

RAFT
FY18 Administrative Plan
July 1, 2017

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I. Introduction

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

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

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

II. Target Population and Household Eligibility

RAFT targets families who, but for this assistance, would imminently become homeless. The families served through RAFT are families at risk of homelessness with (i) a household income not greater than 30% of Area Median Income who are homeless and moving into subsidized or private housing or are at risk of becoming homeless; or (ii) a household income greater than 30% but not more than 50% of Area Median Income who are homeless and moving into subsidized or private housing or are at risk of becoming homeless due to a significant reduction of income or increased expenses.

Eligible households are families comprised 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. If a dependent child is in the legal physical custody of someone outside of the household, the household cannot qualify for RAFT using that child as the eligible dependent. If the child is in DCF custody and will be reunified with the parent if he/she obtains housing, the family may apply for RAFT, but DCF must verify the situation in writing, and no funds may be expended on the family's behalf until the child has been reunified with the parent and this has been verified in writing by DCF.

RAFT benefits will be provided only to applicants whose families include at least one member who is a citizen of the United States or who has legal immigration status in the United States.

Families who have been terminated from EA or HomeBASE in the last 12 months are ineligible for RAFT. DHCD can verify a family's termination date, or identify whether the family was terminated from either program, upon request and with an authorization for release of information.

All approved households must have income at or below 50% AMI. Not less than 50% of the funds shall be provided to households with an income below 30% AMI, subject to the Department's discretion, based on data reflecting program demand and usage. To ensure that payments to households above 30% AMI do not exceed 50% statewide, each RAFT Agency should ensure that it does not pay more than 50% of its own appropriation on behalf of families with income over 30% AMI.

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

RAFT prioritizes those families most likely to otherwise require shelter services from the Emergency Assistance (EA) program. Risk for homelessness is assessed through the RAFT targeting tool, also called the RAFT screen. This screen is derived from national best practices and was adapted, based on Massachusetts data, to identify families who are most at risk of requiring EA services. The screen includes three parts:

1. Housing Crisis
2. Income Level
3. Risk Assessment Questions

A family who meets the criteria for all three screening components may apply for RAFT. Each Risk Assessment Question corresponds to a number of points, the total of which is scored for each family. Applicant families must meet a minimum screen threshold of seven points. RAFT agency supervisors may approve "screen score overrides" for households who score below the minimum screen threshold but who exhibit other risk factors for homelessness. These risk factors should be described in writing on the RAFT screen.

III. Use of the RAFT Benefit

Examples of allowable uses of RAFT funds are summarized below, but the list is not exhaustive.

RAFT is intended to be flexible enough to respond to individual circumstances. Participant families can receive assistance in any combination of benefit types, provided that the total amount of assistance does not exceed \$4,000 within 12 months. Families may access program funds more than once in a given year, subject to the availability of funds, as long as they do not receive more than \$4,000 within 12 months.¹

In determining how RAFT can stabilize a housing situation, RAFT agencies will prioritize the various barriers and expenses that are preventing housing stability. Agencies will use RAFT for those items that will provide the most stability up to the \$4,000/year limit and will provide only what is necessary for the family to avoid homelessness by resolving the identified housing crisis.

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

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

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

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

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. As with any RAFT payment, utility payments may only be made if they connect to resolving one of the eligible RAFT housing crises listed on the RAFT screen.

¹ Some families with housing subsidies who are applying for RAFT for rent arrears may be limited to less than \$4,000 within 12 months. This is explained in Section VI, "Documentation," "Rent Arrearage for Families Residing in Subsidized Housing."

² 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.

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

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

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

Travel expenses are available to families moving out of state. RAFT providers should identify the most economical strategy to support an out-of-state move. Start-up costs such as first month's rent, last month's rent, and security deposit may be paid for families moving out of state, but no ongoing assistance (such as rental stipends) may be provided through RAFT on behalf of these families.

V. Accessing the RAFT Benefit

This section describes how a family applies, is determined eligible, and accesses 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 administer the program will provide an assessment to all families seeking housing assistance, including RAFT, which is a program of the HCECs. Any family can call the HCEC or resource center to be assessed for RAFT, or can walk in during the HCEC or resource center's walk-in hours. Families may be self-referred or may be directed to the HCEC or 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 delays 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 are 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 the family's unique needs and identify relevant resources. Sometimes, information gathered during the HCEC Intake Assessment will reveal that the family will not be eligible for RAFT. For example, a family may reveal that they have income over 50% AMI or may describe a housing situation that does not rise to the level of a RAFT housing crisis. In these cases, HCEC

staff will not proceed with a RAFT screen and will instead assist the family in accessing other resources, whether through the HCEC or elsewhere.

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. The RAFT screen has three parts. Part I asks about the triggering event, or housing crisis, for which a family is seeking RAFT. Part II asks about income and Part III asks a series of questions intended to assess a family's level of risk for homelessness. Parts I and II do not have points attached to the questions, whereas Part III does. A family must be eligible through all three parts of the screen 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 or 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; however, some of this information will be verified during the RAFT application process. DHCD anticipates that some information will not need to be verified. For example, if a family states in question eight that they have been homeless before, the RAA does not need to request verification of prior shelter placements. However, if there is reason to believe that a family has given false information in the RAFT screen, the RAA may request documentation to support an answer at their discretion. If a family provides information that contradicts an answer they gave in the screen, their screen answers should be changed and their score adjusted accordingly.

The minimum threshold for an eligible family household is seven points. In an effort to prioritize families who demonstrate the highest risk, DHCD will evaluate the screening tool's effectiveness on an ongoing basis and may change the minimum point threshold at any time.

In instances where a family does not meet the criteria established by the screen, but nevertheless presents 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 who is denied due to the screen may request a review (see Section VII for more information on reviews).

If an override limit is implemented, DHCD will consider requests for waivers of the override limit. Administering Agencies must submit a waiver request that includes recent, relevant, and regional data supporting the request along with a compelling narrative for the reason to waive.

If a family is determined ineligible following a screen, 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 will be made within two weeks to complete a RAFT application. Families must be given information on the types of assistance that the RAFT benefit can provide and the documentation that HCEC staff will need from them to complete the RAFT application. HCEC staff may also provide applicants with a letter which they can give to a property owner or primary tenant to inform them about the program and the timing of the assistance.

Before completing the RAFT application, HCEC staff may also begin to work with the family on their plan for using RAFT. The assessment for type and 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 or workshop (budgeting, etc.) in order to demonstrate future housing sustainability with RAFT.

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. Staff will enter the information obtained from the application 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 up to two weeks to gather documentation or complete their application.

If a family provides false information, does not provide adequate documentation, fails to attend their appointment or 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), they will be considered ineligible and exited from the RAFT program in Tracker.

VI. Documentation

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

1. HCEC intake

2. RAFT screen
3. RAFT application
4. Fair Information Practices Act sheet
5. RAFT Agency authorization for release of information
6. RAFT Participant Contract
7. RAFT Housing Plan
8. Proof of housing crisis*
9. Identification*
10. Proof of income*
11. Proof of housing*
12. Copies of invoices for any payments made, other than payments to property owners
13. Property owner documentation, if applicable:
 - a. RAFT Owner Contract
 - b. Form W-9
 - c. Proof of ownership for the property for which payments will be made

*These items are clarified below.

Housing Crisis

All families who are found eligible for RAFT must demonstrate one of the eligible housing crises, listed below and on the RAFT screen. A family may not receive RAFT without demonstrating one of these crises, even if their intended use of RAFT matches one of the allowable payment types.

Each family must provide the following verification of the housing crisis:

Housing Crisis	Required Documentation
Eviction from a private dwelling Eviction from public or subsidized housing	Summary Process Summons and Complaint, with proof of amount owed, if RAFT will be used to repay an arrearage
Doubled up and must leave	Letter from the primary tenant or landlord, including the address where the family is staying, and stating that the family is being asked to leave within 30 days
Health & safety	Documentation to demonstrate a serious health and safety risk that prevents the family from continuing to live in the unit, such as a condemnation order from the Board of Health or a failed inspection report
Foreclosure	Letter of intent to foreclose from lender

Severe overcrowding	Documentation to demonstrate that the current unit is too small for the number of people residing there, such as a letter from the landlord verifying the number of people and bedrooms in the unit
Domestic Violence	Documentation to support a domestic violence allegation connected to an inability to stay safely in current housing
Fire/Flood/Natural disaster	Report of fire, flood, or natural disaster
Utility shutoff	Current utility shutoff notice or verification that service has already been disconnected
Other crisis that will result in housing loss within 30 days or less	Documentation to demonstrate that the family will become homeless within 30 days

Identification

1. Each household member must provide at least one form of identification. Acceptable identification must include the family member’s name and date of birth. Some examples of acceptable identification are: driver’s license, birth certificate, passport, and state-issued ID.
2. Household must provide verification of the Social Security number of all family members who have been assigned Social Security numbers. If the household does not have the Social Security card(s) available, they may provide government-issued documentation that includes the Social Security number instead.

Proof of income

1. Household must provide written documentation of all income for all family members who are at least 18 years of age.
2. Documentation cannot be older than 60 days.
3. Documentation must demonstrate a full month’s worth of consecutive pay.
4. The DHCD document “RAFT Income Definitions” explains what must be included, what must be excluded, and what must be deducted from household income when calculating income for eligibility purposes.

Proof of housing

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

For example, a family who is doubled-up and must leave and who provides a letter to that effect may use that letter as proof of their current housing situation and as proof of their housing crisis. Any family using RAFT to move to new housing must provide proof of the new housing in the form of a lease, tenancy at will agreement, or other verification from the property owner. If a family is using RAFT to move into a unit with a subsidy, proof of the total contract rent and of the tenant's rent share must be provided. Depending on which agency or housing authority administers the voucher or subsidy, this may take the form of a lease or a rent share letter.

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.

If a family has already been to court for eviction and has signed an Agreement for Judgment, RAFT Agencies should use their discretion as to whether there is imminent risk of homelessness and whether RAFT funds should be paid. For example, if a family has signed an Agreement for Judgment that stipulates that they pay an extra \$100 per month, and this is deemed to be affordable for the family, RAFT funds should not be used. However, for example, if a family has signed an Agreement for Judgment that states that they pay \$3000 within a month, and this is not feasible for the family, RAFT approval may be an appropriate outcome.

Rent Arrearage for Families Residing in Subsidized Housing

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

Further:

1. Households residing in subsidized housing cannot receive payment for more than six months of rent arrears.
2. Households residing in subsidized housing must demonstrate a hardship that caused the nonpayment of rent that was presumed to be affordable before RAFT may be used to pay for up to six months of their rent arrears.
3. Households residing in subsidized housing cannot receive RAFT assistance for rent arrears within two consecutive fiscal years. For example, if a family received RAFT assistance with subsidized rent arrears in FY17, they are not eligible for assistance with subsidized rent arrears in FY18.

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

Utility Arrearage or Heating Fuel

A copy of a recent utility shutoff notice, or verification from the utility company that services are at risk of shutoff or have already been shut off. Households may not receive RAFT assistance for the same utility (with the exception of home heating oil) within two consecutive fiscal years. For example, if a family received RAFT for a gas bill in FY17, they are not eligible for assistance with a gas bill in FY18. Families should not be approved for RAFT for utilities if they have not first exhausted all other options, including applying for Fuel Assistance if available, or asserting shutoff protection(s) on their utility account. During the Winter Moratorium on utility shutoffs, RAFT funds should not be used to prevent shutoff, as families with low income will not receive shutoff notices during that time.

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

Move-in Costs

A lease, tenancy at will agreement, or other written verification from the property owner outlining the terms of the tenancy/agreement and specifying what costs are required. RAFT may not be used to pay realtor's fees.

Monthly Rental Stipend Payment

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

Households residing in subsidized housing cannot receive RAFT assistance in the form of a monthly stipend.

Property Owner Documentation

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

1. Completed W-9 tax form
2. Proof of ownership (deed, most recent real estate tax bill, or current property insurance policy). The agency that is administering RAFT may also verify property ownership with a local municipal Assessor's Office or with the Registry of Deeds. If this option is used, the agency must maintain a printed copy of such verification in the applicant file.
3. RAAs, at their discretion, may require proof of compliance with the Massachusetts Lead Law when paying rent arrears, start-up costs, or stipends to a property owner.

Conflict of Interest

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

Participant File

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

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

- HCEC Intake
- RAFT Screen
- RAFT Application
- RAFT Housing Plan
- RAFT Participant Contract
- RAFT Primary Tenant Agreement (only if a participant is moving in as a guest of a leaseholder)
- Verification of housing crisis
- Assistance Type and amount
- Emergency Contact Information
- All correspondence on behalf of client
- RAFT Agency Release of Information Form
- Income verification
- Documentation of vendor payments on behalf of household
- 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)
- Eligibility letter (if approved. Each RAFT agency will create its own eligibility/payment approval letter)
- RAFT Notice of Ineligibility/Termination (only for families who are found ineligible for RAFT. This is a DHCD form)
- Proof of housing
- Owner Contract (if a payment is made to a property owner)
- Proof of ownership of property (if a payment is made to a property owner)
- Form W-9 and all necessary taxpayer identification information (if a payment is made to a property owner)
- All documents, letters, and case notes associated with any review

VII. Denials and Administrative Reviews

Denials

A family may be found ineligible for RAFT at the time of the RAFT screen, during the RAFT application process, or after their application is complete. Families who are ineligible or who become ineligible for RAFT will receive a RAFT Notice of Ineligibility/Termination. The appropriate ineligibility reason should be marked. These reasons are described below.

- **Incomplete Documentation:** a household failed to provide all of the documentation that was requested of them during the application process.
- **Over Income:** a household was found to have income over 50% AMI.
- **Not an Eligible Household:** a household was found to be categorically ineligible for RAFT, or did not meet the minimum screen point threshold to qualify.
- **Participant Non-Compliance:** a household came out of compliance with the Participant Agreement or other program requirements while receiving RAFT.
- **Not At Risk of Homelessness:** a household did not demonstrate an eligible housing crisis.
- **Property Owner Not Willing to Participate:** a landlord refused to accept RAFT payments, whether directly, or by not submitting required property owner documentation to the Administering Agency.
- **Receiving Other Benefits:** a household received HomeBASE or RAFT in the last 12 months and receipt of the requested benefits would make them exceed the program limit of \$8,000 in combined HomeBASE and RAFT or \$4,000 in RAFT.
- **Other:** a household is ineligible for some other reason. DHCD anticipates that most ineligible households will be ineligible for one of the above-listed reasons. If a household is found ineligible for some other reason, the Administering Agency should make the reason clear by making a note on the RAFT Notice of Ineligibility/Termination or by attaching a letter to the Notice.
- **No Funding:** a household does not receive RAFT because the RAFT Agency has exhausted its funding for the fiscal year.

Reviews

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

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

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

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

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

VIII. Fair Housing and Language Access

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

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

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

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

1. *Notice of Important Document.* This notice must accompany all vital RAFT documents. The RAFT Agency contact information must be listed.
2. *Legal Notice Translation.* This notice must accompany any documents signed by the participant. The English version of the documents will always be the legally binding version while a translated version should

also be signed. A copy can be kept in the participant record and the original given to the participant along with the *Legal Notice Translation* form.

IX. 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 FY18, the department will set aside a reserve fund that will be distributed as necessary to regions with high demand for RAFT assistance. RAFT Administering Agencies will be paid an administrative fee equal to 18.95% of all service dollars paid in that month.

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

Financial Management

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

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

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

X. 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 FY18 RAFT payments must be disbursed within FY18. Payments for families who apply in FY18 may not be made any later than June 30, 2018.

XI. Data Collection

In FY18 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:

- 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.

XII. 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.