual or family who:
  - (i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
  - (ii) Has no other residence; and
  - (iii) Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

*Homeless Management Information System (HMIS).* The information system designated by the Continuum of Care to comply with HUD's data collection, management, and reporting standards and used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness.

*Homeless person.* A youth (17 years or younger) not accompanied by an adult (18 years or older) or an adult without children, who is homeless (not imprisoned or otherwise detained pursuant to an Act of Congress or a State law), including the following:

- (1) An individual who lacks a fixed, regular, and adequate nighttime residence; and
- (2) An individual who has a primary nighttime residence that is:
  - (i) A supervised publicly or privately operated shelter designed to provide temporary living accommodations (including welfare hotels, congregate shelters, and transitional housing for the mentally ill);
  - (ii) An institution that provides a temporary residence for individuals intended to be institutionalized; or
  - (iii) A public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings.

*Jurisdiction.* A State or unit of general local government.

*Large family.* Family of five or more persons.

*Lead-based paint hazards* means lead-based paint hazards as defined in part 35, subpart B of this title.

*Low-income families.* Low-income families whose incomes do not exceed 50 percent of the median family income for the area, as defined by HUD with adjustments for smaller and larger families, except that HUD may establish income ceilings higher or lower than 50 percent of the median for the area on the basis of HUD's findings that such variations are necessary because of prevailing levels of construction costs or fair market rents, or unusually high or low family incomes.

*Middle-income family.* Family whose income is between 80 percent and 95 percent of the median income for the area, as determined by HUD with adjustments for smaller and larger families, except that HUD may establish income ceilings higher or lower than 80 percent of the median for the area on the basis of HUD's findings that such variations are necessary because of prevailing levels of construction costs or fair market rents, or unusually high or low family incomes.

*Overcrowding.* For purposes of describing relative housing needs, a housing unit containing more than one *person* per room, as defined by the U.S. Census Bureau, for which data are made available by the Census Bureau. (See 24 CFR 791.402(b).)

*Person with a disability.* A *person* who is determined to:

- (1) Have a physical, mental or emotional impairment that:
  - (i) Is expected to be of long-continued and indefinite duration;
  - (ii) Substantially impedes his or her ability to live independently; and
  - (iii) Is of such a nature that the ability could be improved by more suitable housing conditions; or

- (2) Have a developmental disability, as defined in section 102(7) of the Developmental Disabilities Assistance and Bill of Rights Act (42 U.S.C.6001-6007); or
- (4) Be the surviving member or members of any family that had been living in an assisted unit with the deceased member of the family who had a disability at the time of his or her death.

*Poverty level family.* Family with an income below the poverty line, as defined by the Office of Management and Budget and revised annually.

*Rapid re-housing assistance.* The provision of housing relocation and stabilization services and short- and/or medium-term rental assistance as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing.

*Severe cost burden.* The extent to which gross housing costs, including utility costs, exceed 50 percent of gross income, based on data available from the U.S. Census Bureau.

*State.* Any State of the United States and the Commonwealth of Puerto Rico.

*Transitional housing.* A project that is designed to provide housing and appropriate supportive services to homeless persons to facilitate movement to independent living within 24 months, or a longer period approved by HUD. For purposes of the HOME program, there is no HUD-approved time period for moving to independent living.

*Victim service provider.* A private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. This term includes rape crisis centers, battered women's shelters, domestic violence transitional housing programs, and other programs.

*Unit of general local government.* A city, town, township, county, parish, village, or other general purpose political subdivision of a State; an urban county; and a consortium of such political subdivisions recognized by HUD in accordance with the HOME program (24 CFR part 92) or the CDBG program (24 CFR part 570).

*Urban county.* See definition in 24 CFR part 570.3.

## **APPENDIX B**

### **QUALIFYING POPULATIONS FROM HUD HOME-ARP IMPLEMENTATION NOTICE**

## Appendix B

### (From the HUD HOME-ARP Implementation Notice)

#### IV. QUALIFYING POPULATIONS, TARGETING AND PREFERENCES

ARP requires that funds be used to primarily benefit individuals and families in the following specified “qualifying populations.” Any individual or family who meets the criteria for these populations is eligible to receive assistance or services funded through HOME-ARP without meeting additional criteria (e.g., additional income criteria). All income calculations to meet income criteria of a qualifying population or required for income determinations in HOME- ARP eligible activities must use the annual income definition in [24 CFR 5.609](#) in accordance with the requirements of [24 CFR 92.203\(a\)\(1\)](#).

##### A. Qualifying Populations

###### 1. **Homeless**, as defined in [24 CFR 91.5](#) *Homeless* (1), (2), or (3):

- (i) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
  - (A) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
  - (B) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or
  - (C) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;
- (ii) An individual or family who will imminently lose their primary nighttime residence, provided that:
- (iii) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
- (iv) No subsequent residence has been identified; and
- (v) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks needed to obtain other permanent housing;
- (vi) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

- (vii) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
- (viii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
- (ix) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
- (x) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment;

**2. At risk of Homelessness, as defined in [24 CFR 91.5](#) *At risk of homelessness*:**

- (i) An individual or family who:
  - (A) Has an annual income below 30 percent of median family income for the area, as determined by HUD;
  - (B) Does not have sufficient resources or support networks, *e.g.*, family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “Homeless” definition in this section; and
  - (C) Meets one of the following conditions:
    - (D) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
    - (E) Is living in the home of another because of economic hardship;
    - (F) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
    - (G) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;



- (H) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;
  - (I) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
  - (J) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;
  - (i) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(l) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(l)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or
  - (ii) A child or youth who does not qualify as “homeless” under this section but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.
3. **Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking**, as defined by HUD.

For HOME-ARP, this population includes any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. This population includes cases where an individual or family reasonably believes that there is a threat of imminent harm from further violence due to dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual’s or family’s primary nighttime residence or has made the individual or family afraid to return or remain within the same dwelling unit. In the case of sexual assault, this also includes cases where an individual reasonably believes there is a threat of imminent harm from further violence if the individual remains within the same dwelling unit that the individual is currently occupying, or the sexual assault occurred on the premises during the 90-day period preceding the date of the request for transfer.

**Domestic violence**, which is defined in [24 CFR 5.2003](#) includes felony or misdemeanor crimes of violence committed by:

- (i) A current or former spouse or intimate partner of the victim (the term “spouse or intimate partner of the victim” includes a person who is or has been in a social relationship of a romantic or intimate nature with the victim, as determined by the length of the relationship, the type of the relationship, and the frequency of interaction between the persons involved in the relationship);
- (ii) A person with whom the victim shares a child in common;

- (iii) A person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner;
- (iv) A person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving HOME-ARP funds; or
- (v) Any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.

**Dating violence** which is defined in [24 CFR 5.2003](#) means violence committed by a person:

- (i) Who is or has been in a social relationship of a romantic or intimate nature with the victim; and
- (ii) Where the existence of such a relationship shall be determined based on a consideration of the following factors:
  - The length of the relationship;
  - The type of relationship; and
  - The frequency of interaction between the persons involved in the relationship.

**Sexual assault** which is defined in [24 CFR 5.2003](#) means any nonconsensual sexual act proscribed by Federal, Tribal, or State law, including when the victim lacks capacity to consent.

**Stalking** which is defined in [24 CFR 5.2003](#) means engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

- (i) Fear for the person's individual safety or the safety of others; or
- (ii) Suffer substantial emotional distress.

**Human Trafficking** includes both sex and labor trafficking, as outlined in the Trafficking Victims Protection Act of 2000 (TVPA), as amended (22 U.S.C. 7102). These are defined as:

- (i) *Sex trafficking* means the recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purpose of a commercial sex act, in which the commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or
- (ii) *Labor trafficking means* the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

4. **Other Populations** where providing supportive services or assistance under section 212(a) of NAHA ([42 U.S.C. 12742\(a\)](#)) would prevent the family's homelessness or would serve those with the greatest risk of housing instability. HUD defines these populations as individuals and households who do not qualify under any of the populations above but meet one of the following criteria:
5. **Other Families Requiring Services or Housing Assistance to Prevent Homelessness** is defined as households (i.e., individuals and families) who have previously been qualified as "homeless" as defined in [24 CFR 91.5](#), are currently housed due to temporary or emergency assistance, including financial assistance,

services, temporary rental assistance or some type of other assistance to allow the household to be housed, and who need additional housing assistance or supportive services to avoid a return to homelessness.

**6. At Greatest Risk of Housing Instability** is defined as household who meets either paragraph (i) or (ii) below:

- (i) has annual income that is less than or equal to 30% of the area median *income*, as determined by HUD and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs)
- (ii) has annual income that is less than or equal to 50% of the area median *income*, as determined by HUD, **AND** meets one of the following conditions from paragraph (iii) of the “At risk of homelessness” definition established at [24 CFR 91.5](#):
  - (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
  - (B) Is living in the home of another because of economic hardship;
  - (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
  - (D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;
  - (E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;
  - (F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
  - (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan

**Veterans and Families that include a Veteran Family Member** that meet the criteria for one of the qualifying populations described above are eligible to receive HOME-ARP assistance.

## **APPENDIX C**

### **THE MANDATORY CONSULTATION PROCESS: PARTICIPANTS AND SUMMARY COMMENTS**

## Appendix C

### Mandatory Consultation Process: Participants and Summary Comments

***Organizations consulted:***

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
<b>Kate Chang, Vice President Community and Government Relations, Pine Street Inn (Boston COC, MA-500)</b>	Continuum of Care; homeless service provider	Virtual Session 8/25/2022	Attended Consultation
<b>Martha Taylor, Program Manager Barnstable County Department of Human Resources (Cape Cod Islands COC, MA-503)</b>	Continuum of Care	Virtual Session 8/25/2022	Attended Consultation
<b>Katherine Wong, Youth and Young Adult Homeless Project Manager City of Springfield (Springfield/Hampton County CoC, MA-504)</b>	Continuum of Care	Virtual Session 8/25/2022; survey	Attended Consultation; See Survey Monkey response
<b>Leah Bradley, CEO Central Massachusetts Housing Alliance (Worcester City and County CoC, MA-506)</b>	Continuum of Care; homeless service provider; domestic violence service provider	Virtual Session 8/25/2022; survey; written feedback	See Survey Monkey response; Point-in-time count doesn't give a full picture of what they're seeing; 60% increase in homelessness; will see this in trended data  Most CoC's prioritizing permanent housing; how do we create more rental housing., Vouchers going unused. Maybe can help people with legal documentation: one of biggest barriers.
<b>Ellen Bruder-Moore Abramowitz, Vice President of Housing and Community Initiatives Community Counseling of Bristol County (Attleboro, Taunton/Bristol County CoC, MA 519)</b>	Continuum of Care; homeless service provider	Virtual Session 8/25/2022; survey	Has been calling shelter housing: crisis housing. Need to get people to permanent housing asap. 65 people on waiting list for shelter in her area. Has been building own affordable housing using HUD subsidies.  Looking at every possible way to use money; HUD has a lot of requirements but not much funding; looking at potential reallocation to make best possible use of funds. See Survey Monkey response

<b>Liz Rogers, Program Development Director Father Bill's &amp; MainSpring (Quincy, Brockton, Weymouth, Plymouth City and Plymouth County CoC, MA-511)</b>	Continuum of Care; Homeless Services Provider	Virtual Session 8/25/2022	<p>TBRA eligibility, might be cautious about TBRA if expiration in 2030; might prioritize rental housing</p> <p>Hopes DHCD will prioritize housing development over shelter development, but, if there is a shelter gap they are willing to take a look at shelter development.</p> <p>Municipalities might not be friendly to homeless development.</p> <p>If blending CoC funding and HOME-ARP, what are possibilities; differs from CoC to CoC. Has excess of vouchers that they possibly could be used. But service dollars from HUD is never enough.</p>
<b>John Yazwinski, President and CO South Shore CoC</b>	Continuum of Care	Virtual Session 8/25/2022, written response	<p>Specifically, the South Shore CoC asks that DHCD prioritize homeless households as defined in 24 CFR 91.5, including homeless veterans and their families, as well as households fleeing domestic violence, dating violence, sexual assault, stalking, or human trafficking. By prioritizing these most at-risk populations, HOME-ARP can fill a critical gap and can prioritize households most likely to remain homeless for extended periods of time. Further, among the HOME-ARP eligible uses, the CoC recommends that DHCD prioritize rental housing development with available funds.</p>
<b>Dennis Carman, President and CO United Way of Plymouth County</b>	Continuum of Care	Virtual Session 8/25/2022, written response	<p>Specifically, the South Shore CoC asks that DHCD prioritize homeless households as defined in 24 CFR 91.5, including homeless veterans and their families, as well as households fleeing domestic violence, dating violence, sexual assault, stalking, or human trafficking. By prioritizing these most at-risk populations, HOME-ARP can fill a critical gap and can prioritize households most likely to remain homeless for extended periods of time. Further, among the HOME-ARP eligible uses, the CoC recommends that DHCD prioritize rental housing development with available funds.</p>
<b>Sara Johnson, Program Coordinator Lynn Housing Authority and Neighborhood Development (Lynn CoC, MA 502)</b>	Continuum of Care	Virtual Session 8/25/2022; survey	Attended Consultation; See Survey Monkey response.
<b>Keleigh Pereira, Program Director Community Action Pioneer Valley (Three County CoC, MA-507)</b>	Continuum of Care	Virtual Session 8/25/2022	Attended Consultation

<b>Andrew Pape, HMIS Coordinator Massachusetts Department of Housing and Community Development (DHCD) (Balance of State CoC, MA-516)</b>	Continuum of Care	Virtual Session 8/25/2022	Attended Consultation
<b>Kelly Schlabach, HMIS Coordinator DHCD (Balance of State CoC, MA-516)</b>	Continuum of Care	Virtual Session 8/25/2022	Attended Consultation
<b>Charley Bokor DHCD, Division of Housing Stabilization</b>		Virtual Session 8/25/2022	Attended Consultation
<b>Karen Byron, MA Balance of State CoC Supervisor Massachusetts Department of Housing and Community Development (Balance of State CoC, MA-516)</b>	Continuum of Care	Virtual Session 8/25/2022	Attended Consultation
<b>Michael Libby, Executive Director Somerville Homeless Coalition (Balance of State CoC, MA-516)</b>	Continuum of Care; Homeless Service Provider	Virtual Session 8/25/2022	Attended Consultation
<b>Brielle Calderan, Director of Programs Somerville Homeless Coalition (Balance of State CoC, MA-516)</b>	Continuum of Care; Homeless Service Provider	Virtual Session 8/25/2022	Attended Consultation
<b>Hasson Rashid, Senior Director of Policy and Programs City of Cambridge Continuum of Care (Cambridge Continuum of Care, MA-509)</b>	Continuum of Care	Virtual Session 8/25/2022; Survey	Attended Consultation; See Survey Monkey response
<b>Joyce Tavon, Senior Director of Policy and Programs Massachusetts Housing and Shelter Alliance, co- chair of statewide MA CoC group</b>	Continuum of Care; Homeless Service Provider	Virtual Session 8/25/2022	Will non-covered cities in Mass be a priority for HOME-ARP? Is DHCD going to deeply invest in certain projects so there don't have to be so many sources for developers? Have to rethink how these deals get made; willing to make templates for municipalities to use. Smaller projects that haven't received other ARPA funding might be good fit.
<b>Mary Camara, Coordinator of Homeless Programs Fall River Community Development Agency (Fall River CoC, MA 515)</b>	Continuum of Care	Virtual Session 8/25/2022; survey	Attended Consultation; See Survey Monkey response
<b>Emily Rothschild, Director of Special Projects NeighborWorks Housing Solutions</b>	Continuum of Care	Virtual Session 8/25/2022	Attended Consultation; See Survey Monkey response

<b>Jason Gilbert, CEO MA 516 BOS CoC, COO Clear Path for Veterans New England Inc.</b>	Continuum of Care	Virtual Session 8/25/2022	Attended Consultation
<b>Jack Moran, Central Massachusetts Homeless Alliance</b>	Continuum of Care; Homeless Service Provider	Virtual Session 8/25/2022	Attended Consultation
<b>Donna Curley, BOS CoC, HMIS Training Coordinator</b>	Continuum of Care; Homeless Service Provider	Virtual Session 8/25/2022	Attended Consultation
<b>Shaylyn Davis, Senior Community Development Planner City of Newton</b>	Other Public Agency; HOME PJ	Virtual Session 8/25/2022	Attended Consultation
<b>Kate Racer, Director of Housing Development Division, DHCD</b>	DHCD	Virtual Session Host 8/25/2022	Hosted Consultation
<b>Chris LaGrutta, Housing Program Specialist DHCD</b>	DHCD	Virtual Session Host 8/25/2022	Hosted Consultation
<b>Nate Robinson, HOME and Special Projects Manager DHCD</b>	DHCD	Virtual Session Host 8/25/2022	Hosted Consultation
<b>Jason Gilbert, CEO Path for Veterans New England Inc. (Balance of State CoC, MA 516)</b>	Veterans' Groups	Virtual Session 8/31/2022	Attended Consultation
<b>Rick Doran, Director of Government Grants and Relations New England Center and Home for Veterans</b>	Veterans' Groups	Virtual Session 8/31/2022	Attended Consultation
<b>Connie Cogswell, Sr. Underwriter Affordable Housing Trust Fund Mass Housing</b>	Veterans' Groups	Virtual Session 8/31/2022	Attended Consultation
<b>Mary-dith Tuitt, Program Manager Harvard Street Neighborhood Health Center Veteran Outreach Center</b>	Veterans' Groups	Virtual Session 8/31/2022	Can we do a project that turns old hotels into a supportive housing project?
<b>Michelle Vinciguerra, Manager Affordable Housing Trust Fund Mass Housing</b>	Veterans' Groups	Virtual Session 8/31/2022	Attended Consultation
<b>Gordie Calkins, Director of Individual Homelessness, DHCD</b>	Veterans' Groups	Virtual Session 8/31/2022	Attended Consultation



<b>Jim Seymour, Executive Director Cape Islands &amp; Veterans Outreach, Hyannis</b>	Veterans' Groups	Virtual Session 8/31/2022	Annual process or quarterly process of approval?
<b>Kayla Valila, Director Homestead, Disabled American Veterans of Massachusetts</b>	Veterans' Groups	Virtual Session 8/31/2022	Attended Consultation
<b>Peter Graham, Affordable Housing Consultant Soldier On &amp; Valley Housing Consultants</b>	Veterans' Groups	Virtual Session 8/31/2022	capacity building for non-profits; rolling process?
<b>Scott Forbes, Executive Director Veterans Northeast Outreach Center</b>	Veterans' Groups	Virtual Session 8/31/2022	Another option for orgs that offer SSBF services?
<b>Arlene Ireland, Behavioral Outreach Clinical Coordinator Tri-Valley, Inc.</b>	Veterans' Groups	Virtual Session 8/31/2022	Attended Consultation
<b>Stephanie Marchetti, Executive Director Montachusett Veterans Outreach Center</b>	Veterans' Groups	Virtual Session 8/31/2022; Survey	Attended Consultation; See Survey Monkey response
<b>Charley Murphy, President &amp; CEO Harvard Street Veteran Outreach Center, Boston</b>	Veterans' Groups	Virtual Session 8/31/2022	Attended Consultation
<b>Matthew Marrano, Division Director Volunteers of America of Massachusetts</b>	Veterans' Groups	Virtual Session 8/31/2022	Attended Consultation
<b>Jason Stripinis, Southeastern Massachusetts Veterans Housing Program, Inc. (Veterans Transition House)</b>	Veterans' Groups	Virtual Session 8/31/2022; Survey	See Survey Monkey response; Is 2030 the sunset period for supportive services? Is there an innovative way to develop something with an ownership stake? Lots of veterans are older males who might not be able to maintain household; condos?
<b>James Reid, Executive Director Veterans Transition House</b>	Veterans' Groups	Virtual Session 8/31/2022	Attended Consultation
<b>Claire Makrinikolas, Director of Housing &amp; Outreach Massachusetts Department of Veterans Services</b>	Veterans' Groups	Virtual Session 8/31/2022	What are some samples of how funding might be used with other sources?  Want to avoid doing a deal with a large amount of sources if they can
<b>Bruce Buckley, Executive Director Soldier On</b>	Veterans' Groups	Virtual Session 8/31/2022	Can always use more funding for supportive services.
<b>Nate Robinson, HOME and Special Projects Manager DHCD</b>	DHCD	Virtual Session Host 8/31/2022	Hosted Consultation

<b>Rebecca Frawley Wachtel, Tax Credits and HOME Director DHCD</b>	DHCD	Virtual Session Host 8/31/2022	Hosted Consultation
<b>Kate Racer, Director of Housing Development Division DHCD</b>	DHCD	Virtual Session Host 8/31/2022	Hosted Consultation
<b>Chris LaGrutta, Housing Program Specialist DHCD</b>	DHCD	Virtual Session Host 8/31/2022	Hosted Consultation
<b>Robin Lipson, Deputy Secretary Executive Office of Elder Affairs</b>	Other Public Agency	Virtual Session 9/21/2022	Rental Housing: #1 need is affordable housing; there is a significant need in rural areas; Nursing and assisted living facilities closing is an issue and there is a need to house the residents in those communities. Need for memory care facilities as part of a larger rental project. Non-congregate Shelter: There is a need among people who are housed but in an abusive relationship for emergency shelter.
<b>Carole Malone, Assistant Secretary Executive Office of Elder Affairs</b>	Other Public Agency	Virtual Session 9/21/2022	Attended Consultation
<b>Lynn Vidler, Director of Home and Community Based Programs Executive Office of Elder Affairs</b>	Other Public Agency	Virtual Session 9/21/2022	Attended Consultation
<b>Bree Cunningham, Protective Services Regional Manager Executive Office of Elder Affairs</b>	Other Public Agency	Virtual Session 9/21/2022	Attended Consultation
<b>Kate Racer, Director of Housing Development Division DHCD</b>	DHCD	Virtual Session Host 9/21/2022	Hosted Consultation
<b>Laura Baker, Real Estate Development Director Valley Community Development</b>	Homeless Provider/Developer	Virtual Session 9/29; Survey	Attended Consultation; See Survey Monkey response
<b>Evelyn Friedman, CEO Greater Lawrence Community Action Council</b>	Homeless Provider	Virtual Session 9/29; Survey	Attended Consultation; See Survey Monkey response
<b>Peter Graham, Affordable Housing Consultant Valley Housing Consultants</b>	Developer	Virtual Session 9/29	Supportive services are great; is eligible activity of supportive services good for existing deals not new deals?
<b>Thomas Kegelman, Executive Director Home City Development, Inc.</b>	Developer	Virtual Session 9/29	Same comment on supportive services and expiration date on those funds. Has been told it's about \$10,000 per year to serve a chronically homeless individual; how can they avoid not discontinuing the program?

<b>Karen LaFrazia, President/CEO St. Francis House</b>	Homeless Provider/Developer	Virtual Session 9/29	Is there a plan to use PBV's in this funding on the rental assistance side? 100% of QP's need to satisfy requirements for targeted populations? Is there a cap on what can be used for acquisition and development?
<b>Eileen Peltier, President/CEO Berkshire Housing</b>	Homeless Provider/ Developer	Virtual Session 9/29, Survey	See Survey Monkey response; Best uses seem for development; other uses seem challenging. Should reach out to domestic violence populations because there is a need for emergency shelter. There is never a budget for that. Also concerned about what happens when RAFT is reduced to \$20 million and wondering how we can assist this population. For supportive services; could DHCD assist in outreach for those programs?
<b>Andrew DeFranza, Executive Director Harborlight Community Partners</b>	Homeless Provider/ Developer	Virtual Session 9/29, Survey	Seems like McKinney-Vento funds are similar? Wondering what rounds will be used to distribute HOME-ARP funds. See Survey Monkey response
<b>Eric Shupin, Director of Public Policy Citizens' Housing and Planning Association</b>	Homeless Provider/Policy and Advocacy Organization	Virtual Session 9/29	Strong demand for HOME-ARP resource for non-congregate shelter? Based on Eileen's comments on rental assistance; could this be a resource used for short term rental assistance?
<b>Maura Camosse Tsongas, Development Consultant Stone Soup Collaborative</b>	Developer	Virtual Session 9/29	How can tenant selection plans be made more simple?
<b>Rebecca Plaut-Mautner, Director of Real Estate Jamaica Plan Neighborhood Development Corporation</b>	Homeless Provider/ Developer	Virtual Session 9/29	Wants to place a focus on homeless families. Given long term impacts of homelessness; one of best investments we can make to help people long term. ARPA-SH includes funds for homeless families. (See Appendix F for written comments)
<b>Calpurnia Roberts, Director of A Place to Live Initiative Massachusetts Housing and Shelter Alliance</b>	Homeless Provider	Virtual Session 9/29	What are the eight mandatory consultation groups?
<b>Jessica Andors, Executive Director Lawrence CommunityWorks</b>	Homeless Provider; Developer	Virtual Session 9/29	Attended Consultation
<b>Christi Staples, Vice President of Policy and Public Relations United Way</b>	Developer	Virtual Session 9/29	Attended Consultation
<b>Spencer Buchholz, Project Manager Lawrence CommunityWorks</b>	Homeless Provider; Developer	Virtual Session 9/29	Attended Consultation
<b>Rachana Crowley, Director of Real Estate for Western Massachusetts &amp; Connecticut The Community Builders</b>	Homeless Provider; Developer	Virtual Session 9/29	Attended Consultation

<b>Maria Davis, Senior Director of Government Funding Pine Street Inn</b>	Homeless Provider	Virtual Session 9/29	Attended Consultation
<b>Amarillys Rodriguez, Development and Policy Senior Project Manager Planning Office for Urban Affairs</b>	Homeless Provider; Developer	Virtual Session 9/29	Attended Consultation
<b>Kristin Carlson, Director of Real Estate Harborlight Community Partners</b>	Developer	Virtual Session 9/29	Attended Consultation
<b>Steven Strickland, Real Estate Development Director South Middlesex Opportunity Council</b>	Homeless Provider	Virtual Session 9/29	Attended Consultation
<b>Sarah McKeever, Director of Supportive Housing Community Development Economic Assistance Corporation</b>	Other Public Agency	Virtual Session 9/29	Attended Consultation
<b>Bill Brauner, Director of Housing Development and Preservation Community Development Economic Assistance Corporation</b>	Other Public Agency	Virtual Session 9/29	Attended Consultation
<b>Kate Racer, Director of Housing Development Division DHCD</b>	DHCD	Virtual Session Host 9/29	Hosted Consultation
<b>Nate Robinson, HOME and Special Projects Manager DHCD</b>	DHCD	Virtual Session Host 9/29	Hosted Consultation
<b>Rebecca Frawley Wachtel, Tax Credits and HOME Director DHCD</b>	DHCD	Virtual Session Host 9/29	Hosted Consultation
<b>Terry Farmer, Database Coordinator DHCD</b>	DHCD	Virtual Session Host 9/29	Hosted Consultation
<b>Chris LaGrutta, Housing Program Specialist DHCD</b>	DHCD	Virtual Session Host 9/29	Hosted Consultation
<b>Steve Joncas, Director of Real Estate Development Common Ground Development</b>	Developer	Virtual Session 9/29	Attended Consultation
<b>Jesse Edsell-Vetter, Director of Resident Services Homeowners Rehab Inc.</b>	Homeless Provider; Developer	Virtual Session 9/29	Attended Consultation

<b>Zoe Weinrobe, Director of Real Estate 2Life Communities</b>	Homeless Provider; Developer	Virtual Session 9/29	Attended Consultation
<b>Eleni Macrakis, Project Manager Homeowners Rehab Inc.</b>	Homeless Provider; Developer	Virtual Session 9/29	Attended Consultation
<b>Yvette Dyson, Executive Director Worcester Common Ground</b>	Homeless Provider; Developer	Virtual Session 9/29	Attended Consultation
<b>Bill Miller, Vice President, Housing and Homeless Services Clinical and Support Options</b>	Homeless Provider; Developer	Virtual Session 9/29	Attended Consultation
<b>Stephanie Small, Executive Director, Simon C. Fireman Community Hebrew Senior Life</b>	Homeless Provider; Developer	Virtual Session 9/29	Attended Consultation
<b>Joe Valley, Housing Specialist, Mental Health Services Massachusetts Department of Mental Health</b>	Other Public Agency	Virtual Session 10/3	Emphasis on Rental Housing Development. Would like to see if there is funding to maintain certain services they already have. Mentioned 'Safe Haven' program.
<b>Heidi Holland, Director of Young Adult Transitional Services Massachusetts Department of Mental Health</b>	Other Public Agency	Virtual Session 10/3	See Survey Monkey response; Young adults need more support, engagement, and financial support. Even if they've done well under their systems, taking away support is a big transition. Want to Increase opportunities for more support at transition. Just the rental assistance isn't enough for young adults. Shortness and expiration of services is an issue.
<b>Kim Clougherty, Director of Community Services Massachusetts Department of Mental Health</b>	Other Public Agency	Virtual Session 10/3	Attended Consultation
<b>Kate Racer, Director of Housing Development Division DHCD</b>	DHCD	Virtual Session Host 10/3	Hosted Consultation
<b>Rebecca Frawley Wachtel, Tax Credits and HOME Director DHCD</b>	DHCD	Virtual Session Host 10/3	Hosted Consultation
<b>Nate Robinson, HOME and Special Projects Manager DHCD</b>	DHCD	Virtual Session Host 10/3	Hosted Consultation
<b>Ben Stone, Director, Division of Public Housing and Acting Director, Division of Rental Assistance DHCD</b>	Public Housing Authorities/DHCD	Virtual Session 10/6/2022	DHCD Public Housing 'Moving to Work' NOFA is coming out. Could HOME-ARP be paired with State Public Housing? Administering small rental assistance programs is challenging due to administrative complexity and confusion for applicants.

<b>Fatima Razzaq, DHCD, Director, Bureau of Housing Development and Construction</b>	Public Housing Authorities/DHCD	Virtual Session 10/6/2022	Attended Consultation
<b>Edward Chien, DHCD Director of Project Management, Division of Public Housing and Special Projects</b>	Public Housing Authorities/DHCD	Virtual Session 10/6/2022	Attended Consultation
<b>Matthew Mainville, Executive Director, Holyoke Housing Authority</b>	Public Housing Authorities	Virtual Session 10/6/2022; survey	Attended Consultation; See Survey Monkey response
<b>Gina Govoni, Executive Director Franklin County Regional Housing and Redevelopment Authority</b>	Public Housing Authorities	Virtual Session 10/6/2022	Leveraging HOME-ARP with the High Leverage Asset Preservation Program: issue becomes HOME property/rehab standards. Comment on prior special HUD vouchers for those under 62, disabled, and at risk of homelessness.
<b>David Hedison, Executive Director Chelmsford Housing Authority</b>	Public Housing Authorities	Virtual Session 10/6/2022; Survey	Attended Consultation; See Survey Monkey response
<b>Joseph Bamberg, Director of Real Estate Development Boston Housing Authority</b>	Public Housing Authorities	Virtual Session 10/6/2022	Attended Consultation
<b>Colleen Doherty, Executive Director Taunton Housing Authority</b>	Public Housing Authorities	Virtual Session 10/6/2022	Attended Consultation
<b>Kirk Fulton, Director Northeast Regional Capital Assistance Team</b>	Public Housing Authorities	Virtual Session 10/6/2022	Attended Consultation
<b>Donna Brown, Executive Director NAHRO</b>	Public Housing Authorities	Virtual Session 10/6/2022	Attended Consultation
<b>Margaret Moran, Director Planning and Development Department Cambridge Housing Authority</b>	Public Housing Authorities	Virtual Session 10/6/2022	Could pair with state public housing projects as a tool to increase overall project density. More comprehensive work on building better serves community and residents (as opposed to ‘band-aid’); cost is a consideration.
<b>Kate Racer, Director of Housing Development Division DHCD</b>	DHCD	Virtual Session Host 10/6/2022	Hosted Consultation
<b>Rebecca Frawley Wachtel, Tax Credit and HOME Program Director DHCD</b>	DHCD	Virtual Session Host 10/6/2022	Hosted Consultation
<b>Nate Robinson, HOME and Special Projects Manager DHCD</b>	DHCD	Virtual Session Host 10/6/2022	Hosted Consultation

<b>Nate Robinson, HOME and Special Projects Manager DHCD</b>	DHCD	Virtual Session Host 10/14/2022	Hosted Consultation
<b>Rebecca Frawley Wachtel, Tax Credit and HOME Program Director DHCD</b>	DHCD	Virtual Session Host 10/14/2022	Hosted Consultation
<b>David Eng, Housing Stability Specialist MassHousing</b>	MassHousing	Virtual Session 10/14/2022; Written Feedback	See Appendix F for written feedback
<b>Margaux LeClair, Counsel/Fair Housing Specialist DHCD</b>	DHCD	Virtual Session 10/14/2022	Attended Consultation
<b>Stephanie Brown, CEO Casa Myrna</b>	Homeless/Domestic Violence Committee Participant	Virtual Session 10/14/2022	Attended Consultation
<b>Esther Rogers, Safe Housing Initiative Manager Jane Doe, Inc.</b>	Homeless/Domestic Violence Committee Participant	Virtual Session 10/14/2022	Attended Consultation
<b>Amanda Mattingly, ICAPP Supervisor YWCA of Central Massachusetts</b>	Homeless/Domestic Violence Committee Participant	Virtual Session 10/14/2022	Attended Consultation
<b>Wendy Connor, DV Shelter Manager YWCA of Central Massachusetts</b>	Homeless/Domestic Violence Committee Participant	Virtual Session 10/14/2022	Attended Consultation
<b>Linda Garcia, Lead Paralegal Greater Boston Legal Services</b>	Homeless/Domestic Violence Committee Participant	Virtual Session 10/14/2022	Attended Consultation
<b>Catherine Kay, Senior Supervising Attorney: CLAVC Initiative Community Legal Aid</b>	Homeless/Domestic Violence Committee Participant	Virtual Session 10/14/2022	Attended Consultation
<b>Ronit Barkai, Assistant Director Transition House</b>	Homeless/Domestic Violence Service Provider	Virtual Session 10/14/2022	Attended Consultation
<b>Andrew DeFranza, Harborlight Community Partners</b>	Fair Housing/Civil Rights/Disability Rights	Virtual Session 11/16/2022	Attended Consultation; See Survey Monkey response
<b>Andrew Espinosa, Deputy Chief of Investigations MA Commission Against Discrimination</b>	Fair Housing/Civil Rights/Disability Rights	Virtual Session 11/16/2022	Attended Consultation; See Survey Monkey response

<b>Kristina de Fonseca, Executive Director Southcoast Fair Housing</b>	Fair Housing/Civil Rights/Disability Rights	Virtual Session 11/16/2022	See Survey Monkey response; More calls than ever for help; people being priced out as rents go up at investor-owned sites; immediate need for shelter; fear in calls. Calls include people with disabilities, people of color, and people with children. Need to keep equity in mind; geographic representation; tenant-based rental assistance can be an incentive to owners to keep tenants.
<b>Judith Liben, Access to Justice Fellow Massachusetts Law Reform Institute</b>	Fair Housing/Civil Rights/Disability Rights	Virtual Session 11/16/2022	Tenant-based MRVP payment standard too low; try to find ways to make it better
<b>Bill Henning, Executive Director Boston Center for Independent Living</b>	Fair Housing/Civil Rights/Disability Rights	Virtual Session 11/16/2022	See Survey Monkey response Lots of people with disabilities are having tough time finding housing; even with vouchers.
<b>Laura Shufelt, Director of Community Assistance Massachusetts Housing Partnership</b>	Mass Housing Partnership	Virtual Session 11/16/2022	Attended Consultation
<b>Eric Shupin, Director of Public Policy Citizens Housing and Planning Association</b>	Mass Housing Partnership	Virtual Session 11/16/2022	Attended Consultation
<b>Jamie Langowski, Practitioner in Residence Suffolk Law Housing Discrimination Testing Program</b>	CHAPA	Virtual Session 11/16/2022; Survey	Attended Consultation; See Survey Monkey response
<b>Henry Korman, General Counsel 2Life Communities</b>	Fair Housing/Civil Rights/Disability Rights	Virtual Session 11/16/2022	Does it make sense to use for capital, so an operator can devote more 'other' funds for essential services? Likes spending money now to ensure long term benefits. Note that these are non-recurring funds.
<b>Colin Killick, Executive Director Disability Policy Consortium</b>	Fair Housing/Civil Rights/Disability Rights	Virtual Session 11/16/2022	Do persons with disabilities fit within QP's? Rate of homelessness is doubled if disabled.
<b>Ann Houston, CEO Opportunity Communities</b>	Housing Developer/Owner/Manager	Virtual Session 11/16/2022	Attended Consultation
<b>Rachel Heller, CEO Citizens Housing and Planning Association</b>	CHAPA	Virtual Session 11/16/2022	So much need; Worried about the cliff especially if used for rental assistance; can we expand pipeline? acquisition for permanent housing?; Can these funds be combined with other sources? is there MRVP that can go with this? Communities of color being displaced; cliff is scary.
<b>Whitney Demetrius, Director of Fair Housing Engagement Citizens Housing and Planning Association</b>	Fair Housing/Civil Rights/Disability Rights	Virtual Session 11/16/2022	See Survey Monkey response; Agree with Bob Terrell; attention to be paid to those displaced, including domestic violence survivors.



<b>Stephanie Brown, CEO CASA Myrna</b>	Fair Housing/Civil Rights/Disability Rights	Virtual Session 11/16/2022	Attended Consultation
<b>Shaya French, Senior Community Organizer Boston Center for Independent Living</b>	Fair Housing/Civil Rights/Disability Rights	Virtual Session 11/16/2022	Attended Consultation
<b>Christi Staples, Vice President United Way of Massachusetts Bay and Merrimack Valley</b>	Fair Housing/Civil Rights/Disability Rights	Virtual Session 11/16/2022	Attended Consultation
<b>Robert Terrell, Executive Director City of Boston Office of Fair Housing &amp; Equity</b>	Fair Housing/Civil Rights/Disability Rights	Virtual Session 11/16/2022	Likes the thought of getting cost of production down; Market some units to previously displaced persons who want to come home.
<b>Joe Tringali, Director of Community Services Stavros Center for Independent Living</b>	Fair Housing/Civil Rights/Disability Rights	Virtual Session 11/16/2022	Concerns about vouchers and payment standards; wide variance, such as Amherst vs. Springfield; can money be used to make units accessible?
<b>Rebecca Frawley Wachtel, DHCD, Tax Credit and HOME Program Director</b>	DHCD`	Virtual Session Host 11/16/2022	Hosted Consultation
<b>Kate Racer, DHCD, Director of Housing Development Division</b>	DHCD	Virtual Session Host 11/16/2022	Hosted Consultation
<b>Nate Robinson, DHCD, HOME and Special Projects Manager</b>	DHCD	Virtual Session Host 11/16/2022	Hosted Consultation
<b>Virginia Bullock, DHCD, Manager of State Housing Programs</b>	DHCD	Virtual Session Host 11/16/2022	Hosted Consultation
<b>Margaux LeClair, Counsel/Fair Housing Specialist DHCD</b>	DHCD	Virtual Session 11/16	Hosted Consultation

## **APPENDIX D**

### **SURVEY MONKEY: RESPONDENTS AND COMMENTS**

## Appendix D:

### Survey Monkey Form and Responses

#### Appendix D

#### Sample Survey Monkey Form



#### HOME-ARP Consultation Survey

The Massachusetts Department of Housing and Community Development is seeking input on the development of its HOME-ARP allocation plan.

\*1. Please provide your name and title with your organization:

\*2. Please provide your organization name:

\*3. Please select your representation category (select all applicable)

- ☐ Continuum of Care
- ☐ Homeless service provider/affordable housing developer
- ☐ Domestic violence service/shelter/housing provider
- ☐ Veterans service organization
- ☐ Public Housing Authority

☐ Other public agency that serves HOME-ARP qualifying populations

☐ Organization that address fair housing, civil rights, and the needs of persons with disabilities

☐ Other (please specify)

\*4. Please select all HOME-ARP qualifying populations served by your organization:

☐ Homeless, as defined in 24 CFR 91.5 Homeless (1),  
(2), or (3)

At ☐ risk of homelessness, as defined in 24 CFR 91.5

☐ Person(s) fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking

☐ Other populations who do not qualify under any of the populations above but meet this criteria: Other families requiring services or housing assistance to prevent homelessness

☐ Other populations who do not qualify under any of the populations above but meet this criteria: Those at greatest risk of housing stability, including: Extremely low-income household who pay more than 50% of income towards housing costs; Very low-income (50% AMI) households and meets one of the conditions from paragraph from paragraph (iii) of the “At risk of homelessness” definition established at 24 CFR 91.5

☐ Veterans who meet one of the qualifying population definitions above

5. Please briefly describe any unmet housing and service needs of the qualifying populations that your organization serves, especially any changes due to the COVID-19 pandemic.

◀
▶

\* 6. Please rank eligible HOME-ARP activities according to their likelihood to best address unmet needs of the qualifying population(s) your organization serves. Rank 1 to 5, with one (1) being the most likely and five (5) being the least likely to address the unmet needs of the qualifying population your organization serves.

	<input style="width: 40px; height: 30px;" type="text"/>	Acquisition and development non-congregate shelter
Nonprofit	<input style="width: 40px; height: 30px;" type="text"/>	operating and capacity building assistance
Rental		housing development
Supportive	<input style="width: 40px; height: 30px;" type="text"/>	services
	<input style="width: 40px; height: 30px;" type="text"/>	Tenant-Based Rental Assistance

7. Should any  communities or regions receive priority in receiving HOME-ARP assistance? If so, please name below and provide a brief justification for your suggestion(s).

Done - Submit Survey

## **HOME-ARP Consultation Survey:**

### **Survey Monkey Responses in Tabled Form**

The tables below are the responses from the Survey Monkey consultation process. Individual survey responses have been compiled and tabled to present the information in an easily readable format. In total there were 7 questions as detailed in the sample survey included in this appendix.

#### **Questions 1, 2, and 3:**

**Question 1 (Please provide your name and title with your organization)**

**Question 2 (Please provide your organization name)**

**Question 3 (Please select your representation category)**

<b>Question 1: Name and Title</b>	<b>Question 2: Organization</b>	<b>Question 3: Consultation Group/ Representation Category</b>
Kristina da Fonseca, Executive Director	SouthCoast Fair Housing	Fair Housing/Civil Rights/Disability Rights
Bill Henning, Director	Boston Center for Independent Living	Fair Housing/Civil Rights/Disability Rights
Whitney Demetrius Director of Fair Housing Engagement	Citizens' Housing and Planning Association	Fair Housing/Civil Rights/Disability Rights
Andrew Espinosa, Deputy Chief of Investigations	Massachusetts Commission Against Discrimination	Fair Housing/Civil Rights/Disability Rights
Jamie Langowski, Administrative Director	Suffolk Law Housing Discrimination Testing Program	Fair Housing/Civil Rights/Disability Rights
Jodi Breidel, North County Regional Director	WHEAT Community Connections, a direct service of the United Way of Tri- County	Other public agency that serves HOME-ARP qualifying populations
Leah Bradley, CEO	Central Massachusetts Housing Alliance	Continuum of care/Homeless Service Provider/Domestic Violence Service
Krystal Vanhorne	City of Worcester	Other – Municipality
Alex Arriaga Director of Veterans' Services	City of Worcester	Other – Municipality
Emily Rothschild, Director of Special Projects	NeighborWorks Housing Solutions	Other public agency that serves HOME-ARP qualifying populations
Elizabeth Alfred, Staff Attorney	Greater Boston Legal Services	Fair Housing/Civil Rights/Disability Rights
Mary Ficociello, Benefits Coordinator	Town of Braintree Veteran Services	Homeless Service Provider/Veterans Service

Zoe Weinrobe, Director of Real Estate	2Life Communities	Non-Profit Affordable Housing Developer
Gerry McCafferty, Director of Housing	City of Springfield	Other – Municipality
Danielle Hoyt, LHAND Housing Stability Programs Coordinator	Lynn Housing Authority & Neighborhood Development (LHAND)	Public Housing Authority
Sara Johnson, Family Success Center Programs Manager	Lynn Housing Authority & Neighborhood Development	Public Housing Authority
Heidi Holland, Director of Young Adult Transition Services, DMH	Department of Mental Health	Other public agency that serves HOME-ARP qualifying populations
Mary D. Camara, Coordinator of Homeless Programs	Fall River Community Development Agency	Continuum of Care
Angela Clarke, Program Director Supportive Housing/ FlexServices/Coordinated entry	Community Counseling of Bristol County	Continuum of Care/Homeless Service Provider
Eileen Peltier, CEO/President	Berkshire Housing	Homeless Service Provider
Andrew DeFranza, Executive Director	Harborlight Homes	Homeless Service Provider
Laura Baker, Real Estate Development Director	Valley Community Development	Homeless Service Provider
Evelyn Friedman, CEO	Greater Lawrence Community Action Council	Continuum of Care/Homeless Service Provider
Lisa Larrabee, Executive Director	Westford, Littleton & Groton Housing Authorities	Public Housing Authority
Jason Stripinis, CFO	Southeastern Massachusetts Veterans Housing Program, Inc.	Continuum of Care/Homeless Service Provider
Jack Nagle, Executive Director	Arlington Housing Authority	Public Housing Authority
Stephanie Marchetti, Executive Director	Montachusett Veterans Outreach Center	Veterans Service Organization
David Houlden, Executive Director	Gloucester Housing Authority	Public Housing Authority
Paula Schnepf	Sandwich Housing Authority	Public Housing Authority
David Hedison	Chelmsford Housing	Public Housing Authority
Adam Garvey, Chief Operating Officer	Lowell Housing Authority	Public Housing Authority
Matthew Mainville, Executive Director	Holyoke Housing Authority	Public Housing Authority
Stephen G. Finn, Executive Director	Malden Housing Authority	Public Housing Authority



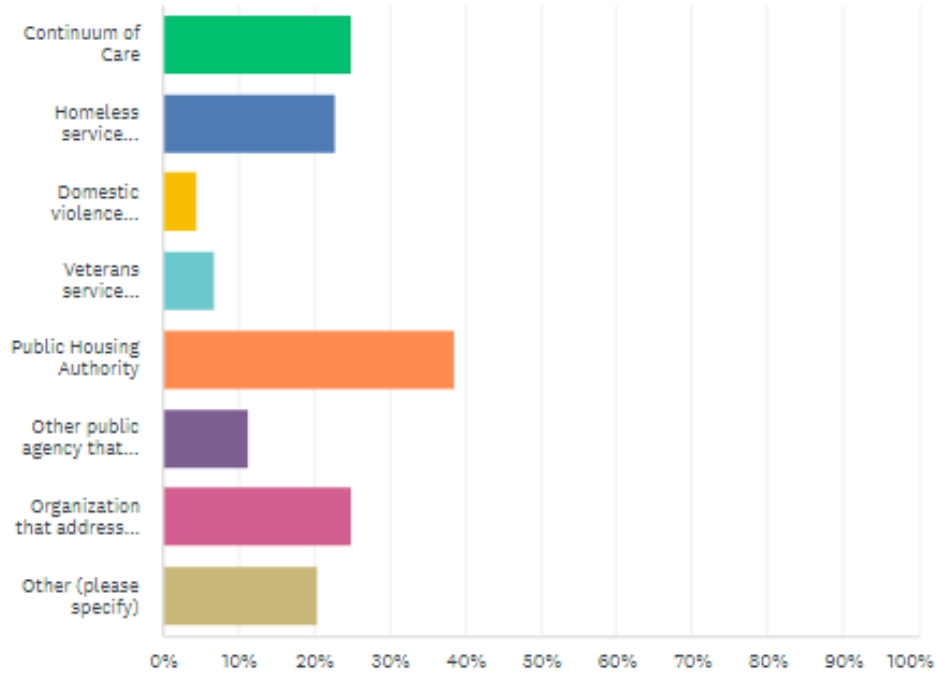
Andrea Lindsay, Executive Director	Stockbridge Housing Authority	Public Housing Authority
Michael Alperin, Executive Director	Brookline Housing Authority	Public Housing Authority
John Slocum, Executive Director	Sutton Housing Authority	Public Housing Authority
Robin Carvide, Executive Director	Ludlow Housing Authority	Public Housing Authority
Tracy Watson, Executive Director	Newburyport Housing Authority	Public Housing Authority
Susan Gregory, Executive Director	Dalton Housing Authority	Public Housing Authority
Donna Gauthier, Executive Director	Charlton Housing Authority	Public Housing Authority

Q3



Please select your representation category (select all applicable):

Answered: 44 Skipped: 0



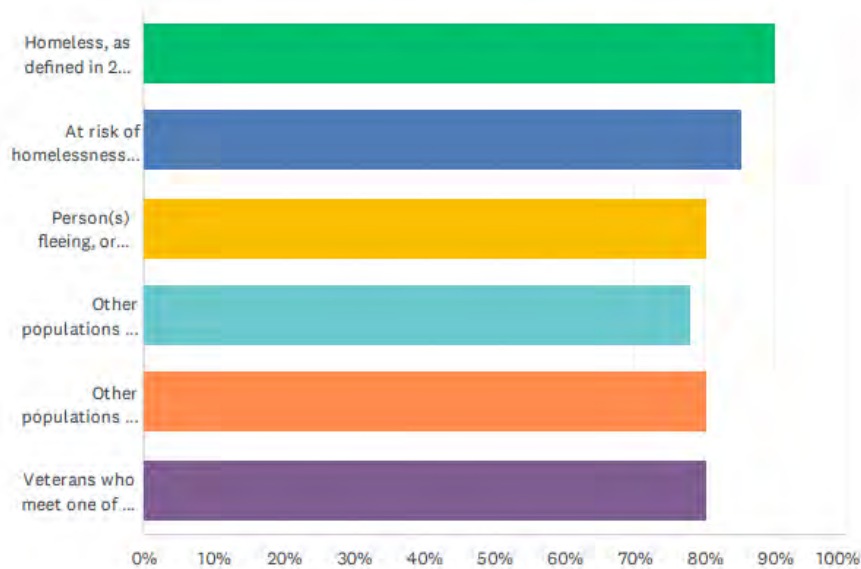
ANSWER CHOICES	RESPONSES	
Continuum of Care	25.00%	11
Homeless service provider/affordable housing developer	22.73%	10
Domestic violence service/shelter/housing provider	4.55%	2
Veterans service organization	6.82%	3
Public Housing Authority	38.64%	17
Other public agency that serves HOME-ARP qualifying populations	11.36%	5
Organization that address fair housing, civil rights, and the needs of persons with disabilities	25.00%	11
Other (please specify)	20.45%	9
Total Respondents: 44		

**4. Please select all HOME-ARP qualifying populations served by your organization:**

**5. Please briefly describe any unmet housing and service needs of the qualifying populations that your organization serves, especially any changes due to the COVID-19 pandemic.**

**Q4 Please select all HOME-ARP qualifying populations served by your organization:**

Answered: 41 Skipped: 0



ANSWER CHOICES	RESPONSES	
Homeless, as defined in 24 CFR 91.5 Homeless (1), (2), or (3)	90.24%	37
At risk of homelessness, as defined in 24 CFR 91.5	85.37%	35
Person(s) fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking	80.49%	33
Other populations who do not qualify under any of the populations above but meet this criteria: Other families requiring services or housing assistance to prevent homelessness	78.05%	32
Other populations who do not qualify under any of the populations above but meet this criteria: Those at greatest risk of housing stability, including: Extremely low-income household who pay more than 50% of income towards housing costs; Very low-income (50% AMI) households and meets one of the conditions from paragraph from paragraph (iii) of the "At risk of homelessness" definition established at 24 CFR 91.5	80.49%	33
Veterans who meet one of the qualifying population definitions above	80.49%	33
Total Respondents: 41		

<b>Respondent &amp; Organization</b>	<b>Comment</b>	<b>Unmet Needs Summary</b>
Hasson Rashid, Board Member Cambridge COC	Acquisition and development non-congregate shelter	Non-Congregate Shelter (NCS) need
Christine O'Connell, C.O.C. Program Director Central Massachusetts Housing Alliance	There is an urgent need for affordable housing, more urgent for studio/one-bedroom units.	Affordable housing supply
Karen Riley-McNary, Housing Manager YWCA Central MA	Finding available rental units has become increasingly more competitive and is become unreachable beyond those most qualified in the Worcester community and some areas of Central MA.	Affordable housing supply
Kristina da Fonseca, Executive Director South Coast Fair Housing	There is not enough available housing, not enough housing that is affordable for these populations, not enough safe and sanitary housing affordable to this population. There is also not enough support services for individuals with disabilities, for whom English is not their primary language, or for folks who are being displaced by the housing shortage and increased rents. Tenant-based rental assistance will not help folks in the current market without greatly increasing the payment standards - there simply is not enough rental housing that would be affordable for someone with or without rental assistance.	Supportive housing supply; supportive services
Bill Henning, Director Boston Center for Independent Living	BCIL's consumers consistently present with a need for: Affordable housing, accessible housing (varying levels; most critical is vertical access to units) - Assistance around evictions and landlord concerns - Discrimination, including around needed accommodations	Accessible housing supply; fair housing services
Andrew Espinosa, Deputy Chief of Investigations Massachusetts Commission Against Discrimination	Constituents that file fair housing complaints are very frequently reliant on tenant-based rental assistance or are applicants for rental assistance. There are simply not enough rental assistance vouchers available currently, and many people report that they have been on a waitlist for a voucher for many years. There is also not enough affordable rental housing available that affirmatively rents to tenants with vouchers. Despite it being illegal in MA to refuse to rent to applicants with	Tenant Based Rental Assistance (TBRA); Fair housing and affirmative marketing

	vouchers, this type of discrimination is still extremely common in the private rental market. Rents in the GBA have risen drastically during the COVID-19 pandemic, making it even harder for voucher holders to qualify for a unit in the private market.	
Jamie Langowski, Administrative Director Suffolk Law Housing Discrimination Testing Program	Voucher-based housing discrimination is occurring at extremely high levels and is preventing families with vouchers from the ability to choose where they want to live.	Fair housing
Jodi Breidel, North County Regional Director WHEAT Community Connections, a direct service of the United Way of Tri-County	WHEAT serves all individuals described above and has nowhere to place people locally. Our Clinton Motor Inn was once used as temporary shelter for our homeless population until we could provide the wrap around services and find permanent solutions. Unfortunately, that option is no longer available and we also don't have public transportation. During COVID we connected our clients to programs and services that assisted with rent, mortgage and utilities to keep them in their existing housing situations. We also processed many unemployment applications and taxes so our clients could access benefits. Lastly, we fed them through the pandemic serving over 60K+ meals the last two years and distributing groceries monthly to subsidize these expenses. For shelters, it was extremely difficult and most times impossible to shelter folks during this time. We are in the same situation today with no housing options available in our area. Our organization is in the process of trying to solve the issue by developing 8 SROs for unaccompanied adults using the Housing First model. We have procured land, have architectural drawings, civil and environmental engineering and working closely with our municipality and funders to move this initiative forward.	Supportive housing supply
Leah Bradley, CEO Central Massachusetts Housing Alliance	We are seeing a significant rise in both households without children and households with children. The pandemic continues to impact those most vulnerable in our community particularly people of color.	Affordable housing supply

	<p>We are seeing many households seeking assistance for the first time. Most recently we are seeing immigrant/refugee populations, seniors, youth and single female headed households at an unusually high rate. This coupled with the lack of affordable units is causing a significant increase in those needing assistance. With the delays in construction during the pandemic, we are seeing a need to develop units for this population as quickly as possible.</p>	
<p>Krystal Vanhorne City of Worcester</p>	<p>I believe there should be more programs in place for those who wouldn't normally qualify due to poor credit and or lack of down payment assistance. For many communities these are barriers to keep them from attaining financial wealth, widening the wealth gap for communities of color.</p>	<p>Fair housing; supportive services</p>
<p>Alex Arriaga, Director of Veterans' Services City of Worcester</p>	<p>Presently in Worcester, our number of adult individuals experiencing homelessness is 427 (July 2022) with the numbers anticipated to rise to 854 in February 2023. This number does not include those that are at-risk of homelessness, which would significantly increase as it relates to service needs. To exacerbate this issue, we also currently have a housing crisis with a lack of affordable housing units as the average price of a one-bedroom in the city of Worcester is \$1,877.91— far above the income of our target population. COVID19 highlighted the need for housing solutions for the target populations that address the risk of disease transmission. As previous solutions needed modification, capacity was reduced.</p>	<p>Affordable housing supply</p>
<p>Emily Rothschild, Director of Special Projects NeighborWorks Housing Solutions</p>	<p>There is not enough subsidized housing to serve all of the homeless individuals and families in our area and of the limited housing resources available for these populations, much of it does not include critical case management services to help formerly homeless individuals and families to prevent recurring homelessness.</p>	<p>Supportive housing supply</p>

<p>Elizabeth Alfred, Staff Attorney Greater Boston Legal Services</p>	<p>The price of housing has surged since the pandemic, people who used to be able to afford cheap apartments can no longer find cheap apartments. There are LIHTC apartments but (1) they're expensive for low-income people and (2) they are difficult to find and know how to apply for and (3) they are virtually unregulated, so we hear of people being told that they won't be eligible for certain units but not provided with any appealable notice. I worked at a legal aid organization in Worcester County for the last 7 years before coming to GBLS in September, and this is particularly a huge problem there. We need apartments that working class people can afford, or that low-income people with vouchers can find and afford. We also desperately, desperately need non-congregate shelters in the EA system, and enough of them to keep people in their home community. Placement outside the home community is incredibly traumatizing for already traumatized families, and anecdotally appears to lead to less stable future housing. Statistics might imply that being placed out of your home community leads to shorter stays, but if that's true that's likely because people either leave and couch-surf to be in their home community or are terminated for reasons having to do with distance, like violating curfews to try to keep their old job, or due to behavior when they have to switch doctors and lose access to medication and therapy. This absolutely does not lead to better outcomes for homeless children.</p>	<p>Affordable housing supply; non-congregate shelters</p>
<p>Gerry McCafferty, Director of Housing City of Springfield</p>	<ul style="list-style-type: none"> <li>* Permanent supportive housing for individuals with high service needs</li> <li>* Extended rental assistance support for participants in rapid rehousing programs (especially HomeBase) who are not able to afford market rent once the short-term assistance ends</li> <li>* Increased services for families receiving HomeBase assistance to improve the</li> </ul>	<p>Supportive housing supply; TBRA; supportive services; NCS</p>

	<p>likelihood of self-sufficiency as the program support ends</p> <ul style="list-style-type: none"> <li>* Housing available and affordable to households with extremely low incomes*</li> </ul> <p>Non-congregate shelter for individuals unable or unwilling to stay in congregate shelter</p> <ul style="list-style-type: none"> <li>* Accessible affordable units</li> <li>* Housing navigation support</li> <li>* Coming out of the pandemic, our rental market is much tighter, and rents have risen quickly.</li> </ul> <p>Tenants struggle to find any units, and when they do find a unit, it is likely to cost more than fair market rent. Post-pandemic we are seeing increase mental health and substance use needs, and an increased need for supportive housing--this translates into both a need for more PSH units, but also a need for tenant stabilization services in buildings where this was not previously needed--or not needed at the same level of need we are seeing now.</p>	
<p>Danielle Hoyt, LHAND Housing Stability Programs Coordinator Lynn Housing Authority &amp; Neighborhood Development (LHAND)</p>	<p>Stakeholders reported in our 2022 Needs Assessment/Gaps Analysis process that the Continuum of Care needs more:</p> <ul style="list-style-type: none"> <li>• Affordable housing stock</li> <li>• Supportive housing</li> <li>• Housing dedicated to people experiencing homelessness</li> <li>• Shelter for people fleeing domestic violence, dating violence, sexual assault and stalking</li> <li>• Non-hotel shelter options for people who have been trafficked</li> <li>• Detoxification center capacity for people dealing with addiction</li> <li>• Access to psychiatrists for people experiencing a mental health crisis</li> </ul>	
<p>Sara Johnson, Family Success Center Programs Manager Lynn Housing Authority &amp; Neighborhood Development</p>	<p>There is a lack of affordable units, a lack of accessible units, and rising rents will continue to displace vulnerable households.</p>	<p>Affordable housing supply; accessible housing</p>



<p>Heidi Holland, Director of Young Adult Transition Services, DMH</p>	<p>According to the Massachusetts Commission on Unaccompanied and Homeless Youth, on any given night there are at least 1,000 youth and Young Adults (YA) under the age of 25, experiencing homelessness in Massachusetts. The intersection of mental illness plays a significant role in among the population of youth and young adults experiencing homelessness. At the same time, Massachusetts is reflecting national trends intersecting with the Covid pandemic, of significant increases of young adults experiencing, suicidality, depression anxiety. According to the Journal of Adolescent Health (April 13, 2022), among young adults aged 18-15 in 2021, Forty-eight percent reported mental health symptoms and, among those with symptoms, 39% used prescription medications and/or received counseling, while 36% reported unmet counseling need. At DMH, we currently have approximately 600 YA's receiving services in our Intensive Community Services (ICS) and Adult Community Clinical Services (ACCS) programs, while there are approximately 10,000 participants in these services overall, young adults only represent less than 17% of participants. Overall, we have seen an upward trend in YA's applying for DMH services in the last several years, while demand for housing supports, greatly outpaces resources. Additionally, many young people experiencing mental illness may not have the opportunity to live at home with their families as these relationships are often deeply fractured and for many young adults, who have been part of state systems such as the Department of Children and Families (DCF), they have never had a consistent safe family relationship.</p>	<p>Affordable housing for unaccompanied youth</p>
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Mary D. Camara, Coordinator of Homeless Programs	Although the City of Fall River and its CoC have submitted a HOME-ARP allocation Plan, no funding has been allocated to a specific project yet.	
Angela Clarke, Program Director Supportive Housing/ FlexServices/Coordinated Entry Community Counseling of Bristol County	supportive housing for both individuals and families, the success rate for our current PSH units is extremely high but there are not enough units available along with case management wrap around services for those with extreme barriers to maintaining housing	Supportive housing supply
Eileen Peltier, CEO/President Berkshire Housing	Permanent Supportive Housing for chronically homeless populations is needed. The pandemic as well as the substance use disorder crisis have exacerbated an already challenging situation. Additionally, the market pressures and supply issues across the commonwealth are creating more economic homelessness which suggests the need for more affordable housing at up to 80% AMI.	Supportive housing supply
Andrew DeFranza, Executive Director Harborlight Homes	There are many homeless families and individuals either doubled up with others in unhealthy situations or in shelters who cannot find long term homes because of the lack of affordable units. We have waiting lists for both homeless families and individuals.	Supportive housing supply
Laura Baker, Real Estate Development Director Valley Community Development	We need additional project based rental vouchers to serve the high percentage of housing applicants who need this assistance. We need consistent and sufficient, annual funding to pay for on-site resident services which are tied to, and remain with, the affordable housing property and which funding is controlled by the property owner or property manager.	Project-based vouchers; supportive services
Evelyn Friedman, CEO Greater Lawrence Community Action Council	The rising cost of rental housing has put many households in danger of homelessness. Many households have to double up causing overcrowding endangering the wellbeing of all. In Lawrence it is not unusual for as many as 25 people to be displace or more displaced when there is a fire in a triple decker. Besides working with CTI on RAFT and	Affordable housing supply;

	<p>Homebase, we are managing the city's ESG program, we are a grantee of the CoC and we are working with the schools on addressing student homelessness. COVID and the opioid epidemic have impacted access to housing by restricting availability of rental housing. Poor housing quality standard make some apartments uninhabitable. Finally, Lawrence was enormously impact by the gas Ex explosions and the affordable housing stock has not rebounded. At the same time while there has been substantial housing development in the city the development of affordable housing has lagged.</p>	
<p>Lisa Larrabee, Executive Director Westford, Littleton &amp; Groton Housing Authorities</p>	<p>We are unable to house applicants sooner than we would like to because of units that we are unable to turnover due to lack of funds. If we had the funds available at our fingertips to turn units over, we could house our most vulnerable populations a lot faster than we do now.</p>	<p>Operating support (housing authority response)</p>
<p>Jason Stripinis, CFO Southeastern Massachusetts Veterans Housing Program, Inc.</p>	<ol style="list-style-type: none"> <li>1. There is an unmet need for an intermediate step between transitional housing and nursing home care for aging veterans who face challenges such that independent living is not sustainable, yet whose need is below the threshold for nursing care.</li> <li>2. There is an unmet need for transitional housing for female veterans with children.</li> <li>3. There is an unmet need for affordable housing for widowed veterans whose incomes do not allow them to stay in-place.</li> </ol>	<p>Supportive housing; veteran housing</p>
<p>Jack Nagle, Executive Director Arlington Housing Authority</p>	<p>We are in great need of mental health assistance and support. It would be very beneficial for PHA/LHA's to be able to have a mental health clinician. They would have the authority to section an individual in crisis as well as some additional training. Mental health has become an extremely difficult issue at our housing authority. We do not have the budget or qualifications/training to address the issues related to mental health that affect those suffering from it as well as the residents and</p>	<p>Public housing recapitalization</p>

	<p>staff that are impacted by it. On that same note, additional support and assistance to help residents maintain their housing would be greatly beneficial whether that be rental assistance as well as supports that help residents address root causes and barriers. We also need additional funding and supports to help preserve our portfolio and to complete the needed alterations/renovations to make our units and building ADA compliant.</p>	
<p>Stephanie Marchetti, Executive Director Montachusett Veterans Outreach Center</p>	<p>The veterans we serve largely need permanent supportive housing options with either project-based vouchers or the ability to accept a tenant-based voucher. These veterans are capable of living independently but need access to medical transportation, food (a pantry or meal delivery program), benefits advisement, and life planning services. They are often in recovery from substance use disorders and would benefit from a sober living environment, and this is often a contributing factor in their homeless/at risk status. They would also benefit largely from a living environment that allows them to "age in place," not necessarily handicap units but units that are designed to be convertible or flexible with the needs of an aging population.</p>	<p>Veteran permanent supportive housing</p>
<p>David Houlden, Executive Director Gloucester Housing Authority</p>	<p>Permanent Housing with support services and recently Long-term Nursing Care residents being transitioned back to community housing due to facilities closures.</p>	<p>Supportive housing supply</p>
<p>David Hedison Chelmsford Housing</p>	<p>Security deposit payment after qualifying for new mainstream section 8 voucher to help move families/individuals towards stability.</p>	<p>Supportive services</p>
<p>Adam Garvey, Chief Operating Officer Lowell Housing Authority</p>	<p>Availability of affordable rental units and affordable homebuyer opportunities. Permanent supportive housing for homeless individuals and families.</p>	<p>Affordable housing supply; supportive housing</p>
<p>Matthew Mainville, Executive Director Holyoke Housing Authority</p>	<p>Unsheltered Homelessness continues to be an issue in Holyoke. In addition, we have a constant need for housing for individuals and families fleeing domestic violence.</p>	<p>Unsheltered individuals; DV housing supply</p>

Stephen G. Finn, Executive Director Malden Housing Authority	Significant shortage of available affordable housing units and insufficient number of supportive service providers for populations to be assisted with HOME-ARP funds.	Affordable housing supply; supportive service supply
Andrea Lindsay, Executive Director Stockbridge Housing Authority	Additional affordable units to combat our list of 1,474.	Affordable housing supply
Michael Alperin, Executive Director Brookline Housing Authority	It has been very hard to find housing for households with a disability, particularly service enriched.	Accessible housing supply
Susan Gregory, Executive Director Dalton Housing Authority	Home Care services. Assistance with Tenant issues. Wellness programs	Supportive services
Donna Gauthier, Executive Director Charlton Housing Authority	Affordable housing shortage	Affordable housing supply

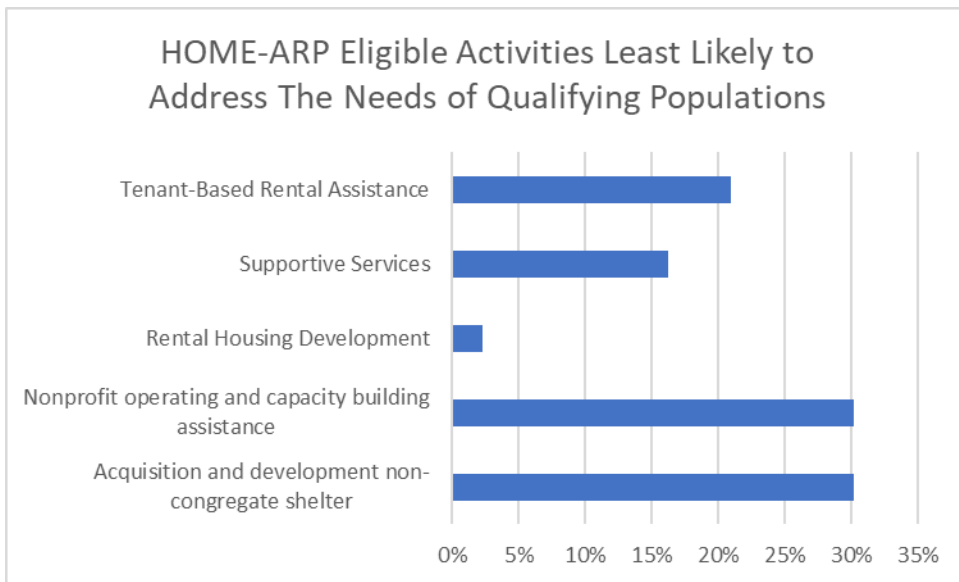
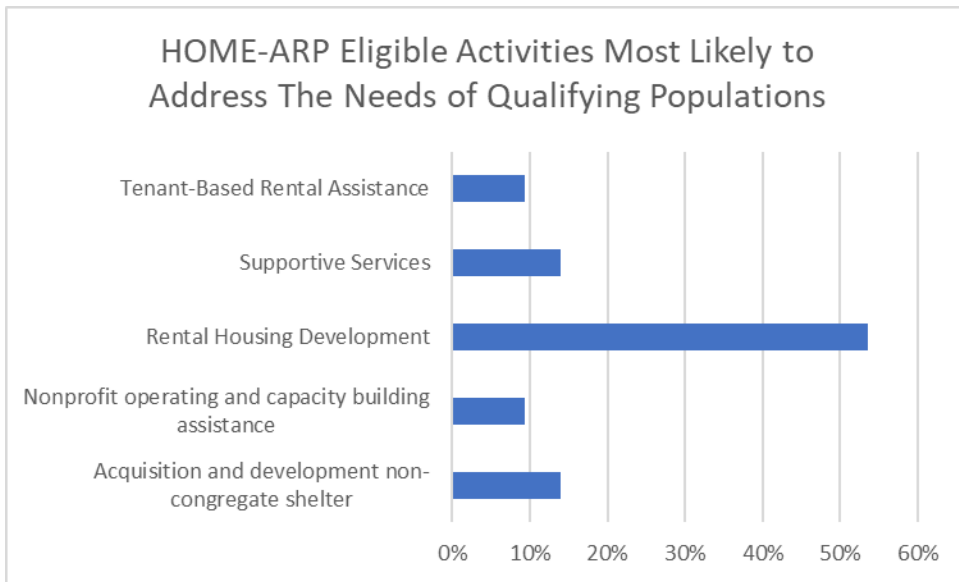
The Department analyzed the individual survey responses and coded them according to the unmet housing/service needs identified and to eligible HOME-ARP activities.

Of the 34 respondents who identified unmet HOME-ARP eligible housing and service needs, 30 respondents identified a shortage of affordable housing as an unmet need of the qualifying populations that they serve.

<b>Affordable/Supportive Housing Supply</b>	<b>DV housing/shelter</b>	<b>Non-Congregate Shelter</b>	<b>Supportive Services</b>	<b>Tenant-Based Rental Assistance</b>	<b>Fair Housing</b>
<b>32</b>	<b>2</b>	<b>3</b>	<b>5</b>	<b>2</b>	<b>4</b>

**6.** Please rank eligible HOME-ARP activities according to their likelihood to best address unmet needs of the qualifying population(s) your organization serves. Rank 1 to 5, with one (1) being the most likely and five (5) being the least likely to address the unmet needs of the qualifying population your organization serves.

HOME-ARP Activities	1 (Most Likely)	2	3	4	5 (Least Likely)
Acquisition and development non-congregate shelter	6 (14% of respondents)	7 (16% of respondents)	9 (21% of respondents)	8 (19% of respondents)	13 (30% of respondents)
Nonprofit operating and capacity building assistance	4 (9% of respondents)	5 (12% of respondents)	7 (16% of respondents)	4 (33% of respondents)	13 (30% of respondents)
Rental Housing Development	23 (53% of respondents)	9 (21% of respondents)	12% of of respondents)	5 (12% of respondents)	1 (2% of respondents)
Supportive Services	6 (14% of respondents)	10 (23% of respondents)	12 (28% of respondents)	8 (19% of respondents)	7 (16% of respondents)
Tenant-Based Rental Assistance	4 (9% of respondents)	12 (28% of respondents)	10 (23% of respondents)	8 (19% of respondents)	9 (21% of respondents)



#### Question 7 Answers

**Should any communities or regions receive priority in receiving HOME-ARP assistance? If so, please name below and provide a brief justification for your suggestion(s).**

Hasson Rashid, Board Member  
Cambridge COC

The homeless and those at risk of becoming homeless

Christine O'Connell, C.O.C. Program Director Central Massachusetts Housing Alliance	Worcester County is experiencing a sharp increase in unsheltered homelessness.
Karen Riley-McNary, Housing Manager YWCA Central MA	Communities experiencing elevated negative health disparities and communities experiencing higher rates of eviction and childcare insecurity should be prioritized.
Kristina da Fonseca, Executive Director South Coast Fair Housing	Gateway Cities. Southeastern MA - known to see an increasing rate of folks moving from other regions due to relative affordability. Also, the plan for the new commuter rail, mixed with the overall housing crisis is leading to increased outside investment in rental housing with the goal of renovating and raising rents. There is a very real crunch for folks who have fixed or low incomes in this region, who had previously been able to survive but who now are being systematically displaced from their homes due to rent increases and profit-driven decisions by property investors. We get these types of calls from tenants very regularly now. At a recent meeting, another non-profit mentioned that they are now, for the first time in 20 years, purchasing sleeping bags and tents for people because emergency types of shelter is so full. Adults with no children are particularly limited b/c there isn't enough shelter space for them. I, myself, made calls last week to try to find shelter for a woman who uses a wheelchair - she had been illegally evicted from a shared housing space that is often viewed as an option for folks who are homeless. I could not find her shelter space, and ultimately suggested she go to the ER, which would have required her to check in and then be discharged so she would be able to stay the night in the waiting area without being kicked out by security. I also could not find 1 available cab that could drive her from New Bedford to Fall River. She ultimately opted to sleep

	<p>in a tent. During a housing crisis like this, bad-actor landlords can operate without limit because there will always be the next tenant willing to live in a unit with a bad landlord. Tenants are afraid to complain about conditions and other abuses because they are afraid their rent will increase.</p>
<p>Bill Henning, Director Boston Center for Independent Living</p>	<p>BIPOC neighborhoods will also have greater numbers of people with disabilities so would logically be a focus, though concentration of resources in one area could be a challenge.</p>
<p>Andrew Espinosa, Deputy Chief of Investigations Massachusetts Commission Against Discrimination</p>	<p>Boston, Worcester, Springfield, and any of the Commonwealth's other urban centers that have large low-income populations should receive priority for HOME-ARP assistance. Our cities are still where the majority of the need for this type of assistance is found due to high population and lower average incomes.</p>
<p>Jodi Breidel, North County Regional Director WHEAT Community Connections, a direct service of the United Way of Tri-County</p>	<p>North Central Mass region, and Clinton in particular, should receive priority HOME-ARP assistance because we have been historically underfunded in this region. We are located between Worcester and Fitchburg and are oftentimes forgotten despite poor health indicators in the region and no public transportation. During UMass Memorial HealthAlliance - Clinton Hospital's Determination of Needs Assessment it was highlighted through 18 focus groups that COVID-19 exposed vulnerabilities within our area that included but weren't limited to the following:</p> <ul style="list-style-type: none"> <li>- Declining housing stability and an increase in homelessness.</li> <li>- Financial wellness has a direct correlation on physical health and social well-being.</li> <li>- Public transportation</li> </ul> <p>The study also highlighted exposed racism, health equity and racial and ethnic health disparities, which caused limited access to health care, delayed appointments, or procedures/surgeries; Increased social isolation, mental and behavioral health needs; Significant impact on the wellbeing of families as they struggle to afford</p>



	<p>necessities including housing, food and childcare as well as delayed public response to reach non-English speaking residents, immigrants Digital Divide. WHEAT Community Connections and our community partners work with residents to address these issues and have been for 40 years. We are hoping to get some help this upcoming year so that we can finally add the much-needed housing program within our community to address this need once and for all. Thank you!</p>
<p>Leah Bradley, CEO Central Massachusetts Housing Alliance</p>	<p>In Worcester County, the north and south parts of the region have historically not had shelter options for individuals resulting in folks having to leave employment and supports in order to access shelter. As the CoC we have identified Clinton as an area that needs non-congregate housing along with the support of the shelter and housing in Leominster. With the challenges in Worcester, we also see large scale project as a priority. While there aren't any viable projects in south county, we would recommend resources for this area as well. This will prevent households from having to leave employment and supports because their rent had increased and they are now homeless.</p>
<p>Krystal Vanhorne City of Worcester</p>	<p>I believe those communities who are Marginalized, disfranchised and systemically oppressed, specifically persons of color, should receive priority with HOME -ARP assistance.</p>
<p>Alex Arriaga Director of Veterans' Services City of Worcester</p>	<p>Worcester city should be prioritized in receiving HOME-ARP assistance as it is a hub for a variety of resources that our target population— those currently or at-risk of experiencing homelessness— need. As the second-largest city in New England, a number of the surrounding towns and cities heavily rely on the resources that are based in Worcester. Receiving these funds would allow us to expand the capacity of the services that are provided. Additionally, as a gateway community we</p>

	boast one of the most diverse populations, with members of the HOME-ARP target population who are part of those most heavily affected by COVID19. The funds would go a long way in addressing the equity gap by reaching the intended members. Our most impacted citizens.
Gerry McCafferty, Director of Housing City of Springfield	Communities with high rates of homelessness, including unsheltered homelessness, should be prioritized. The state can use the upcoming January 2023 point-in-time count to determine which communities have high rates of homelessness.
Elizabeth Alfred, Staff Attorney Greater Boston Legal Services	No, we need it all over the Commonwealth.
Gerry McCafferty, Director of Housing City of Springfield	The City of Lynn is experiencing a high need among low-income populations. There is very little affordable housing available, including voucher holders who are experiencing difficulty locating units.
Danielle Hoyt, LHAND Housing Stability Programs Coordinator Lynn Housing Authority & Neighborhood Development (LHAND)	Lynn MA-502, as Lynn has a substantial number of individuals and families who do not have stable housing. As the City of Lynn's HOME-ARP plan describes, low incomes and the lack of affordable housing are the primary drivers of homelessness. Some sub-populations are more likely than others to become homelessness and to face particular barriers to establishing housing stability. Among the groups that have disproportionately high rates of homelessness are seniors, people with disabilities (both physical and mental), young adults, and people who have experienced domestic violence, sexual assault, stalking and/or commercial sexual exploitation/trafficking. The Lynn CoC has also committed to understanding and redressing inequities in services to people experiencing homelessness. Utilizing a needs-based assessment, rather than a time-based system, will lead to more equitable distribution of housing resources, which are so desperately needed.

Sara Johnson, Family Success Center Programs Manager Lynn Housing Authority & Neighborhood Development	The City of Lynn is experiencing a high need among low-income populations. There is very little affordable housing available, including voucher holders who are experiencing difficulty locating units.
Heidi Holland, Director of Young Adult Transition Services, DMH	As specified in question 5, we are proposing a specific focus on young adults ages 18-25 who are living with mental illness and experiencing housing insecurity. We will work with the Commission on Unaccompanied and Homeless Youth to further establish which localities across the state are in greatest need.
Evelyn Friedman, CEO Greater Lawrence Community Action Council	Lawrence because of the lack of affordable housing and the generally low incomes of the people who live in Lawrence, which is one of the poorest cities in the state.
Lisa Larrabee, Executive Director Westford, Littleton, & Groton Housing Authorities	I think that smaller housing authorities should receive priority with these funds. These are the communities that get less funding than larger cities so there is less that we can do for our vulnerable population.
Andrew DeFranza, Executive Director  Harborlight Homes	Gateway Cities as a way to respond to those with the deepest needs and hardest impact from Covid and as a response to racial equity goals
Laura Baker, Real Estate Development Director Valley Community Development	Communities characterized by high percentages of ELI residents and high concentrations of BIPOC residents should receive priority based on concentration of need.
Stephanie Marchetti, Executive Director Montachusett Veterans Outreach Center	Regions that do not have strong public transportation systems would benefit from assistance, particularly if funds are used to create/support housing with supportive services, so that recently housed residents would have access to the services they need on site.
Lisa Larrabee, Executive Director  Westford, Littleton & Groton Housing Authorities	I think that smaller housing authorities should receive priority with these funds. These are the communities that get less funding than larger cities so there is less that we can do for our vulnerable population.

Jason Stripinis, CFO Southeastern Massachusetts Veterans Housing Program, Inc.	Communities with housing stock the median cost of which, relative to the average income of the lowest quintile resident there, yields the highest number, should precede in priority.
Jack Nagle, Executive Director Arlington Housing Authority	Regions with the highest population of homeless or those with other mental health related needs. Due to our close proximity to larger communities like Cambridge, Somerville, Medford, and Boston, we are more likely to have individuals from shelters or other programs located in those communities. We should receive priority for assistance so that we are better able to assist residents/applicants with these needs. Our goal is to assist in fight to prevent homelessness as well as to ensure our residents have the supports needed to maintain their housing.
Matthew Mainville, Executive Director Holyoke Housing Authority	Gateway Cities and communities more adversely impacted by COVID
David Houlden, Executive Director Gloucester Housing Authority	Gateway Communities
David Hedison Chelmsford Housing	Anyone applying for repositioning of 705 scattered site should be able to add additional units to help create incremental new units targeted at the groups identified.
Adam Garvey, Chief Operating Officer Lowell Housing Authority	Those communities with high percentages of renters, specifically those who are rent burdened. Communities with large homeless populations. Communities with underutilized properties available for housing conversion.
Adam Garvey, Chief Operating Officer Lowell Housing Authority	Homeless population largest in the cities
Matthew Mainville Executive Director Holyoke Housing Authority	Gateway Cities and communities more adversely impacted by COVID
Stephen G. Finn Executive Director Malden Housing Authority	Compliant (District and Interim) MBTA Communities are the best fit for HOME-ARP fund use.
Andrea Lindsay Executive Director Stockbridge Housing Authority	The South County of the Berkshires historically is a difficult area to find affordable housing. There is a great need for more units, more vouchers and more affordable private market rentals.

Michael Alperin, Executive Director Brookline Housing Authority	The Greater Boston Region has such a higher cost of housing and more ready available services with the local shelter/hospital/health systems. It would be great to prioritize resources in the urban core.
Donna Gauthier, Executive Director Charlton Housing Authority	Homeless population largest in the cities

## **APPENDIX E**

### **ADDITIONAL WRITTEN COMMENTS SUBMITTED TO DHCD**

**From:** [David Eng](#)  
**To:** [Robinson, Nate \(OCD\)](#)  
**Cc:** [Libby Hayes](#); [Kara Johnson](#); [Stephanie Brown](#)  
**Subject:** HOME-ARP comments  
**Date:** Wednesday, December 7, 2022 4:57:03 PM  
**Attachments:** [image001.png](#)

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**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hi Nate,

Thanks again to you and Rebecca for joining the Housing Stability Subcommittee of the Gov's Council to Address Sexual Assault & Domestic Violence, sharing information about HOME-ARP, and asking for our thoughts and suggestions on how DHCD could use these funds. Thanks as well for this opportunity to reiterate what I said in the meeting.

Last year, DHCD made available 53 MRVP vouchers for the longest stayers, most over a year, in the DV shelter system. These survivors were no longer in danger but were unable to leave the DV shelter because they had no housing options. This barrier at the back door prevented other survivors who were in imminent danger from coming in the front door of the DV shelters.

To address this, there needs to be permanent affordable housing units prioritized for survivors. The HOME-ARP funds could be used to subsidize the development of units in multifamily housing which could be prioritized for applicants meeting the HOME-ARP priority populations, as follows:

1. DHCD HOME/HTF VAWA emergency transfers
2. DV shelter applicants
3. EA shelter applicants with DV history
4. Anyone fleeing from domestic violence, dating violence, sexual assault, stalking, or human trafficking

These VAWA-prioritized units would need to be layered with project-based rental assistance since many survivors lose their employment when forced to flee their homes and could not sustain even a Low HOME rent. If possible within the program regs, these units should also float within the development so that the units, and the residents, don't become unintentionally labeled.

DHCD could also use a small amount of the HOME-ARP funding to expand Casa Myrna's existing DHCD HOME/HTF VAWA emergency transfer program contract to work with these HOME-ARP applicants and the SDV/EA providers, coordinating applications with the owners/agents.

Please let me know if you or any DHCD colleagues wish to discuss this with us (Housing Stability Subcommittee co-chairs, cc'd).

Thanks again for the opportunity.  
Dave

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One Beacon Street, Boston, MA 02108

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**David Eng**

Housing Stability Specialist

617-854-1089 [deng@masshousing.com](mailto:deng@masshousing.com)

[www.masshousing.com](http://www.masshousing.com)

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## **Overview Proposal to DHCD from the Department of Mental Health**

### **A Model to Support the Unique Housing Needs of Young Adults Facing Mental Health Challenges October 28, 2022**

**Population:** According to the Massachusetts Commission on Unaccompanied and Homeless Youth, on any given night there are at least 1,000 youth and Young Adults (YA) under the age of 25, experiencing homelessness in Massachusetts. The intersection of mental illness plays a significant role in among the population of youth and young adults experiencing homelessness. At the same time, Massachusetts is reflecting national trends of significant increases of young adults experiencing, suicidality, depression anxiety. According to the Journal of Adolescent Health (April 13, 2022), among young adults aged 18-25 in 2021, Forty-eight percent reported mental health symptoms and, among those with symptoms, 39% used prescription medications and/or received counseling, while 36% reported unmet counseling need. At DMH, we currently have approximately 600 YA's receiving services in our Intensive Community Services (ICS) and Adult Community Clinical Services (ACCS) programs, while there are approximately 10,000 participants in these services overall, young adults only represent less than 17% of participants. Overall, we have seen an upward trend in YA's applying for DMH services in the last several years, while demand for housing supports, greatly outpaces resources. Additionally, many young people experiencing mental illness may not have the opportunity to live at home with their families as these relationships are often deeply fractured and for many young adults, who have been part of state systems such as Department of Children and Families (DCF), they have never had a consistent safe family relationship.

**Models for YA Housing:** To be successful in gaining and maintaining housing in the community, young adults require significant supports. YA in the community who have mental health challenges need a support structure that includes, employment and education guidance, budgeting and life skills supports and an anchor to a community that reduces isolation while fostering independence. Our DMC ICS and ACCS programs provide those services and these supports can be aligned with the new housing opportunity for young adults. Additionally, Young Adult Access Centers, currently in 10 locations around the state, are a place where young adults can find community and peer support to reduce isolation that they may be experiencing.

In our DMH Intensive Community Services for Young Adults program, there are two models for housing support. Staffed apartments have staff on-site 24/7 who assist young adults with their treatment and independent living goals. The second model is a Provider-Based Support Apartments, staff are not onsite but are available 24/7 by phone as needed. Contractors are the lease-holders for these properties. Young adults work with an outreach worker on their goals toward independent living.

Another community based model has been developed and is being implemented by More Than Words (MTW), a social enterprise that provides employment and life coaching to young adults involved with state systems. MTW recently added a small "single room occupancy" housing program geared to young adults who are enrolled in their job training program and are experiencing homelessness. This arrangement promotes privacy, safety and independence. Young adults meet regularly with Community Resource staff. The rent is fully subsidized by the Liberty Mutual foundation, and young adults pay a portion of their income toward "rent" which goes into a savings account to assist them toward future housing costs.

**Proposed Model:** DMH is proposing a type of hybrid of these promising models. Young adults with mental health challenges need a balance between independence, strong connections to their providers and a link

to a peer community of young adults. As such DMH in partnership with DHCD is hoping to explore the development of buildings with individual studio apartments that have kitchenettes and private bathrooms. At the same time there is a shared community space for meetings, events and recreational activities. This model provides privacy and safety for the young adult while fostering independence and reducing isolation. This space also has computers to support young adults in their educational and employment pursuits. There are staff offices for Case Managers, Transition Facilitators (to support young adults in achieving their goals) peer and clinical staff. This staffing array assures that young adults feel supported and maintain a focus toward their longer-term treatment, housing and employment goals. Young adults will also be linked to community-based DMH Young Access Centers to further engage them in the community. Additionally, a potential partnership with Massachusetts Rehabilitation Commission (MRC) could support these young adults in their educational and employment goals.

**Goal:** Ultimately, young adults between the ages of 18-25 can enroll in this program for up to three years. During this time, they are able to focus on treatment and recovery as well as the skills needed for living independently in the community. DMH has two options to support individuals to sustain their housing in the long-term:

- **Tenancy support** – Activities to support an individual to remain in housing. Good Neighbor practices, advocacy skills to address issues related to housing, applying for mainstream housing opportunities, etc.
- **Tenancy preservation** – Activities to support an individual to keep their housing and keep it in good standing with a property owner/LHA/community. Prepping for inspections and addressing maintenance issues, landlord mitigation, neighbor mitigation, etc.

These supports along with DMH Rental Assistance, would provide a safety net for long term housing stability as young adults reach the age of 26 and beyond.

#### **Outstanding Questions:**

1. Is the opportunity to build new housing or renovate existing properties?
2. What is the approximate timeframe on this project?
3. How might you assist us with coming up with a design that works for young adults that offers independence and promotes community?
4. What scale might work best i.e. 2-4? 6-8? Other?
5. How could this model be financed? What state/fed programs might be tapped?
6. Who would be interested to serve as developer? CDC? LHA? Other?

#### **Key Stakeholders:**

1. DMH Area Directors
2. The Commission on Unaccompanied & Homeless Youth
3. Other state agencies including DCF and MRC as potential collaborators
4. Young adults with lived experience of mental health challenges and housing insecurity to serve in an advisory capacity in this effort

----- Original message -----

From: Rebecca Mautner <[rMautner@jpndc.org](mailto:rMautner@jpndc.org)>

Date: 10/6/22 11:20 PM (GMT-05:00)

To: "Racer, Catherine (OCD)" <[catherine.racer@mass.gov](mailto:catherine.racer@mass.gov)>, "Frawley, Rebecca (OCD)" <[rebecca.frawley@mass.gov](mailto:rebecca.frawley@mass.gov)>

Cc: Teronda Ellis <[tellis@jpndc.org](mailto:tellis@jpndc.org)>, Ricky Guerra <[rGuerra@jpndc.org](mailto:rGuerra@jpndc.org)>

Subject: HOME ARP - public comment

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Kate and Rebecca,

Thank you for the public information session on the HOME ARP funds. They will be a critical resource. As many said, given the time limit for expenditure, it seems they will be best suited for capital expenditures (despite the fact that creation of sustainable supportive housing for formerly homeless people requires deep and long-lasting operating subsidies). We understand that the time limits for expenditure were the work of Congress, not the Department, so look forward to helping find ways to deploy these funds that will have maximum impact on helping unhoused people move to the next step of their lives, building more security and stability.

JPNDC would like to note that although much of the housing for homeless people produced in recent years has been for individuals, housing for homeless families is critical.

1. **Family Homelessness is a big and growing problem in Massachusetts and Boston in particular. It has deep implications for creating housing and health crises in the next generation of young people of color, especially those who are African heritage, Latino and Indigenous.**

a. Even as fewer families are becoming homeless across the country, more and more become homeless in Massachusetts. ***The Commonwealth is a dismal national leader -- since 2007, it has shown the highest percentage increase in family homelessness in any state, according to new federal data<sup>[1]</sup>.***

Because of our state's Emergency Shelter Assistance program, family homelessness is masked and is an invisible problem. While that program is excellent in making sure many families are not literally on the street, the program does not proactively solve for homes and provide ongoing, steady linkage to broader community and needed supports.

Family homelessness is a public health crisis. It affects children's health, development, and school achievement (numerous scholarly articles – see below).

Most homeless families are headed by a woman who is African American (56%) and/or Hispanic (39%)<sup>[2]</sup>.

b. While recognizing that DHCD is developing a statewide plan, we note that the family homelessness crisis is hitting Boston especially hard.

In 2022 Boston alone experienced a 10% increase in family homelessness.

1. The Mayor has recognized the gravity of this crisis: earlier this year, she announced the formation of a Special Commission to End Family Homelessness<sup>[3]</sup>.

2. One of the dramatic effects of family homelessness is the increase in mental health crises among BIPOC children.

3. According to Boston Public Schools (BPS) district officials, the number of homeless BPS students has climbed more than 25% in four years - currently 11% of the entire student body and nearly all of them are students of color<sup>[4]</sup>.

4. According to Dr. Kevin Simon, the City's Behavioral Health Director for the Boston Public Health Commission, we cannot hire our way out of this crisis, or build our way out, we must do all of the things necessary for intervention – the most immediately helpful approach is to offer permanent housing and building strong community cohorts and spaces where children can be safe. This lessens the primary burdens on their parents and allows parents mental health space to focus on recovery, stability and mobility.

**2. The impact of homelessness has a disproportionate impact on children and adults of color, creating a dramatically worse prognosis in terms of health that will widen the health outcomes for young people based on race. More than half of all homeless families are headed by an African heritage woman.**

a. Homelessness among BIPOC communities reflects racial inequity and is a leading driver of mental/behavior health barriers for our communities.<sup>[5]</sup>

b. African heritage people represent over 45% of homeless people, triple their presence in the population overall<sup>[6]</sup>.

c. In order to heal from homelessness and related traumas, families need access to stable homes and community, as **housing stability removes one of the most critical barriers to healing for families experiencing multi-layered trauma. Without stable housing, families are unable to engage in the needed healing work.**

**3. Service-enriched family supportive housing that addresses the intertwined issues related to housing, health and racism is critically needed to address this challenge and avoid far more devastating impacts in the future.**

JPNDC urges DHCD to dedicate HOME-ARP resources to be used for the construction of service-enriched housing that addresses the social challenges of homeless and economic inequality with multiple solutions and support to families. This is a critical force that is undoing systemic and racial barriers to housing, financial freedom, and long-term stability under three umbrellas:

housing, job placement and financial counseling. Our holistic approach allows for residents to get their foot in the door to stability.

#### Start with Housing

Focusing on affordable family housing allows for more people to gain stability and helps meet the specific needs of children and families. Supportive housing provides a pathway out of homelessness by providing not only housing, but support and resources as well that holistically improve the lives of those who face homelessness.

##### Housing security

Creating units– adding new deeply affordable units to the market  
Robust service program that preserves tenancy (economic prosperity, resources/programming, a management plan that fairly treats how lease violations are handled).

Enriched by a variety of services such as:

##### Food security such as:

On-site food distribution  
Gardening elements in site design  
Assistance with entitlements

##### Access to healthcare services

Strong partnerships with existing clinical programs/referrals  
Programming: wellness clinics, exercise classes  
Mental health services for young people and parents

##### Educational opportunities

Financial coaching – which rectifies the lack of knowledge and accessibility that penetrate inequitable financial systems and affect long term financial stability  
Partnerships with folks who are doing this well (Boys & Girls Clubs, unions, training programs through accredited community colleges)  
Youth employment/internships – with existing clinical providers

##### Access to jobs

Resident hiring, MBE goals for contractors we work with  
On-site family prosperity hours  
On-site childcare, or access to vouchers/affordable childcare options  
Training  
Partnerships with local businesses willing to hire residents

+++++

Rebecca Plaut Mautner

Director of Real Estate

Jamaica Plain Neighborhood Development Corporation

[rmautner@jpndc.org](mailto:rmautner@jpndc.org) / 617-230-2166

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[1]

<https://www.huduser.gov/portal/datasets/ahar/2021-ahar-part-1-pit-estimates-of-homelessness-in-the-us.html>

[2]

[https://www.tbf.org/~media/TBFOrg/Files/Reports/Homlessness%20Report\\_Feb2017R.pdf](https://www.tbf.org/~media/TBFOrg/Files/Reports/Homlessness%20Report_Feb2017R.pdf)

[org/~media/TBFOrg/Files/Reports/Homlessness%20Report\\_Feb2017R.pdf](https://www.tbf.org/~media/TBFOrg/Files/Reports/Homlessness%20Report_Feb2017R.pdf)

[3]

<https://www.boston.gov/news/members-special-commission-end-family-homelessness-announced>

[ton.gov/news/members-special-commission-end-family-homelessness-announced](https://www.boston.gov/news/members-special-commission-end-family-homelessness-announced) [4]

<https://www.bostonherald.com/2022/01/22/number-of-homeless-boston-public-schoolsstudents-climbs>

[5]

<https://nationalhomeless.org/issues/racial-equity/> or

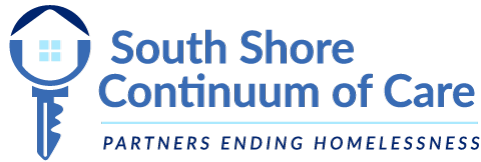
[omeless.org/issues/racial-equity/](https://nationalhomeless.org/issues/racial-equity/) or

<https://nationalhomeless.org/wpcontent/uploads/2020/11/Racial-Equity-and-Homelessness-Fact-Sheet.pdf>

[6]

Source: HUD

2021 AHAR / Point in Time Homelessness Count



October 12, 2022

Mr. Nate Robinson  
Assistant Manager – HOME Program  
Massachusetts Department of Housing and Community Development  
100 Cambridge St., Suite 300  
Boston, MA 02114

Dear Mr. Robinson,

Thank you for the opportunity to provide DHCD with input on the development of the HOME-ARP Allocation Plan on behalf of the MA-511 South Shore CoC. As you outlined in the listening session on August 25, 2022, HOME-ARP will strengthen communities' ability to support homeless households. The MA-511 CoC, also known as the South Shore CoC, has a long history of providing low-threshold emergency services and an array of permanent housing options using Housing First and Harm Reduction frameworks. These priorities have allowed the CoC to significantly reduce the number of homeless families and veterans, as well as unsheltered persons. These successes form the basis of our recommendations for the HOME-ARP Allocation Plan.

Specifically, the South Shore CoC asks that DHCD prioritize homeless households as defined in 24 CFR 91.5, including homeless veterans and their families, as well as households fleeing domestic violence, dating violence, sexual assault, stalking, or human trafficking. By prioritizing these most at-risk populations, HOME-ARP can fill a critical gap and prioritize households most likely to remain homeless for extended periods of time. HUD expects CoC's to prioritize their resources this way because it is proven to have the greatest impact in reducing homelessness and maximizing resources.

Further, among the HOME-ARP eligible uses, the CoC recommends that DHCD prioritize rental housing development with available funds. The CoC believes firmly that housing is the solution to homelessness, and that any capital investments are better spent on permanent housing than on temporary shelter unless there is a well-documented and urgent community need to meet a gap in emergency services. Given the funds must be committed by 2030, funds will be best used for capital development rather than rental assistance or supportive services that need longer-term resource commitments. The CoC encourages DHCD to prioritize projects that leverage other sources of service and operating dollars, such as CoC funding, CSP-CHI, DPH service programs, private sources, and others.

Thank you for your consideration, and please contact us with any additional questions.

With Appreciation,

November 9, 2022

Jennifer Maddox, Undersecretary  
Department of Housing and Community Development  
Boston, MA

Re: Commonwealth of Massachusetts HOME-ARP Allocation

Dear Undersecretary Maddox:

Thank you for giving us the opportunity to provide input to the HOME-ARP process. As the lead agency for the CoC that covers all of Worcester County, Central Massachusetts Housing Alliance (CMHA) stays informed of the development projects for persons experiencing homelessness to include in our overall planning. We are fortunate to have strong partnerships with our municipalities, PHAs, CDCs, philanthropic organizations and homeless service providers. We have gathered input from these partners for this response to your request for input.

### **Worcester County Needs**

Over the last year, ***Worcester County has seen a 45% increase in individuals experiencing homelessness rising from 475 in March of 2021 to 690 in March of 2022 with the City of Worcester having a 61% rise during the same time period.*** Given the numbers we are currently seeing ***we expect that number to jump to 850 this upcoming winter.*** This is a dramatic spike, and the highest numbers we have seen since we have been tracking data. Our unsheltered population is on the rise due to our shelters being beyond capacity during the warmer months when we typically see a decrease. In addition, our congregate shelters do not meet the needs of many populations – LGBTQIA+, youth, seniors among others. Many of those entering homelessness are newly homeless unable to afford rising rents and losing income as a result of COVID.

We also have seen a rise in the number of families seeking shelter. As the largest family shelter provider in Worcester, we are currently full and are getting requests to assist refugees, some of whom are eligible for EA, some of whom are not. We have begun placing families in hotel/motel. In addition, disasters such as building collapses, fires, floods, etc. that displace households results in more households experiencing homelessness while the vacancy rate in the city is at an all time low of 2.9% - well below the 5% threshold. This low vacancy rate coupled with rents that have increased exponentially in the last year, is placing many households at imminent risk of homelessness. We are seeing this in our RAFT program numbers serving the same number of households in the first 6 months of 2022 that we served in all of calendar year 2021. Without immediate housing production for those at all income levels, the number of households experiencing homelessness will continue to rise.

We also know that our data is an undercount of those experiencing homelessness. In the rural parts of our County where there are fewer outreach resources we are not capturing all those living outdoors. Our Point In Time count is also performed during the winter months, which leaves out families living in campgrounds who find a temporary solution for the



winter months that often includes families splitting so the children have a home and the parent(s) continue to experience homelessness. Families find alternatives to prevent DCF from becoming involved.

Worcester County also has a diverse geography with no transportation from many areas to our shelter sites. Currently, there are congregate shelters in Worcester, and recently with DHCD COVID funds, a non-congregate shelter in Leominster. This does not meet the demand in the other areas of the County that have folks who become homeless. These individuals, who live in more rural settings, are forced to leave their existing supports including employment to access shelter. This disrupts their current support system and forces them to an unfamiliar urban area with no supports. We have identified smaller non-congregate sites as a gap in these areas to minimize the length of time these individuals are in the homeless system and maintain their supports.

Folks with housing vouchers are having a very difficult time finding units to use the vouchers. Many apartment rents are too high for the FMR and landlords have so many tenants applying for the units, they don't need to wait for the inspection process even if it is a quick turnaround. This contributes to our assessment that we need production of new units.

What we know is we need bricks and mortar quickly to stop this rapid increase. Access to development resources, such as HOME-ARP, in an expedited manner is essential for us to stop this growing crisis.

### **HOME-ARP Recommendations**

While CMHA advocates for housing production, we do not undertake development ourselves. However, as the lead for the CoC, we track existing projects and get regular updates on their progress. Through these updates we have seen several barriers that either slow down the construction and/or increase the costs of the projects. Our region currently has three projects that could quickly add non-congregate shelter for individuals Clinton, non-congregate shelter for non-EA families in Worcester and permanent supportive housing in Worcester. These are priority projects for the CoC to help alleviate the crisis that continues to grow.

Our recommendations are as follows:

- **Prioritize Acquisition and Development of new units over TBRA:** With the low vacancy rate, increasing rents, and vouchers being returned for lack of units, we recommend that the dollars be prioritized for new production versus TBRA. The Housing Authorities have received Emergency Housing Vouchers and are currently eligible for stability vouchers for populations experiencing homelessness. These vouchers along with CoC rental assistance are stressing our already saturated rental market. Our County needs new production over TBRA.
- **Allow Non-Congregate Shelter for underserved geographies and populations:** As mentioned above, Worcester County has quasi-rural areas where individuals are forced to leave their home community when experiencing homelessness. This not only displaces households from their employment and supports, it also places more burden on the urban centers to house more households in an already stressed market.

- **No cap per unit:** We appreciate DHCD's commitment to not requiring a cap on the maximum request per unit. We recommend that DHCD ensure construction meet cost reasonableness. This allows developers to minimize the other sources that are required, which can delay the start of construction.
- **Minimize requirements for additional funding streams:** Having to negotiate several application processes with differing deadlines and guidelines delays the building of projects.
- We appreciate DHCD indicating that they will recommend fewer resources for these funds and recommend considering this for other funding streams especially during this crisis.
- **Minimize unnecessary requirements that raise project costs:** We ask the DHCD review its requirements that can increase project costs such as upgrading systems that have not reached end of useful life as per manufacturer recommendations. Not only does this increase costs when construction costs are on the rise, it also delays and/or prolongs construction.
- **Fund 100% of project-based vouchers:** One challenge we have seen with projects is the ability to obtain project-based vouchers from multiple sources. We recommend that DHCD provide 100% of the vouchers to expedite projects. Other voucher sources such as the housing authorities and the use of CoC rental assistance dollars, require the developer to wait for RFP processes, delaying the start of construction.
- **Allow for multi-use projects:** We also recommend that DHCD allow for multi-use properties to be funded through HOME-ARP. Having commercial or program space can assist with the overall operating costs and provide a needed service that is synergistic with the permanent supportive housing. With the costs of developing properties and the limited number, this would allow the Commonwealth to use its resources to support multiple needs in the communities.
- **Require Projects to Participate in CoC Coordinated Entry:** The CoCs are required by HUD to have a process in place where the most vulnerable clients are prioritized for the open units for persons experiencing homelessness. This is an effective process that ensures every person experiencing homelessness has access to these units. We recommend that all PSH projects that serve households with and without children experiencing homeless - not just HOME-ARP funded - are required to accept referrals through the coordinated entry process.
- **Inform CoC of All PSH Projects for Persons Experiencing Homelessness in their Regions:** We track PSH projects as part of our overall planning and have to report to HUD through the NOFO process the number of beds covered in HMIS along with our efforts to promote housing production. We recommend that DHCD include the CoC in any announcements of funding for PSH so we can incorporate them into our HMIS and coordinated entry. We also may be able to support the projects through the NOFO process and can work with recipients to maximize resources.

These recommendations will assist development projects in quickly utilizing funds and building desperately needed housing and non-congregate shelter in our communities. The data we are seeing along with many other costs on the rise such as food and utilities require that we produce housing as quickly as possible.

### **Strength of our collaborative responses**

We have seen the strength in municipal, provider, philanthropy, CoC, homeless service provider and CDC collaboration. A recent partnership led by the City of Worcester to provide incentives, landlord support and client supportive services, has decreased the amount of time it takes a person experiencing homelessness with a voucher by 35% when comparing it to those without this service. Collaborations that can think outside the box and create pilots such as this are critical in this unprecedented time. We recommend DHCD include these partners when developing regulations and reviewing projects. Having the CoC included in the discussions will allow for a coordinated approach to gaps, priorities and funding. We also recommend DHCD bring these partners to the table to think if creative solutions in this time when there are additional dollars available and we have this growing crisis.

### **How the CoC and its partner agencies can help**

As the lead for the CoC, CMHA collects data from all programs providing services to populations experiencing homelessness. We use this data to identify trends and gaps in services with a particular focus on equity. We are in a unique position to inform DHCD on the needs of our specific community. While the state data warehouse has the raw data, we can provide context and priority needs based on this data and what is occurring in the field. Having this perspective will allow DHCD to have a more comprehensive understanding of the priority projects and their stage of development when making decisions.

The CoCs also receive direct funding from HUD that we RFP for new projects. This funding, with the appropriate timing, can be coupled with DHCD resources for rental assistance to support operating costs of the buildings.

### **Conclusion**

The HOME-ARP funding provides a unique opportunity for DHCD and the CoCs to develop a strong partnership for this funding and future funding for persons experiencing homelessness to ensure funds meet the current demands and gaps. In Worcester County, we are seeing a dramatic increase in those at imminent risk for homelessness and those experiencing homelessness that we do not see an end to without expedited housing production. DHCD currently has the power to pause this rise by decreasing barriers that prolong or delay construction. We have several projects that are shovel ready that could assist in addressing our growing crisis in Worcester County.

Thank you for giving us this opportunity to provide input to the HOME-ARP allocation. We hope this input can also be applied to other funding that is utilized for populations experiencing homelessness.

If you have any questions or require any additional information, please do not hesitate to contact me via email [lbradley@cmhaonline.org](mailto:lbradley@cmhaonline.org) or via cell 508-688-7375.

Sincerely,

*Leah M. Bradley*

Leah M. Bradley  
Chief Executive Officer



December 13, 2022

Catherine Racer  
Division of Housing and Community Development  
100 Cambridge St #300  
Boston, MA 02114

Correspondence sent by email to: [catherine.racer@state.ma.us](mailto:catherine.racer@state.ma.us)

Dear Kate:

We appreciated the meeting last month to discuss the use of HOME-ARP funds and your encouragement to submit comments on the needs of people with disabilities.

We respect that there are various guidelines on the use of the funds and acknowledge the obvious fact that the state faces an intense affordable housing crisis with many complicated parts needing attention, including insufficient numbers of subsidies, skyrocketing home and rental costs, and a shortage of housing stock. For people with disabilities, there also are additional needs including accessibility in various forms and frequently a need to be in proximity of employment, educational, health care, and service options as well as public transit. An automobile-dependent location can be unsuitable for many people who neither drive nor own vehicles. It is not surprising that the biggest need of consumers using the services of the state's ten independent living centers is most definitely housing, manifesting in a need for units, subsidies, and assistance with accommodations, search, and contesting unfair evictions and discrimination.

Much attention is most appropriately given to people who are homeless, and many of these individuals have a range of disabilities, and some number will access independent living services as well. But we also will emphasize that the independent living centers work with people right now in far greater number who face serious housing instability, being, practically speaking, without a home as they live in rest homes, nursing homes, their cars, parents' or siblings' homes, inaccessible units in which they may be trapped, or place to place, essentially couch surfing.

With this in mind we strongly urge consideration of the HOME-ARP funds for a project that can, in the quickest manner, start to dent the crisis for low-income persons with disabilities. We are in agreement with the point that funds should be utilized sooner rather than later. There are practical political elements around this, but more so there are simply too many disabled people in seriously destabilized situations that significantly impact persons' wellbeing. If interested we can provide a document speaking to how the health of people with disabilities improves with housing (now known, of course, as a key social determinant of health)— which likewise illustrates the especially acute negative impact unstable housing causes. This document is a profile of eight BCIL members and their lives before and after acquiring stable housing.

We also wish to indicate that people with disabilities fall within HUD's criteria for use of the funds:

- *Homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11302\(a\)](#));*
- *At-risk of homelessness, as defined in section 401(1) of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11360\(1\)](#));*
- *Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by the Secretary;*
- *In other populations where providing supportive services or assistance under section 212(a) of the Act ([42 U.S.C. 12742\(a\)](#)) would prevent the family's homelessness or would serve those with the greatest risk of housing instability;*
- *Veterans and families that include a veteran family member that meet one of the preceding criteria.*

Significantly, there is this reference to 42 USC 12742(a) in the fourth bullet on eligible use of HOME funds, which include "permanent housing for disabled homeless persons, transitional housing, and single room occupancy housing..."

Potential uses of the funds that would benefit people with disabilities might include purchase of services to stabilize tenancies or creating deeper subsidies and/or expanding accessibility to make current projects in the pipeline more usable, or even rehabbing units built to be accessible that have fallen into disrepair. In consideration of climate change and hotter summers, efforts to support air conditioning for people with disabilities also might be considered. And purchasing in-unit washers and dryers and dishwashers may be extremely beneficial for a disabled person. And please note that when we speak of access, it is important to think beyond just physical access, critical as that is, to the understanding that cognition is the most significant disability in the state and includes mental health, neurodiversity, intellectual limitations, and brain injury. There are new and important accommodations that can serve these populations ([Housing Design Standards for Accessibility and Inclusion - The Kelsey](#)). And with respect to physical access, beyond the need for units that fully accommodate a person who may use wheeled mobility, there's perhaps greater need to simply ensure vertical access—an elevator or graded entrance to a unit, for instance— as many people can ambulate but cannot negotiate stairs, including people with COPD, arthritis, diabetes, serious asthma, or knee or back injuries, among many conditions. They especially can be shut out from use of the state's ample older housing stock.

We hope this information provides suitable background for the urgent need to support more housing for people with disabilities.

Thank you.

Sincerely,

Bill Henning, BCIL Director

Shaya French, BCIL Senior Community Organizer

Joe Tringali, Editor/Informational Advocate, Stavros Center for Independent Living

Cc: Rachel Heller (CHAPA), Henry Korman (BCIL Board)

## **APPENDIX F**

# **CURRENTLY AVAILABLE RESOURCES TO ASSIST QUALIFIED POPULATIONS IN MASSACHUSETTS**

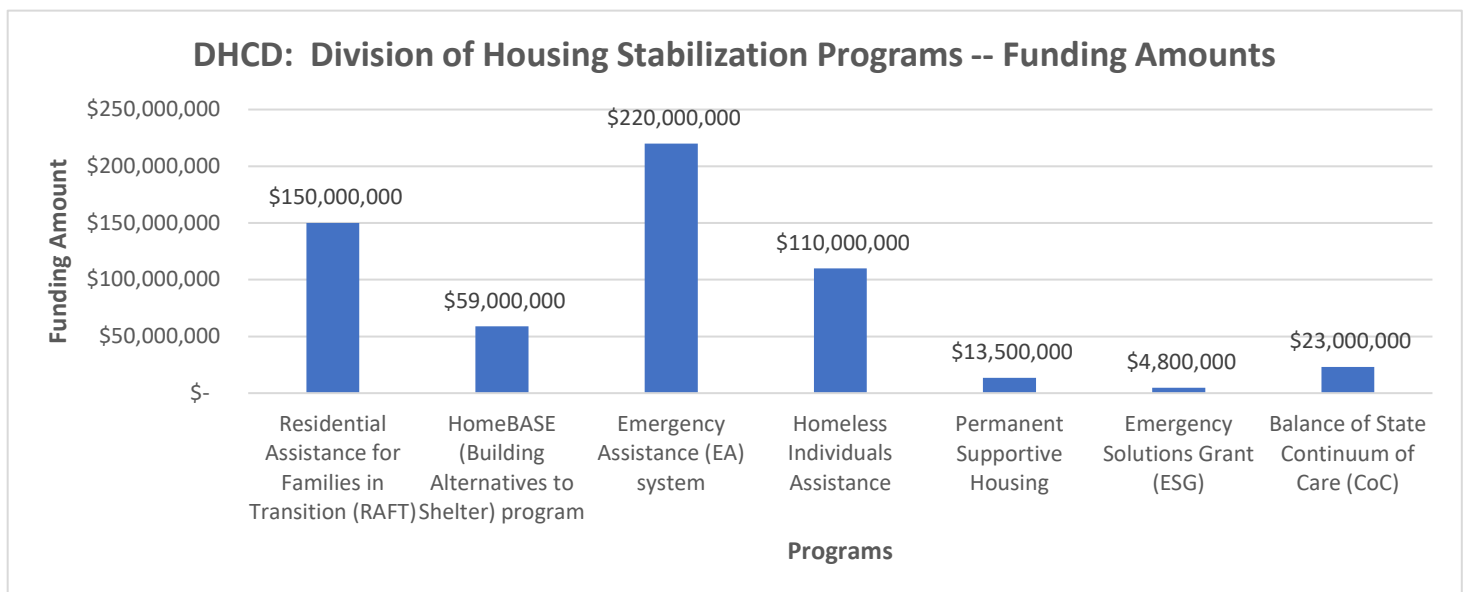
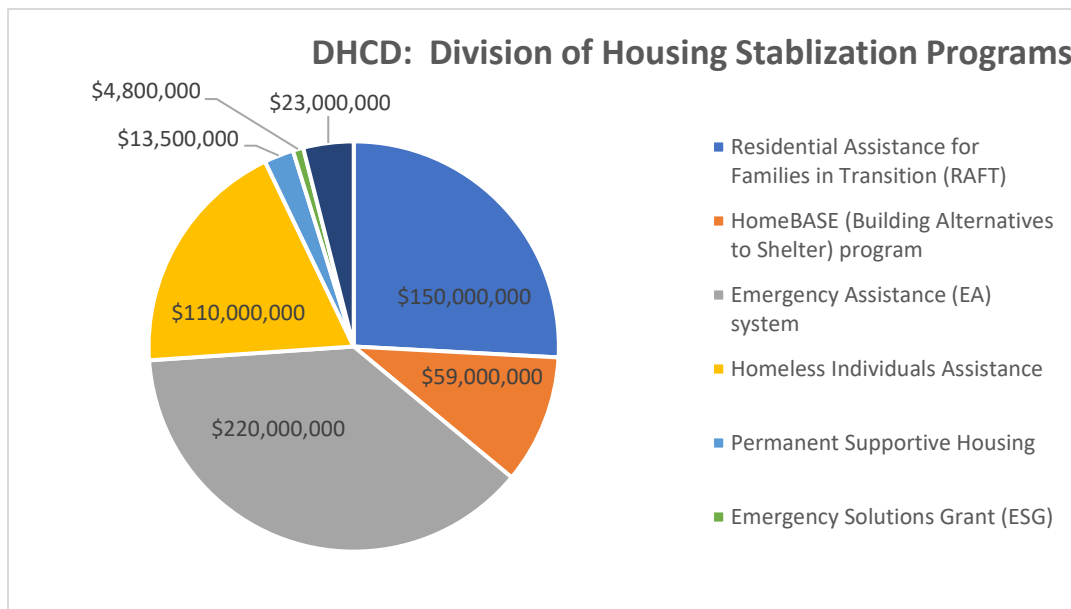
## **APPENDIX F: CURRENTLY AVAILABLE RESOURCES TO ASSIST QUALIFYING POPULATIONS IN MASSACHUSETTS**

### **I. Programs That Provide Housing Stabilization -- Administered by DHCD**

Numerous programs are available within the Department and/or its affiliated agencies to assist qualifying populations with housing and housing-related needs. These resources are listed in the tables and graphs below and on the following pages. The Department also has included narrative descriptions of these programs in this appendix.

<b>DHCD Housing Stabilization Programs</b>		
<b>Program</b>	<b>Funding Amount</b>	
Residential Assistance for Families in Transition (RAFT)	\$150,000,000	\$80,000,000 in supplemental funds carried over from the previous fiscal year's operating budget making \$220M available for RAFT in FY23
HomeBASE (Building Alternatives to Shelter) program	\$59,000,000	
Emergency Assistance (EA) system	\$220,000,000	Plus an additional \$7M in admin funds
Homeless Individuals Assistance	\$110,000,000	
Permanent Supportive Housing	\$13,500,000	\$6.4M annual appropriation and Sponsor Based Supportive Housing (\$7.1M annual appropriation).
Emergency Solutions Grant (ESG)	\$4,800,000	
Balance of State Continuum of Care (CoC)	\$23,000,000	





## Description of Programs Available Through DHCD's Division of Housing Stabilization

### 1) Division of Housing Stabilization (DHS)

DHS is responsible for making homelessness rare, brief, and non-recurring. DHS accomplishes this through a suite of homelessness and eviction prevention programs (designed to make homelessness rare), individual and family homeless shelter systems (designed to make homelessness brief), and rapid rehousing and sponsor-based permanent supportive housing programs (to make homelessness non-recurring).

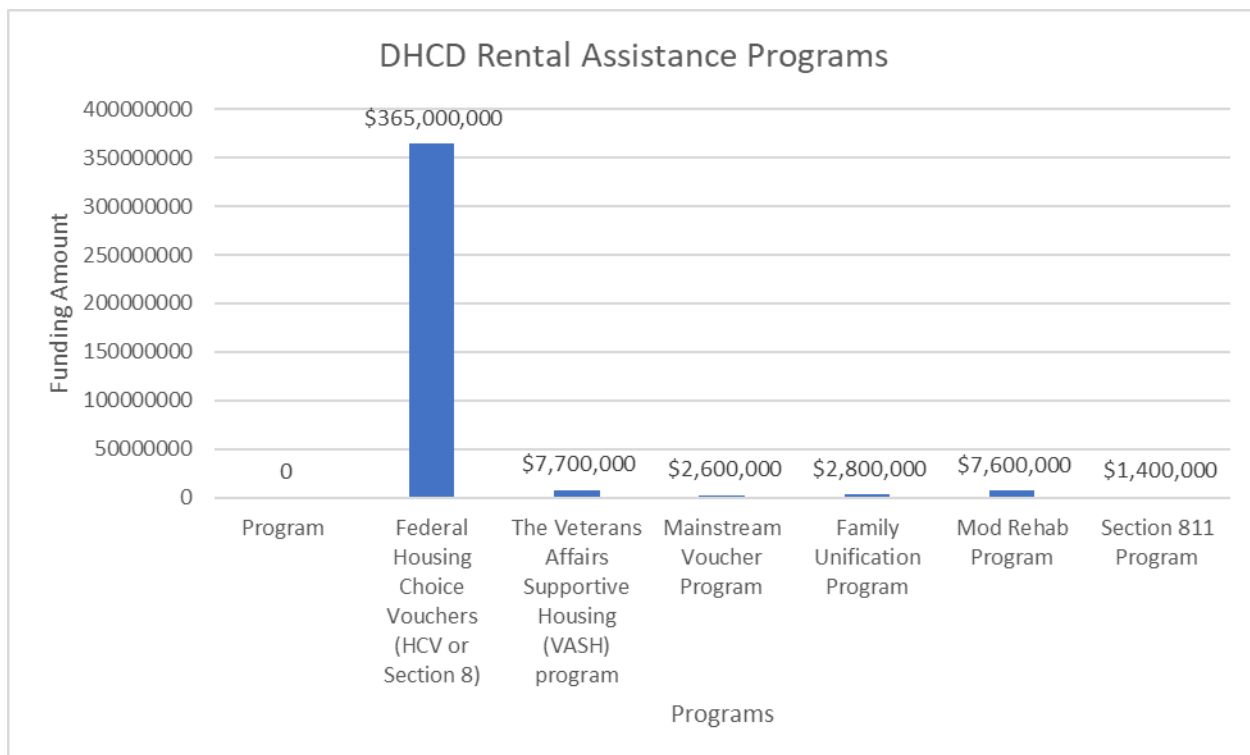
The Division's major programs, organized from farthest upstream prevention, through shelter, then rehousing, are:

- **The Residential Assistance for Families in Transition (RAFT)** program is a homelessness prevention and eviction diversion program that provides households that are low income (<50% Area Median Income) and housing unstable with up to \$7,000 (\$10,000 in FY23) to pay for rent, utilities, and/or moving expenses. During the past 18 months, DHCD also deployed \$843 million in federal funds for a similar “Emergency Rental Assistance Program” (ERAP); those funds are now 97% expended. The RAFT annual appropriation is currently \$150 million in the state operating budget, though an additional \$80 million of supplemental funds carried over from the previous fiscal year’s operating budget results in \$220 million available for RAFT in FY23.
- **The HomeBASE (Building Alternatives to Shelter)** program is intended to divert EA-eligible families from entering shelter and to assist them in exiting shelter to permanent housing. HomeBASE provides stabilization services and rental assistance, capped at \$20,000 per household over 24 months (doubling FY22 levels). HomeBASE rental assistance may be used to pay for a family’s current housing or its move into new housing. HomeBASE has an annual allocation of \$59M in the state operating budget.
- **The Emergency Assistance (EA)** system is unique to the Commonwealth as a Right to Shelter state. EA shelter is available to eligible to families with children and to pregnant women who meet categorical eligibility requirements and have incomes below 115% of the federal poverty level. Categorical eligibility is related to reasons for homelessness. The EA shelter system currently has 3,600 units with a plan to temporarily expand by 200 more units by June 2023. When EA shelter is at capacity, eligible families are housed in motels, in coordination with the Department of Public Health and the Department of Children and Families. The EA system has an annual allocation of \$220 million in the state operating budget, plus additional \$7 million administrative funds.
- **Homeless Individuals Assistance:** The Commonwealth supports a network of 50 individual shelter providers as well as service agencies that address the needs of an unaccompanied adult population. This system operates more independently than the EA system. Eligibility is not determined by statute (entries are managed by shelters directly), there is not a statutory right to shelter, and DHCD funding covers only a portion of operational costs. The Commonwealth supports approximately 3,070 beds, with an annual appropriation of \$110 million in the state operating budget.
- **Permanent Supportive Housing:** In addition, the state operating budget supports two programs for permanent supportive housing for chronically homeless individuals: the Home and Healthy for Good program (\$6.4 million annual appropriation) and Sponsor Based Supportive Housing (\$7.1 million annual appropriation).

- **The Emergency Solutions Grant (ESG)** is a federally funded program funding homelessness prevention, emergency shelter operations, and rapid rehousing services. DHCD issued a procurement for ESG (jointly with the individual shelter system) to coordinate funding. DHCD is one of the HUD-designated ESG “entitlement areas” across the Commonwealth, which also includes cities or towns. The current annual ESG allocation from HUD to DHCD is \$4.8 million.
- **Balance of State Continuum of Care (CoC):** HUD allocates homeless assistance grants to organizations that participate in local homeless program networks. Each network is called a CoC. In Massachusetts, there are twelve CoCs, and DHS serves as the lead agency for the “Balance of State CoC”, which includes providers from multiple communities in Eastern Massachusetts that are not affiliated with a local CoC. DHS coordinates the work of multiple state agencies to respond to homelessness in the balance of state by administering 44 grants for various services, including housing placement and stabilization services, transitional housing units for families fleeing domestic violence, and services for unaccompanied homeless youth, as well as over 1,000 permanent supporting housing and rapid rehousing slots for disabled families and individuals who were formerly homeless. HUD allocates \$23 million annually to DHCD for the Balance of State CoC.

## II. Rental Assistance Programs -- Administered by DHCD

DHCD Rental Assistance Programs	
Program	Funding Amount
Federal Housing Choice Vouchers (HCV or Section 8)	\$365,000,000
Veterans Affairs Supportive Housing (VASH) Program	\$7,700,000
Mainstream Voucher Program	\$2,600,000
Family Unification Program	\$2,800,000
Mod Rehab Program	\$7,600,000
Section 811 Program	\$1,400,000



## Description of Programs Available through DHCD's Division of Rental Assistance

### 1) Division of Rental Assistance (DRA)

DRA administers both federal and state rental assistance programs that provide rental vouchers to more than 33,000 low-income households throughout the Commonwealth. The current annual budget allocation across all DRA programs is \$573 million, including \$208 million in state operating funds and approximately \$365 million in federal funds.

DRA oversees federal vouchers allocated and regulated by the US Department of Housing and Urban Development (HUD). These are administered by nine Regional Administering Agencies (RAAs):

- **The Housing Choice Voucher (HCV or Section 8) program** that currently serves over 20,000 low-income households or individuals and provides rental subsidies of \$335.6 million annually.
- **The Veterans Affairs Supportive Housing (VASH) program**, which is accessed through local Veteran's Administration hospitals, currently serves over 600 participants and provides rental subsidies of \$7.7 million annually.
- **The Mainstream Voucher program**, which is targeted to non-elderly, disabled households, currently serves nearly 140 participants and provided rental subsidies of \$2.6 million in FY22.
- **The Family Unification Program (FUP)**, which is a direct referral program targeted to youth and families involved with the Department of Children and Families, currently serves nearly 190 participants and provided rental subsidies of \$2.8 million in FY22.

- **The Mod Rehab program**, a sunsetting project-based program which currently serves over 780 participants and provided rental subsidies of \$7.6 million in FY22.
- **Section 811 PRA**, a program providing supportive housing for people with disabilities, currently serves nearly 115 participants and provided rental subsidies of \$1.4 million in FY22.
- **The Emergency Housing Voucher (EHV) program**, a new targeted program established under ARPA, is limited to families and individuals who are homeless or at risk of homelessness; fleeing or attempting to flee domestic violence, dating violence, sexual assault, or human trafficking; or recently homeless. EHV's are accessed through the COC network, which directly refers clients to the program. DHCD has been allocated 917 EHV's from HUD, and the nine RAAs are in the process of leasing them. In FY22, the first year of program design and implementation, the EHV program provided \$1.2 million in rental subsidies, but that number will increase significantly as leasing increases. As of September 26, 2022, 351 of these vouchers were leased, and 689 issued.

DRA also administers state vouchers that are funded by the annual operating budget. State voucher programs are administered by 100 LHAs and the 9 RAAs:

- **The Massachusetts Rental Voucher Program (MRVP)** is similar to the federal HCV program but provides a slightly lower subsidy per household. MRVP currently serves over 9,400 households with an annual appropriation of \$154.3 million (plus an additional \$19.9 million from the prior year's appropriation).
- **The Alternative Housing Voucher Program (AHVP)** is for non-elderly individuals with disabilities who are also eligible for state-aided public housing. AHVP currently serves 688 households with an annual appropriation of \$13.7 million (plus an additional \$5.6 million from the prior appropriation).
- **The Department of Mental Health Rental Subsidy Program (DMH RSP)** is for low-income persons who receive supportive residential services through the state's Department of Mental Health (DMH). DMH RSP currently serves 1,750 households with an annual appropriation of \$12.6 million.
- **Re-entry Pilot:** In FY23, a new \$2 million budget line item was created "for a housing assistance for re-entry transition pilot program," stating that "funds shall be expended for rental subsidies to participants in re-entry programs funded under" the Executive Office of Public Safety and Security (EOPSS). DHCD is working closely with EOPSS and advocates on program design.

Both federal and state rental assistance programs offer tenant-based (or mobile) vouchers as well as project-based vouchers that are tied to specific units in an affordable housing project.

DHCD is one of 127 public housing authorities designated by HUD as a Moving to Work (MTW) agency. MTW authority, granted to high performing housing authorities, allows DHCD to waive certain federal regulations (with HUD approval) to realize administrative efficiencies, support self-sufficiency, and/or increase housing choices and opportunities for voucher holders and other low-income members of the community. DHCD uses MTW funding and flexibilities to fund economic mobility programs, such as the Family Self-

Sufficiency (FSS) program and Supporting Neighborhood Opportunity in Massachusetts (SNO Mass), a special program that offers counseling and barrier removal to voucher families choosing to move to neighborhoods with higher quality schools, lower crime, and increased access to opportunities that have demonstrated better life outcomes for children.

## **APPENDIX G**

### **HOME-ARP PUBLIC PARTICIPATION PROCESS (LEGAL NOTICE AND WRITTEN COMMENTS)**

Notice Date: February 17, 2023

## NOTICE OF PUBLIC HEARING

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT (DHCD)

COMMONWEALTH OF MASSACHUSETTS

Draft HOME-American Rescue Plan (“HOME-ARP”) Allocation Plan, Substantial Amendment to the FFY 2021 One-Year Annual Action Plan

In accordance with the provisions of Title 24 – Department of Housing and Urban Development (HUD) Part 91 – Consolidated Submissions for Community Planning and Development Programs, and U.S. Department of Housing and Urban Development Community Planning and Development’s “*CPD-21-10 Implementation Notice - Requirements for the Use of Funds in the HOME-American Rescue Plan Program*,” notice is given of the proposed following action to be undertaken by this Department. DHCD has posted a Draft HOME-ARP Allocation Plan as a Substantial Amendment to the 2021 One-Year Annual Action Plan. To access the draft plan, go to [www.mass.gov/dhcd](http://www.mass.gov/dhcd) and search for DHCD Consolidated Plans or email DHCD at <mailto:bertha.borin@mass.gov>.

The Massachusetts Department of Housing and Community Development (DHCD) has scheduled a public hearing to solicit comments on the draft HOME-ARP Allocation Plan. This plan was developed following an extensive consultation process in accordance with HUD guidance. The Department’s HOME-ARP allocation is \$36,453,826. HOME-ARP eligible activities may include: administration and planning; HOME-ARP rental housing; tenant-based rental assistance; supportive services; acquisition and development of non-congregate shelter; nonprofit operating and capacity building support. The Department intends to fund HOME-ARP rental housing and administration and planning with its HOME-ARP allocation as detailed in the draft plan.

During the period in which the draft HOME-ARP Allocation Plan is available for public review and comment, DHCD will hold the following online/remote public hearing and will accept written comments until the close of business Thursday, March 16, 2023, prior to finalizing the HOME-ARP Allocation Plan.

The HOME-ARP Allocation Plan public hearing will be held at 11:00 a.m. on Thursday, March 9, 2023. The hearing will be held remotely via video/teleconference. For details regarding access to this remote public hearing, please contact DHCD at 617-573-1309 or by email to [bertha.borin@mass.gov](mailto:bertha.borin@mass.gov).

At the public hearing, interested parties will have the opportunity to offer comments relative to the draft HOME-ARP Allocation Plan. Interested parties also may submit written comments at any time prior to or during the hearing or by the close of business on Thursday, March 16, 2023, by directing the same to: The Department of Housing and Community Development, HOME-ARP Allocation Plan, 100 Cambridge Street, 3<sup>rd</sup> floor, Boston, MA 02114 or [nate.robinson@mass.gov](mailto:nate.robinson@mass.gov). All written comments must be received by the close of business on Thursday, March 16, 2023.



For reasonable accommodations regarding this meeting, please contact (617) 573-1100 (TTY 617-573-1140) and direct requests to Tyler Newhall, Policy Development Manager and Legislative Liaison.

Favor de comunicarse con el Departamento de Vivienda y Desarrollo de la Comunidad de Massachusetts en (617) 573- 1100 (TTY 617-573-1140) para ayuda gratis con el idioma.

Entre em contato com o Departamento de Moradia e Desenvolvimento Comunitário de Massachusetts no número (617) 573-1100 (TTY 617-573-1140) para obter assistência gratuita com o idioma.

如果您需要免費的語言翻譯幫助，請聯絡麻州住宅及社區發展部 (The Massachusetts Department of Housing and Community Development) 聯絡方式：(617) 573-1100 (TTY 617-573-1140).

Свяжитесь с сотрудником Департамента жилищного хозяйства и общественного развития штата Массачусетс на предмет оказания бесплатной помощи по переводу на иностранный язык. ((617) 573-1100 (TTY 617-573-1140)).

Vui lòng liên hệ Bộ Phát Triển Nhà Ở và Cộng Đồng Massachusetts tại (617) 573-1100 (TTY 617-573-1140) để được hỗ trợ ngôn ngữ miễn phí.

Tanpri kontakte Department of Housing and Community Development [Depatman Devlopman Lojman ak Kominote] Masachousèt la nan (617) 573-1100 (TTY 617-573-1140) pou asistans gratis nan lang.

Si prega di contattare il Dipartimento Edilizia Abitativa e Sviluppo della Comunità dello Stato del Massachusetts al (617) 573-1100 (TTY 617-573-1140) per avere assistenza gratuita per la traduzione.

១) និន្ននេះគឺជាឯកសារសំខាន់ៗសម្រាប់ទំនាក់ទំនងផ្នែកអភិវឌ្ឍន៍សហគមន៍និងលំនៅដ្ឋានរបស់រដ្ឋា ម៉ា សាឈូសេត (Massachusetts Department of Housing and Community Development) តាមរយៈ (617) 573-1100 (TTY 617-573-1140) នៃដ្ឋ ម៉ាសាឈូសេត។ ម៉ែត្រងាយបានជំនួយផ្នែកភាសាដើមឥតគិតថ្លៃ។

This notice was posted at [www.mass.gov/dhcd](http://www.mass.gov/dhcd)



[WWW.PINESTREETINN.ORG](http://WWW.PINESTREETINN.ORG)

444 Harrison Avenue  
Boston, MA 02118  
617.892.9100

March 9, 2023

Jennifer Maddox, Undersecretary  
MA Dept. of Housing and Community Development  
100 Cambridge Street, Suite 300  
Boston, MA 02114

Dear Undersecretary Maddox:

**Pine Street Inn, Inc. (PSI)** is pleased to submit the following comments regarding the Draft DHCD Home Investment Partnership – American Rescue Plan (HOME-ARP) Plan. Pine Street Inn continues to collaborate with the Commonwealth and, to date, operates over **850** affordable housing units targeted to people experiencing homelessness in Greater Boston. Most of these units were constructed with support from DHCD programs, a testament to DHCD's commitment to creating units for people experiencing homelessness.

**Housing is the answer to homelessness**, and deconcentrating the population in homeless shelters is imperative. The need for more permanent affordable housing in Boston is undeniable. Over **1,200** single adults live on the streets of Boston and stay in emergency shelters (*the City of Boston 42nd Annual Homeless Census*, City of Boston, January 2022, Boston.gov).

Housing is a **fundamental human right**, and there should be no preconditions for housing. It is possible to succeed in housing regardless of housing history, duration of homelessness, criminal history, mental illness, trauma history, and sobriety. **Housing First** is an **evidence-based practice** supporting housing as the foundation for life improvement. Individuals stabilize more quickly than in shelter or on the streets. Housing offers a solid foundation to address their needs, such as unemployment, behavioral health treatment, or chronic medical conditions.

When people experiencing homelessness are housed first, they often require **significant support** and services, particularly initially, to remain housed. Leaving homelessness with insufficient support often leads to a return to shelter. DHCD has acknowledged the importance of supportive services in providing **stabilization and preserving tenancy**. Resources like the CSP-CHI program address this need for some, but many persons are uncovered. A **sustainable mechanism** for adequate supportive services is critical to ensure the move to housing is permanent.

Jennifer Maddox, Undersecretary  
MA Dept. of Housing and Community Development  
March 7, 2023  
Page 2

Pine Street Inn's vision is a **permanent home and community** for everyone. Using HOME-ARP funds to develop affordable rental housing, particularly **fully-accessible units**, is a concrete action to ensure people can exit homelessness. The promise of project-based subsidy support through HUD Section 8 and state-funded MRVP vouchers is also invaluable to the projects' viability.

As DHCD promotes the use of Housing First, funding for **service reserves** is as necessary as any other reserve to the success of projects targeted to serve formerly homeless persons. **Robust supportive services** ensure that formerly homeless individuals and families **live stably** and successfully into the future. PSI encourages DHCD to expand the uses of HOME-ARP to extend to funding for support services reserves. This will assist with the overall feasibility of new developments that are targeting the unhoused.

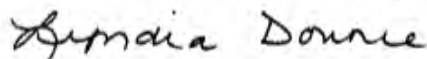
Pine Street Inn appreciates the **prioritization** for projects intended to **exclusively serve homeless** or chronically homeless individuals or families or those restricting at least **50%** of the total units for people experiencing chronic homelessness while noting that this tenant mix will require staff trained in **Trauma-Informed Care**, as well as a sufficient presence to provide **intensive supportive services** effectively.

Pine Street Inn **heartily supports** the proposed Plan to facilitate affordable rental housing development. DHCD engaged in significant community processes and consulted stakeholders from across the spectrum of affordable rental housing developers, service providers, and the vast and varied homeless services systems and providers throughout Massachusetts. A thorough gaps analysis indicates that the need for units far surpasses what may be constructed with available funds. Using the long-established **housing development Round system** to deploy the funds provides a **streamlined process** for rapid yet thoughtful distribution.

Pine Street Inn appreciates the knowledgeable staff, essential services, and informed guidance of DHCD. We pledge to work together **in partnership with the Commonwealth** to preserve, create, and provide access to affordable rental housing for the individuals experiencing homelessness we strive daily to assist and empower.

Thank you for the opportunity to comment on the DHCD HOME-ARP Plan. Pine Street Inn applauds DHCD's **unwavering commitment** to increasing affordable rental housing in Massachusetts.

Sincerely,



Lyndia Downie  
President and Executive Director



## HOME-ARP CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the participating jurisdiction certifies that:

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** --It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.

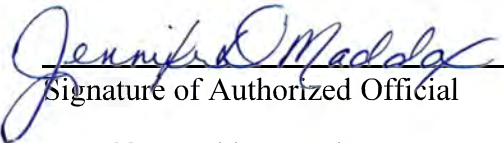
**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and program requirements.

**Section 3** --It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

**HOME-ARP Certification** --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.

  
\_\_\_\_\_  
Signature of Authorized Official

Jennifer Maddox, Undersecretary

\_\_\_\_\_  
Title

\_\_\_\_\_  
March 24, 2023

\_\_\_\_\_  
Date

## Application for Federal Assistance SF-424

**\* 1. Type of Submission:**

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

**\* 2. Type of Application:**

- ☒ New  
☐ Continuation  
☐ Revision

**\* If Revision, select appropriate letter(s):**

**\* Other (Specify):**

**\* 3. Date Received:**

**4. Applicant Identifier:**

**5a. Federal Entity Identifier:**

**5b. Federal Award Identifier:**

**State Use Only:**

**6. Date Received by State:**

**7. State Application Identifier:**

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:**

Commonwealth of Massachusetts

**\* b. Employer/Taxpayer Identification Number (EIN/TIN):**

046002284

**\* c. UEI:**

G9PBNNBRK2N9

**d. Address:**

**\* Street1:**

100 Cambridge Street

**Street2:**

Suite 300

**\* City:**

Boston

**County/Parish:**

Suffolk

**\* State:**

MA: Massachusetts

**Province:**

**\* Country:**

USA: UNITED STATES

**\* Zip / Postal Code:**

021142531

**e. Organizational Unit:**

**Department Name:**

Dept. of Housing&Comm Develop

**Division Name:**

Housing Development

**f. Name and contact information of person to be contacted on matters involving this application:**

**Prefix:**

Ms.

**\* First Name:**

Rebecca

**Middle Name:**

**\* Last Name:**

Frawley Wachtel

**Suffix:**

**Title:** Tax Credits and HOME Program Director

**Organizational Affiliation:**

Department of Housing and Community Development

**\* Telephone Number:**

617-573-1318

**Fax Number:**

**\* Email:** rebecca.frawley@mass.gov

## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

A: State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

Department of Housing and Urban Development

### 11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME Investment Partnerships Program

### \* 12. Funding Opportunity Number:

\* Title:

### 13. Competition Identification Number:

Title:

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

HUD Community Planning and Development Substantial Amendment to 2021 Annual Action Plan, HOME-ARP Allocation Plan.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**\* a. Applicant \* b. Program/Project 

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**\* a. Start Date: \* b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="36,453,826.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="36,453,826.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)**

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:

Middle Name:

\* Last Name:

Suffix:

\* Title: \* Telephone Number:  Fax Number: \* Email: 

\* Signature of Authorized Representative:

**Jennifer D. Maddox**

Digitally signed by Jennifer D.  
Maddox  
Date: 2023.03.24 10:51:14 -04'00'

\* Date Signed:



## ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

<p>SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL</p> <div style="border: 2px solid red; padding: 5px; display: inline-block;"> <b>Jennifer D. Maddox</b> </div> <p>Digitally signed by Jennifer D. Maddox Date: 2023.03.24 10:51:53 -04'00'</p>	<p>TITLE</p> <div style="border: 1px solid black; padding: 2px;">Undersecretary</div>
<p>APPLICANT ORGANIZATION</p> <div style="border: 1px solid black; padding: 2px;">Commonwealth of Massachusetts</div>	<p>DATE SUBMITTED</p> <div style="border: 1px solid black; padding: 2px;">03/24/2023</div>

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL <div style="border: 2px solid red; padding: 5px; display: inline-block;"> <b>Jennifer D. Maddox</b> </div> Digitally signed by Jennifer D. Maddox Date: 2023.03.24 10:52:34 -04'00'	TITLE <div style="border: 1px solid black; padding: 2px;">Undersecretary</div>
APPLICANT ORGANIZATION <div style="border: 1px solid black; padding: 2px;">Commonwealth of Massachusetts</div>	DATE SUBMITTED <div style="border: 1px solid black; padding: 2px;">03/24/2023</div>