

RAFT
FY 16 Administrative Plan
July 1, 2015

Table of Contents

I.	Introduction.....	2
II.	Definitions	3
III.	RAFT Benefits	6
	Assistance Types.....	6
IV.	Participant Eligibility.....	8
V.	Accessing the RAFT Benefit	9
VI.	Documentation.....	13
	Identification	14
	Housing.....	14
	Income.....	15
	Statements of Financial Need	15
	Required Program Documents.....	17
	Conflict of Interest.....	17
VII.	Program Participation	18
	Appeals.....	19
	Reviews.....	20
VIII.	Accounting and Fiscal Management	23
	Allocation of Funds.....	23
	Financial Management.....	23
	Vendor Payments	24
IX.	Program Documentation.....	25
	Participant File.....	25
	Data Collection	26
	Reporting.....	27

I. Introduction

In FY 13 the Residential Assistance for Families in Transition (RAFT) program was expanded to provide a significant homelessness prevention resource across the Commonwealth. In FY14 and FY 15, DHCD made a small adjustments to better serve low income families who otherwise would have require EA shelter services. For FY16, DHCD will make a few additional adjustments with influence from previous years' experience.

RAFT provides flexible financial assistance designed to meet each family's particular needs. Eligible uses include moving cost assistance, rent and utility arrears, rental stipends, and incentives to a primary tenant that will host a RAFT family to keep them from becoming homeless. All interventions will focus on helping families to develop and/or maintain housing and pursue longer term stability.

The program will be administered on a regional level by DHCD's Regional Housing Administering Agencies (RAAs) and two HomeBASE agencies, Lynn Housing and Neighborhood Development and Central Massachusetts Housing Alliance. These agencies will be responsible, to the extent funding allows, for the day-to-day operation of RAFT statewide which includes triaging applicants through the Housing Consumer Education Centers at the RAAs and through the Resource Center in Lynn and the Housing Counseling Program in Worcester, providing information on community based resources, conducting RAFT Screens, reviewing RAFT applications, administering RAFT assistance, and reporting on RAFT outcomes.

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

II. Definitions

Program Goal- To provide short term, limited financial assistance which will enable families to retain housing, obtain new housing or otherwise avoid homelessness.

Target Population- Families at risk of homelessness with (i) a household income not greater than 30 percent of area median income that are homeless and moving into subsidized or private housing or are at risk of becoming homeless; or (ii) a household income greater than 30 per cent but not more than 50 per cent of area median income that are homeless and moving into subsidized or private housing, or are at risk of becoming homeless due to a significant reduction of income or increase in expenses. RAFT shall prioritize these families mostly likely to otherwise require shelter services from the Emergency Assistance Program.

At Risk of Homelessness- RAFT will use a targeting tool derived from national best practice and adapted based on Massachusetts data to identify families who but for this assistance are most at risk of homelessness. This tool will be evaluated as needed on an ongoing basis to assess effectiveness.

Eligible Family Household- A family may be composed of two or more people living together, one of whom is a dependent child under the age of 21 (up until 21st birthday), or a single pregnant head of household.

Income Eligibility- Not less than 50 percent of the funds shall be provided to households with an income not greater than 30 percent of area median income, subject to the department's discretion based on data reflecting program demand and usage. In distributing the RAFT Program funds, the department shall prioritize those families most likely to require EA shelter services.

Definition of Income - Household income must be at or below the Area Median Income as defined by the federal Department of Housing and Urban Development in accordance with eligibility guidelines and for the region in which a family is applying for RAFT. The Agency that is administering RAFT must use the RAFT Definition of Income provided by DHCD when considering what is included in a household's income.

Maximum Amount of Financial Assistance- Pursuant to legislation, financial assistance cannot exceed \$4,000 per family within a 12 month period. Eligible families can access program funds more than once in a given year so long as the total funds received does not exceed \$4,000, subject to the availability of program funds.

Program Participant- The term program participant refers to applicants that have been approved for RAFT assistance.

Qualification for RAFT Funds for New Leasing- In order to qualify for RAFT funds for leasing a new unit (with the exception of co-housing scenarios) the applicant must provide information/documentation to the RAA which substantiates that the applicant needs to move to avoid homelessness. Acceptable reasons for needing to move include:

- Applicant needs to move due to non-renewal of current lease (no fault of applicant)
- Applicant needs to move due to eviction
- Current unit not in compliance with minimum health & safety standards (no fault of applicant)
- Current unit is overcrowded in accordance with State Sanitary code
- Relocation makes housing financially sustainable in comparison to a current location/unit
- Medical necessity
- Violence or abuse in the household (family is either living in a domestic violence shelter or in other temporary housing but cannot remain there or return to previous housing situation due to risk of violence)

Subsidized Housing- DHCD has defined subsidized housing as any property in which public funds are used to reduce the participant's share of rent. This includes:

- all public housing
- all units in privately owned housing developments that are receiving public funds
- all, state and federal rental housing voucher programs
- refer to Section VI re: restrictions on use of RAFT funds for subsidized households.

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

Citizenship Status: RAFT benefits will be provided only to residents who have at least one person in the family that is a citizen of the United States or alien lawfully admitted for permanent residence or otherwise permanently residing here.

Geographic targeting: RAFT funds will be available to families in specific income tiers and cities and towns to effectively allocate funds across a wide geography and distribution of family need. Families must apply in the region in which they intend to use RAFT assistance. They will not be eligible in a different region.

III. RAFT Benefits

Examples of allowable uses of RAFT funds are summarized below, but the list is not exhaustive. RAFT is intended to be flexible enough to respond to individual circumstances. Participant families can receive assistance in any combination of types provided the total amount of assistance does not exceed \$4,000 within 12 months. In determining how RAFT can stabilize a housing situation RAFT agencies will prioritize the various barriers/costs that are preventing housing stability – using RAFT support for those items that will provide the most stability up to the \$4,000/year limit, and providing only what is necessary to avoid homelessness.

We anticipate the following uses commonly observed to support housing stability and avoid homelessness:

Assistance Types

- Rental Stipends
- Rent Arrearage
- Moving Costs (first, last, security)¹
- Utility arrearage
- Furniture (only applicable to families moving to a new apartment and no more than \$1,000 of the family's \$4,000 assistance can be paid for furniture)²

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

- Partial rent payments on behalf of primary tenant
- Grocery gift cards

¹ Moving-related expenses may only be paid for one move per year per family, except when a subsequent move is caused by a direct threat to the family's safety or a serious health condition of a family member that cannot be reasonably accommodated in the original housing arrangement.

² In extraordinary circumstances RAFT Supervisors may request a waiver from DHCD for the \$1,000 limit

- Utility payments
- Furnishings
- Family counseling

This type of assistance allows a RAFT family to stabilize its current housing situation – which includes assistance paid on behalf of a primary tenant who is hosting a family or assistance paid to landlords who are willing to allow families to remain in their apartment. It may include financial assistance to an owner/landlord on behalf of the primary tenant for help with rent and to a utility company for utilities. RAFT payments for rent or utility arrearages may only be used when the arrearage on the account was acquired by and is in the RAFT participant's name.

Additional supportive uses, if they allow a household to maintain housing or avoid homelessness include:

- Car repair/transportation costs
- Extraordinary medical expenses
- Childcare from licensed provider
- Legal assistance (credit repair, birth certificates, child support)

Types of assistance that relate to housing stability may be used in extraordinary circumstances including:

- After school and summer camp tuition for children
- Financial literacy and budgeting classes
- Financial aid for educational expenses (registration, prerequisites that financial aid won't cover, required text books, tuition, etc.)
- Certified Adult Basic Education classes (GED, ESOL, literacy, etc.)
- Job training and attainment (job skills classes, interview clothing, tools for licensed trades, etc...)

Travel expenses are available to families moving out of state. RAFT providers should identify the most economical strategy to support an out-of-state move.

IV. Participant Eligibility

For a family to be considered eligible for RAFT, the household must be income eligible. Not less than 50 percent of the funding will be available for families with an income at or below 30% of AMI, and a maximum of 50 percent for families between 30-50% AMI. Eligibility for RAFT assistance will not depend on the amount of income that a family is contributing toward rent payments, if the assistance helps the family to obtain or maintain stable housing, or avoid homelessness.

Additionally, RAFT is targeted at those families that are most at-risk for homelessness. DHCD has developed a targeting tool based on research and the experience of the U.S Department of Housing and Urban Development, and the National Alliance to End Homelessness that will help identify these families but regional agency staff will be allowed flexibility in applying the tool to determine eligibility: a family that does not meet the criteria established by the tool but nevertheless present as high risk may be determined eligible through a supervisory review at the agency level.

The RAFT eligibility process will consider the reasons for which someone is homeless or at risk of becoming homeless, including loss of income and increased expenses for those with incomes between 30 and 50 percent of AMI. To examine the events that resulted in a loss of income or increased expenses the agency that is administering RAFT will consider the following change in circumstances (override criteria for the targeting tool):

- Employment lay-off , mandatory reduction in hours/earnings, or forced relocation
- A necessary reduction in hours/earnings for medical reasons
- Death in the household that resulted in significant financial costs, including loss of income, to the household
- Unplanned medical expenses not covered by insurance
- Victim of crime that resulted in theft of resources
- Property or vehicle accidents not covered by insurance
- Having to relocate due to non-renewal of a lease, unsafe housing conditions, severe overcrowding, or for medical or educational necessity

- Applicant is homeless and lacks a permanent place to live

As part of the override criteria supervisors may also consider other/additional circumstances as well that may have contributed to the need for RAFT funding in accordance with RAFT guidelines on available types of funding. Please see section V regarding override limits.

Before RAFT assistance is granted the administering agency shall make a finding that the payment will enable the family to retain its current housing, obtain new housing, or otherwise avoid homelessness. All families must complete and certify a housing plan that demonstrates the ability to avoid homelessness. The agencies shall apply a presumption that, unless the facts of the case warrant otherwise, the family, by signing the housing plan, will be able to avoid homelessness.

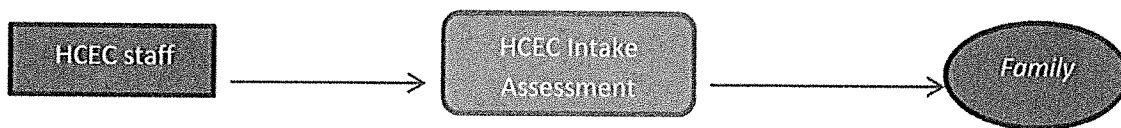
Families who apply for RAFT but are determined ineligible, or for reasons of funding availability do not receive assistance will be referred to other resources, as available, through the HCECs.

V. Accessing the RAFT Benefit

This section describes how a family can apply for, is determined eligible for, and can access the RAFT benefit.

Completing a Housing Consumer Education Center (HCEC) Intake Assessment is the first step to accessing RAFT. The HCECs and resource centers located at the agencies that are administering the program will provide an assessment to all families seeking housing assistance, including RAFT – a program of the HCECs. Any family can walk into or call the HCEC/Resource Center to receive a copy of the Intake Assessment form and in some cases may receive one in the mail. Agencies do not require an in-person appointment to complete an intake assessment but will be *available* if a family requires in-person assistance to complete it. Families may be self-referred or may be directed to the HCEC/resource center from another agency such as a DTA office, housing court, or social service agency. DHCD will distribute material on the HCECs and RAFT program, including eligibility requirements, to identified agencies.

Families should be informed that there may be up to a couple of weeks delay in arranging an appointment and/or reviewing an intake depending on the volume of families seeking assistance. DHCD anticipates that families seeking RAFT will be able to stay where they are while being assessed for HCEC assistance. However, RAFT agencies will be required to have a prioritization process in place for families presenting as emergency cases that are not otherwise qualified for emergency shelter.



After the family has completed the HCEC Intake Assessment HCEC staff will review it to determine individual needs and resources.

Even prior to the RAFT screen, the HCEC Intake will contain questions, including asking about household income, that will screen out some families who will not be eligible for RAFT. The family may be over income at 50% of AMI or for families between 30-50% of AMI might not meet minimal criteria regarding a reduction in income or increase in expenses. HCEC staff might also identify resources other

than RAFT for the family in which case the family will continue to work with HCEC staff but will discontinue the process to access RAFT.

HCEC staff will enter HCEC Intake information into the same system that is currently used at the RAA. Not all families that complete the HCEC intake are expected to be eligible for or to need RAFT, and therefore will not be entered into Tracker. Only families that are referred to RAFT after the Intake will complete the targeting tool through the RAFT Screen.



If a family does appear eligible for RAFT and this is the most effective resource to assist in maintaining stable housing and preventing homelessness the HCEC staff will arrange a time for the family to complete a RAFT Screen. This Screen consists of the targeting tool that DHCD developed to identify those families most at risk of homelessness.

The RAFT screen has three parts. Part I asks only about the triggering event/housing crisis for which a family is seeking RAFT assistance. Part II asks about income, and Part III asks a series of questions that describe the level of risk for each family. Part I and Part II do not have points attached to the questions, whereas Part III does. A family must be eligible through all parts of the Screen (I, II, and III) in order to qualify for RAFT. If a family does not meet any criteria in Part I or Part II they will not need to complete Part III. DHCD anticipates that *most* families referred to RAFT will pass Parts I and II, but that some families will not be prioritized/ determined eligible for RAFT based on Part III.

Although HCEC staff may complete the Screen with a family using a paper form, all information gathered from the family for the RAFT screen, starting with Part I, will need to be entered directly into Tracker. The Screen consists of 12 questions with drop down boxes which should take no more than 10-15 minutes to complete. Tracker will calculate a score for each family which will determine eligibility for RAFT assistance. If the Screen is being completed on paper, HCEC staff may calculate the score using a scoring sheet provided by DHCD and enter the family's Screen information into Tracker in a timely fashion for accurate

reporting. Families are not required to present documentation in support of the information they provide during the Screen rather this information will be verified during the RAFT application process.³

The minimum threshold to be eligible for RAFT Assistance is 7 points but priority should be given to families at highest risk. The minimum threshold will be reviewed on a monthly basis by DHCD and may be changed anytime.

In instances where a family does not meet the criteria established by the tool, but nevertheless present as high risk, they may be determined eligible through a supervisory review at the agency level, as requested by HCEC staff. DHCD will allow HCEC Supervisors the ability to review and override the minimum screen score. DHCD will monitor the number of approved overrides on a monthly basis and may institute a limit if necessary. An applicant family that is denied due to the targeting tool may request a review (see Section VII for more information on reviews).

DHCD will consider request for waiver of the override limits. Administrating Agencies must submit a formal waiver request that includes; recent, relevant and regional data supporting the request.

If after a Screen a family is determined ineligible, they may choose to continue to work with HCEC staff to identify other options or may be referred to other resources. If a family passes the Screen and is determined eligible, a follow up appointment is made (within 2 weeks) to complete a RAFT application.

HCEC should begin to work with an eligible family as soon as possible after completing the Screen. Families must be given information on the types of assistance that the RAFT benefit can provide and the documentation HCEC staff will need from them to complete a RAFT application on their behalf. HCEC staff may also provide applicants with a letter which they can give to a landlord or primary tenant to inform them about the program and the timing of the assistance.

Before completing the RAFT application HCEC staff will also begin to work with the family on their plan for using RAFT resources. The assessment for type and

³ RAAs should make this Screen/Score available to families upon request.

level of assistance will take into account the amount needed to sustain or obtain housing and/or to avoid homelessness. HCEC staff may recommend that a family complete an application for any available additional funding sources or take a class (budgeting, etc...) in order to demonstrate future housing sustainability with RAFT assistance.



To complete the RAFT Application HCEC staff will collect all documentation from the family required to (1) determine the appropriate benefit type and amount of assistance and (2) make a payment, and will enter this into Tracker.

In identifying the appropriate benefit award for the family, staff will consider the documentation that is provided by the family, as well as the family's plan for the use of this assistance, and any communication with a host family, landlord, or co-housing tenant. If the RAFT application along with all necessary documentation is complete, the RAFT payment can be scheduled. The family may also request additional time (2 weeks) to gather documentation or complete a plan/application.

If a family provides false information, does not provide adequate documentation, fails to show up or to complete the RAFT Application or otherwise does not meet the eligibility requirements by the date of the Application appointment (or with an approved extension from the agency) it will be considered ineligible and exited from the RAFT program in Tracker.

VI. Documentation

The following section outlines the required documentation that a family must provide to receive a RAFT benefit.

Identification

1. Each household member must provide at least one form of identification. Acceptable identification includes a birth certificate, picture ID, driver's license, or Mass Health card.
2. Household must provide verification of the social security number of all family members. If the household does not have the social security card(s) available, the agency may accept another form of written documentation that includes the social security number, i.e., pay stubs, public assistance award letter.

Housing Crisis

1. Each head of household must provide the following verification of the housing crisis:
 - a. Eviction: Writ of Summary Process *Families that are tenants-at-will and must move due to no fault of their own will be eligible for assistance after receiving a 30-day no cause notice to quit
 - b. Doubled up/must leave: Letter from landlord or primary tenant stating that the family is being asked to leave within 30 days
 - c. Health & Safety: Condemnation order of unit from the Board of Health
 - d. Severely Overcrowded: Letter from Board of Health verifying the living situation is a state health code violation
 - e. Foreclosure: If renter, letter from landlord stating the family must leave due to the unit being in foreclosure. If owner, the notice of intent to foreclose by the lender.

Housing

1. Household must provide a copy of the lease from participant or primary tenant/rent receipts, or mortgage (if applicable).

2. Household must provide copies of recent bills, if utilities are not included in rent (if applicable). RAA will pay a utility bill up to the limits allowed by the Section 8 Utility Allowance for the region in which the client is living.

Income

1. Household must provide written documentation of all income for all family members at least 18 years of age. Acceptable documentation includes four consecutive pay statements or a letter from an employer for wage earners, monthly bank statements for assets, and an award letter from the administering agency if the applicant is receiving public assistance, i.e., TAFDC.
2. Documentation cannot be older than 60 days.

Statements of Financial Need

The agency that is administering RAFT will determine the amount and types of financial assistance needed based on information provided by the household. The agency may require the following documentation or verification of information, depending on the specific circumstances.

Rent Arrearage - A copy of a Summary Process Summons and Complaint identifying the applicant(s) as the Defendant(s)/Tenant(s)/Occupant(s), which sets forth a hearing date within thirty (30) days of the submission of said Summary Process Summons and Complaint documentation to the HCEC or copy of recent payment record (rent receipts or statement signed by property owner).

- Households residing in subsidized housing cannot receive payment for more than 6 months of rent arrears
- Households residing in subsidized housing cannot receive RAFT assistance for **rent arrears** two consecutive years. If a family received RAFT assistance with rent arrears in FY 15, they are not eligible for assistance with rent arrears in FY 16.

Mortgage Arrearage- Current mortgage statement, and letter from mortgage lender indicating that payments are at least thirty (30) days in arrears.

Utility Arrearage or Heating Fuel- Copies of recent bills and utility shut off notice. Households that used RAFT in previous fiscal year cannot use RAFT for the same utility (i.e. electric, gas) in the current year. A household requesting assistance for utility expenses must also document that they have applied for or have an appointment to apply for fuel assistance benefits if available in your region.

Security Deposit, First/Last Month's Rent- Copy of lease for new unit or letter from property owner stating amounts due upon lease-up. Household would need to provide additional documentation to qualify for RAFT funds for new leasing expenses (refer to definitions section).

Employment Related Transportation Expenses- Household must be employed and provide proof of ownership of vehicle and copy of bill from mechanic detailing work items and costs.

Monthly rental stipend/Incentive payment- Based on a review of household's income and expenses, and coordination with the primary tenant if applicable, the agency will determine the amount needed for housing stipends.

- Households residing in subsidized housing cannot receive RAFT assistance in the form of a monthly stipend.
- Households residing in subsidized housing may receive RAFT for move-in costs and/or for rent arrearages if there is also a documented loss of income/increase in expenses or other hardship (medical expenses, reported income but was not changed by PHA, etc...) and the household completes a subsidized housing certification with the property owner.

Property Owner Documentation: The household's landlord must provide:

- a. Completed W-9 tax form
- b. Proof of ownership (deed, most recent real estate tax bill, or current property insurance policy).
- c. Must sign a certificate stating compliance with Massachusetts Lead Law. The agency that is administering RAFT may also require an LOC.

- d. The agency that is administering RAFT may also verify property ownership with a local municipal Assessor's Office or with the Registry of Deeds. If this option is used, the agency must maintain a printed copy of such verification in the applicant file.

Conflict of Interest

Any unit for which a RAFT participant resides in or is moving to that is owned or operated by the Administering Agency or its subsidiary must be disclosed and approved by DHCD prior to a participant being determined eligible.

Required Program Documents

HCEC Intake RAFT Screen, and RAFT Application- The RAFT agency must date and time stamp all forms submitted. Tracker will serve as an electronic record if a form is completed in that system.

Authorization for Release of Information/Fair Information Practices Act Statement - Must be signed and dated by all household members who are at least 18 years of age.

RAFT Housing Plan/ Participant Agreement-Must be completed before receiving RAFT benefit.

Property Owner Agreement to Participate (Owner Contract) (if applicable):This form must be used for all households receiving an incentive payment, financial assistance for a rent arrearage, monthly rent stipend, security deposit, or first/last month's rent.

Primary Tenant RAFT agreement (if applicable): This form provides information to the Primary tenant regarding the RAFT program and the RAFT participant's benefit.

Eligibility/Denial Letter: If a household is eligible for RAFT this letter will indicate the award type. If the household is ineligible it will indicate the reasons for ineligibility.

VII. Program Participation

For how long can a family use this benefit? The timing of how the benefit is disbursed will depend on the use of the benefit and award amount but can't exceed 12 months from the first payment. Most families will not receive \$4,000 in a lump sum payment up front, rather the model is to determine the amount needed for an individual circumstance. Families will not lose access to the remainder of a potential \$4,000 benefit in a 12 month period if they have not reached that limit as long as any additional funding is available and payments will serve the purpose of keeping the family housed and/or avoiding homelessness. There is no lifetime cap on the receipt of RAFT. All payments must be made within the State's Fiscal Year (For FY 16 July 1, 2015 – June 30, 2016).

Can a family living in an EA Shelter be eligible for RAFT? No, RAFT is a homelessness prevention program. If a family is already homeless (living in an EA shelter) they should access HomeBASE Household Assistance.

How long after being determined eligible does a family have to use the RAFT assistance? The first payment of the benefit award must be used within 60 days of being determined eligible unless there is a documented administrative delay or family hardship.

What happens if a family receives \$4,000 through RAFT but ends up homeless again within 12 months, are they eligible for more money? No, they cannot receive additional RAFT support for 12 months from the date of the first payment they received. If they are at risk of homelessness, we ask that you refer them to other community resources. The family may apply to EA.

If there is new information or the family's circumstances change, may they re-apply for RAFT? Once a family is determined ineligible for RAFT their case will be

closed. They may reapply for RAFT after 30 days if they believe there is new information and will begin at the HCEC Intake stage.

Can a family be found eligible for RAFT if they have been terminated from EA or HomeBASE? No, if a family has been terminated from EA or HomeBASE within the last 12 months, they are not eligible for RAFT for 12 months from date of termination.

How do you define “non-renewal of current lease”? The LL still has to file for an eviction and the family must have the Writ of Summary Process. The “non-renewal of lease” is considered a “no-fault” or excused” eviction. This can happen in the case of 1) foreclosure, 2) condemnation for safety violations, 3) repairs to the unit 4) request to move family member into the unit

How do you account for irregular income (i.e. summer job, or temporary work)? RAFT will follow the EA regulations on calculating income which counts the last four pay stubs

If a family got RAFT in FY 15, when are they eligible for RAFT in FY 16? They are eligible 12 months from the first RAFT payment in FY 15 (for ex. If a family got \$4,000 on October 1, 2014, they would be eligible for assistance on October 1, 2015). The same \$4,000 cap in any 12 months still applies.

Can a person use RAFT to move out-of-state?

Yes, but only for moving expenses and start-up costs. No ongoing funds (rent stipends, childcare payments, etc.) can be paid

Can a person whose children are in DCF custody receive RAFT if they say it will allow them to get their kids back? Only if there is a signed letter by DCF with a specific date that they will allow the kids to be reunited.

Can a person who has a Section 8 and is moving from one unit to another unit receive RAFT? Only if they are being evicted and have a “Writ of Summary Process”. We are not providing relocation money for families who are already on the Section 8 program.

Appeals

Reviews

As mentioned in Section V there are several cases in which an agency that is administering RAFT may complete an informal record review. Reviews will be performed at the agency level by a supervisor who is familiar with the program but unfamiliar with the particular case being reviewed. A RAFT review must be conducted within 15 calendar days of the eligibility determination. The decision should be sent to the client and a copy of the written finding should be placed in the applicant's file. There is no appeal to DHCD of this finding.

The following households may receive a review when requested by HCEC staff:

1. An applicant family that does not meet the criteria established by the tool but still presents as high risk as determined by the HCEC staff conducting the Screen.

In addition a family can request a review when:

1. An applicant family that is determined not eligible after submission of a RAFT Screen.
2. An applicant family was determined eligible through the Screen but upon verifying information for the RAFT application is determined ineligible.
3. A family is terminated because of a violation of the participant contract or program guidance.

Households cannot appeal a denial of eligibility which is due to a lack of funding and may not appeal the benefit award type.

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

Incomplete Documentation; household failed to provide all required supporting documentation by the date of the application appointment or approved extension date.

Over Income; total household income exceeds program eligibility income limits.

Not an Eligible Household; household does not meet the program definition of eligible family household.

No Extenuating Circumstances; household did not demonstrate there was a one-time significant decrease in income or increase in necessary household expenses, which was beyond the control of the household.

Participant Non Compliance; the household previously received financial assistance but failed to comply with the terms of Participant Contract (failed to comply with rent and utility payment obligations, committed fraud, or did not follow-through with other referral services offered by the agency.

Not At-Risk of Homelessness; household did not demonstrate a lack of income to meet housing expenses or documentation of a housing crisis as defined in the Program Guidance.

No Funding; the agency that is administering RAFT does not have RAFT funds available.

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

- Engages in drug/criminal activity;
- Threatens DHCD or RAFT agency staff, employees of the property owner, or others;
- Is evicted from a unit for nonpayment of rent or other "Fault" reason;
- Vacates a unit without notifying the agency that is administering RAFT;
- Commits fraud against the program.

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

Exhibit A

VIII. Accounting and Fiscal Management

Allocation of Funds

Allocation of RAFT funds to the RAFT Administering Agencies will be determined by DHCD based on demand determined by data from both EA and HomeBASE. In FY 16, the department will set aside a reserve fund that will be distributed as necessary to regions with high demand for RAFT assistance. RAFT Administering Agencies will be paid an administrative fee equal to 18.95% of all service dollars paid in that month.

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

RAFT Administering Agencies will be reimbursed on a monthly basis for both service dollars and administrative fees. Agencies shall never exceed their total maximum obligation.

Financial Management

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

This includes but is not limited to:

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

Vendor Payments

The RAFT regional administering agency will make direct payments to participating vendors (property owners, utility companies, etc.), on behalf of the program participant up to the level of financial assistance provided each family through RAFT. The agency may require that payments be made by direct deposit rather than by paper checks.

All RAFT Assistance Payments must be disbursed within FY 16. Payments may not be schedule after June 30, 2016.

IX. Program Documentation

Participant File

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

Each RAFT family file must contain at least the following documentation:

- HCEC Intake
- RAFT Screen
- RAFT application
- Assistance Type and amount
- Emergency Contact Information
- All correspondence on behalf of client
- Release of Information Form
- Income verification
- Documentation of vendor payments on behalf of household including
- Contact information for vendors or host families.
- Copies of invoices for all approved expenditures (such as for furniture, moving expenses, transportation and/or utility arrearage payments)

Leasing/Property documents (if applicable):

- Property Owner Agreement to Participate in RAFT
- Proof of ownership of property to be leased
- Form W-9 and all necessary taxpayer identification information

Reviews (if applicable):

All documents, letters, and case notes associated with any review.

Data Collection

In FY16b RAFT will utilize Tracker Systems Inc. (TSI) for RAFT Screening, Applications, and Reporting. DHCD will be responsible for determining the minimum data collection elements and for ensuring that each agency has access to the necessary software systems to meet the program requirements. The following types of information will be captured in the system:

Assessment information gathered through the RAFT Screen and Application including:

Demographics of household relating to Risk of Homelessness

Income of Household

Type of RAFT award and amount

Leasing information

Contact information for vendors/host families

All payments made to vendors/host families

Letters sent to vendors and host families

Notices related to property and leasing

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

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

confidential information and for meeting DHCD reporting requirements in a timely and accurate manner.

Reporting

From time to time, DHCD may request to review specific participant files or for a report on progress and outcomes across the program. Some of the elements which DHCD will collect and report on regularly include at a minimum:

- Number of families applying for RAFT and reasons why
- Number of Families served
- Participant Use of Benefits – award type and amount
- Spending levels
- Participant time in program

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