

A. Background

Section 245 of Chapter 218 of the Acts of 2016 requires that: “The Department of Revenue shall conduct a study evaluating each manufactured housing community in the Commonwealth to determine what percentage of resident households at each manufactured housing community would qualify for low or moderate income housing under chapter 40B of the General Laws.” The instructions further detailed that:

“For the purposes of this section, “manufactured home” shall mean a structure that: (i) is built in conformance with the manufactured home construction and safety standards under 24 CFR Part 3280; (ii) is transportable in 1 or more sections; (iii) is 8 body feet or more in width or 40 body feet or more in length in traveling mode or 320 or more square feet when erected on site; (iv) is designed to be used as a dwelling unit with or without a permanent foundation when connected to the required utilities; and (v) includes plumbing, heating, air conditioning and electrical systems in the manufactured home.”

B. Methodology

DOR conducted the required analysis in three steps:

1. Identified manufactured housing parks (MHP) communities in the Commonwealth;
2. Identified households at each MHP that appear in DOR’s tax returns database;
3. Based on this data, identified resident households at each MHP whose household income appears to be below the threshold for low or moderate income housing under DHCD regulations relating to Chapter 40B.

C. Caveats

We note three important caveats with respect to DOR’s analysis:

1. While DOR is able to identify some MHP residents by using available tax return data, it can only analyze the incomes of individuals who have filed tax returns. If a Massachusetts resident has not filed a tax return, DOR will not have data relative to that individual. This is especially problematic when attempting to analyze low-income filers, as individuals below a certain income threshold are not required to file tax returns. In Massachusetts, if a resident’s filing status is “single” and their yearly gross income is under \$8,000, he/she does not need to file an income tax return. The thresholds are \$14,400 for “head of household” filers and \$16,400 for “married filing jointly”.¹

¹ For these two filing types, the threshold is increased by \$1,000 for each dependent. Thus, a married couple with two dependents filing jointly would not be required to file a return if their income was \$18,400 or less.

Individuals below these income thresholds would qualify for “No Tax Status”, and would not be required to file a return.

2. Certain types of income are not taxable under Massachusetts law, and are therefore not included on an individual tax return. Exclusions from income include public assistance benefits, certain types of retirement income, and perhaps what might be the most significant for this analysis, Social Security income. DOR’s analysis revealed that these factors limited the number of individuals whose income could be examined.
3. DOR does not have information as to household assets or other criteria that may affect a household’s eligibility for low or moderate income housing. Eligibility is not determined simply based on an income test. Accordingly, DOR is not able to provide a definitive determination as to the percentage of resident households at each manufactured housing community that would qualify for low or moderate income housing under chapter 40B of the General Laws, taking all eligibility criteria into account.

D. Data and Findings

1. Manufactured Homes in Massachusetts.

DOR obtained from the Department of Housing and Community Development (DHCD) a list of MHP sites within Massachusetts². DHCD identified a total of 20,698 sites³ at various MHPs in Massachusetts. For this analysis, we have assumed that all homes in the MHP communities satisfy the definition of “manufactured home” in the statute.

2. Identify households at each MHP by matching DHCD data and DOR tax return data.

Using the DHCD data, DOR matched all listed MHP addresses with addresses supplied as part of filers’ 2015 Income Tax Returns.⁴ As discussed above, this method can only identify some, but not all, MHP residents.

Results of the data process:

- Of the 20,698 addresses of manufactured home park sites, DOR was able to match households with a total of 4,454 filed returns in 2015, which represents about 22% of all sites. Some towns returned zero matches. Note that a small number of addresses had more than one filer. These are possibly co-habitants or

² <http://www.mass.gov/hed/docs/dhcd/mhc/park.pdf>

³ The term “Manufactured Home Site” is defined in regulations promulgated by the Attorney General at 940 CMR 10.00 *et seq.* to mean land within a manufactured housing community on which a manufactured home and appurtenances are or may be located and over which a tenant has possessory or other rights and interests. For purposes of this memorandum, we have assumed that the number of sites identified by DHCD includes site available for occupancy by a tenant owning a manufactured home, regardless of whether such sites are actually occupied at any given time.

⁴ Note that while this is a reasonable way to identify residents, it is not ideal; matching Social Security numbers is a preferable method of data matching, but was not an option in the case.

children who used their parents' addresses as their permanent contact information.

- "No Tax Status" may be part of the reason why only about 22% of MHP residents were identified in 2015 tax returns. It is also possible that some tax filers may have a different primary residence, and used the MHP site as their second home or vacation home, or some sites might be not occupied.

3. Identify Filers who would qualify as Low or Moderate Income.

To qualify for low or moderate income housing, certain income and asset criteria must be met. A household meets the income criteria if its income does not exceed 80% of area median income, or as otherwise established by the DHCD G.L. c.40B Comprehensive Permit Projects: Subsidized Housing Inventory Guidelines (the "Guidelines")⁵. Note that income limits vary with household size, requiring DOR to make simplifying assumptions as to household size.

Additional criteria include assets held by the household, which depend on age restrictions and whether the housing is owned or rented. For age-restricted homeownership units, household assets may not exceed \$275,000 in value, including equity in a dwelling. For non-age restricted homeownership units, household assets may not exceed \$75,000 in value. DOR does not have any data on these assets, and therefore did not make any adjustments in our findings for these criteria.

After identifying the MHP residents who would qualify for low or moderate income housing, we counted the number of these residents, and calculated the percentage of all identified MHP residents, by city/town⁶. In total, of the 4,454 MHP residents identified in DOR's tax year 2015 database (see previous section), 3,508 (78.8%) may qualify for "low or moderate income housing," based solely on their earned and investment income. As noted above, several forms of income, including Social Security benefits, certain retirement benefits, and other forms of public assistance, would not be included on an individual tax return, and therefore it is possible that some of these residents would not qualify for "low or moderate income housing" based on total income. Note that there are other criteria for eligibility, including an asset qualification test, but DOR does not have the information required to determine whether those other criteria have been met.

(Please see the following page for the results of the study)

⁵ See Appendix for further details regarding the qualifications for "Low or Moderate" income housing, including the definition of "area median income (AMI)."

⁶ We calculated the percentage of qualified MHP residents by city instead of by MHP community.

**Percentage of All Identified MHP Residents Who Qualify for Low or Moderate
 Income Housing, By City/Town**

CITY	Number of 2015 Returns from MHP Residents with Massachusetts Net AGI ⁷ at or below 80% of the Area Median Income (A)	Total Number of MHP residents who filed 2015 Tax Return (B)	% of MHP residents under income Limit (C=A/B)
ACUSHNET	**	**	**
ASHBY	6	6	100.0%
ATHOL	62	68	91.2%
ATTLEBORO	85	120	70.8%
AUBURN	97	122	79.5%
AYER	32	36	88.9%
BELCHERTOWN	29	33	87.9%
BERNARDSTON	17	23	73.9%
BOSTON	52	59	88.1%
BRIDGEWATER	**	**	**
BRIMFIELD	37	66	56.1%
CARVER	34	57	59.6%
CHARLTON	**	**	**
CHELMSFORD	124	162	76.5%
CHESHIRE	10	13	76.9%
CHICOPEE	199	264	75.4%
DALTON	3	3	100.0%
DANVERS	108	128	84.4%
EASTON	7	7	100.0%
FITCHBURG	28	32	87.5%
FOXBOROUGH	5	5	100.0%
GARDNER	**	**	**
GREENFIELD	37	42	88.1%
HINGHAM	8	9	88.9%
HINSDALE	**	**	**
HOLBROOK	**	**	**

⁷ Net AGI (Net Adjusted Gross Income, a simple sum of earned and investment income). Note that Net AGI represents only part of household income. In addition, the exclusions from income used by DOR for determining “adjusted gross income” are not necessarily the same as those applied for low or moderate income housing. Most low or moderate income housing (unless the Subsidy program provides for otherwise) determines annual income consistent with HUD standards at 24 CFR 5.609.

ANALYSIS OF INCOMES OF FILERS REPORTING RESIDENCE IN MANUFACTURED HOME COMMUNITY

MASSACHUSETTS DEPARTMENT OF REVENUE

CITY	Number of 2015 Returns from MHP Residents with Massachusetts Net AGI at or below 80% of the Area Median Income (A)	Total Number of MHP residents who filed 2015 Tax Return (B)	% of MHP residents under income Limit (C=A/B)
HUDSON	**	**	**
INDIAN ORCHARD	67	76	88.2%
KINGSTON	136	210	64.8%
LAKEVILLE	33	36	91.7%
LANESBORO	5	6	83.3%
LEE	16	16	100.0%
LENOX	41	47	87.2%
LEOMINSTER	154	192	80.2%
LITTLETON	58	68	85.3%
LUDLOW	6	6	100.0%
MALDEN	55	65	84.6%
MARLBOROUGH	**	**	**
MASHPEE	28	30	93.3%
MERRIMAC	**	**	**
MONSON	35	43	81.4%
NEW BEDFORD	16	30	53.3%
NORTH ADAMS	14	16	87.5%
NORTH ATTLEBORO	72	93	77.4%
NORTH READING	22	33	66.7%
NORTON	103	132	78.0%
NORWELL	31	38	81.6%
ORANGE	33	42	78.6%
PEABODY	472	576	81.9%
PEPPERELL	16	20	80.0%
PITTSFIELD	50	69	72.5%
PLAINVILLE	203	249	81.5%
PLYMOUTH	35	39	89.7%
RAYNHAM	20	26	76.9%
REVERE	24	29	82.8%
SALISBURY	47	54	87.0%
SAUGUS	65	81	80.2%
SHIRLEY	32	39	82.1%
SHREWSBURY	19	24	79.2%
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WELLFLEET	14	18	77.8%
WEST BRIDGEWATER	**	**	**
WEST BROOKFIELD	9	19	47.4%
WEST HATFIELD	29	37	78.4%
WEST SPRINGFIELD	21	39	53.8%
WEST STOCKBRIDGE	17	21	81.0%
WESTBOROUGH	21	24	87.5%
WESTFIELD	101	145	69.7%
WEYMOUTH	**	**	**
WILLIAMSTOWN	**	**	**
WORCESTER	12	13	92.3%
All	3,508	4,454	78.8%

** Confidentiality rules prohibit releasing these numbers.

Conclusions and Caveats

DOR is required by statute to report the percentage of households residing at MHPs that would qualify for low or moderate income housing under chapter 40B. Of the 20,698 MHP sites identified by Massachusetts Department of Housing and Community Development, DOR was able to verify households for 4,454 residents, or 22% of all MHP residents. This relatively low percentage may be due to income thresholds for filing Massachusetts income tax returns. It is also possible that a disproportionate number of the residents of MHPs are not required to file tax returns or some sites were not occupied.

Of the 4,454 MHP residents identified in DOR's tax year 2015 database, 3,508 (78.8%) may qualify for "low or moderate income housing," based solely on their earned and investment income. As noted, total household income may be higher, based on excluded income categories such as Social Security and retirement income that are not reported on a Massachusetts return. In addition, there are other criteria for eligibility, including an asset qualification test, but DOR does not have the information required to determine whether those other criteria have been met. It is also important to note that income and asset eligibility represent only a partial

ANALYSIS OF INCOMES OF FILERS REPORTING RESIDENCE IN MANUFACTURED HOME COMMUNITY

MASSACHUSETTS DEPARTMENT OF REVENUE

component of the definition of Low or Moderate Income Housing under DHCD regulations (760 CMR 56.00 *et seq.*) and Guidelines.⁸

Based on the relatively low number of returns filed by residents of MHPs, any conclusions based on these results should be carefully considered. As noted, the data available to DOR from income tax returns is not adequate for a complete analysis of issues impacting low-income individuals. Given all these caveats, figures in the above table should be used with caution.

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⁸ This definition, in turn, is a component of eligibility for inclusion on the state Subsidized Housing Inventory (“SHI”). Another essential component of Low or Moderate Income Housing is that it receives a Subsidy, integral to which are additional regulatory requirements imposed by the Subsidizing Agency, including requirements pertaining to income and asset eligibility, allowable housing costs, manner and term of the legal mechanism for restricting affordability for a minimum period of time (i.e., the affordable use restriction), and marketing and resident selection. These criteria are covered in further detail in the Guidelines.

The SHI is used to measure a community’s attainment of subsidized housing goals for the purposes of c. 40B. A developer may generally appeal to the state Housing Appeals Committee to overturn local action on the developer’s Comprehensive Permit application (i.e., overturn a denial of the permit or conditions on the permit that would make the housing project uneconomic) if less than 10% of the community’s total year round housing stock is subsidized. DHCD determines the percentage of subsidized housing in a community by dividing the number of qualifying SHI Eligible Housing units, as defined at 760 CMR 56.02, by the community’s total number of year-round housing units based on the latest available U.S. Census.

Appendix: Income and Asset Eligibility as a Component of Low or Moderate Income Housing; DHCD 40B Guidelines

- Income Eligible Household is defined under the regulations as “a household of one or more persons whose maximum income does not exceed 80% of the area median income, adjusted for household size, or as otherwise established by the Department in Guidelines.”⁹ The regulations further state that “[f]or homeownership programs, the Subsidizing Agency may establish asset limitations for Income Eligible Households by statute, regulations, or guideline. In the absence of such provisions, Income Eligible Households shall be subject to asset and/or other financial limitations as defined by the Department in Guidelines.”¹⁰
- The Guidelines clarify that an Income Eligible Household is “a household of one or more persons whose maximum income does not exceed 80% of AMI, or as otherwise established by these Guidelines.” Area Median Income (“AMI”) means “household income as defined by the U.S. Department of Housing and Urban Development (“HUD”) pursuant to section 3 of the 42 U.S.C. 1437 (the Housing Act of 1937), as amended, adjusted for household size.”¹¹
- The Guidelines also state that the Subsidizing Agency may establish for its housing programs asset limitations for eligible households. In the absence of such provisions, the Guidelines provide the following criteria for evaluating assets:
 - For age-restricted homeownership units, household assets shall not exceed \$275,000 in value, including equity in a dwelling (to be sold).
 - For non-age restricted homeownership units, household assets shall not exceed \$75,000 in value.
 - For rental units, the greater of the income derived from assets or an imputation of income based on HUD standards is included in the calculation of income when determining income eligibility.
 - Assets are determined based on the HUD “Occupancy Requirements of Subsidized Multifamily Housing Programs”; Handbook 4350.3, Chapter 5, and Appendix II.2, “Additional Guidance on Income.” The Guidelines also clarify that in the event of any conflict between the Handbook and the explicit requirements of these Guidelines or of a Subsidizing Agency, the requirements of the Subsidizing Agency and these Guidelines, in that order, take precedence over the Handbook.

⁹ 760 CMR 56.02.

¹⁰ *Id.*

¹¹ Pursuant to its statutory authority, HUD applies income standards based on HUD defined regions within each state (see e.g., HUD area median income related data by region and explanatory materials at <https://www.huduser.gov/portal/datasets/il/il16/index.html> .)

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WILLIAMSTOWN	**	**	**
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component of the definition of Low or Moderate Income Housing under DHCD regulations (760 CMR 56.00 *et seq.*) and Guidelines.⁸

Based on the relatively low number of returns filed by residents of MHPs, any conclusions based on these results should be carefully considered. As noted, the data available to DOR from income tax returns is not adequate for a complete analysis of issues impacting low-income individuals. Given all these caveats, figures in the above table should be used with caution.

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⁸ This definition, in turn, is a component of eligibility for inclusion on the state Subsidized Housing Inventory (“SHI”). Another essential component of Low or Moderate Income Housing is that it receives a Subsidy, integral to which are additional regulatory requirements imposed by the Subsidizing Agency, including requirements pertaining to income and asset eligibility, allowable housing costs, manner and term of the legal mechanism for restricting affordability for a minimum period of time (i.e., the affordable use restriction), and marketing and resident selection. These criteria are covered in further detail in the Guidelines.

The SHI is used to measure a community’s attainment of subsidized housing goals for the purposes of c. 40B. A developer may generally appeal to the state Housing Appeals Committee to overturn local action on the developer’s Comprehensive Permit application (i.e., overturn a denial of the permit or conditions on the permit that would make the housing project uneconomic) if less than 10% of the community’s total year round housing stock is subsidized. DHCD determines the percentage of subsidized housing in a community by dividing the number of qualifying SHI Eligible Housing units, as defined at 760 CMR 56.02, by the community’s total number of year-round housing units based on the latest available U.S. Census.

**Appendix: Income and Asset Eligibility as a Component
of Low or Moderate Income Housing; DHCD 40B Guidelines**

- Income Eligible Household is defined under the regulations as “a household of one or more persons whose maximum income does not exceed 80% of the area median income, adjusted for household size, or as otherwise established by the Department in Guidelines.”⁹ The regulations further state that “[f]or homeownership programs, the Subsidizing Agency may establish asset limitations for Income Eligible Households by statute, regulations, or guideline. In the absence of such provisions, Income Eligible Households shall be subject to asset and/or other financial limitations as defined by the Department in Guidelines.”¹⁰
- The Guidelines clarify that an Income Eligible Household is “a household of one or more persons whose maximum income does not exceed 80% of AMI, or as otherwise established by these Guidelines.” Area Median Income (“AMI”) means “household income as defined by the U.S. Department of Housing and Urban Development (“HUD”) pursuant to section 3 of the 42 U.S.C. 1437 (the Housing Act of 1937), as amended, adjusted for household size.”¹¹
- The Guidelines also state that the Subsidizing Agency may establish for its housing programs asset limitations for eligible households. In the absence of such provisions, the Guidelines provide the following criteria for evaluating assets:
 - For age-restricted homeownership units, household assets shall not exceed \$275,000 in value, including equity in a dwelling (to be sold).
 - For non-age restricted homeownership units, household assets shall not exceed \$75,000 in value.
 - For rental units, the greater of the income derived from assets or an imputation of income based on HUD standards is included in the calculation of income when determining income eligibility.
 - Assets are determined based on the HUD “Occupancy Requirements of Subsidized Multifamily Housing Programs”; Handbook 4350.3, Chapter 5, and Appendix II.2, “Additional Guidance on Income.” The Guidelines also clarify that in the event of any conflict between the Handbook and the explicit requirements of these Guidelines or of a Subsidizing Agency, the requirements of the Subsidizing Agency and these Guidelines, in that order, take precedence over the Handbook.

⁹ 760 CMR 56.02.

¹⁰ *Id.*

¹¹ Pursuant to its statutory authority, HUD applies income standards based on HUD defined regions within each state (see e.g., HUD area median income related data by region and explanatory materials at <https://www.huduser.gov/portal/datasets/il/il16/index.html> .)

A. Background

Section 245 of Chapter 218 of the Acts of 2016 requires that: “The Department of Revenue shall conduct a study evaluating each manufactured housing community in the Commonwealth to determine what percentage of resident households at each manufactured housing community would qualify for low or moderate income housing under chapter 40B of the General Laws.” The instructions further detailed that:

“For the purposes of this section, “manufactured home” shall mean a structure that: (i) is built in conformance with the manufactured home construction and safety standards under 24 CFR Part 3280; (ii) is transportable in 1 or more sections; (iii) is 8 body feet or more in width or 40 body feet or more in length in traveling mode or 320 or more square feet when erected on site; (iv) is designed to be used as a dwelling unit with or without a permanent foundation when connected to the required utilities; and (v) includes plumbing, heating, air conditioning and electrical systems in the manufactured home.”

B. Methodology

DOR conducted the required analysis in three steps:

1. Identified manufactured housing parks (MHP) communities in the Commonwealth;
2. Identified households at each MHP that appear in DOR’s tax returns database;
3. Based on this data, identified resident households at each MHP whose household income appears to be below the threshold for low or moderate income housing under DHCD regulations relating to Chapter 40B.

C. Caveats

We note three important caveats with respect to DOR’s analysis:

1. While DOR is able to identify some MHP residents by using available tax return data, it can only analyze the incomes of individuals who have filed tax returns. If a Massachusetts resident has not filed a tax return, DOR will not have data relative to that individual. This is especially problematic when attempting to analyze low-income filers, as individuals below a certain income threshold are not required to file tax returns. In Massachusetts, if a resident’s filing status is “single” and their yearly gross income is under \$8,000, he/she does not need to file an income tax return. The thresholds are \$14,400 for “head of household” filers and \$16,400 for “married filing jointly”.¹

¹ For these two filing types, the threshold is increased by \$1,000 for each dependent. Thus, a married couple with two dependents filing jointly would not be required to file a return if their income was \$18,400 or less.

Individuals below these income thresholds would qualify for “No Tax Status”, and would not be required to file a return.

2. Certain types of income are not taxable under Massachusetts law, and are therefore not included on an individual tax return. Exclusions from income include public assistance benefits, certain types of retirement income, and perhaps what might be the most significant for this analysis, Social Security income. DOR’s analysis revealed that these factors limited the number of individuals whose income could be examined.
3. DOR does not have information as to household assets or other criteria that may affect a household’s eligibility for low or moderate income housing. Eligibility is not determined simply based on an income test. Accordingly, DOR is not able to provide a definitive determination as to the percentage of resident households at each manufactured housing community that would qualify for low or moderate income housing under chapter 40B of the General Laws, taking all eligibility criteria into account.

D. Data and Findings

1. Manufactured Homes in Massachusetts.

DOR obtained from the Department of Housing and Community Development (DHCD) a list of MHP sites within Massachusetts². DHCD identified a total of 20,698 sites³ at various MHPs in Massachusetts. For this analysis, we have assumed that all homes in the MHP communities satisfy the definition of “manufactured home” in the statute.

2. Identify households at each MHP by matching DHCD data and DOR tax return data.

Using the DHCD data, DOR matched all listed MHP addresses with addresses supplied as part of filers’ 2015 Income Tax Returns.⁴ As discussed above, this method can only identify some, but not all, MHP residents.

Results of the data process:

- Of the 20,698 addresses of manufactured home park sites, DOR was able to match households with a total of 4,454 filed returns in 2015, which represents about 22% of all sites. Some towns returned zero matches. Note that a small number of addresses had more than one filer. These are possibly co-habitants or

² <http://www.mass.gov/hed/docs/dhcd/mhc/park.pdf>

³ The term “Manufactured Home Site” is defined in regulations promulgated by the Attorney General at 940 CMR 10.00 *et seq.* to mean land within a manufactured housing community on which a manufactured home and appurtenances are or may be located and over which a tenant has possessory or other rights and interests. For purposes of this memorandum, we have assumed that the number of sites identified by DHCD includes site available for occupancy by a tenant owning a manufactured home, regardless of whether such sites are actually occupied at any given time.

⁴ Note that while this is a reasonable way to identify residents, it is not ideal; matching Social Security numbers is a preferable method of data matching, but was not an option in the case.

children who used their parents' addresses as their permanent contact information.

- "No Tax Status" may be part of the reason why only about 22% of MHP residents were identified in 2015 tax returns. It is also possible that some tax filers may have a different primary residence, and used the MHP site as their second home or vacation home, or some sites might be not occupied.

3. Identify Filers who would qualify as Low or Moderate Income.

To qualify for low or moderate income housing, certain income and asset criteria must be met. A household meets the income criteria if its income does not exceed 80% of area median income, or as otherwise established by the DHCD G.L. c.40B Comprehensive Permit Projects: Subsidized Housing Inventory Guidelines (the "Guidelines")⁵. Note that income limits vary with household size, requiring DOR to make simplifying assumptions as to household size.

Additional criteria include assets held by the household, which depend on age restrictions and whether the housing is owned or rented. For age-restricted homeownership units, household assets may not exceed \$275,000 in value, including equity in a dwelling. For non-age restricted homeownership units, household assets may not exceed \$75,000 in value. DOR does not have any data on these assets, and therefore did not make any adjustments in our findings for these criteria.

After identifying the MHP residents who would qualify for low or moderate income housing, we counted the number of these residents, and calculated the percentage of all identified MHP residents, by city/town⁶. In total, of the 4,454 MHP residents identified in DOR's tax year 2015 database (see previous section), 3,508 (78.8%) may qualify for "low or moderate income housing," based solely on their earned and investment income. As noted above, several forms of income, including Social Security benefits, certain retirement benefits, and other forms of public assistance, would not be included on an individual tax return, and therefore it is possible that some of these residents would not qualify for "low or moderate income housing" based on total income. Note that there are other criteria for eligibility, including an asset qualification test, but DOR does not have the information required to determine whether those other criteria have been met.

(Please see the following page for the results of the study)

⁵ See Appendix for further details regarding the qualifications for "Low or Moderate" income housing, including the definition of "area median income (AMI)."

⁶ We calculated the percentage of qualified MHP residents by city instead of by MHP community.

**Percentage of All Identified MHP Residents Who Qualify for Low or Moderate
 Income Housing, By City/Town**

CITY	Number of 2015 Returns from MHP Residents with Massachusetts Net AGI ⁷ at or below 80% of the Area Median Income (A)	Total Number of MHP residents who filed 2015 Tax Return (B)	% of MHP residents under income Limit (C=A/B)
ACUSHNET	**	**	**
ASHBY	6	6	100.0%
ATHOL	62	68	91.2%
ATTLEBORO	85	120	70.8%
AUBURN	97	122	79.5%
AYER	32	36	88.9%
BELCHERTOWN	29	33	87.9%
BERNARDSTON	17	23	73.9%
BOSTON	52	59	88.1%
BRIDGEWATER	**	**	**
BRIMFIELD	37	66	56.1%
CARVER	34	57	59.6%
CHARLTON	**	**	**
CHELMSFORD	124	162	76.5%
CHESHIRE	10	13	76.9%
CHICOPEE	199	264	75.4%
DALTON	3	3	100.0%
DANVERS	108	128	84.4%
EASTON	7	7	100.0%
FITCHBURG	28	32	87.5%
FOXBOROUGH	5	5	100.0%
GARDNER	**	**	**
GREENFIELD	37	42	88.1%
HINGHAM	8	9	88.9%
HINSDALE	**	**	**
HOLBROOK	**	**	**

⁷ Net AGI (Net Adjusted Gross Income, a simple sum of earned and investment income). Note that Net AGI represents only part of household income. In addition, the exclusions from income used by DOR for determining “adjusted gross income” are not necessarily the same as those applied for low or moderate income housing. Most low or moderate income housing (unless the Subsidy program provides for otherwise) determines annual income consistent with HUD standards at 24 CFR 5.609.

ANALYSIS OF INCOMES OF FILERS REPORTING RESIDENCE IN MANUFACTURED HOME COMMUNITY

MASSACHUSETTS DEPARTMENT OF REVENUE

CITY	Number of 2015 Returns from MHP Residents with Massachusetts Net AGI at or below 80% of the Area Median Income (A)	Total Number of MHP residents who filed 2015 Tax Return (B)	% of MHP residents under income Limit (C=A/B)
HUDSON	**	**	**
INDIAN ORCHARD	67	76	88.2%
KINGSTON	136	210	64.8%
LAKEVILLE	33	36	91.7%
LANESBORO	5	6	83.3%
LEE	16	16	100.0%
LENOX	41	47	87.2%
LEOMINSTER	154	192	80.2%
LITTLETON	58	68	85.3%
LUDLOW	6	6	100.0%
MALDEN	55	65	84.6%
MARLBOROUGH	**	**	**
MASHPEE	28	30	93.3%
MERRIMAC	**	**	**
MONSON	35	43	81.4%
NEW BEDFORD	16	30	53.3%
NORTH ADAMS	14	16	87.5%
NORTH ATTLEBORO	72	93	77.4%
NORTH READING	22	33	66.7%
NORTON	103	132	78.0%
NORWELL	31	38	81.6%
ORANGE	33	42	78.6%
PEABODY	472	576	81.9%
PEPPERELL	16	20	80.0%
PITTSFIELD	50	69	72.5%
PLAINVILLE	203	249	81.5%
PLYMOUTH	35	39	89.7%
RAYNHAM	20	26	76.9%
REVERE	24	29	82.8%
SALISBURY	47	54	87.0%
SAUGUS	65	81	80.2%
SHIRLEY	32	39	82.1%
SHREWSBURY	19	24	79.2%
STOUGHTON	13	14	92.9%
STURBRIDGE	9	9	100.0%
TAUNTON	232	283	82.0%
TURNERS FALLS	15	18	83.3%
WALES	42	73	57.5%
WARE	**	**	**

ANALYSIS OF INCOMES OF FILERS REPORTING RESIDENCE IN MANUFACTURED HOME COMMUNITY

MASSACHUSETTS DEPARTMENT OF REVENUE

CITY	Number of 2015 Returns from MHP Residents with Massachusetts Net AGI at or below 80% of the Area Median Income (A)	Total Number of MHP residents who filed 2015 Tax Return (B)	% of MHP residents under income Limit (C=A/B)
WAREHAM	73	83	88.0%
WELLFLEET	14	18	77.8%
WEST BRIDGEWATER	**	**	**
WEST BROOKFIELD	9	19	47.4%
WEST HATFIELD	29	37	78.4%
WEST SPRINGFIELD	21	39	53.8%
WEST STOCKBRIDGE	17	21	81.0%
WESTBOROUGH	21	24	87.5%
WESTFIELD	101	145	69.7%
WEYMOUTH	**	**	**
WILLIAMSTOWN	**	**	**
WORCESTER	12	13	92.3%
All	3,508	4,454	78.8%

** Confidentiality rules prohibit releasing these numbers.

Conclusions and Caveats

DOR is required by statute to report the percentage of households residing at MHPs that would qualify for low or moderate income housing under chapter 40B. Of the 20,698 MHP sites identified by Massachusetts Department of Housing and Community Development, DOR was able to verify households for 4,454 residents, or 22% of all MHP residents. This relatively low percentage may be due to income thresholds for filing Massachusetts income tax returns. It is also possible that a disproportionate number of the residents of MHPs are not required to file tax returns or some sites were not occupied.

Of the 4,454 MHP residents identified in DOR's tax year 2015 database, 3,508 (78.8%) may qualify for "low or moderate income housing," based solely on their earned and investment income. As noted, total household income may be higher, based on excluded income categories such as Social Security and retirement income that are not reported on a Massachusetts return. In addition, there are other criteria for eligibility, including an asset qualification test, but DOR does not have the information required to determine whether those other criteria have been met. It is also important to note that income and asset eligibility represent only a partial

ANALYSIS OF INCOMES OF FILERS REPORTING RESIDENCE IN MANUFACTURED HOME COMMUNITY

MASSACHUSETTS DEPARTMENT OF REVENUE

component of the definition of Low or Moderate Income Housing under DHCD regulations (760 CMR 56.00 *et seq.*) and Guidelines.⁸

Based on the relatively low number of returns filed by residents of MHPs, any conclusions based on these results should be carefully considered. As noted, the data available to DOR from income tax returns is not adequate for a complete analysis of issues impacting low-income individuals. Given all these caveats, figures in the above table should be used with caution.

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