

Commonwealth of Massachusetts
**EXECUTIVE OFFICE OF
HOUSING & LIVABLE COMMUNITIES**

Maura T. Healey, Governor ◆ Kimberley Driscoll, Lieutenant Governor ◆ Edward M. Augustus Jr., Secretary

DMHRSP NOTICE: FY24-02

To: DMHRSP Administering Agencies & Service Providers
From: Ben Stone, Director, Divisions of Public Housing and Rental Assistance
Subject: **DMHRSP FY24 Guidance Update, Effective 2/1/2024 – Positive Identification, Vital Documents, Income and Asset Verification**
Date: January 3, 2024
cc: Department of Mental Health Central Office & Area Offices

The Executive Office of Housing and Livable Communities (EOHLC) continually strives to improve our rental assistance programs in partnership with administering agencies and service providers. We appreciate and have incorporated the considerable input we received regarding the Department of Mental Health Rental Subsidy Program (DMHRSP) during the numerous feedback sessions earlier this year. In partnership with DMH, we will implement the following program improvements to be effective as of February 1, 2024:

- [Positive Identification and Vital Documents](#)
- [Income and Asset Verifications and Calculation](#)
- [New Forms](#)
- [Failure to Recertify](#)
- [Holding Payment](#)

All other regulations, guidance, and policies not mentioned in this program notice remain in effect. Additional program improvements will follow in the coming year.

As of February 1, 2024, administering agencies and service providers can begin following this guidance for any DMHRSP clients that they are currently working with, regardless of the effective date of any action.

This guidance does not require or permit administering agencies to perform any redetermination or recalculation of any recertification or new lease up, including those with an effective date of 2/1/2024 or later, that was completed before 2/1/2024 for the purpose of retroactively applying this new guidance.

All guidance and training documents are available at our [State Rental Assistance Training Webpage](#). All program documents and forms are available at the [LHA Portal/RAA Portal](#). **Please register for a *mandatory* training session regarding these important program changes on [Thursday 1/18 at 9-11:30am](#) or [Monday 1/22 at 9-11:30am](#).**

Positive Identification and Vital Documents

EOHLC recognizes that obtaining vital documents for identification can sometimes be difficult for DMH clients wishing to enter DMHRSP. To reduce potential barriers or delays to entry, we are providing greater flexibility regarding acceptable verification across both tenant-based and sponsor-based vouchers as well as reducing requirements of items to be verified in sponsor-based vouchers. The below guidance complements and/or replaces the [FY19 DMHRSP Guidance](#) “B. General Eligibility, 1. Positive Identification” section beginning on page 13 and is effective as of 2/1/2024. All other regulations, guidance, and policies not mentioned below remain in effect.

This FY24 Guidance is effective 2/1/2024 for both tenant-based and sponsor-based and applies to all new and pending cases and household members going forward. Administering agencies will not retroactively apply this FY24 Guidance to any existing household members that are already fully in compliance the prior requirements of the FY19 Guidance.

Please note that the overall guidance on Positive Identification is specific to DMHRSP and is generally more flexible than state-aided Public Housing or the Massachusetts Rental Voucher Program (MRVP).

Tenant-Based Positive Identification

For administrative ease, consistency, and flexibility, EOHLC is applying a universal policy regarding positive identification and vital documents across all of the tenant-based and project-based vouchers in all of its state rental assistance programs, including MRVP, the Alternative Housing Voucher Program (AHVP), and DMHRSP.

This guidance replaces the [FY19 DMHRSP Guidance](#) “Positive Identification” section (pages 13-24) as it applies to tenant-based clients. Effective 2/1/2024, the below guidance regarding positive identification and vital documents applies to all tenant-based clients and household members at entry, including those that enter directly into the tenant-based program as well as those transitioning from sponsor-based into tenant-based vouchers.

CORI/SORI and Specified Prior Conduct checks are still required per DMHRSP regulations [760 CMR 38.06\(2\)](#) and are described in [FY19 DMHRSP Guidance](#) on pages 17-24.

For every household member, the administering agency must have verification of date of birth. Ideally the administering agency shall receive an original or copy of every household member’s birth certificate. A passport, immigration card, or other government-issued photo ID is acceptable only when a birth certificate is not available. As outlined below, if a household member self-attests that they cannot provide a birth certificate or government-issued photo ID, they must provide their Social Security card, self-attest to their date of birth, and provide any documentation that may confirm their date of birth. For young children, the administering

agency may also accept a mother's letter provided by a hospital at the time of the child's birth in lieu of a birth certificate.

Each household member that has a Social Security number must provide verification. Each adult household member with a Social Security number must also authorize its use to verify income for the purposes of determining eligibility, client occupancy charge, and subsidy payment. The ideal verification of a Social Security number is someone's Social Security card, but other verification may be accepted, such as official correspondence from the Social Security Administration.

Unless a household member attests that they are unable to obtain a government-issued photo identification, using the Government-Issued Photo ID Self-Attestation form, the administering agency must obtain a government-issued photo ID for the head of household and every other adult household member. A government-issued photo ID is a photo ID issued by the state or federal government or by a foreign government. Government-issued photo ID is acceptable so long as identification can be reasonably determined. For example, it must at least include a birthdate, a photograph and an issue date.

Examples of government-issued photo ID include, but are not limited to:

- Driver's license (any state and/or country);
- State ID card (any state);
- Passport (United States or foreign);
- Permanent resident immigration card;
- U.S. military ID;
- Foreign national identification card;
- Massachusetts Commission for the Blind Blindness Identification Card.

The following shall not be considered government-issued photo ID:

- Blind Access and Senior CharlieCards, Transportation Access Pass, and any other MBTA transportation ID card (*note that these are no longer acceptable because the MBTA recently changed its verification process so that it no longer meets the necessary standards*)
- Library cards;
- Student ID cards;
- Employee ID cards (except for military IDs);
- Photo IDs issued by cities and shelters; and
- All other photo IDs where date of birth and Social Security number, if applicable, are not verified.

If an adult household member, including the head of household, attests that they cannot obtain a government-issued photo ID, they must state the reason for being unable to obtain a government-issued photo ID on the self-attestation form. The reason for being unable to obtain government-issued photo ID must be listed on the self-attestation form. Acceptable

reasons for being unable to obtain government-issued photo ID may include, but are not limited to:

- Requested/applied for government-issued photo ID, but will not obtain in a timely manner (in this case, government-issued photo ID will be provided to the administering agency upon receipt of the ID);
- Applicant/participant does not have documents required to obtain government-issued photo ID; and/or
- Government-issued photo ID was lost, stolen, and/or destroyed (and has not yet been replaced and will be provided to the administering agency upon receipt of a replacement ID).

Additionally, the administering agency shall collect whatever photo ID the household member can provide. An adult household member who attests that they cannot obtain government-issued photo ID must provide at least one of the following:

- Birth certificate; or
- Social Security card.

All adult household members must provide at least one of the following:

- Government-issued photo ID, or completed and signed attestation;
- Birth certificate; or
- Social Security card.

If an adult household member, including the head of household, cannot provide either a government-issued photo ID, birth certificate, or Social Security card, they are not eligible for tenant-based DMHRSP. There is no exception (including domestic violence situations or other extenuating circumstances) due to the requirements provided by the CORI board. Per [760 CMR 38.06\(2\)](#), a review of the Criminal Offender Record Information (CORI) is required to determine eligibility for tenant-based DMHRSP. By providing a government-issued photo ID, birth certificate, or Social Security card, as required in [803 CMR 2.11\(5\)\(a\)-\(b\)](#), the administering agency will have sufficient documentation to review the CORI.

Government -Issued Photo ID	<ul style="list-style-type: none"> Required for all household members 18+ If unable to obtain, may self-attest
Birth Certificate	<ul style="list-style-type: none"> May be submitted in lieu of government-issued photo ID for minors May be submitted for adults if unable to obtain government-issued photo ID If unable to obtain, may submit a government-issued photo ID
Social Security Card	<ul style="list-style-type: none"> May be submitted for adults if unable to obtain government-issued photo ID Ideal, but not required, verification of Social Security number

Note that, in a change from prior DMHRSP policy, if a household member has in their possession any or all of the three vital documents listed above, they must provide them to the administering agency. For example, if someone has a government-issued photo ID, they must also provide the administering agency with their Social Security card. Furthermore, during their participation in DMHRSP, if a household member receives any vital documents that had not been previously provided, they must provide them to the administering agency.

The administering agency must receive any relevant custody or guardianship paperwork for minors. If a Household adds a minor other than through birth to an existing Household member, the administering agency must receive paperwork granting custody or guardianship of the child to a Household member. For the purposes of DMHRSP, a notarized letter from the minor’s guardian will suffice to determine custody; DMHRSP does not require court-determined custody.

In some cases involving foster or adopted children, the head of household may not have a minor’s Social Security number and/or birth certificate. The administering agency may waive the requirement for the documents if it verifies with the foster or adoption agency that they did not provide those documents to the head of household.

Sponsor-Based Positive Identification

To further reduce barriers and processing time for entry into the sponsor-based program, EOHLC is dramatically simplifying positive identification verification, as well as reducing requirements of information to be verified. Effective 2/1/2024, this section of guidance replaces [FY19 DMHRSP Guidance](#) (pages 13-15) on Positive Identification for sponsor-based vouchers only.

Effective 2/1/2024, sponsor-based clients and service providers are only required to provide the DMHRSP Sponsor-Based Household Certification Form. No other verification is required. This form requires only full name and date of birth to be verified by both the client and the service provider. As DMH and service providers have already verified these for each client upon entry into DMH, the administering agency will not require photo ID, birth certificate, Social Security number, or additional verification form or vital document. Administering agencies will only accept completed forms signed by both client and service provider.

Effective 2/1/2024, confirmation of Social Security number (SSN) is no longer required for sponsor-based clients as Wage Match is no longer required for sponsor-based clients and CORIs are not required for sponsor-based clients.

Any sponsor-based client wishing to convert to a tenant-based voucher must meet all tenant-based requirements including full vital documents, identification, and SSN at the time of conversion.

Special Circumstances

Please note that the “Special Circumstances” section (page 15) in the [FY19 DMHRSP Guidance](#) is withdrawn and no longer in effect as of 1/31/2024. Effective 2/1/2024, this above guidance modifies the positive identification and vital document requirements to incorporate flexibilities for both tenant-based and sponsor-based clients, and therefore, replaces the Special Circumstances guidance. All DMHRSP clients must adhere to this new guidance.

Income Verification

EOHLC recognizes that many DMHRSP clients have minimal sources of income and minimal changes in income. To reduce administrative burden for our clients, administering agencies, and service providers, we are providing greater flexibility regarding acceptable verification in situations where there are minimal income sources and minimal income changes across both tenant-based and sponsor-based vouchers. Additionally, effective 2/1/2024, EOHLC no longer requires Wage Match for sponsor-based vouchers.

As always, the client and service provider must report any and all income, regardless of whether verification will be required or whether the income will be counted.

The below guidance complements and/or replaces the [FY19 DMHRSP Guidance](#) “B. General Eligibility, 2. Income Eligibility” section beginning on page 15 and is effective as of 2/1/2024. Where the DMHRSP Guidance does not specify or detail, please refer to Public Housing guidance in [760 CMR 6.00](#) and the [A-Z Rent Guide](#) (aka Rent Re-Determination A to Z). Please also refer to the below Income and Asset Verification Chart to help determine which verification is acceptable for each situation. Exceptions can be considered where appropriate

for reasonable accommodation or domestic violence circumstances. All other regulations, guidance, and policies not mentioned below remain in effect. *Please note that the overall guidance on income verification is specific to DMHRSP and is generally more flexible than state-aided Public Housing and MRVP.*

Social Security, Pension, and Life Insurance Benefits

Per [FY19 DMHRSP Guidance](#) (page 15), annual benefit letters continue to be ideal verification for annually determined, non-varying payments, such as:

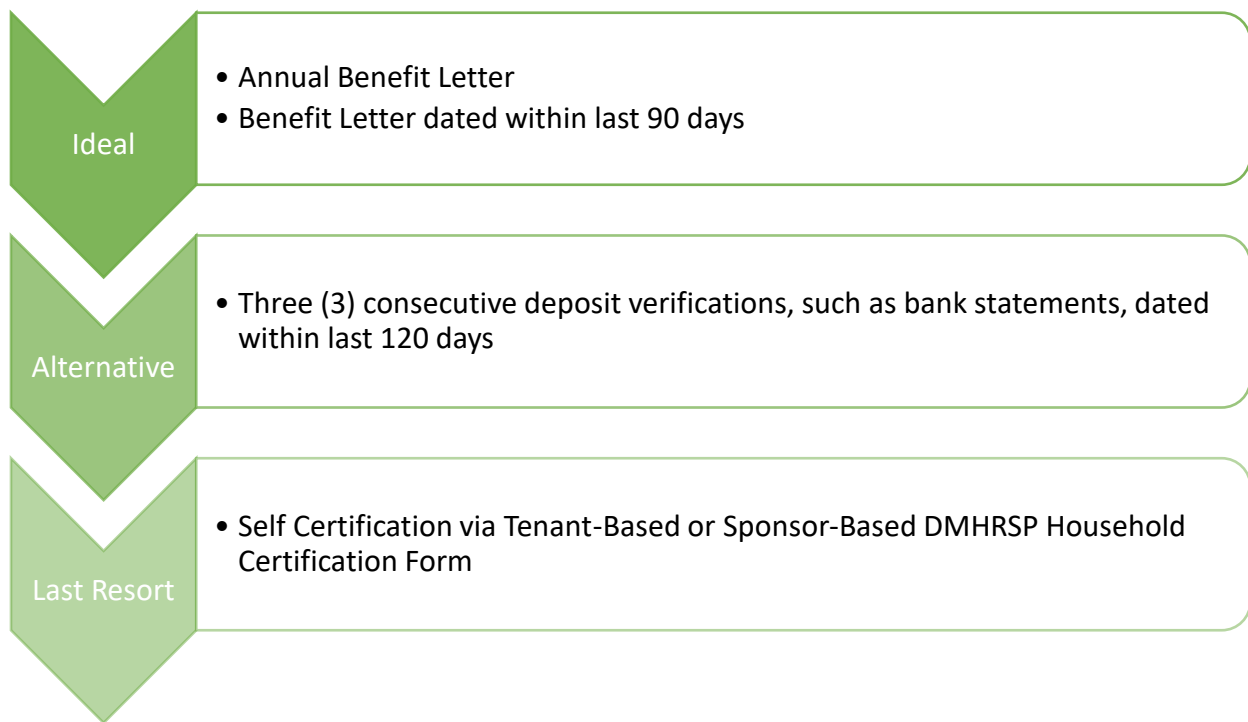
- Federal Social Security, including retirement, disability, survivor benefits, dual entitlement;
- Pensions; and
- Life insurance benefits.

These annual benefit letters are usually mailed at the end of each calendar year and outline the benefits for the next calendar year. The administering agency may use this letter for the full calendar year described in the letter and is generally dated within the last twelve (12) months (even if it is not dated within 90 days). It is the administering agency's discretion to determine whether the verification reasonably demonstrates that the payment amounts are unlikely to change for the year and are paid on a specified schedule, and to request additional verification (per the applicable guidance below) if there is any reasonable concern for inaccuracy or subsequent change.

This does not include other forms of Social Security (SSI, SSDI, SSP), variable trust payments or fund releases, or other income that varies in amounts or frequency throughout the year, for which you should follow applicable guidance below.

Effective 2/1/2024, only if the original annual benefit letter is lost and cannot be provided by the client to the administering agency, the client must make attempts to provide verification in this order:

1. The client must first request a new benefit letter dated within the last 90 days to provide to the administering agency.
2. If the client is unable to obtain a new benefit letter or provide it in a timely manner to the administering agency, then the client must attempt to provide three (3) consecutive deposit verifications, such as bank statements, within the last 120 days that show deposit amount consistent with the amount the client is reporting, including the gross amount and any deductions.
3. If the client is still unable to provide a new benefit letter or deposit verifications as described above, then the client may self-certify to this income through the Tenant-Based or Sponsor-Based DMHRSP Household Certification Form and provide any verifications they subsequently obtain.



SSI, SSDI, and SSP

This section addresses federal Supplemental Security Income (SSI), federal Social Security Disability Income (SSDI), and State Supplemental Program (SSP), which usually only moderately vary in response to other changes of income or for the cost-of-living adjustment (COLA). This guidance replaces the guidance regarding verification for SSI, SSDI, and SSP and similar moderately varying income, under “Income and Asset Verification” section on pages 15-16 of the [FY19 DMHRSP Guidance](#).

No Other Income Changes

Effective 2/1/2024, for federal Supplemental Security Income (SSI), federal Social Security Disability Income (SSDI), and State Supplemental Income (SSP), the administering agency may use the annual benefit letter only if:

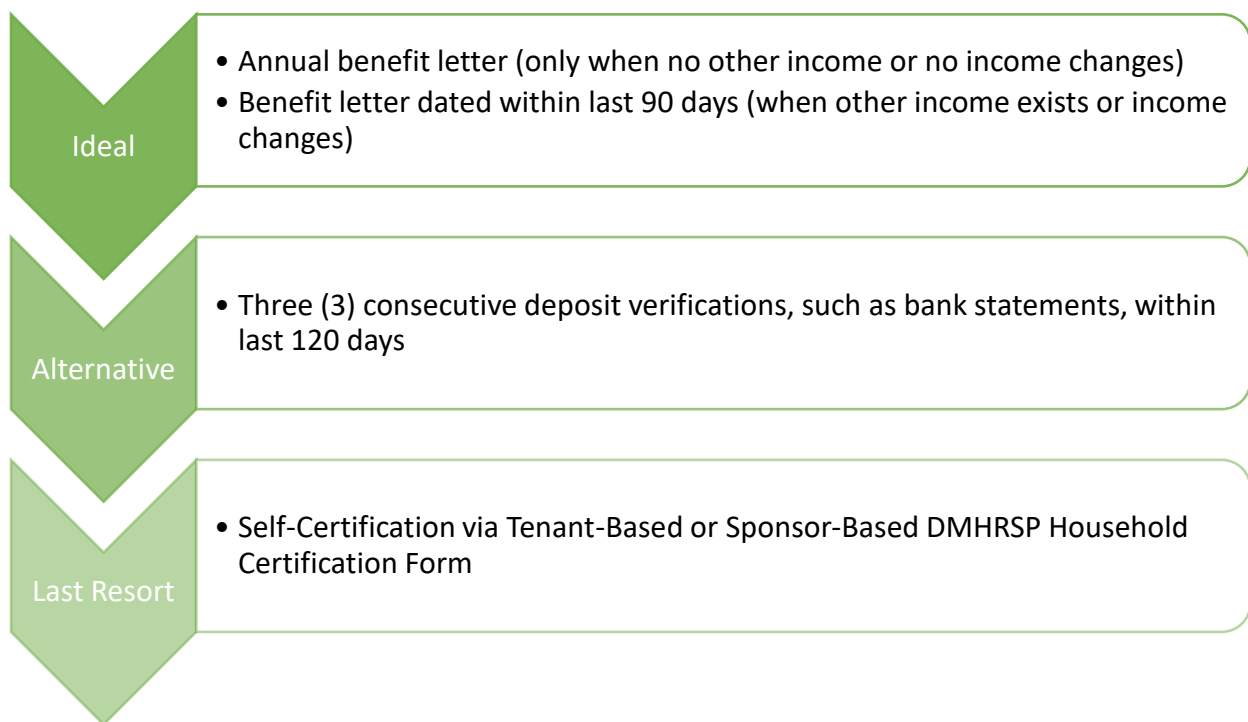
- a) the household has no other income; or
- b) the household’s income (including any other sources and amounts) has not changed.

The annual benefit letter can only be used in the situations above, in which there would be no changes in other income that would trigger a corresponding change in SSI, SSDI, or SSP. These annual benefit letters are usually mailed at the end of each calendar year and outline the benefits for the next calendar year. The administering agency may use this letter for the full calendar year described in the letter and is generally dated within the last twelve (12) months, even if it is not dated within 90 days.

Income Changes

Effective 2/1/2024, if the household is unable to provide the annual benefit letter or if the household has other income or one or more of the household's sources of income or amount of income has changed (which would potentially trigger a corresponding change in SSI, SSDI, or SSP), then the client must make attempts to provide verification in this order:

1. The client must first request a new benefit letter dated within the last 90 days to provide to the administering agency.
2. If the client is unable to obtain a new benefit letter or provide it in a timely manner to the administering agency, then the client must attempt to provide three (3) consecutive deposit verifications, such as bank statements, within the last 120 days that show deposit amount consistent with the amount the client is reporting, including the gross amount and any deductions (see example).
3. If the client is still unable to provide a new benefit letter or deposit verifications as described above, then the client may self-certify to this income through the Tenant-Based or Sponsor-Based DMHRSP Household Certification Form and provide any verifications they subsequently obtain.



Cost-of-Living Adjustment (COLA)

Commonly, the federal Social Security Administration (SSA) will announce a cost-of-living adjustment (COLA) for Social Security benefits at the end of a calendar year to be effective on January 1st of the coming year. See the COLA Fact Sheet at <https://www.ssa.gov/cola/>.

When SSA announces a COLA at the end of a calendar year, the administering agency is permitted to immediately apply the COLA to all types of federal Social Security for all DMHRSP income calculations effective for January 1st or later of the following year.

The COLA shall be applied to all types of federal Social Security income, including:

- Federal Social Security, including retirement, disability, survivor benefits, dual entitlement;
- Supplemental Security Income (SSI); and
- Social Security Disability Income (SSDI).

The COLA shall be applied to all income calculations, including:

- Determination of eligibility;
- Annual recertification;
- Interim reexamination; and
- Relocation.

The SSA's COLA announcement must be included in file as part of the income verification. It serves to support your COLA calculation. All other income verification, including the most recent SS, SSDI, and SSI benefit letter on which the COLA will be based, is still required.

This federal COLA does not apply to the State Supplemental Program (SSP), and separate verification of SSP amount is still required.

The client must provide the administering agency with a copy of updated benefits letters upon receipt as usual. Interim reexamination policies continue to apply as usual.



Example A: A new client is referred for entry into DMHRSP for January. The client reports that their SSDI is their only source of income, and they received \$1200 per month before deductions with a \$170 per month deduction for Medicare. SSA has announced a 3% COLA, but the client has not yet received the annual benefit letter for the coming year. → The administering agency could use the SSA announcement to verify COLA, but the client is unable to provide last year's benefit letter on which to base the COLA. → As the client is unable to provide last year or next year's benefit letters, they provide recent bank statements showing three consecutive deposits of \$1,030. The administering agency uses these in conjunction with the COLA announcement to calculate SSDI for January.

Example B: The client's only source of income is SSI, but they are unable to provide the most recent benefit letter. → The service provider worked with the client to submit a request to SSA for a new benefit letter a few weeks ago, but has not yet received it, so they worked together to submit a request again. → A family member is the client's representative payee on their bank account, but due to an ongoing dispute, is refusing to help provide the bank statements. The bank is refusing to provide the information directly to the client due to lack of identification. → The client self-certifies their income through the Tenant-Based or Sponsor-Based DMHRSP Household Certification Form and will provide the SSI benefit letter once received.

TAFDC/TANF, EAEDC, Unemployment, Child Support, Alimony

This section addresses TAFDC/TANF, EAEDC, unemployment, child support, alimony, and similar frequently varying income that may be difficult or slow to obtain updated verification. This guidance replaces the guidance regarding verification for these types of frequently varying income, under "Income and Asset Verification" section on pages 15-16 of the [FY19 DMHRSP Guidance](#).

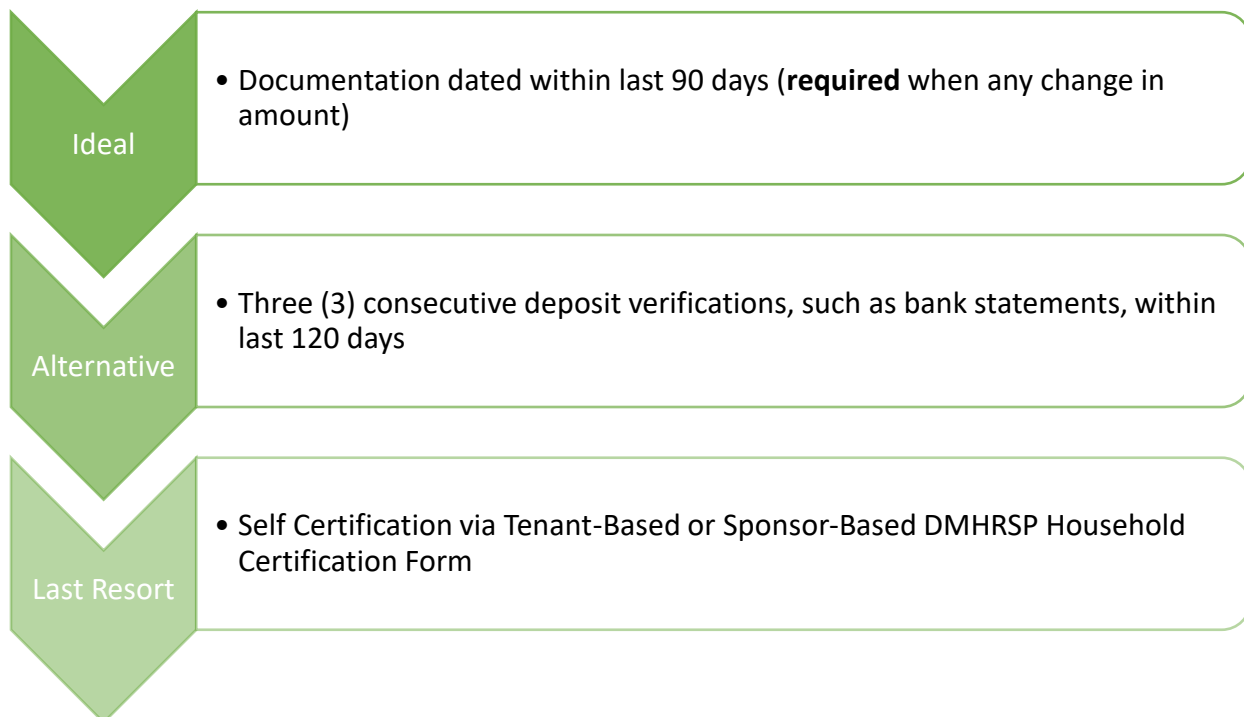
For these income sources, when there is *any change* in the amount, new verification that is dated within the last 90 days is *required*. See the below Income and Asset Verification Chart for acceptable types of verification.

Effective 2/1/2024, only if there is *no change* to the amount of the income, the client must make attempts to provide verification in this order:

1. The client must first request new verification dated within the last 90 days to provide to the administering agency.
2. If the client is unable to obtain new verification or provide it in a timely manner to the administering agency, then the client must attempt to provide three (3) consecutive

deposit verifications, such as bank statements, within the last 120 days that show deposit amount consistent with the amount the client is reporting, including the gross amount and any deductions.

3. If the client is still unable to provide new verification or deposit verifications as described above, then the client may self-certify to this income through the Tenant-Based or Sponsor-Based DMHRSP Household Certification Form and provide any verifications they subsequently obtain.



Earned Income/Wages, Self-Employment, Gig Work, Other Disability Income, Worker’s Compensation, Gifts, Foster Care Payments, Trusts, and Any Other Types of Income

There is no change to the current policy per [FY19 DMHRSP Guidance](#) (pages 15-16) and Public Housing guidance ([760 CMR 6.00](#) and the [A-Z Rent Guide \(aka Rent Re-Determination A to Z\)](#)) requiring verification dated within the last 90 days, as outlined the Income and Asset Verification Chart below, for all other types of income, including:

- Earned income/wages;
- Self-employment, including gig work;
- Other disability income;
- Worker’s compensation;
- Gifts;
- Foster care payments, including for adult foster care;
- Trusts;
- Any other income type not discussed elsewhere.

Gig Work (Self Employment)

Gig work such, as Uber, Lyft, DoorDash, and Instacart, is considered self-employment. If working a particular gig job for more than one calendar year, use the tax return to verify and calculate income. If working for less than a year, use weekly or monthly payment statements and verification of claimed expenses or a ledger.

If a household member is a contractor for a company that uses monthly or weekly payment statements, like Uber or Lyft:

1. Obtain the same number of payment statements as you would for pay stubs.
2. Determine Gross Income: Average the weekly or monthly income and annualize.
3. Determine Expenses: Average the weekly or monthly expenses and annualize.
Determine if there are expenses that are not weekly or monthly that should be included (i.e., insurance).
4. Determine Net Income: Subtract the annualized expenses from the annualized gross income (if the amount is negative, enter \$0).

Toll amounts listed on Uber and Lyft payment statements are generally reimbursements to the driver and should not be included as income. Drivers pay the toll with their EZ Pass, and Uber/Lyft reimburse the driver for this. Since this is reimbursement, it is not income, and should be removed from the driver's gross pay.

Income and Asset Verification Chart

This chart lets clients know which types of verification may be acceptable and is included in the Tenant-Based and Sponsor-Based DMHRSP Household Certification form.

Income Source	Ideal	Possible Alternative in Certain Situations [^]	Unacceptable
Social Security (not SSI or SSDI)	Annual benefit letter Benefit letter < 90 days old	3 Deposit/bank statements Self-certification Prior benefit letter + COLA	
SSI, SSDI	Benefit letter < 90 days old Annual benefit letter (only if no other income or no income changes)	3 Deposit/bank statements Self-certification Prior benefit letter + COLA	
SSP (State Supplemental Income)	Benefit letter < 90 days old Annual benefit letter (only if no other income or no income changes)	3 Deposit/bank statements Self-certification	
TANF, TAFDC, EAEDC	Benefit letter < 90 days old	3 Deposit/bank statements Self-certification	Benefit letter > 90 days old
Earned Income	5 weekly paystubs		Offer letter Salary letter

	3 biweekly or bimonthly paystubs 2 monthly paystubs		Projected earnings Bank statement
Unemployment	5 check stubs with deductions DUA Printout	3 Deposit/bank statements Self-certification	
Child Support	DOR Printout Notarized letter from person paying support Personal checks	3 Deposit/bank statements Self-certification	Court order
Alimony	Notarized letter from person paying support Personal checks	3 Deposit/bank statements Self-certification	Court Order
Other Disability Income	Benefit letter Payment receipts		Bank statement
Worker's Compensation	Benefit letter Payment receipts		Bank statement
Self Employment, Gig Work	Tax return Business ledger		Bank statement
Gifts	Notarized letter from gift giver		
Foster Care Payments	Payment receipts Bank statements		
Assets	Self-Certification only if < \$50,000 in assets Two months of statements for retirement and investment accounts Bank statements for bank accounts		
^If you are unable to provide 'Ideal' verification, please ask the Administering Agency (AA) whether you can provide a 'Possible Alternative' verification based on your situation.			

Third-Party Verification of Income

This guidance replaces the guidance regarding third-party verification under “Income Eligibility” section on page 15 of the [FY19 DMHRSP Guidance](#).

Effective as of 2/1/2024, for both sponsor-based and tenant-based vouchers, if the client provides ‘Ideal’ or ‘Alternative’ level documentation, the administering agency does not need to attempt to independently verify income. If the client cannot supply ‘Ideal’ or ‘Alternative’ level documentation per the new guidance in this notice, then the administering agency needs to attempt to independently verify income. For example, if a client submits three biweekly paystubs, the administering agency does not need to attempt to verify their earned income via a third party or alternative means.

Please note that clients and service providers must not rely on the administering agency's attempt for third-party verification in lieu of directly obtaining verification themselves, as this can cause delays in eligibility decisions and recertifications.

Wage Match

This guidance replaces the guidance regarding wage match under "Income Eligibility" section on page 15 of the [FY19 DMHRSP Guidance](#).

Effective as of 2/1/2024, for sponsor-based voucher clients only, administering agencies are no longer required to perform Wage Match.

Administering agencies will continue to perform Wage Match for **tenant-based** clients per the existing [FY19 DMHRSP Guidance](#) (page 15) and in compliance with all other Wage Match guidance issued by EOHLIC. This includes any sponsor-based client that transitions to a tenant-based voucher.

Zero Income

There is no change to the existing policy regarding zero income households for both sponsor-based and tenant-based vouchers in the [FY19 DMHRSP Guidance](#) (page 16). DMHRSP continues to follow state-aided Public Housing guidance and procedures for verifying zero income households including [760 CMR 6.00](#) and the [A-Z Rent Guide \(aka Rent Re-Determination A to Z\)](#).

For any adult household member claiming zero income, the household member must sign a statement acknowledging that they are claiming zero income. If the entire household is claiming zero income, each adult must sign a statement acknowledging that they are claiming zero income. The administering agency shall contact the client every six (6) months to inquire about the household's current income situation and request updated bank statements. The administering agency shall also verify income of said household members with the Department of Unemployment Assistance (DUA) and the Department of Transitional Assistance (DTA) every six (6) months.

Income Increases and Decreases

There is no change to the existing policy regarding income increases and decreases. Per [FY19 DMHRSP Guidance](#) (pages 57-58, Interim Reexamination) and DMHRSP regulation [760 CMR 38.07\(4\)\(b\) and \(c\) and \(5\)](#), when a client household's income increases or decreases by 30% or more, verification of the change must be provided before the occupancy charge can be changed. For decreases, verification must state or indicate that the income has ended or decreased. If the client's earned income has decreased or stopped, the administering agency must inquire about unemployment, worker's compensation, or other income for which the client may now be eligible.

The client and service provider do not need to report any income increase or decrease of less than 30%, unless the client is zero income. If the client has zero income, the client and service provider must report any new income, regardless of amount. If in doubt, report it to the administering agency and the administering agency will let you know how to proceed. Administering agencies cannot provide any interim reexamination for any increase or decrease of less than 30%.

As always, the client and service provider are required to report any and all income upon the administering agency's request. This includes at recertification or periodic zero income review, regardless of whether the income change is less than 30%, whether verification will be required, or whether the income will be counted.

Asset Verification and Calculation

EOHLC recognizes that many DMHRSP clients have minimal assets. In order to reduce administrative burden for our clients, administering agencies, and service providers, we are providing greater flexibility in regard to need for verification and acceptable verification, as well as how income from assets is calculated across both tenant-based and sponsor-based vouchers.

As always, the client and service provider are required to report any and all assets, regardless of whether verification will be required or whether the income from the assets will be counted.

The below guidance is effective 2/1/2024. It replaces the guidance regarding asset verification and calculation in the [FY19 DMHRSP Guidance](#) "B. General Eligibility, 2. Income Eligibility" section beginning on page 15.

Please note that the overall guidance on asset verification is specific to DMHRSP and does not exactly match and is generally more flexible than state-aided Public Housing or MRVP.

Asset Definition and Limit

An asset includes, but is not limited to, the following:

- All money held in cash, saving, checking, money market, or similar account;
- The market value of equity in real property, stocks, bonds, or other form of capital investment, whether person or business;
- The value of equity in personal property such as boats, recreational vehicles, and luxury goods. Value is determined by taking the higher of the insured value or appraised market value;
- Money in an Individual Retirement Account (IRA), 401(k), pension, or similar retirement account subject to IRS regulation;
- Payment received or scheduled in settlement of personal or property loss;
- Money at interest and debts due to an Applicant by any person(s);

- The value of a cash surrender insurance policy;
- The value of any personal or business asset disposed of by any Household member (including the disposition in trust) for less than fair market value during the two years prior to determination of eligibility. The value of such assets is the difference between the fair market value and the consideration received; and
- The value of any interest in a trust fund benefitting any adult Household member.

An asset does not include the following:

- Any automobile used as a primary means of transportation by one or more Household members; and
- The value of any interest in a special needs trust, as defined by state and federal law.

DMHRSP continues to have no limit on total assets at entry or during participation. Any countable income derived from assets with a combined value of more than \$50,000 will continue to be included in the income that is used to determine income eligibility at both entry and ongoing participation. DMHRSP also continues to allow for ownership of real estate, but now calculates only actual income as described below.

Total Assets Equal to or Less Than \$50,000

When the value of the client's total assets is equal to or less than \$50,000, the administering agency is not required to obtain asset verifications or count any of the income from those assets towards net household income. The administering agency may accept the self-certification of assets equal to or less than \$50,000 via the Tenant-Based or Sponsor-Based DMHRSP Household Certification Form.

The administering agency must still require verification of assets equal to or less than \$50,000 when there is another reason to do so, such as when the household has zero income.

As always, the client and/or service provider is required to report any and all assets, regardless of whether verification will be required or whether the income from the assets will be counted.

The accompanying waiver of regulations [760 CMR 38.07\(3\)](#), which references [760 CMR 6.05](#), allows for this change in the calculation of income when total assets are equal to or less than \$50,000 for all DMHRSP clients as of 2/1/2024 and going forward.



Example A: Client receives monthly social security payment of \$800 and has \$3,000 in their savings account. → The client provides their annual social security benefit letter. They self-certify to assets under \$50,000 via the Tenant-Based or Sponsor-Based DMHRSP Household Certification Form. → The administering agency does not require any further income or asset verification, including bank statements. The administering agency does not count any income from assets towards countable income.

Example B: The entire client household is zero income and has \$9,000 in their savings account. → The client provides all the necessary documents and verifications for zero income per existing FY19 DMHRSP Guidance, including two recent bank statements. → The administering agency does not require any further income or asset verification from the client. The administering agency does not need to separately verify directly with the bank but does need to inquire with DTA and DUA. The administering agency does not count any income from assets towards countable income.

Total Assets of More Than \$50,000

Effective 2/1/24, when the value of the client's total assets is more than \$50,000, the administering agency must continue to verify the assets and count actual income from the entirety of the assets, not just the portion over \$50,000. However, there are two major changes, first to verification and then to calculation.

Third-Party Verification of Assets

Effective as of 2/1/2024, the administering agencies must continue to verify assets when they are more than \$50,000 or for a household with zero income.

However, if the client provides 'Ideal' or 'Alternative' level documentation, the administering agency does not need to attempt to independently verify assets. Only if the client cannot supply 'Ideal' or 'Alternative' level documentation (per the above Income and Asset Verification Chart) does the administering agency need to attempt to independently verify assets.

For example, if a client provides the appropriate bank statements to verify savings account assets, the administering agency does not need to attempt to verify their savings account again directly through the bank.

Please note that clients and service providers must not rely on the administering agency's attempt for third-party verification in lieu of directly obtaining verification themselves, as this can cause delays in eligibility decisions and recertifications.



Example A: The entire client household is zero income and has \$9000 in their savings account. → The client provides all the necessary documents and verifications for zero income per existing FY19 DMHRSP Guidance, including two recent bank statements. → The administering agency does not require any further income or asset verification from the client. The administering agency does not need to separately verify directly with the bank, but does need to inquire with DTA and DUA. The administering agency does not count the assets towards countable income.

Example B: Client has an investment account of \$70,000 but has been unable to obtain and provide two monthly statements. → The administering agency submits a third party request for verification directly with the investment company. → Upon receipt, the administering agency will include any actual income from the entirety of the \$70,000 account in the client's household income.

Asset Calculation

Effective as of 2/1/2024, DMHRSP will only count *actual income* generated from the entirety of assets (not just the portion over \$50,000). This simplifies how we calculate and count assets and lines up with the [MRVP Administrative Plan](#) (rather than [760 CMR 6.05](#) and the [A-Z Rent Guide](#), as we previously did). Specifically, administering agencies will count income of any kind from real or personal property including rent, dividends, and interest:

- Amortization of capital indebtedness and depreciation shall not be deducted in computing net income.
- Any realization of taxable capital gain on sale or transfer of an investment or other real or personal property shall be included in income.
- If the household has marketable real or personal property with a fair market value exceeding \$50,000 (excluding any automobile used as the primary means of transportation by one or more Household members), gross household income shall include the actual income derived from the assets.

The accompanying waiver of regulations [760 CMR 38.07\(3\)](#), which references [760 CMR 6.05](#), allows for this change in the calculation of income when total assets are equal to or less than \$50,000 for all DMHRSP clients as of 2/1/2024 and going forward.

Deductions

While there is no substantive change to the policy and procedures of deductions from the [FY19 DMHRSP Guidance](#) (page 16), the below provides additional details. Except for the Disabled Household Deduction verification as outlined below, deductions continue to follow Public

Housing regulation [760 CMR 6.05\(4\)](#) and Public Housing's guidance (such as the [A-Z Rent Guide](#)).

Disabled Household Deduction

To be referred to DMHRSP by DMH, the client must be authorized for DMH services pursuant to 104 CMR 29.00. By referring the client to DMHRSP, DMH and/or the service provider confirms that the client has met the clinical criteria set forth in 104 CMR 29.04(2) and has been determined to need a DMH service.

Accordingly, as a verified DMH client, the administering agency will not further verify handicapped or disabled status per 760 CMR 5.07 or M.G.L. c. 121B § 1 for the purposes of DMHRSP eligibility and the disabled household deduction listed [in 760 CMR 6.05\(4\)\(a\)](#). The administering agency will automatically provide the disabled household deduction as part of the Occupancy Charge calculation for every DMHRSP client. The amount of the disabled household deduction, \$400, follows Public Housing guidance and regulation [760 CMR 6.05\(4\)\(a\)](#).

The administering agency may still request further disability-related verification as needed for other purposes, such as reasonable accommodation and other specific disability-related deductions.

Animal Policy and Deduction

For medical deductions for assistance, support, and service animals under [760 CMR 6.05\(4\)\(e\)](#), please follow Public Housing's [PHN 2023-01 Guidance for Animals in State-aided Public Housing](#), found at [Public Housing Admin Notices](#). This notice includes formal guidance and several charts, including how to determine the type of animal, what questions to ask and not ask, what items can be deducted, etc. In addition, you can view the slides, recording, and FAQs from the [Guidance for Animals in State-aided Public Housing, Feb 15, 2023 training](#) at [Training Resources for Local Housing Authorities](#). Medical deductions for assistance animals start on slide 30 of the presentation and minute 22 of the video. More detailed guidance is provided in the [A-Z Rent Guide \(aka Rent Re-Determination A to Z\)](#) on pages 22-27.

Heat Deduction

A heat deduction is provided when a client or household pays for heat directly. If the service provider pays for the heat or utilities, and the household does not pay for the heat or utilities, then the household will not receive a heat deduction or the reduced occupancy charge rate. Please see page 36 of the [FY19 DMHRSP Guidance](#) for more details.

HEAT DEDUCTION CHART:

This chart is used to simplify common calculations, but administering agency shall prorate as appropriate for each situation.

Approved Voucher Size or Unit Size (whichever lesser)	Total Deduction Per Unit	Deduction per Client (Sponsor-Based Only and when unit equally split)
SRO	\$200	\$200
Studio	\$300	\$300
1 Bedroom	\$400	\$400
2 Bedroom	\$500	\$250
3 Bedroom	\$600	\$200
4 Bedroom	\$700	\$175
5 Bedroom	\$800	\$160
6 Bedroom	\$900	\$150
7 Bedroom	\$1000	\$143
8 Bedroom	\$1100	\$138

For larger units, add \$100 per additional bedroom to the Total Deduction Per Unit and split accordingly.

Other Deductions

Please continue to follow Public Housing regulation [760 CMR 6](#) and Public Housing’s guidance, such as the [A-Z Rent Guide](#) (aka Rent Re-Determination A to Z) for all eligible deductions.

For all other types of deductions, the client may only deduct *actual expenditures* and only cover a consecutive twelve (12) month period. A receipt, not a bill or invoice, that shows actual payment already made by client is required. The receipt should be from the payee or provider, such as a pharmacy or school. The receipt must list item or service, date of service, amount, and confirmation of payment received. Administering agencies may accept detailed paystubs and benefit letters if the deduction is automatically withheld from pay or benefits, such as an insurance premium.

New Forms

To enable the multiple changes and flexibilities provided in this guidance, EOHLC has created several new prescribed forms, which are required and will replace forms that were previously created or provided by the administering agency. All existing DMHRSP prescribed forms continue to be in effect.

Sponsor-Based

Effective 2/1/2024, the newly created DMHRSP Sponsor-Based Household Certification form is *required* for all new sponsor-based referrals, recertifications, and relocations. This form

includes household composition, demographics, positive identification self-certification (where necessary), income and asset information and self-certification (where necessary), and signatures of both client and service provider. It will replace similar forms, such as the Income Eligibility Determination form used by DMH, that administering agencies use or accept in their associated packets. Administering agencies should continue to accept simple emails from the service provider and DMH Area Housing Coordinator for sponsor-based referrals per FY19 [DMHRSP Guidance](#).

If you are already actively working on a new referral, recertification, or relocation, you may continue to do so using older documents until you complete the process, unless you have need for a self-certification of income or assets or of positive identification. If you need to complete a self-certification of income or assets or of positive identification, then the client and service provider may either write and sign a separate self-certification (no form) or complete the DMHRSP Sponsor-Based Household Certification form.

If you submit or start a new referral, recertification, or relocation after 2/1/2024, use the new DMHRSP Household Certification form.

Tenant-Based

Effective 2/1/2024, the newly created DMHRSP Tenant-Based Household Certification form is *required* for all new tenant-based referrals, recertifications, and relocations. This form includes household composition, demographics, income and asset information, and self-certification (where necessary). It will replace similar forms, such as the Income Eligibility Determination form used by DMH, that administering agencies use or accept in their associated packets.

Effective 2/1/2024, the new DMHRSP Tenant-Based Referral Form is *required* alongside the new DMHRSP Tenant-Based Household Certification form for all new tenant-based referrals. This form is now required in addition to the email from service provider and DMH Area Housing Coordinator for tenant-based referrals per [FY19 DMHRSP Guidance](#).

Effective 2/1/2024, the new Government-Issued Photo ID Self-Attestation form (which is used for tenant-based and project-based MRVP, AHVP, and DMHRSP) is *required* when a DMHRSP client is requesting a tenant-based voucher does not have government-issued photo ID.

If you are already actively working on a new referral, recertification, or relocation, you may continue to do so using older documents until you complete the process, unless you have need for a self-certification of income or assets or the client does not government-issued photo ID. If you need to complete a self-certification of income or assets or the client does not have government-issued photo ID, then the client and service provider may either write and sign a separate self-certification (no form) or complete the DMHRSP Tenant-Based Household Certification form and/or Government-Issued Photo ID Self-Attestation form as appropriate.

If you submit or start a new referral, recertification, or relocation after 2/1/2024, use the new forms.

Failure to Recertify

For both tenant-based and sponsor-based program, to encourage good relationships with property owners who are understanding of our DMHRSP program and clients and to reduce administrative burden for administrating agencies and service providers, **subsidy payments to property owners will no longer be suspended due to a client's failure to recertify.**

Note that this is the only change to the current policy and that all other procedures, timelines, and parts of the policy remain in effect, including but not limited to all the necessary notices and warnings of failure to recertify all the way up to termination of the voucher and lease (at which time subsidy payments would necessarily end). Terminations due to non-compliance, including failure to recertify, will continue as appropriate. Recoupment and retroactively correcting rent shares may also be necessary since potentially inaccurate payments may be released in the meantime. While we understand that delays in recertification are sometimes unavoidable, recertification is a fundamental requirement of the DMHRSP program. It is critical to ensure that recertifications are completed with as little delay as possible to avoid increased terminations and the associated administrative burden on all parties.

Termination and suspension of subsidy payments for any reason other than failure to recertify remain in effect per DMHRSP regulations and guidance.

Holding Payment

The Holding Payment Policy had been extended through 6/30/2023. All parts of the policy remain in effect and are now **permanently** incorporated into DMHRSP Guidance without any end date.

Questions?

Please contact Stephanie Kan, DMHRSP Coordinator, at 617-573-1222 or stephanie.kan@mass.gov, with any questions, comments, or concerns.