

City of Boston

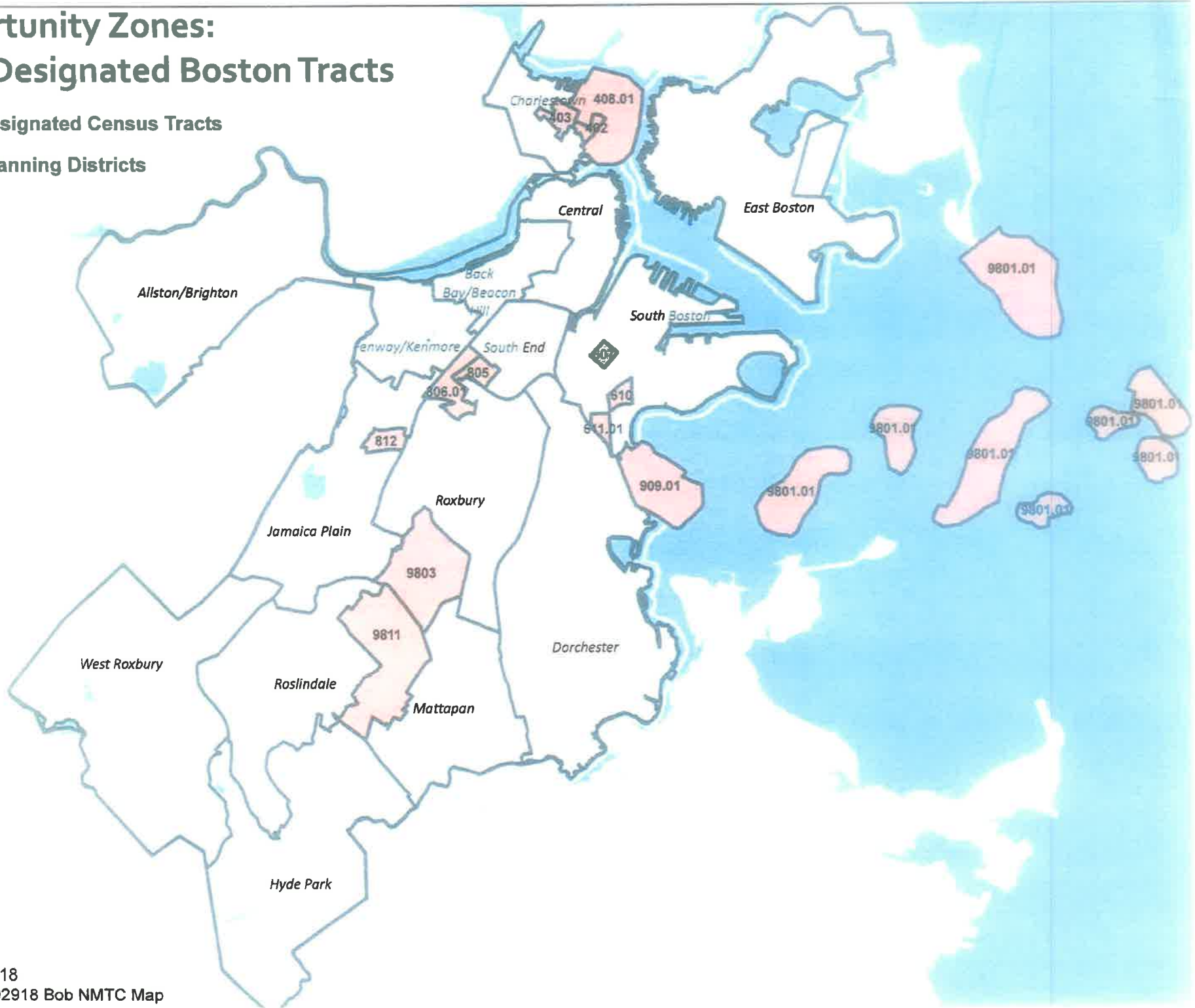
Program Year 2019 Action Plan

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	Reference Maps: Opportunity Zones, BHA's Whittier Choice Target Area, Low-Mod Block Groups
AP-55	Affordable Income and Rent Table
AP-90	ESG Written Standards
	Request to Extend Employee Participation Program

Opportunity Zones: Final Designated Boston Tracts

-  Designated Census Tracts
-  Planning Districts



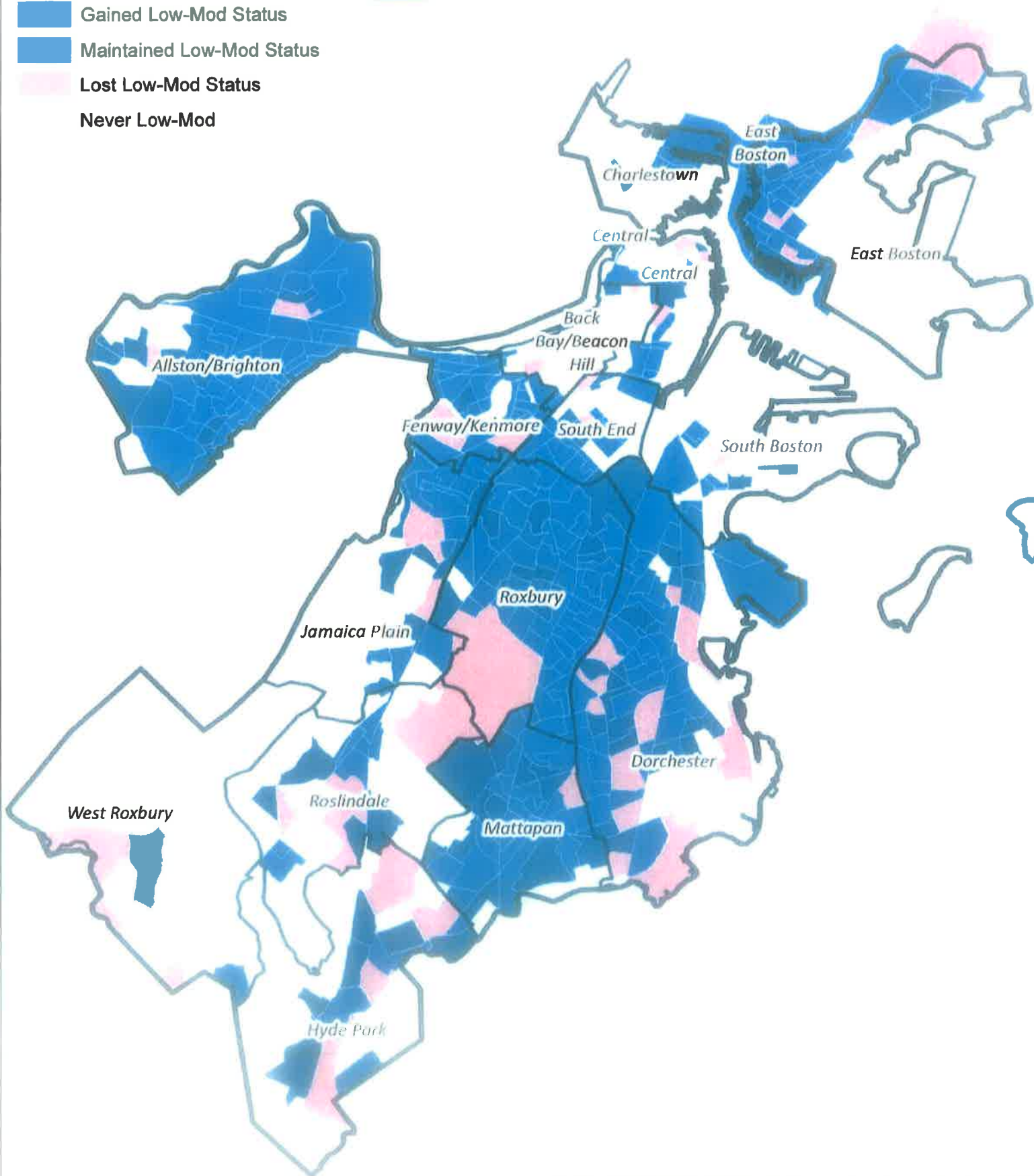
Low-Mod Block Groups: 2010 vs 2015

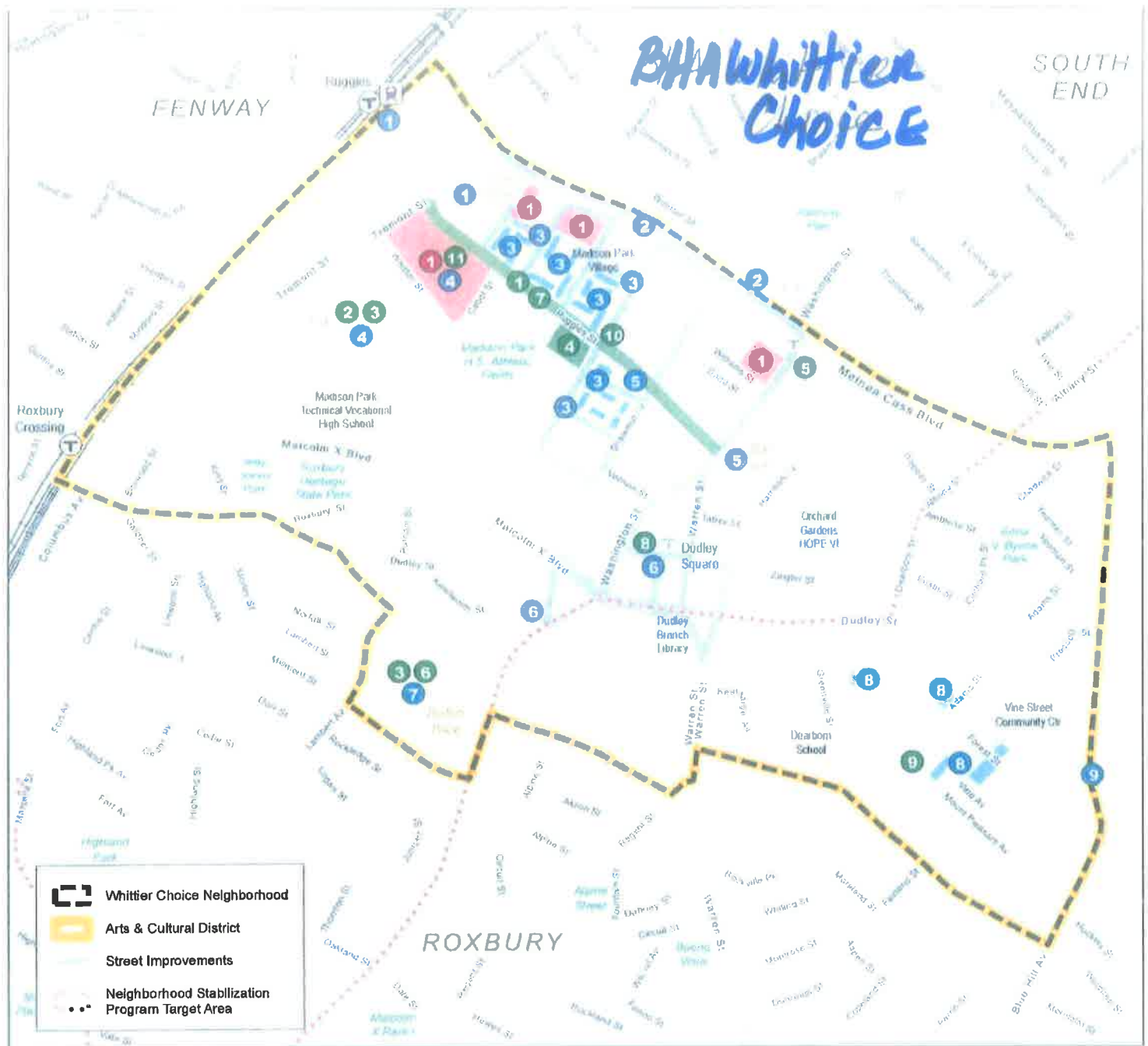
Source: HUD Low- and Moderate- Income Summary Data, based on ACS 2015, released February 2019

Low-Mod Status (by block group)

- Gained Low-Mod Status
- Maintained Low-Mod Status
- Lost Low-Mod Status
- Never Low-Mod

DND Planning District





Proposed CNI Housing

- 1 Whittier Replacement Housing

Planned CCI Projects

- 1 Ruggles Gateway Street Improvements
- 2 NCAA Museum
- 3 Retail Incubation/Coworking Program
- 4 Park at Dewitt Crossing
- 5 Visitor/Orientation Center
- 6 Bartlett Station Plaza Cultural Space
- 7 Public Art Installation along Ruggles
- 8 Enhanced RESTORE Program
- 9 Homebuyer Program Area-Wide
- 10 Additional Security Cameras
- 11 Wicked Free WiFi

Projects highlighted in green will be fiscally managed by DND

NEIGHBORHOOD INVESTMENTS

Residential/Mixed-Use

- 1 Crescent Parcel*
- 2 Melnea Hotel & Residences (P-9)
- 3 Madison Park III Renovations
- 4 Tremont Crossing (P-3)*
- 5 Smith House Renovations
- 6 2451 Washington St. Homeownership
- 7 Bartlett Place*
- 8 Neighborhood Homes Initiative
- 9 Dudley Crossing*

* Potential PBV locations

Infrastructure

- 1 Ruggles Station Modernization
- 2 Melnea Cass Blvd Complete Streets
- 3 MPV Street Improvements
- 4 Whittier Site New Streets
- 5 Blair Parking Lot Improvements
- 6 Dudley Square Complete Streets

HUD Income & Rent Limits (6/28/19 Updates)

Annual Household Income (as a percentage of the area median income - AMI) by Household Size

Household Size	(1) HOME 30% (Extremely Low)	(1) HOME 50% (Very Low)	(1) HOME 60%	(2) CDBG Low-Mod 80% Median; Same as HOME Low-Income
1 person	\$24,900	\$41,500	\$49,800	\$62,450
2 persons	\$28,450	\$47,400	\$56,880	\$71,400
3 persons	\$32,000	\$53,350	\$64,020	\$80,300
4 persons	\$35,550	\$59,250	\$71,100	\$89,200
5 persons	\$38,400	\$64,000	\$76,800	\$96,350
6 persons	\$41,250	\$68,750	\$82,500	\$103,500

(1) Issued by HUD 6/28/19, and calculated in accordance with the IRS guidelines for consistency with HOME & LIHTC Programs. (2) Issued by HUD 6/28/19. Note, CDBG @ 80% is same as HOME Program Low Income.

Monthly Rent Limits (Inclusive of Utilities)

Bedroom Size	Homeless Set-Aside of median (30%)	(1) Low HOME (50% of median)	(1) High HOME (65% of median)	(2) CDBG Affordable (80% median)	(5) Section 8 FMR
SRO	\$334	\$778	\$997	\$1,064	\$1,206
0-BR/Eff	\$622	\$1,037	\$1,329	\$1,608	\$1,608
1-BR	\$666	\$1,111	\$1,425	\$1,749	\$1,801
2-BR	\$800	\$1,333	\$1,712	\$2,098	\$2,194
3-BR	\$924	\$1,540	\$1,970	\$2,424	\$2,749
4-BR	\$1,031	\$1,718	\$2,178	\$2,704	\$2,966

(1) Issued by HUD, effective 6/28/19. (2) Calculated by DND based on lower of 78.7% of AMI or 100% FMR (4/15/19).

City of Boston ESG Written Standards:

Introduction

The City of Boston has developed the following standards for providing assistance with Emergency Solutions Grants (ESG) funds as required by 24 CFR 576.400 (e).

The City of Boston is awarded ESG funds from the Department of Housing and Urban Development and as part of the Annual Action Plan process. These funds, which are distributed as part of an annual competitive RFP process, are designed to identify sheltered and unsheltered homeless persons, as well as those at risk of homelessness, and provide the services necessary to help those persons quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness.

The City of Boston's ESG Program strives to place less emphasis on providing funds for Emergency Shelter operations and essential services and more emphasis on Homelessness Prevention and Rapid Re-housing programs. This policy shift is in accordance with the U.S. Interagency Council on Homelessness Plan, *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness*. To illustrate this policy shift, the City continues to award 83% of its ESG funds to Rapid Re-housing and Homelessness Prevention programs.

Additionally, the City of Boston had the experience of administering an \$8.2 million dollar Homelessness Prevention and Rapid Re-housing (HPRP) grant and learned a great deal from administering that grant. Many of the policies outlined in the Written Standards and the forms used by ESG sub-grantees were informed by our experience with HPRP.

These are initial standards that have been created in coordination with the City of Boston Continuum of Care (CoC). These standards represent goals for providing services for the community and the entire CoC, the City of Boston expects that the standards will become more expansive as more experience is gained with the administration of ESG and more data is collected from service providers.

These standards are in accordance with the interim rule for the Emergency Solutions Grants Program released by the U.S. Department of Housing and Urban Development on December 5, 2011 and the final rule for the definition of homelessness also released by the U.S. Department of Housing and Urban Development on December 5, 2011.

A. Standard Policies and Procedures for Evaluating Individuals' and Families' Eligibility for Assistance under ESG.

All households seeking assistance from ESG must meet a baseline of eligibility. The criteria are defined clearly by HUD. For all households deemed eligible, documentation supporting their status must be maintained on file by the ESG non-profit sub-grantees. DND will supply all sub-grantees with Boston CoC ESG Program Eligibility forms (one for each ESG component) including income eligibility forms. These forms will be expected to be in each program participant file. DND also expects to provide a series of other standard forms that were developed for HPRP and will be adapted for ESG. These standard forms will include but are not limited to the following:

standard intake and assessment forms, habitability checklists, rent reasonableness forms and a case file checklist.

HUD Baseline Criteria to be utilized by the City of Boston

Street Outreach	Emergency Shelter	Rapid Re-Housing	Homelessness Prevention
Homeless as defined by HUD §576.2 of the ESG Interim Rule	Homeless as defined by HUD §576.2 of the Interim Rule	Homeless as defined by HUD §576.2 of the Interim Rule	At-risk of Homelessness as defined by HUD §576.2 of the ESG Interim Rule
		Must willingly engage with an Initial Assessment with a Case Manager for a consultation and assessment to determine ESG eligibility and be referred to appropriate ESG or related services.	Must willingly engage with an Initial Assessment with a Case Manager for a consultation and assessment to determine ESG eligibility and be referred to appropriate ESG or related services
		The household must be at or below 30 percent at the annual recertification.	Must be a household at or below 30 percent of Area Median Income (AMI). In addition, the household must be at or below 30 percent at recertification
		Must lack sufficient resources and support networks to retain housing without ESG assistance.	Have no appropriate subsequent housing options identified Lack financial resources and support needed to obtain new housing or remain in existing housing.

Additional Eligibility Criteria Include

1. An individual or family must reside within the City of Boston or in a Boston homeless shelter or must be displaced previously from the City of Boston. (Not more than a year prior to application for assistance for funding).
2. The individual or family must have at least an initial consultation with a case manager or other authorized representatives who can determine the appropriate type of assistance to meet their needs. At this initial consultation, long-term strategies for ensuring stable housing should be covered with the client including referrals to other agencies or programs for other kinds of support including income supports, child care, legal assistance, SNAPs and connections to educational and employment opportunities.
3. HMIS participation is a mandatory ESG requirement. All clients receiving ESG assistance must be reported in the Boston's HMIS system.
4. In the event that two unrelated households are joint parties on a lease, eligibility will be determined by the total of their incomes

Limitations on funds usage:

Service providers shall not use the risk factor for homeless allowed under paragraph 576.2 "otherwise lives in housing that has characteristics associated with Instability and an increased risk of homelessness."

B. Policies and Procedures for Coordination among Emergency Shelter Providers, Essential Services Providers, Homelessness Prevention and Rapid Re-housing Service Providers and Mainstream Service and Housing Providers, Other Homelessness Assistance Providers, and Mainstream Service and Housing Providers

The City of Boston's Department of Neighborhood Development (DND) is the convening entity for the City of Boston's Continuum of Care (CoC) and is also the ESG grantee. All ESG sub-grantees are members of the CoC and as such, they are required to attend all CoC meetings and trainings. In addition, DND is the recipient of HOME, CDBG, and HOPWA funds. The Supportive Housing Division (SHD) at DND administers CoC and HOPWA funds. The SHD Deputy Director sits on the Neighborhood Development Divisions Project Review Committee therefore the affordable housing production and preservation agenda is coordinated between the two Divisions and both are responsible, for the implementation of the many aspects of the Consolidated Plan, Housing 2030 and Boston's Way Home, the Mayors Plan for ending Veterans and Chronic Homelessness. Therefore, the Supportive Housing Programs and the Mainstream HUD programs work hand-in-hand to develop and implement the Consolidated Plan, Housing 2030 and Boston's Way Home. A prime example of this is the DND's Homeless Set-Aside Policy, where at least 10% of all affordable housing projects where there are 10 or more units using DND resources must be set for the homeless households.

DND also convenes and participates in a number of Working Groups, Sub-committees and Advisory Groups around specific homeless and at-risk populations that brings together shelter providers, prevention providers, housing providers and agencies who have experience providing Homelessness Prevention, Rapid Re-housing and Emergency Shelter services. Examples of this include the Chronically Homeless Working Group, the Homeless Elders Working Group, the Front Door Triage and Rapid Re-housing and Homeless and At-Risk Veterans Working Group. DND also participates in the Rapid Re-housing Roundtable organized by the Massachusetts Housing and Shelter Alliance. This Roundtable will guide the work of the agencies involved in the Rapid Re-housing for individuals program which is funded with Boston ESG and funds from the Massachusetts Department of Housing and Community Development.

DND has and will continue to host mainstream benefits trainings for its CoC members for them to be abreast of any changes to regulations in order to maximize the number of participant accessing these benefits. In every Request for Proposals for CoC related funding, DND always includes demonstrated evidence of linkages to mainstream resources and benefits as a ranking criteria. The Boston CoC was named as one of the 9 Continuum of Care that was selected for SAMSHA's SOAR Project Technical Assistance. The goal of the SOAR TA is to build capacity to improve the success rate of applications for both SSDI and SSI for chronically homeless adults.

Finally, over the last several years, DND has developed an extensive email list that includes all homeless and at-risk agencies and mainstream service and housing agencies. We use this list regularly to inform these agencies, funding opportunities, changes in CoC policy and practice or any other information that these agencies find useful. Often, other agencies including state agencies will solicit our assistance to get the word out on a variety of topics and opportunities.

- C. Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance.

For Rapid Re-housing programs that serve families, families with children will be given preference. Based on this funding priority to help families quickly regain stability in permanent housing after experiencing homelessness, only families who are literally homeless (living in shelter, streets or places not meant for human habitation) at the time of contacting the program will be assisted under the Rapid Re-housing component. In addition, DND will require that agencies that provide Rapid Re-housing services to homeless families develop a sustainability plan for the families they serve. DND does not want to be in the situation where an agency rapidly re-houses a family in order to achieve the project outcomes, for example, but that permanent housing situation is known not to be sustainable after a few months. We do not want families to be set up to become homeless again. Therefore we are requiring that a sustainability plan be developed for each family and that the agency is providing needed stabilization services for those families to remain housed.

For the Rapid Re-housing Program that serves individuals, prioritization will be given to those families that are eligible for the state funded Rapid Re-housing program. DHCD has provided \$950,000 through its ESG program for Rapid Re-housing services in Boston. DND funded case management services for the same program. The lead agency is the Massachusetts Housing and Shelter Alliance (MHSA) collaborating with Pine Street Inn, Boston Public Health Commission, St. Francis House and HomeStart. The geographic area to be served is the City of Boston. Eligible participants will access services through referrals from Boston homeless service providers, including emergency shelters, day programs and street outreach programs. All participants must meet the HUD definition of homelessness, are unaccompanied individuals and will fall within the income requirements set by HUD. In addition, they will be either in an emergency shelter or living in a place not meant for human habitation. As long as potential clients meet the HUD eligibility requirement, are currently residing in Boston, and can provide the required documentation, they will be considered eligible for the program.

For the Homelessness Prevention programs, prioritization will be given to individuals and families who meet the HUD Definition for prevention programs, have a written lease or occupancy agreement and are in a court ordered eviction process. A 14 day notice to quit will be acceptable on a case by case basis, if the agency working with the client can document that this is not a pattern. The only exception to this is for a few programs that are working closely with community-based partners (property management firms and resource staff from the Boston Public Schools) where we are trying to create system-wide models for prevention.

The Supportive Housing Division is soon to launch an on-line Coordinated Access system developed by Green River, a tech company located in Vermont. The first phase is set to launch in September, 2016. Phase 1 is to match available CoC units with chronically homeless clients. HMIS data will be used to match the client to the unit that meets their needs and for which they are eligible. Chronically homeless individuals are prioritized by longest time homeless.

Although the first phase of Coordinated Access is for chronically homeless persons eligible for CoC Permanent Supportive Housing, it is our hope to expand Coordinated Access to all populations served by McKinney Vento resources.

D. Standards for Determining Share of Rent and Utility Costs that each Program Participant Must Pay, if any, While Receiving Homelessness Prevention or Rapid Re-housing Assistance

The City of Boston has determined that rental assistance will not exceed the local FMR. In addition the rent for all properties must be determined as rent reasonable. An assisted property may not be owned by the grantee itself, sub-grantee or the parent, subsidiary or affiliated organization of the grant recipient. A lease or written occupancy agreement must be in place and the assisted household must be on the lease in order to use ESG for rental assistance or rent arrears. All rental agreements must be arms-length transactions. The City of Boston will require that the program participants must contribute at least 30% of their income towards rent. DND is requesting that all agencies utilize the least amount of direct client assistance as possible in order to avoid homelessness or to be rapidly re-housed. We encourage all agencies to utilize other resources coupled with ESG resources. For example, DHCD administers the RAFT program for those at risk of losing their housing. This benefit can be up to \$4,000 for those who are eligible. DND will encourage agencies to combine these resources to stabilize the family in housing. For utility assistance, DND is requiring that agencies utilize the BHA HUD approved utility allowance when paying for utility costs.

E. Standards for Determining How Long a Particular Participant will be provided with Financial Assistance and whether and How the Amount of that Assistance will be adjusted over Time.

The City of Boston has determined that program participants may receive up to 12 months of rental assistance. Reassessments will be required every 3 months. Although the City will allow up to 12 months of rental assistance, in actuality the expected duration will be much shorter than allowed. Only 10% of the award is set-aside for direct financial assistance to program participants. Therefore we expect that most of the direct financial assistance will be in the form of a one-time rent arrearage, move in costs or small rental assistance payments for 2 or 3 months. The amount of the Assistance will be adjusted based on the participant's needs and income at the time of reassessment.

F. Standards for Determining the Type, Amount and Duration of Housing Stabilization and/or Housing Relocation Services to Provide to a Program Participant

ESG funds can be used to cover costs associated with providing homeless or at-risk clients with housing relocation and stabilization services. Funds in this category will primarily cover case management salaries. As stated earlier, Boston is requiring that every individual or family must have at least an initial consultation with a case manager or other authorized representatives who can determine the appropriate type of assistance to meet their needs. At this initial consultation, long-term strategies for ensuring stable housing should be covered with the client including referrals to other agencies or programs for other kinds of support including income supports, child care, legal assistance, SNAPs and connections to educational and employment opportunities.

The amount and the duration of Housing Stabilization and/or Housing Relocation Services will be based on the housing stability plan developed by the case manager and the program participant. If the services provided are longer than 3 months then a re-assessment will be conducted at that time and the housing stability plan may be revised at that time as well. Unless otherwise indicated by DND prior to the end of the Contract term, Housing Stabilization Services and/or Housing Relocation Services must be completed by the end of the Contract term.

G. Participation in HMIS. The recipient must ensure that data on all persons served and all activities assisted under ESG are entered into the applicable community-wide HMIS in the area in which those persons and activities are located, or a comparable database, in

accordance with HUD's standards on participation, data collection, and reporting under a local HMIS. If the sub recipient is a victim service provider or a legal services provider, it may use a comparable database that collects client-level data over time (i.e., longitudinal data) and generates unduplicated aggregate reports based on the data. Information entered into a comparable database must not be entered directly into or provided to an HMIS.

Included in all of contracts with agencies that are funded with McKinney-Vento resources, including ESG, is the following language: The Contractor will be required to participate in Boston's Homeless Management Information System (HMIS). The Department of Neighborhood Development (DND) is the City of Boston's HMIS administrator (BostonHMIS). Participation in an HMIS is required by HUD for all McKinney-Vento funded programs. The ESG is funded with McKinney-Vento funds. Programs will be required to collect the HUD prescribed Universal Data Elements and Program Specific Data Elements for their clients and provide data for the Annual Homeless Assessment Report and the annual McKinney-Vento funding application to HUD. Program Specific Data Elements are required to be captured at program entry and program exit. HUD also requires McKinney-Vento recipients to collect data regarding a client's homeless status in regards to HUD's definition and the number of chronically homeless served. It is the City of Boston's Department of Neighborhood Development's expectation that all homeless programs, regardless of McKinney-Vento funding, report on all clients in these programs in the HMIS and share this data with the City of Boston. DND has contracted with a software provider (Social Solutions, Inc.) to collect data in a common format but Contractors may select their own software system as long as they collect the previously described data elements and share the data with DND. Contractors who choose to utilize another HMIS data collection system are required to provide data to DND on a monthly basis and must be received by the 15th day of the month after the previous month.

All Contractors must also abide by the specified BostonHMIS Policies and Procedures (See attached). Failure to abide by these terms and conditions will result in non-compliance of this contract. All Contractors, regardless of the data collection system being utilized must adhere to the following specified data quality standards. Fields which captures the required Universal Data Elements must be 5% or less "null" or "missing" data. Fields which captures the Program Specific Data Elements must be 10% or less "null" or "missing" data. All Contractors, regardless of their HMIS, will have data quality reports distributed on a monthly basis for corrections by the HMIS System Administrators. Contractors who do not meet this minimum standard on an ongoing basis with no remedy will be considered not compliant with this contract.

All Contractors must ensure that clients served are entered into the HMIS with the required data elements and assigned to a program with an entry date and subsequent exit date from the program. The entry and exit dates are required to determine a client's length of stay in the program, the client's patterns of homelessness and daily capacity rates of the program. Entry and exit dates differ for program types however DND expects the following standards for each program type.



CITY OF BOSTON • MASSACHUSETTS
DEPARTMENT OF NEIGHBORHOOD DEVELOPMENT
MARTIN J. WALSH, MAYOR

June 11, 2019

Robert D. Shumeyko, Director
U.S. Department of Housing and Urban Development
Office of Community Development & Planning,
Thomas P. O'Neill, Jr. Federal Building
10 Causeway Street, 5th Floor
Boston, MA 02222-1092

RE: Request for One-Year Extension of the City of Boston's Employee Participation Program for DND Housing Programs

Dear Mr. Shumeyko,

We hereby request a one-year extension of the City of Boston's Employee Participation Program for DND Homebuyer Programs to June 30, 2020. This program enables certain DND employees, based on their job function, to participate in HUD funded Homebuyer Programs. As noted in the City's Action Plan, the program will continue to operate the same as originally proposed and all individual requests will be transmitted to HUD for review.

Sincerely,

Robert C. Gehret
Deputy Director
Policy Development and Research Division

MASSACHUSETTS STATE OFFICE
2019 JUN 11 P 2:24

